

January 30, 1995

Mr. D. R. Linger
Vice President, Operations
1284 Soldiers Field Road
Boston, MA 02135

Dear Mr. Linger:

This responds to your letter of June 30, 1994, to Mr. Donald Moore of our Central Region office, regarding his interpretation of 49 CFR § 192.5 (Class locations.) made in the course of the recent New Jersey Audit. Mr. Moore's establishment of the class change end points for a cluster of houses is inconsistent with your understanding of the requirements for clusters in § 192.5(f).

Your position appears to be based on a misinterpretation of "ends 220 yards from the nearest building" as that phrase is used in paragraphs (f)(1) - (f)(3). These paragraphs use "building" in the singular because they refer to the nearest building in the group or cluster to which the boundary adjustment of 220 yards applies in relation to the other buildings intended for human occupancy. As such, the two boundary adjustments are measured along the centerline of the pipeline, beginning at points which are the perpendicular projection of the extremities of the furthestmost upstream building and furthestmost downstream building.

Accordingly, your agreement to extend the two designated pipeline segments, to conform with Don Moore's interpretation, will put them in compliance with § 192.5

We trust that this responds to your request for a resolution of the interpretation issue by this office.

Sincerely,

Cesar De Leon
Deputy Associate Administrator for
Pipeline Safety