

U.S. Department
of Transportation

400 Seventh Street, S.W.
Washington, D.C. 20590

**Research and
Special Programs
Administration**

May 17, 1995

Mr. S. J. Choby
Manager, Codes and Standards
Columbia Gas Transmission Corporation
P. O. Box 1273
Charleston, West Virginia 25325-1273

Dear Mr. Choby:

We have considered your two letters dated March 16, 1995, requesting waivers of safety regulations in 49 CFR Part 192 for two transmission lines. Based on information in the letters and phone conversations with you, we believe a waiver is not needed to operate the transmission lines as planned.

One letter concerns a plug valve at Fairfax Stone on transmission line WB-3. You requested a waiver of § 192.179(a)(4) to allow replacement of the valve with line pipe, resulting in a distance between block valves of 20.2 miles. Section 192.179(a)(4) requires that each point on a transmission line in a Class 1 location must be within 10 miles of a valve. However, because the WB-3 line was constructed before this valve spacing requirement took effect, the line is not subject to § 192.179. Only the replacement length of pipe would become subject to § 192.179. But, since each point on the replacement pipe would be less than 10 miles from the nearest block valve (located at Thomas Measuring Station), the replacement pipe would meet § 192.179(a)(4).

The other letter concerns a 603-foot Class 3 segment of the A-5 East transmission line, beginning at the Huguenot regulator station. The segment is exempt from odorization under § 192.625(b)(1), because at least 50 percent of the length of the A-5 East line downstream from the Class 3 segment is in a Class 1 or Class 2 location. Last year, a safety-related condition caused Columbia to reduce pressure temporarily in the line east of the Huguenot station and to introduce a supplemental gas supply. As a result, during periods of extremely low demand, the normal west-to-east flow between the Huguenot station and the supply point could reverse direction. Because you are concerned the Class 3 segment would lose its odorization exemption if reverse flow occurs (since there would be no class 1 or 2 location downstream from the segment), you requested a waiver of § 192.625(b) until the safety-related condition is corrected.

However, as we apply the odorization exemption under § 192.625(b)(1), “downstream” refers to locations along a pipeline in the direction of flow during normal operations. Using normal operations as a bench mark provides a stable planning basis and minimizes the cost of the odorization rule. So a temporary flow reversal would not cause a transmission line segment to lose its odorization exemption. Since Columbia plans to return the Class 3 segment to normal operation as soon as it corrects the safety-related condition, we believe a waiver of § 192.625(b) is unnecessary.

Sincerely,

Cesar DeLeon
Deputy Associate Administrator
for Pipeline Safety