



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

SEP 16 2014

Mr. Andrew N. Romach
Regulatory Compliance Manager
URS Corporation
1600 Perimeter Park Drive
Morrisville, NC 27560

Ref. No.: 14-0148

Dear Mr. Romach:

This is in response to your letter dated July 21, 2014 requesting confirmation that the relief from the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) provided by § 173.306(f)(1) for accumulators installed in assembled machinery is applicable to certain gas lift valves used in the oil drilling industry. The described gas lift valves contain a gas spring (accumulator) that operates the opening and closing of the valve. The bellows containing the accumulator is its own separate component of the assembled valve and the accumulator is designed with a burst pressure of not less than five times its charged pressure at 70 °F.

As described, the accumulator is a component of and installed in an item of assembled machinery (the gas lift valve). Pursuant to § 173.306(f)(1), provided the accumulator contains only non-liquified, non-flammable gas and the gas lift valve contains no other hazardous materials, the described gas lift valves are not subject to the requirements of the HMR.

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads "Shane C. Kelley". The signature is written in a cursive style with a long, sweeping underline.

Shane C. Kelley
Acting International Standards Coordinator
Standards and Rulemaking Division

Babuch
173.306(R)(1)
limited quantity

14-0148

Dodd, Alice (PHMSA)

From: Ciccarone, Michael CTR (PHMSA)
Sent: Monday, July 21, 2014 4:19 PM
To: Hazmat Interps
Subject: FW: Request for Formal Interpretation Letter
Attachments: request for DOT regulatory interpr accumulator 07212014.pdf

Shante and Alice,

Please submit this for a formal letter of interpretation.

Thanks,

Mike

From: Jarman, Erin [<mailto:erin.jarman@urs.com>]
Sent: Monday, July 21, 2014 2:47 PM
To: PHMSA HM InfoCenter
Cc: Drakeford, Carolyn (PHMSA)
Subject: Request for Formal Interpretation Letter

Dear Info Center,

Attached is a request for formal interpretation related to accumulators. If you need additional information, please feel free to contact me via e-mail or at the telephone number below. Have a great day!

Erin N. Jarman
Environmental Scientist
URS Corporation
1600 Perimeter Park Dr.
Suite 400
Morrisville, NC 27560

919-461-1478 (office phone)

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July 21, 2014

Mr. Charles Betts, Division Director
Standards and Rulemaking (PHH-10)
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
East Building, 2nd Floor
1200 New Jersey Ave., SE
Washington, DC 20590

Dear Mr. Betts:

I am writing to request a Department of Transportation (DOT) interpretation concerning whether a gas lift valve that contains a gas spring could be excepted from the DOT Hazardous Material Regulations (HMR) as set out in 49 CFR 173.306(f)(1) for an accumulator installed in assembled machinery. DOT previously issued an interpretation (11-0311) applying this same exception to another scenario of an accumulator system that functions as part of an oil drilling rig.

See below photograph of a gas lift valve that contains a gas spring (accumulator). This gas spring operates the opening and closing of the valve; this assembly is inserted into a gas pipeline on an oil rig for the purpose of lifting the oil column and forcing the fluid out of the wellbore. The bellows that contains the pressure (the accumulator) is its own separate piece of the assembled valve. This accumulator is designed and fabricated with a burst pressure of not less than five times its charged pressure at 70°F when shipped, as required in 49 CFR 173.306(f)(1).



Please confirm that the exception from the DOT Hazardous Material Regulations (HMR) as set out in 49 CFR 173.306(f)(1) for an accumulator installed in assembled machinery would apply to the above-described gas lift valve that contains a gas spring.

I would appreciate your assistance with this question.

Sincerely,

Andrew N. Romach
Regulatory Compliance Manager
URS Corporation

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