

PI-95-0102

U.S. Department  
of Transportation

400 Seventh Street, SW  
Washington, DC 20590

**Research and  
Special Programs  
Administration**

October 9, 1995

Mr. Beryl Gamse  
Consulting Engineer  
McDowell Owens Engineering, Inc.  
Suite 100  
1075 Kingwood Drive  
Kingwood, TX 77339

Dear Mr. Gamse:

I am responding to your letter of September 1, 1995, concerning application of the gas pipeline safety regulation in 49 CFR 192.317(b) to a liquid petroleum gas transmission line in a rural area. You asked what criteria can be used to determine if the pipeline is a "safe distance from the traffic" under §192.317(b).

I must first point out that pipelines carrying liquid petroleum gas in a liquid state are not subject to the regulations in 49 CFR Part 192. These regulations apply only to the pipeline transportation of certain hazardous materials in a gaseous state. Pipelines carrying liquid petroleum gas in a liquid state are subject to the safety regulations in 49 CFR Part 195.

As to §192.317(b), we have not adopted criteria to judge the safety of distances separating aboveground gas pipeline facilities from vehicular traffic. So a safe distance would be whatever a reasonable and prudent pipeline operator would conclude is safe under the circumstances, considering relevant factors such as the speed limit, the direction of traffic, the terrain, and any natural barriers.

Sincerely,

Richard D. Huriaux, P.E.  
Director for Technology and Regulation  
Office of Pipeline Safety

McDowell Owens  
Texas commerce Bank Building  
Suite 100  
1075 Kingwood Drive  
Kingwood, Texas 77339

September 1, 1995

Office of Pipeline Safety  
Department of Transportation  
DPS-1  
400 Seventh Street, S.W.  
Room 2335  
Washington, D.C. 20590

RE: Our File No: 952631

Dear Associate Administrator:

I have reviewed CFR49 192.317(b) which is concerned with the protection of pipelines from damage by vehicular traffic. The paragraph reads:

"Each aboveground transmission line or main, not located offshore or in inland navigable water areas, must be protected from accidental damage by vehicular traffic or other similar causes, either by being placed at a safe distance from the traffic or by installing barricades."

I would like to get guidance on the definition of the term safe distance from the traffic. In the field of highway design, the generally accepted requirement for a "clear zone" is that any fixed object more than 30 feet from the edge of the travel way, on relatively flat ground, does not have to be protected from errant highway vehicles by guard rails or other such barricades. The authority for the highway design clear-zone criteria is the American Association of State Highway and Transportation Officials (AASHTO).

What, if any other authorities and factors should be taken into consideration in defining the safe distance from the traffic required by par. 192.317? The situation of particular interest is a liquid petroleum gas (LPG) transmission line in a rural setting.

Thank you very much for your help.

Sincerely,  
McDOWELL OWENS ENGINEERING, INC.  
Beryl Gamse, Ph.D., P.E.  
Consulting Engineer