

July 28, 1981

Mr. Dale W. Johansen  
Assistant Director, Gas Department  
Engineering Section  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, Missouri 65102

Dear Mr. Johansen:

We apologize for the lateness of our response to your letter of April 14, 1981, asking whether §192.357(d) requires nonrelief type service regulators, which would release gas only upon failure to have their breather vents vented to the outside atmosphere.

As indicated by the enclosed interpretations (dated October 12, 1973, and November 1, 1976), §192.357(d) does not apply to nonrelief type service regulators because they do not release gas during operation. Nevertheless, nonrelief type service regulators that have breather vents are subject to the requirements of §192.355(b)(2) and must be installed so that gas escaping from the vents in the events of diaphragm or other failure is released into the outside atmosphere.

We trust that this response will satisfy your concerns.

Sincerely,

/signed/

Melvin A. Judah  
Acting Associate Director for  
Pipeline Safety Regulation  
Materials Transportation Bureau

October 12, 1973

Mr. A. C. Singer  
Vice President of Operations  
The Gas Service Company  
700 Scarritt Building  
Kansas City, Mo. 64142

Dear Mr. Singer:

In your letter of September 24, 1973, you requested an interpretation of Paragraph 192.357(d), Title 49, Code of Federal Regulations, which reads as follows:

"Each regulator that might release gas in its operation must be vented to the outside atmosphere."

Your specific question was whether the above paragraph requires an outside vent on service regulators which are installed inside, and which are not equipped with relief facilities. Since they do not release gas in their operation, you have considered such regulators as constituting a closed system.

Your interpretation is correct. Since there is no release of gas in the operation of such a service regulator, that regulator need not be vented to the outside atmosphere.

If we may assist further, please let us know.

Sincerely,

/signed/

Joseph C. Caldwell  
Director  
Office of Pipeline Safety

November 1, 1976

Mr. Leonard M. Coffelt  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, Missouri 65101

Dear Mr. Coffelt:

This responds to your letter dated September 21, 1976, asking that we review a previous interpretation dated October 12, 1973, regarding 49 CFR 192.357(d). You ask whether that interpretation permits "service regulators to be installed within a building without venting the diaphragm breather vent to the outside atmosphere."

Section 192.357(d) reads:

"Each regulator that might release gas in its operation must be vented to the outside atmosphere."

The October 12, 1973, interpretation essentially provides that Section 192.357(d) does not apply to a regulator which does not release gas in its operation.

That interpretation was not intended to permit installation of a regulator with a diaphragm breather vent inside a building without placing the discharge end of the vent outside the building. Sections 192.199(e) and 192.355(b)(2) are clear that the outlet of each regulator vent must be located outside.

Sincerely,

/signed/

Cesar DeLeon  
Acting Director  
Office of Pipeline  
Safety Operations