

## Interpretation 192.625 2

January 4, 1971

Mr. James B. Williams  
Utilities Engineer  
Alabama Public Service Commission  
P.O. Box 881  
Montgomery, Alabama 36102

Dear Mr. Williams:

This is in reply to your letter of December 22, 1970, concerning 49 CFR, Section 192.625, odorization of gas.

If the line involved is operated at 20% or more of SMYS, under 49 CFR, Section 192.625 as amended, there is requirement for odorization. If it is operated at less than 20% SMYS you may initiate a waiver proceeding under Section 3(e) of the Natural Gas Pipeline Safety Act.

Thank you for your interest in pipeline safety.

Sincerely,

/signed/

Joseph C. Caldwell  
Director, Acting  
Office of Pipeline Safety

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February 12, 1971

Mr. James B. Williams  
Utilities Engineer  
Alabama Public Service Commission  
P. O. Box 991  
Montgomery, Alabama 36102

Dear Mr. Williams:

In reviewing our correspondence we have discovered an inadvertent error of omission in my letter to you of January 4, 1971.

The first sentence of the second paragraph should read: "If the line involved is operated at 20% or more SMYS, under 49 CFR, Section 192.625 as amended, there is no requirement for odorization."

We hope that this error did not inconvenience you, and regret it occurred.

Sincerely,

/signed/

Joseph C. Caldwell  
Director, Acting  
Office of Pipeline Safety