

Nov. 19, 1998

Mr. Glynn Blanton
Chief, Gas Pipeline Safety Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Dear Mr. Blanton:

This is in response to your letter of March 16, 1998, concerning the proposed Vertex Chemical Corporation pipeline from the Vertex facility on President's Island to Cargill Corn Milling facility in Memphis, Tennessee. The proposed pipeline will transport chemical solutions that contain bleach, caustics, and acid. You request confirmation that this proposed pipeline will not be jurisdictional to 49 CFR Part 195.

Part 195 is applicable to the transportation of hazardous liquids and carbon dioxide as indicated in § 195.1. Hazardous liquid is defined in § 195.2. to mean petroleum, petroleum product, or anhydrous ammonia.

The chemicals proposed to be transported do not fall under the definition of a hazardous liquid nor are they carbon dioxide. Therefore, you are correct that the proposed pipeline is non-jurisdictional to 49 CFR Part 195.

Sincerely,

Richard D. Huriaux
Manager, Regulations
Office of Pipeline Safety

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cc: DPS-1,2,10,Regions,TSI,StateMail