

PI-72-0115

November 10, 1972

Mr. H. F. Cain  
Measurement Superintendent  
Piedmont Natural Gas Company, Inc.  
P.O. Box 1968  
Charlotte, North Carolina 28201

Dear Mr. Cain:

This is in response to your letter of October 25, 1972, in which you question whether the company practice with regard to cutting off service remains an acceptable procedure under the recently adopted amendment 192-8 to 40 CFR Part 192.

Under the amendment, Sections 192.379(d) and 192.727(d)(2) now provide for the inactivation of lines by use of a mechanical device or fitting installed in the service line or in the meter assembly to prevent the flow of gas. Your practice is to valve off the service cook, break the meter inlet connection, and insert a tin shut off seal in order to prevent unauthorized use of gas.

The use of a shut off seal or disc is a commonly used method to prevent the flow of gas, and the procedure you have described is one of the methods we had in mind in adopting this alternative method in the amendment.

Your interpretation of the regulations, which permits the use of the procedure as described, is correct.

Your interest in pipeline safety is appreciated.

Sincerely,  
Joseph C. Caldwell  
Director  
Office of Pipeline Safety

Piedmont Natural Gas Company, Inc.  
4301 Yancey Road  
Post Office Box 1968  
Charlotte, North Carolina 28201

October 25, 1972

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

Dear Mr. Caldwell:

We have a question in regard to Part 192-8 of Title 49 of the Code of Federal Regulations, which is effective November 3, 1972.

We refer to Sections 192.379 "New Service Lines Not in Use", Paragraph (b); and 192.727 "Abandonment or Inactivation of Facilities", Paragraph (d) (2), both of which read as follows:

"A mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly."

It has been standard practice, in the case of summer cut offs, or cut offs for non-pay, etc., to valve off the service cock, break the meter inlet connection and insert a tin shut off seal in order to prevent unauthorized use of gas.

Our interpretation of the two sections in question leads us to believe that this would still be an acceptable procedure under the new regulations.

Please advise if our interpretation of these sections is incorrect.

Very truly yours,  
H. F. Cain  
Measurement Superintendent