

March 31, 1998

Glynn Blanton
Chief, Gas, Water & Electric Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville TN 37243-0505

Dear Mr. Blanton:

Thank you for your letter of March 16, 1997, regarding the Vertex Chemical Corporation plans to construct a pipeline in Memphis, Tennessee to carry bleach, caustics, and acids. You asked if the pipeline would come under the hazardous liquid pipeline safety standards in 49 CFR Part 195.

The Part 195 standards apply to pipelines used to transport hazardous liquids. The term "hazardous liquid" is defined in 49 CFR 195.2 to mean petroleum, petroleum products, or anhydrous ammonia. None of the liquids Vertex plans to transport is a hazardous liquid under this definition. Hence, the Part 195 safety standards would not apply to Vertex's proposed pipeline.

I hope you find this information helpful. If we can be of further assistance, please contact me at (202) 366-4565.

Sincerely,

Richard D. Hurliaux, P.E.
Director, Office of Technology and Standards