

October 21, 1992

Mr. Kevin E. Miller
Facilities Engineering Department
Ashland Oil, Inc.
P.O. Box 391, EH
Ashland. Ky 41114

Dear Mr. Miller:

We have considered your letter of August 17, 1992, which advises that Ashland Petroleum Company is studying its terminal facilities to ensure their compliance with the pipeline safety regulations of 49 CFR Part 195. You further advise that during the course of the study, questions have developed on where Part 195 jurisdiction ends when a pipeline enters a storage facility and what constitutes "in plant piping."

We are aware that Part 195 does not define the point where a jurisdictional pipeline ends and "in plant piping" begins. So we are preparing a notice of proposed rulemaking that will clarify this and other issues related to Part 195. The notice is titled "Regulatory Review: Hazardous Liquid and Carbon Dioxide Pipeline Safety Standards." When the notice is published, all interested persons will have an opportunity to comment on a proposed definition of "in plant piping."

Meanwhile, we have enclosed eight "Liquid Drawings" which are currently used at our Transportation Safety institute (TSI) in Oklahoma City as guidelines on jurisdictional issues. We expect that the information on these instructional drawings will be of use in answering your jurisdictional questions.

Sincerely,

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety