

Mr. Joseph T. Finnan
Supervisor, Gas Safety Division
Bureau of Transportation and Safety
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

Dear Mr. Finnan:

This responds to your letter of December 18, 1995, asking whether American Meter Regulator Model 1833, when used as a district regulator, complies with 49 CFR § 192.199(g). Model 1933 incorporates control and overpressure protection in the same body. Section 192.199(g) requires a regulator, when used as a district regulator, to be designed and installed to prevent any single incident such as an explosion in a vault or damage by a vehicle from affecting the operation of both the overpressure protection device and the regulator.

We have reviewed the July 13, 1995, letter from John O. Graham, General Manager, North East Heat & Light Co. concerning the installation of Model 1933 at regulator station #1 at Weaver's Hillside Mobile Homes. The letter fails to explain how Model 1933, which incorporates the overpressure assembly as part of the regulator, would be precluded from a single incident such as an explosion in a vault or damage by a vehicle from affecting the operation of both the overpressure protection device and the regulator.

In the absence of any additional rationale, we agree with you that the installation does not comply with § 192.199(g).

Sincerely,

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

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cc: DPS-1,2,10,Regions,TSIEMail,StateMailing