

Mr. Walter T. Kelly
Director, Office of Pipeline Safety
State of Minnesota
Department of Public Safety
175 Aurora Avenue
St. Paul, MN 55013-2356

Dear Mr. Kelly:

This responds to your letter of August 25, requesting our opinion whether .049 square inches of exposed polyethylene pipe are acceptable under 49 CFR §192.375(a). You said the .049 square inches of exposed polyethylene pipe are exposed to ultraviolet rays through a vent hole on a service riser.

Section 192.375(a) requires that all plastic service lines transporting gas above ground, outside a building, be protected against deterioration and external damage. Ultraviolet rays are known to deteriorate polyethylene pipe; so no exposure of polyethylene pipe to ultraviolet rays is permitted under §192.375(a).

We trust this adequately responds to your inquiry.

Sincerely,

Cesar DeLeon
Director for Pipeline Safety
Regulatory Programs