

April 30, 1975

Mr. William V. Bud Porter
President
The Porter Company
New Braunfels, Texas 78130

Dear Mr. Porter:

This responds to your letter of April 14, 1975, asking whether pipelines which are carrying liquefied petroleum gas, ammonia, hydrogen, carbon dioxide, or other products which are flammable, toxic, or corrosive must be marked under 49 CFR Part 192 or under 49 CFR Part 195.

The Federal safety standards in 49 CFR Part 192 apply to the transportation of gas by pipeline. The term "gas" is defined in Section 192.3 as "natural gas, flammable gas, or gas which is toxic or corrosive."

The standards in 49 CFR Part 195 apply to pipelines transporting hazardous liquids which are subject to 49 CFR Parts 172 and 173, petroleum, or petroleum products if the pipelines are operated by a carrier engaged in interstate or foreign commerce. Part 195 does not apply to pipelines transporting gas.

Therefore, pipelines carrying liquefied petroleum gas, hydrogen, ammonia, or carbon dioxide in liquid form which are operated by an interstate carrier must be marked under 49 CFR 195.410. Pipelines carrying ammonia or hydrogen gas or other gas which is flammable, toxic, or corrosive must be marked under 49 CFR 192.707. Pipelines carrying carbon dioxide gas are not subject to regulation under Part 192 since carbon dioxide gas is not flammable, toxic, or corrosive.

We trust this satisfactorily answers your inquiry.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety