

PI-71-0105

March 24, 1971

Mr. Gerald Pohlman  
Great Plains Gas  
National Propane Corporation  
P. O. Box 2067  
Cedar Rapids, Iowa 52406

Dear Mr. Pohlman:

This is in reply to your letter of March 12, 1971, stating that it is your understanding that the Minimum Federal Safety Standards require that DOT Form F-7100-1 be filed by "anyone servicing more than then individual living quarters, such as trailer courts."

The operator of the trailer court is an "operator...transport (ing) petroleum has in a system that serves ten or more customers," under Section 192.11 of these regulations, and as such is subject to all the requirements of the regulations, including those for reporting.

You also ask whether the regulations apply to a motel of ten or more separate units, where each unit has its own service line feeding from a common main which, in turn, is supplied from a single storage tank, either with one meter serving all units, or alternatively. with a separate meter at each unit.

From the safety viewpoint, there is no difference between the trailer court operator and the motel operator, and the regulations apply in both instances.

If we can be further assistance, please let us know.

Sincerely,

Joseph C. Caldwell  
Director, Acting  
Office of Pipeline Safety

Great Plains Gas  
National Propane Corporation  
P.O. Box 2067  
1101 Second Avenue S.E.  
Cedar Rapids, Iowa 52406

March 12, 1971

Secretary of Transportation  
Washington D.C. 20590

ATTENTION: Joseph C. Caldwell

Dear Mr. Caldwell:

Thank you for your reply to my letter, I'm sorry I wasn't too clear about the information I need. It is my understanding that D.O.T. regulations require anyone servicing more than ten individual living quarters, such as trailer courts, is required to fill out D.O.T. Form F71001-1.

My other question was to see if these same regulations apply to a motel of ten or more units where each unit *has* its own service line feeding from a common main which in turn is from a single storage tank? I will attach a drawing to try to show what I mean. These, of course, could be used with one meter serving all units or a separate meter at each unit.

Sincerely,  
Gerald Pohlman