



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

1200 New Jersey Ave, S.E.
Washington, D.C. 20590

DEC 20 2012

Mr. Michael J. Frenzel
Associated Safety Consultants, Inc.
8315 Kelwood Avenue
Suite B
Baton Rouge, LA 70806

Dear Mr. Frenzel:

In a letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) dated August 9, 2012, the Associated Safety Consultants (ASC), Inc., requested an interpretation of the applicability of the Federal pipeline safety regulations at 49 CFR 192.317(b) to an aboveground gas transmission line or main. Specifically, ASC asks PHMSA's interpretation of how a 'safe distance' is defined or determined, and what would constitute an effective barricade?

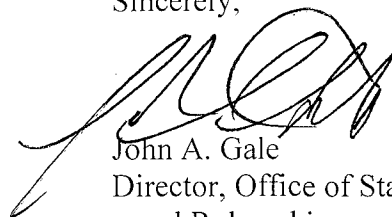
Section 192.317(b) reads as follows:

(b) Each aboveground transmission line or main, not located offshore or in inland navigable water areas, must be protected from accidental damage by vehicular traffic or other similar causes, either by being placed at a safe distance from the traffic or by installing barricades.

PHMSA has not adopted general criteria to judge the safety of distances and effective barricades separating aboveground gas pipeline facilities from vehicular traffic. Therefore, a safe distance and effective barricade would be whatever a reasonable and prudent pipeline operator would conclude is safe under the site specific circumstances, considering relevant factors such as the speed limit, the direction of traffic, the terrain, and any natural barriers.

I hope that this information is helpful to you. If I can be of further assistance, please contact me at 202-366-4046.

Sincerely,



John A. Gale
Director, Office of Standards
and Rulemaking

The Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety provides written clarifications of the Regulations (49 CFR Parts 190-199) in the form of interpretation letters. These letters reflect the agency's current application of the regulations to the specific facts presented by the person requesting the clarification. Interpretations do not create legally-enforceable rights or obligations and are provided to help the public understand how to comply with the regulations.

PI-12-0008

ASSOCIATED SAFETY CONSULTANTS, INC.

Providing Safety Program Management Services to Business and Industry
8315 Kelwood Avenue, Suite B, Baton Rouge, Louisiana 70806
Phone (225) 926-0560, Fax (225) 926-1509

August 9, 2012

Office of Pipeline Safety (PHP-30)
PHMSA
US Department of Transportation
1200 New Jersey Avenue, SE
Washington DC 20590-0001

AUG 17 2012

RE: Interpretation of 49CFR192.317(b)

Dear Sir:

49CFR192.317(b) reads in part that 'Each above ground transmission line or main ... must be protected from accidental damage by vehicular traffic or other similar causes, either by being placed at a safe distance from the traffic or by installing barricades.'

My questions are:


Assuming a safe distance means from a highway or roadway, how is a 'safe distance' defined or determined, and by whom?

What would constitute an effective barricade?

If my questions are not clear, please call. Otherwise, I eagerly await your response.

Sincerely,

ASSOCIATED SAFETY CONSULTANTS, INC.


MICHAEL J. FRENZEL, CSP