

Mr. Jim C. Hallmark
Sales Representative
Byron Jackson Pump Division
Borg-Warner Corporation
P.O. Drawer 12946
Houston, Texas 77017

Dear Mr. Hallmark:

This is in reply to your letter dated April 3, 1979. Your letter requests an interpretation of hydrostatic testing requirements for components set out in 49 CFR Part 195, ?195.304. You ask whether the 24-hour hydrostatic test period set forth in ?195.302(b) applies to components such as pumps.

Please be advised that the 24-hour hydrostatic test period does not necessarily apply to components. Section 195.304(b) provides for exceptions to the 24-hour test period if the component is the only item being replaced or added to the pipeline system and if the component was hydrostatically tested at the factory or was manufactured under a quality control system that ensures each component is at least equal in strength to a prototype that was hydrostatically tested at the factory.

Inasmuch as the pumps you mentioned are apparently the only components being replaced or added and inasmuch as these pumps are hydrostatically tested at the factory, although not for a 24-hour period, please be advised that the requirements of ?195.304(b) and ?195.304(b)(1) have been met.

Sincerely,

/signed/

Cesar De Leon
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

April 3, 1979

Mr. Ceasar DeLeon
Office of Pipeline Safety Operations
Material Transportation B
Department of Transportation
2100 2nd St. Southwest
Washington, D. C. 20590

Dear Mr. DeLeon:

I would like an official interpretation of your D.O.T. Reg. #195.304 concerning the hydrostatic testing of components of a pipeline service or in conjunction with a pipeline service.

I have a customer, Texas Eastern Transmission, that requires a 24 hour hydrostatic test on each pump they purchase. They use Subpart E, 195.300, 195.302, 195.304 as the basis for their requirement.

Is it our understanding that the 24 hour test pertains to pipeline and pipe and not necessarily to the components, such as pumps. Since we hydrostatically test all our pumps to 1.5 times the shut-in or 2 times the operating pressure, whichever is greater and in accordance with the Hydraulic Institute Standards and certify the test.

I see that this is covered by your 195.304 - B1 and B2. I stated all our pumps are hydro tested and all our prototypes have been tested but not for a 24 hour period. It does not specify the amount of time the factory has to hydro test.

I talked with Mr. DeLaFuenta at D.O.T. in Houston and Mr. Frank Robinson in Washington, D. C. and they both concur with my interpretation of the D.O.T. Reg. 195.304, that is, as long as we hydrostatically test our pumps and certify their operation, that is all that is needed.

Your cooperation in this matter will be greatly appreciated.

Very truly yours,

BRYON JACKSON PUMP DIVISION

Jim. C. Hallmark
Sales Representative

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