

## **1980 Division of Regulatory Responsibility between USCG and MTB on LOOP Project**

DATE: May 16, 1980

SUBJECT: Division of Regulatory Responsibility Between US Coast Guard and MTB on LOOP Project

FROM: Associate Director for Pipeline Safety Regulation, DMT-30

TO: Chief, Ports Division, P-73, Office of Marine Transportation  
Chief, Deep Water Ports Branch, G-MMT-7, Office of Merchant Marine Safety

In accordance with a conference on May 13, 1980, with representatives of the Ports Division, Office of Marine Transportation, and Deep Water Ports Branch, Office of Merchant Marine Safety, of the US Coast Guard, and myself, this clarifies the attached February 23, 1977, memorandum regarding the extent to which the pipeline safety regulations, 49 CFR 195, apply to the LOOP pipeline. The pipeline safety regulations administered between the MTB will be applicable to the pipeline between the inlet flanges of the PLEM and the shore terminus, including the piping of the platform.

I will respond to the letter of April 22, 1980, to Bob Aubry from Mr. W.P. Binger, Vice President of LOOP, regarding the extent to which MTBs pipeline safety regulations apply to the LOOP project, and obtain your concurrence on that correspondence.

Cesar De Leon

UNITED STATES GOVERNMENT  
*Memorandum*

DEPARTMENT OF TRANSPORTATION  
**RESEARCH AND SPECIAL  
PROGRAMS ADMINISTRATION**

DATE: January 17, 1980

SUBJECT: Loop Pipeline Surveillance System

FROM: Associate Director for Pipeline Safety Regulation, DMT-30

TO: CDR Stephen J.T. Masse, GMMT7/TP13

The technical staff of the Office of Pipeline Safety Regulations has reviewed the subject report for the LOOP Pipeline System prepared by Control Applications, Inc., of Houston, Texas. We did not find anything in the report which appears to not meet the Federal liquid pipeline safety standards in 49 CFR Part 195. While Federal standards do not have specific requirements for a leak detection system, § 195.50, Accident Reporting, prescribes that a release of commodity of 50 barrels or more of liquid would require the submission of a report to the Materials Transportation Bureau. Relative to this, we noted in Section 6 that the best leak detection capability is for a leak quantity of 95 barrels, which is a leak rate of 0.4 percent of maximum flow in a 15-minute detection time. This is for a Level III Dynamic Line Balance System.

We did not review in detail the principles and theory, detailed mathematical computations, and transient model tests which were include in the various Appendices. If we may be of further assistance, please advise.

Cesar De Leon

DEPARTMENT OF TRANSPORTATION  
**UNITED STATES COAST GUARD**  
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16613.1  
3 March 1977

Mr. William B. Read  
LOOP, Inc.  
350 Bank of New Orleans  
1010 Common Street  
New Orleans, LA 70112

Dear Mr. Read:

The design standards for main oil transfer piping on deepwater port platforms are presently covered by 33 CFR 149 (Deepwater Ports) and 49 CFR 195, as amended, August 12, 1976 (Transportation of liquid by pipeline). Please be guided by the more current 49 CFR 195 requirements.

Sincerely,

J.B. Friel, Captain, US Coast Guard, Manager, Deepwater Ports Project

UNITED STATES GOVERNMENT  
*Memorandum*

DEPARTMENT OF TRANSPORTATION  
**RESEARCH AND SPECIAL  
PROGRAMS ADMINISTRATION**

DATE: February 28, 1977

SUBJECT: Design Standards, Deepwater Port Pipes

FROM: Acting Director, Office of Pipeline Safety Operations, MTP-1

TO: Director, Office of Deepwater Ports, S-90

Regarding your February 17, 1977, memorandum concerning disagreements between the Coast Guard and OPSO design standards for oil transfer piping and risers and pipes on the pump platform, we have met with Coast Guard on this matter.

The OPSO regulations will be applicable to the pipeline from the platform on to shore, including the piping on the platform. The differences between the OPSO regulations and ANSI B31.4 were discussed and we mutually agreed that OPSO regulations were appropriate.

Cesar De Leon