

Oct 31 1972

Mr. J. H. Jordan
Anderson, Greenwood & Company
Industrial Products Division
P.O. Box 1097
Bollaire, Texas 77401

Dear Mr. Jordan:

This is in response to your letter of October 5, 1972, addressed to our Houston Office, regarding instrument and control valves. You note that Section 192.203(b) does not refer to any written specification for valves and that API 6D, referenced in Section 192.145, covers valves 2 inches and larger. You ask which specification applies to valves that are under 2 inches in size.

Section 192.203 applies to the design of instrument, control, and sampling pipe and components, except for permanently closed systems. That section requires that all material employed for pipe and components must be designed to meet the particular conditions of service and to meet certain listed requirements. Where relevant, the standards contained in Section 192.203(b) apply to valves. Specific valve requirements, however, are set forth in Section 192.145 which states that each valve must meet the requirements of one of the listed industry standards or the equivalent.

Published specifications do not exist for all types and size of valves that are manufactured. However, there are certain basic safety design features that can be adapted to all these valves. In Section 192.145, the word "equivalent" is used in the sense of providing equivalent safety. Thus, although the listed specifications do not cover all sizes and types of valves, the valves not covered must at least meet the applicable safety requirements contained in the listed specifications.

The fact that the valves with which you are concerned are used in instrument manifolds rather than in the actual pipelines is not of significance. Valves used in both applications are pipeline components and are governed by the regulations contained in Subpart D of Part 192.

I trust this answers your inquiry.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety