

October 24, 1973

Mr. James H. Collins  
Electrical-Mechanical Engineer  
1310 Short Street  
New Orleans, LA 70118

Dear Mr. Collins:

This is in response to your letter of September 25, 1973, to our Houston Regional Field Office which was forwarded to this office for reply.

Your letter indicates that the gas system concerned is an intermediate pressure (typically 25 psi) distribution system, serving the buildings on a college campus and owned by the college. Gas is supplied through a regulator-metering station from odorized mains of a gas service utility company. The system comprises approximately 4.5 miles of welded steel mains and service lines 5 inch to 1 1/2 inch diameter, serving 45 regulators at campus buildings, installed largely prior to 1970. Cathodic protection was installed in June 1971, monitored weekly at key points by owner-personnel, and checked so far at 16-month intervals by a corrosion engineer.

The gas system as described raises the jurisdictional question of whether the pipelines on the college campus constitute a master meter system subject to the Federal gas pipeline safety regulations or whether the college is the ultimate customer and therefore the lines in the college are not subject to the regulations. In order to assist you in making this determination, if the college owned gas system consumes the gas and provides another type of service such as heat or air conditioning, to the individual buildings, then the college is not engaged in the distribution of gas. In this instance the college would be the ultimate consumer, and the Federal pipeline safety standards would only apply to mains and service lines upstream of the meter.

If the college owned gas system provides gas to consumers such as concessionaires, tenants, or others, it is engaged in the distribution of gas, and the persons to whom it is providing gas would be considered the customers even though they may not be individually metered. In this situation the pipelines downstream of the master meter used to distribute the gas to these ultimate consumers would be considered mains and service lines subject to the Federal pipeline safety standards.

The answers to your specific questions are predicated on the assumption that this system is a distribution system subject to the jurisdiction of the Federal pipeline safety standards.

Question 1. Is an annual report on the monitoring and engineering check of the cathodic protection required to be made by the owner (the college) and if so on what Form?

Answer. Section 192.453 of the Code of Federal Regulations requires that all phases of work performed during design, installation, operation and maintenance including recordkeeping in connection with corrosion control be carried out by, or under the direction of a person qualified by experience and training in pipeline corrosion control methods.

An annual report to the Office of Pipeline Safety (OPS) on the monitoring and engineering check of the cathodic protection of a gas pipeline is not currently required and there are no Federal forms for this purpose. However §192.491 does require each operator to keep records in sufficient detail to demonstrate the adequacy of his corrosion control measures or that a corrosive condition does not exist.

Question 2. Is an annual report on leaks from any cause required to be made by the owner, and if so on what Form?

Answer. Section 191.11, 49 CFR requires that each operator of a distribution system submit an annual report on Department of Transportation Form DOT-F-7100.1-1 (copy enclosed) not later than February 15 for the preceding calendar year.

Your attention is also directed to Section 191.5, 49 CFR which sets out the requirements for telephonic notice of certain leaks by all gas operators.

Question 3. Is a gas detector leakage survey required by OPS regulations, per No. 192.723, and if so, per (b)(1) as in a business district at 1-year intervals, or per (b)(2) as a system outside of principal business areas, at intervals not exceeding 5-years. What Form is available for the report to OPS?

Answer. Your attention is directed to the language of paragraph (b) of Section 192.723, stating that the type and scope of the leakage control program must be determined by the nature of the operations and local conditions, but it must meet the minimum requirements of a gas detector survey (1) at least once a year in business districts, and (2) as frequently as necessary, but at least every 5 years, outside the principal business areas. In the interest of continuing safe pipeline operation it is contemplated by this section that whenever local conditions warrant it surveys will be conducted more frequently than once a year in business districts, and more frequently than every 5 years outside the municipal business areas. It follows that there may very well be instances in which conducting a survey only once a year in a particular business district, or only once in 5 years in a particular area outside of the principal business district would be considered inadequate. An evaluation of the potential hazard due to the nature of buildings such as those on campus and the specific condition and environment of the pipeline system could indicate that consideration to conducting leakage surveys "as frequently as necessary" would mean more frequently than the minimum interval of 5 years.

The answer to the recordkeeping and report filing requirement in question one also applies here.

Question 4. Are periodic tests of odorization per No. 192.625 required of the owner or is he covered by tests made by the supply utility company?

Answer. Section 192.625(f), 49 CFR, requires that each operator shall conduct periodic sampling of combustible gases to assure the proper concentration of odorant in accordance with this section. Based on the assumption that the college is operating a gas distribution system, periodic tests of odorization by the owner are required.

The enclosed literature includes Parts 190 and 192 which you requested.

We trust that this will clarify the matter for you. If we can be of further assistance to you, please let us know.

Sincerely,

\signed\

Joseph C. Caldwell  
Director  
Office of Pipeline Safety

Enclosures