

PI-72-0101

January 31, 1972

Mr. William P. Davis
Utilities Supervisor
Iowa State Highway Commission
Ames, Iowa 50010

Dear Mr. Davis:

This is in reply to your letter of November 30, 1971, regarding 49 CFR Section 192.111 (c). Your specific question was:

“In the even an existing steel pipe did not meet the minimum design specifications, would you interpret this provision to require encasement of the carrier pipe throughout the entire width of the highway right of way, without exception, or an encasement within the right of way through the traveled portion of the highway as specified as a minimum within State policy and regulations.”

Section 192.111 is discussed in the preamble which should answer your particular question. This preamble states that the purpose of the section was to insure that heavier wall pipe is installed across the entire right of way when a pipeline crosses a public road or street. This does not preclude using both encasement and heavier wall pipe in meeting the requirements of this section.

We trust that this answers your question. Should you have any further questions, please contact us.

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

The Iowa State Highway Commission
Ames, Iowa 50010

Mr. Joseph C. Caldwell
Acting Director
Office of Pipeline Safety
Department of Transportation
400 Sixth Street S.W.
Washington, D.C. 20590

Dear Mr. Caldwell:

Section 192.111, Subpart C of Part 192, OPS Safety Regulations provides certain design criteria for steel pipe when a pipeline crosses a highway, Class 1 or Class 2 locations, without a casing.

In the event an existing steel pipe did not meet the minimum design specifications would you interpret this provision to require encasement of the carrier pipe throughout the entire width of highway right of way, without exception, or an encasement within the right of way through the traveled portion of the highway as specified as a minimum within State policy and regulation.

We will appreciate receiving your interpretation and assistance in this matter.

Sincerely yours,
GERALD T. SOLBECK
Development Support Engineer
Wm. P. Davis
Utilities Supervisor