

PI-82-0104

June 21, 1982

Mr. Don Hughes
Houston Valve & Repair Company
P.O. Box 16386
Houston, Texas 77022

Dear Mr. Hughes

This is in response to your letter dated March 29, 1982, inquiring whether use of remanufactured valves can be in compliance with 49 CFR Part 195.

Although Part 195 does not use the term "remanufactured" with reference to valves, their use is not precluded by Part 195. For purposes of compliance with §195.116, there is no distinction between new and remanufactured valves. Therefore, Part 195 requirements apply to both new and remanufactured valves.

We hope this fully answers your question.

Sincerely,

SIGNED

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

Houston Valve & Repair Company
P.O. Box 16386
Houston, Texas 77022

Department of Transportation
400 7th St. SW
Room 8423
Washington, D.C. 20590

Attn: Mr. Melvin Judah

Dear Sir,

We are a valve repair company located in Houston, Texas. We have been soliciting valve repair work from the pipeline industry, and on numerous occasions, have been told by the pipeline companies that the Department of Transportation would not allow remanufactured valves in pipeline operations.

I have available a set of the Minimum Federal Safety Standards for Liquid Pipelines, relating to transportation of liquids by pipeline (Part 195, Title 49, Code of Federal Regulations); these regulations do not cover this subject. I would appreciate very much if you would clarify the regulations on this matter.

Sincerely,
Don Hughes
Sales Manager