

PI-99-0105

U.S. Department of Transportation
Research and Special Programs Administration
400 Seventh St., S.W.
Washington, D.C. 20590

December 1, 1999

Mr. Rodney A. Blane
City of Rolling Meadows
3600 Kirchoff Road
Rolling Meadows, IL 60008

Dear Mr. Blane:

Thank you for your letter of November 23, 1999 faxed to us on that date. In your letter, you ask if the requirements of Part 192 apply to gas piping within a structure that is between the point of entry into the building and the meter that may be located anywhere within the building.

As a point of explanation, Part 192 is not a regulation of The GPTC Guide for Gas Transmission and Distribution Piping Systems as you indicated. Part 192 is contained in title 49 of the Code of Federal Regulations and is cited as 49 CFR part 192. The Gas Piping Technology Committee (GPTC) Guide for Gas Transmission and Distribution Piping Systems is a document endorsed by us which contains information and some methods to assist the gas pipeline operator in complying with the regulations contained in 49 CFR part 192.

The gas pipeline safety standards apply to each gas service line. The definition of "service line," which addresses customer meters, is defined in 49 CFR 192.3 as follows -

Service line means a distribution line that transports gas from a common source of supply to (1) a customer meter or the connection to a customer's piping, whichever is farther downstream, or (2) the connection to a customer's piping if there is no customer meter. A customer meter is the meter that measures the transfer of gas from an operator to a consumer.

When the end point of the jurisdiction under 49 CFR part 192 is the customer meter as defined above, the regulations in 49 CFR part 192 apply whether the customer meter is located inside or outside the building. Therefore, the piping upstream of the meter is subject to the regulations in 49 CFR part 192 regardless if the piping is inside or outside the building.

Sincerely,
Richard B. Felder
Associate Administrator for Pipeline Safety

City of Rolling Meadows
3600 Kirchoff Road
Rolling Meadows, Illinois 60008

November 23, 1999

Richard B. Felder
Associate Administrator for Pipeline Safety
Office of Pipeline Safety
Department of Transportation
400 – 7th St. NW
Washington, D.C. 20590

Dear Mr. Felder:

I write to you on the suggestion of Lloyd Aldridge of your office.

As an Appeals Board member for the International Codes Council, I am seeking interpretation regarding Federal jurisdiction under Part 192 of the GPTC Guide for Gas Transmission and Distribution Piping Systems, specifically the point of delivery definition.

In the way of background, the International Code Council's code development process approved a change to the International Fuel Gas Code (IFGC) to change the definition of "point of delivery" to the point of entrance to a building where a service meter assembly is located within the building. This would serve to make all gas piping within the building, including that which is before the meter, subject to the requirements of the International Fuel Gas Code. The American Gas Association has appealed this approved code change based primarily on what could be a jurisdictional conflict between D.O.T. regulation and the I.F.G.C.

The interpretation or ruling I seek is whether the requirements of Part 192 would apply to gas piping within a structure that is between the point of entry into the building and the meter that may be located anywhere within the building.

I know it is short notice, but a response before December 1st would be appreciated since our board is to have its hearing on that date.

Thank you in advance for your assistance and cooperation.

Sincerely,
Rodney A. Blane
Director of Building & Zoning