

Interpretation 192.13 22

November 19, 1984

Mr. Alfred V. Colabella, Jr., PE
A. V. Colabella, Engineers
138 Farnsworth Avenue,
P. O. Box 187

Bordentown, New Jersey 08505

Dear Mr. Colabella:

This responds to your letter of November 14, 1984, asking additional questions about the qualification of certain steel pipes in a garden apartment complex as service lines under Part 192 standards.

As we indicated in our letter of November 7, 1984, any pipes (or portion thereof) that were readied for gas service before March 13, 1971, and have not been replaced, relocated, or otherwise changed since November 12, 1970 may be used as service lines under Part 192 without regard for the material, design, and construction standards (including standards for initial leak or pressure testing and initial inspection). The pipes must, however, meet the applicable operation, maintenance, and corrosion control requirements of Part 192.

Any pipes (or portion thereof) readied for gas service after March 12, 1971, or replaced, relocated, or otherwise changed after November 12, 1970, must, in addition to the applicable operation, maintenance, and corrosion control standards, meet the applicable material, design, and construction standards. In this regard, the pipes appear to qualify under §192.55(a)(2)(i), because all the criteria of Section II of Appendix B are satisfied, except weldability, which does not apply because no field welding has been or is intended to be done. It does not appear the pipes would qualify under the additional criteria of §192.55(a)(2)(ii), because for Section III of Appendix B to apply, the pipes must have been manufactured to a known edition of a specification of which a later edition was listed in Section I of Appendix B, and it appears you do not know the edition of the specification to which the pipes were manufactured. The information you have provided indicates the pipes would additionally qualify under §192.55(c), based on the intended operating hoop stress of less than 6000 p.s.i., the absence of close coiling and bending, and the results of your visual inspection. In addition, to §192.55, the operator should also determine that all other applicable requirements of Part 192 are met.

Sincerely

Original signed by

Richard L. Beam
Associate Director for
Pipeline Safety Regulation

GTR0001807

A.V. Colabella, Engineers
138 Farnsworth Avenue
P.O. Box 187
Bordentown, N.J. 08505

1984 November 14

U. S. Department of Transportation
Materials Transportation Bureau
Office of Pipeline Safety Regulations
Attention: Richard L. Beam (DMT-30)
Associate Director
400 7th Street, SW
Washington, D.C. 20590

Dear Mr. Beam:

Thank you for your letter of 1984 November 7 responding to ours of October 31. We are grateful for the information received and your prompt response.

The following points clarify and expand upon information contained in our letter of October 31 relative to the pipelines we seek to qualify as service lines.

1. The pipes within the building run above ground and beneath the first floors in crawl spaces. They do not actually underlie the building as indicated in your letter.
2. To the best of our knowledge, the pipelines were readied for service on or before March 12, 1971. We are searching for records to confirm this. Also, we believe that all operation, maintenance and corrosion control standards can be readily satisfied.
3. The pipe joints are threaded. Hence, since the pipes have not and are not intended to be welded we believe that the weldability requirements described in Appendix B, Section II B therefore do not apply.
4. The writer, in his capacity as a professional engineer, inspected the pipes and found that: they are in good condition, they are free of split seams and other defects that would cause leakage, they are clean enough to permit adequate inspection, they are reasonably round and straight, and there are no defects which might impair the strength or tightness of the pipes.

In light of the foregoing we respectfully request your opinion or interpretation regarding the following:

- A. If we verify that the pipes in question were readied for service on or before March 12, 1971 and that operation, maintenance and corrosion control standards are met do they qualify as service lines under paragraph 192.13? ✓
- B. Do the pipes in question qualify as service lines under paragraph 192.55(a)(2)(i)?
- C. Do the pipes in question qualify as service lines under paragraph 192.55(a)(2)(ii)?
- D. Do the pipes in question qualify as service lines under paragraph 192.55(c)?

We seek to qualify the pipes in question under more than one provision of the Regulations in order to eliminate any doubt of safety. Again, we respectfully draw your attention to the need for expeditiousness.

Sincerely,

A.V. Colabella, Engineers
Alfred V. Colabella Jr., P