

PI-75-0111

October 30, 1975

Mr. Philip G. Alter  
Customer Services  
Washington Gas Light Company  
1100 "H" Street, N.W.  
Washington, D.C. 20005

Dear Mr. Alter:

This responds to your letter of October 16, 1975, to Mr. Joseph C. Caldwell, in which you ask whether 49 CFR 192.361(f) would be violated if a customer constructs a building over an existing service line and the line is not protected as required by that Section.

Section 192.361(f) is a construction standard which applies at the time a service line is installed under a building. If, through no action of the pipeline operator, a building is subsequently constructed over the pipeline, the requirements of Section 192.361 need not be met.

However, construction of a building over the pipeline may result in a change in the class location of the pipeline or the pipeline's being generally unsafe. In that event, the operator must take remedial action required by Sections 192.611, 192.613, or 192.703, as appropriate.

We trust this satisfactorily answers your inquiry.

Sincerely,  
Cesar DeLeon  
Acting Director  
Office of Pipeline  
Safety Operations

Washington Gas  
1100 H Street, Northwest  
Washington, D.C. 20005

October 16, 1975

Mr. Joseph Caodwell, Director  
Office of Pipeline Safety  
2100 2nd Street, S. W.  
Washington, D. C. 20590

Dear Mr. Caodwell:

The Washington Gas Light Company has underway a program of systematically checking all of our customers' services for violations where an enclosed structure is over the service line.

In the form letter that I send out, federal standards are implied. In the past our Law Department has mentioned 49 CFR 192.361 (F) titled "Installation of service lines under buildings" as one of the guide lines we follow.

Mr. Graham R. Evans, 14215 Bismark Avenue, Woodbridge, Virginia is one of our customers who is in violation. Mr. Evans contacted your department and received a reply back from Mr. Larry Johnson, telephone number 426-4723 stating Title 49 does not apply to Mr. Evans.

The Washington Gas Light Company would be very appreciative if you would send me a confirming memo on this matter.

Please do not hesitate to call me if I can be of help. My telephone number is 624-6104.

Sincerely,  
Philip G. Alter  
Customer Services

Washington Gas  
1100 H Street, Northwest  
Washington, D.C. 20005

Account Number:  
Control Number:

A recent inspection of your building shows that your gas service is in violation of Company and Federal standards.

These standards prohibit certain kinds of construction over an existing gas line that creates a potential danger if a leak might occur. Any leak that might develop under the area built over could rise to the surface and enter the structure and endanger the occupants.

The expense involved in correcting this problem is not our responsibility since the potentially hazardous condition developed after the gas line was installed. This unexpected cost can be paid by installment payments if you so desire.

It is necessary that this unsafe situation be corrected as soon as possible. We urge you to let us give you an estimate at your earliest convenience which is based on time and material and your authorization to proceed with the corrective work. You can contact me at 624-6104 so that arrangements can be promptly made.

Sincerely,  
Philip G. Alter  
Customer Services