

PI-76-0111

August 31, 1976

Mr. A. R. Kahmann  
Chief Engineer  
Chandler Engineering Company  
7707 East 38th Street  
Tulsa, OK 74145

Dear Mr. Kahmann:

This responds to your letter dated July 23, 1976, asking whether accessory test equipment is subject to 49 CFR Parts 192 and 195.

There are no specific regulations governing accessory test equipment in 49 CFR Parts 192 and 195. However, if accessory test equipment is installed in a pipeline (including pipe, valves, and other appurtenance attached to pipe, compressor units, pump stations, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies) as a physical facility through which gas or liquid move in transportation, then it is subject to the general requirements governing design, construction, operation, and maintenance of a pipeline. We suggest that you contact the operators who purchased the accessory test equipment you manufacture to determine whether or not the equipment is used as part of a pipeline.

Thank you for your interest in pipeline safety.

Sincerely,  
Cesar DeLeon  
Acting Director  
Office of Pipeline  
Safety Operations

TO: Mat'l Trans Bureau ATTN: Cesar DeLeon  
Office of Pipeline Safety Operations  
2100 Second St, S.W.  
Washington, D.C. 20590

SUBJECT: Our letter of 23 July

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**MESSAGE**

Gentlemen,

We would appreciate your review and answer to our letter, copy enclosed.

Thank you.

23 July, 1976

Material Transportation Bureau  
Office of Pipeline Safety Operations  
2100 Second Street, S.W.  
Washington, D.C. 20590

Attention: Cesar De Leon, Director

Gentlemen:

We are manufactures of Dead-Weight Pressure Measuring Instruments. These instruments are used both in the construction and operation of gas and product pipelines, for exact pressure determinations.

We have received orders from some of our customers requesting that instruments we furnish them "meet all of the applicable provisions of the Department of Transportation Minimum Safety Standards".

We have reviewed Federal Regulations Title No. 49, Section 192 and find no specific reference to accessory test equipment. We would appreciate assistance from your office directing us to the specific Sections of the Law that would apply to our equipment. Any pertinent excerpts you might forward to us would be appreciated.

Thank you.

Very truly yours,  
CHANDLER ENGINEERING COMPANY  
A. R. Kahmann  
Chief Engineer