

PI-07-0103

April 11, 2007

Mr. Bruce Hancock  
Manager, Codes and Standards  
Kinder Morgan, Inc.  
P.O. Box 281304  
Lakewood, CO 80228-8304

Dear Mr. Hancock:

On October 20, 2006 you wrote to the Pipeline and Hazardous Materials Safety Administration (PHMSA) requesting interpretations of 49 CFR 192.153, 192.503 and 192.505 as they pertain to temporary pipeline pig launchers and receivers.

In your letter you ask, *“When a temporary launcher or receiver is built utilizing standard pipe and fittings with the intention of running pipeline cleaning and inspection tools in gas pipelines does that fabrication fall under the jurisdiction of 49 CFR 192.153, Components fabricated by welding?”*

The pipeline safety regulations at § 192.3 define a *“pipeline”* to mean *“all parts of those physical facilities through which gas moves in transportation, including ... fabricated assemblies.”* As fabricated assemblies through which gas moves in transportation, temporary pig launchers and receivers are regulated by 49 CFR Part 192, including Subpart D, Design of Pipeline Components. The temporary pig launchers and receivers you describe, however, would meet the exceptions in Subpart D, § 192.153(a), if the standard pipe and fittings used to build the launchers and receivers are joined by circumferential welds and any connections to the launchers or receivers are branch connections welded to the launcher or receiver in accordance with § 192.155, Welded Branch Connections.

You also ask, *“When a temporary launcher or receiver is placed in a gas pipeline for the purpose of running pipeline cleaning or inspection tools is a pressure test required in conformance with 49 CFR 192.505?”*

As stated above, temporary pig launchers and receivers are fabricated assemblies through which gas moves in transportation, therefore, they must be tested in accordance with 49 CFR Subpart J, which includes § 192.505. Subpart J also includes general test requirements, environmental and safety requirements, record keeping requirements, and references to other sections in 49 CFR 192 that also apply to launchers and receivers. The regulations do allow a pre-installation strength test for fabricated units and short sections of pipe for which a post installation test is impractical on pipelines operated at a hoop stress of 30 percent or more of the specified minimum yield strength (SMYS) [see § 192.505(e)].

Lastly you ask, “*When a temporary launcher or receiver is moved to a new location on the same or a different gas pipeline is a new pressure test required prior to placing the launcher or receiver back into temporary service?*”

Section 192.503 states that a segment of a pipeline cannot be returned to service after it has been relocated until it has been tested in accordance with Subpart J and § 192.619 to substantiate the maximum allowable operating pressure (MAOP). A pipeline includes temporary pig launchers and receivers as explained above. Accordingly, testing must be performed after a temporary pig launcher or receiver is relocated and before it is returned to service as required by § 192.503 (a). As also stated above, the regulations do allow a pre-installation strength test for fabricated units and short sections of pipe for which a post installation test is impractical on pipelines operated at a hoop stress of 30 percent or more of SMYS [see § 192.505(e)].

If I can further assist you with this, or any other regulatory matter, please contact me at (202) 366-4595.

Sincerely,

Florence L. Hamn  
Director, Office of Regulations