

PI-71-0121
December 3, 1971
Mr. W. C. Roberts
Cyclonics, Inc.
711 West Smith Road
Medina, Ohio 44256

Dear Mr. Roberts:

Your letter of October 20, 1971 reflects the regulations as they were originally proposed by Notice of Proposed Rulemaking procedure. Enclosed is a copy of the regulations and amendments as promulgated that are now in effect.

In reply to your questions:

Question 1: is there anything in OPS rules that would preclude the use of CO₂ as a testing medium in connection with leak testing under the act?

The use of inert CO₂ gas for testing is permissible in accordance with Section 192.503 (b) and (c).

Question 2: It is our understanding that the new regulations provide for periodic testing of existing lines every five years as well as newly installed lines. Is this correct?

Periodic testing is not required in the final standards. General initial test requirements are covered in Subpart J, uprating test requirements are covered in Subpart k, and test requirements where a change in class location is involved are covered in section 192.611.

Question 3: It is our understanding that the new regulations are not satisfied by the use of vapor sniffing equipment, but that an internal test of the pipe under 90 pound pressure is required. May we have your comments?

Subpart J covers the test requirements. Any method that will discover all potentially hazardous leaks in any segment of pipeline being tested may be used.

Question 4: Who is charged with enforcement?

Since Louisiana and New Jersey are not presently cooperating with the Department under Section 5 of the Natural Gas Pipeline Safety Act, all intrastate gas facilities in those States are a direct enforcement responsibility of this office. At the present time this office also has direct safety enforcement responsibility for municipal gas systems in California, Georgia, Kentucky, Missouri, Ohio, Pennsylvania and Virginia. Except for these municipal systems, a few privately owned gas facilities in some States, and some LP gas systems that are subject to the act, certain State agencies have safety jurisdiction over all intrastate gas facilities. In Minnesota, Nebraska, and South Dakota, the State agency is the State Fire Marshal. In all the other States including the District of Columbia and Puerto Rico, the Public Service Commission (sometimes called the Railroad Commission or Utilities Commission) has safety jurisdiction over intrastate facilities.

Question 5: Does your office interest itself in the selection or specification of test equipment? If so, we would welcome the opportunity to have your office inspect and evaluate the equipment of our client.

This office does not make any recommendations with regard to the use of proprietary equipment.

Thank you for your interest in our safety program.

Sincerely,
Original signed by:
Joseph C. Caldwell
Acting Director
Office of Pipeline Safety

Cyclonics, inc
711 West Smith Road
Medina, Ohio 44256

October 20, 1971

Mr. W. C. Jennings, Director
Office of Pipeline Safety
Department of Transportation
Washington, D. C.

Dear Mr. Jennings:

One of our clients has under development and test a new device designed to facilitate the testing of gas service lines under the new high pressure testing requirements of the Pipe Line Safety Act.

This was developed with the active collaboration of several officials of one of the large utilities in this area and in fact a number of these devices is currently in use. I am attaching herewith a photo and description of the product.

We are retained to investigate the marketing possibilities of this unit and would appreciate your response to the following questions at your earliest convenience.

1. Is there anything in OPS rules that would preclude the use of CO₂ as a testing medium in connection with leak testing under the act?
2. It is our understanding that the new regulations provide for periodic testing of existing lines every five years as well as newly installed lines. Is this correct?
3. It is our understanding that the new regulations are not satisfied by the use of vapor sniffing equipment, but that an internal test of the pipe under 90 pound pressure is required. May we have your comments?
4. Who is charged with enforcement?
5. Does your office interest itself in the selection or specification of test equipment? If so, we would welcome the opportunity to have your office inspect and evaluate the equipment of our client.

At your earliest convenience will you please forward a copy of the new regulations concerning leak inspection procedures also any other background materials, news releases, etc. which would give us a broader understanding of this area of interest.

Sincerely,
Marketing Services Division
W. C. Roberts
General Manager