

Mr. Douglas Russell, P.E.
D. Russell Associates, Inc.
553 Mission Street
San Francisco, CA 94105

Dear Mr. Russell:

Your letter of April 9, 1976, to the attention of Mr. Jack Overly in the Western Regional Office of the Office of Pipeline Safety Operations (OPSO) has been referred to headquarters for a reply. Your letter concerned Section 195.208, Welding of supports and braces (49 CFR Part 195, Transportation of Liquids by Pipeline), and Section 421.1 Supports, Braces, and Anchors, in ANSI B31.4 (Liquid Petroleum Transportation Piping Systems).

The regulations in Part 195 are for the most part performance standards. Where a specific method is neither required nor excluded, the operator has the responsibility of selecting a method of compliance that will conform with the appropriate standard.

If you comply with the requirements of Section 421.1 in ANSI B31.4-1974, the requirements of Section 195.208 in Part 195 will have been met.

Do not hesitate to call or write, if OPSO can be of any further assistance.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

TO: Chief, Operations Division MTP-50
FROM: Chief, Western Regional Office
SUBJECT: Question by D. Russell, Associates

Copy of letter by D. Russell Associates, Inc. is enclosed for headquarters action and answer.

The references to ANSI B31.4 cannot be checked as this office does not have a copy.

Jack. C. Overly

Attachment

Department of Transportation
Office of Pipeline Safety
831 Mitten Road
Burlingame, California 94010

Attention: Mr. Jack Overly

Subject: Welding to Pipelines Operated in Excess 100 PSIG

Gentlemen:

We are designing a pipeline system in accordance with Title 49, Chapter I, Subchapter B, Part 195 - "Transportation of Liquids by Pipeline". A section of the pipeline will be built on a trestle and aboveground. In this portion of the pipeline, it will be necessary to support as well as anchor for thermal expansion. We are in a quandary as to the acceptable methods to engage both the supports and the anchor to the pipeline.

The referenced regulation to which we are designing (Part 195) "Transportation of Liquids by Pipeline", Paragraph 195.208, "Welding of Supports and Braces", states, "Supports or braces may not be welded directly to pipe that will be operated at a pressure of more than 100 PSIG."

ANSI Code B31.4 requires under such circumstances that a band of steel encircle the pipeline, be welded to the pipeline and that all braces and anchors be welded in turn to the band.

It would seem to us that the practice set forth in B31.4 would meet the requirements of D.O.T. Regulation 195.208 as the brace or support would not "directly" engage the pipeline.

Will you please advise us if following B31.4 for this purpose would be acceptable to the Department of Transportation, Office of Pipeline Safety? If such practice would not meet the acceptance of your office, would you please advise us what procedure would? We would like to point out that welding is preferred to bolting to pipe supports and the pipe anchor in this section of the pipeline under study.

Thank you for your help in this matter. We sincerely appreciate it.

Your truly,

D. RUSSELL ASSOCIATES, INC.

Douglas Russell, P.E.

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