

May 22, 1998

Mr. John B. McGowan, Jr.
President
UMAC, Inc.
120 South Ship Road,
Exton, PA 19341-2853

Dear Mr. McGowan::

This is in response to your letter of March 12, 1998, requesting an interpretation of how 49 CFR §192.381(a) applies to a manufacturer's testing of each excess flow valve (EFV).

Your letter stated that §192.381(a) requires a manufacturer to "test each EFV to ensure that at 10 psig, each valve will ... upon closure, reduce gas flow ... for an EFV designed to allow pressure to equalize across the valve, to no more than 5 percent of the manufacturer's specified closure flow rate, up to a maximum of 20 cubic feet per hour." UMAC has interpreted the regulation as requiring a manufacturer to test each EFV capsule in its fabricated form to ensure that the reduced gas flow does not exceed the specified rate.

Your letter explained that UMAC manufactures EFVs in capsule form, which are then fabricated into fittings and polyethylene (PE) or steel bodies. In UMAC's opinion it would be difficult to ensure the integrity of the "O" ring seal and guarantee the specified gas flow rates without testing the complete assembly once the EFV capsule has been inserted, particularly in the tee outlet under field conditions.

Section 192.381(a) requires a natural gas service line operator to only use EFVs that have been manufactured and tested in accordance with the specified performance standards. The regulation does not apply to a fitting or assembly that includes an EFV. The regulation does not require an operator to do any testing of valves that the manufacturer has tested in accordance with Section 192.381. The regulation does not require a manufacturer to test each valve, but only to conduct testing to ensure that the valves meet performance standards.

If we can be of further assistance in this matter, please contact me at (202) 366-4565 or Mike Israni at (202) 366-4571.

Sincerely,

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

cc: Richard E. Sanders, TSI
OPS Regional Directors