

PI-72-0107

June 1, 1972

Mr. J. E. Hansford
Safety Director
Florida Gas Company
P.O. Box 44
Winter Park, Florida 32789

Dear Mr. Hansford:

This is in reply to your letter dated May 12, 1972, regarding an interpretation of Section 192.111(b) (2).

Your particular question was:

Would the creation of a public bicycle path parallel to an existing transmission line designed, constructed, tested, and operated as prescribed for a Class 1 location, require either requalification or reduction of the maximum allowable operating pressure in that transmission line based on the Office of Pipeline Safety's regulations contained in Title (49), CFR Part 192.

Although a bicycle path bears some resemblance to a public highway, it differs in a number of significant aspects. Therefore, the creation of a bicycle path as you have described would not require either requalification or reduction of the maximum allowable operating pressure.

We trust that this has answered your particular question. If we can be of further assistance, please let us know.

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

Florida Gas Company
General Offices
Orlando and Orange Avenues
P.O. Box 44
Winter Park, Florida 32789

May 12, 1972

Mr. Joseph C. Caldwell, Director
Office of Pipeline Safety
Department of Transportation
Washington, D. C. 20590

Dear Mr. Caldwell:

Florida Gas Transmission Company operates gas transmission pipelines in Central Florida. We have been approached by a local group, represented by the Orange County Commission, whose efforts are directed toward creating bicycle paths in the Central Florida area. Their current plans include the utilization of portions of our pipeline right of way in Class 1 areas. The bicycle paths would consist of an 8-foot wide improved path parallel to and along the edge of our pipeline right of way. These paths would be open to the public but motorized vehicles would not be allowed. These paths would probably be located within the cleared right of way about 20 feet from our pipeline.

This proposal is under consideration by our management and one question which has arisen concerns Section 192.111(b)(2) of the Office of Pipeline Safety's regulations. Our concern is that the creation of bicycle paths parallel to our transmission line might be considered to be a "... hard surface road, a highway, a public street ..." which would change the design factor from .72 to .60 and might require revisions to our existing operating procedures. We therefore request an interpretation on the following question: "Would the creation of a public bicycle path parallel to an existing transmission line designed, constructed, tested and operated as prescribed for a Class 1 location, require either requalification or reduction of the maximum allowable operating pressure in that transmission line based on the Office of Pipeline Safety's regulations contained in Title 29 CFR, Part 192?"

Sincerely,
J. E. Hansford
Safety Director