

March 3, 1976

Mr. John M. Baumgardner
Engineer
Virginia State Corporation Commission
Division of Public Utilities
Box 1197
Richmond, VA 23209

Dear Mr. Baumgardner:

In your February 2, 1976, letter to the Office of Pipeline Safety Operations you ask: "Would 192.465 requiring tests on separately protected service lines once every 10 years include meter risers where metal is the gas carrier when used with a plastic service line?"

If the gas is carried in metal piping that extends below the ground surface, Subpart I - Requirements for Corrosion Control must be complied with. This would require operators of such piping to monitor these short sections as required in 192.465(a).

Thank you for your interest in pipeline safety.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

COMMONWEALTH OF VIRGINIA

February 2, 1976

Mr. Cesar DeLeon
Acting Director
Office of Pipeline Safety Operations
Department of Transportation
Materials Trans. Bureau
400 7th Street, S. W.
Washington, D. C.

Dear Mr. DeLeon:

Would 192.465 requiring tests on separately protected service lines once every 10 years include meter risers where metal is the gas carrier when used with a plastic service line? Some operators contend that the riser is considered a fitting, and this requirement would not apply.

By the definition of "pipeline" I felt that a meter riser would have to be tested once every 10 years, and discussed this with Frank Fulton. However, I would like this interpretation in writing.

Yours truly,

John M. Baumgardner
Engineer