

PI-01-0104

April 3, 2001

Mr. Richard Motsinger
PRAGMATICS
P.O. Box 737
Manchester, MO 63011

Dear Mr. Motsinger:

Thank you for your telephone call of December 11, 2000 and your letter of February 2, 2001 concerning leak detection equipment used on gas pipelines.

I am puzzled that some consulting firms have been telling their clients that the U.S. Department of Transportation(DOT) pipeline safety regulations require gas leak surveys to be conducted with flame ionization equipment. This is not the case. The DOT pipeline safety regulations at 49 CFR §192.706 and §192.723 only require that leakage be conducted "using leak detector equipment."

Our leak detection regulations are performance-based. In practice, this means that any equipment capable of detecting all leaks in gas distribution or transmission systems may be used. The regulations do not mandate the use of any specific type of detection equipment. However, we encourage the development and deployment of new technology that can improve leak detection capabilities.

If you need additional information, please call me at (202) 366-4565.

Sincerely,

Richard D. Huriaux, P.E.
Manager, Regulations