

PI-73-0103

February 20, 1973

Mr. A. Roy Whitelock
Plumbing Engineer
Alan H. Smith Consulting Engineers, Inc.
8700 Stemmons Freeway, Suite 407
Dallas, Texas 75247

Dear Mr. Whitelock;

Your letter of January 25, 1973, addressed to our Houston office has been referred to this office for reply. In your letter you asked for information regarding gas pipeline corrosion and the role of the consulting engineer.

Federal safety standards for the transportation of natural and other gas by pipeline are contained in Part 192, Title Code of Federal Regulations, a copy of which is enclosed. Subpart I of Part 192 sets forth the requirements for corrosion control. Those particular requirements were adopted as Amendment 192-4, issued on June 25, 1971, with an effective date of August 1, 1971.

As you will note in section 192.453, the Subpart I requirements are applicable to operators, and the term "operator" is defined in section 192.3 as a person who engages in the transportation of gas. This Department issues no regulations directed to consulting engineers as such. An operator is free to employ or otherwise utilize the services of a consulting engineer if he so chooses. The Department is not concerned with such arrangements, but will look to the operator for compliance with all applicable regulations.

You have also asked with regard to jurisdiction over service lines on private properties which have two or more service risers. Service line is presently defined in section 192.3 as a distribution line that transports gas to a customer meter set assembly from a common source of supply. Thus, any pipeline coming within the definition of service line is subject to the applicable regulations irrespective of whether it is on private property or has two or more service risers.

At the state level, insofar as intrastate gas pipeline facilities are concerned, a State agency may adopt standards that are in addition to, or more stringent than, the Federal safety standards. In Texas, the Texas Railroad Commission, Drawer 12967, Capitol Station, Austin, Texas 78711, has assumed responsibility for the safety regulation of intrastate gas pipeline facilities. You may, therefore, wish to contact that agency for any information it may have relevant to your inquiry.

If we may be of further assistance in this matter, please call on us.

Sincerely,
Joseph C. Caldwell
Director
Office of Pipeline Safety

Alan H. Smith Consulting Engineers, Inc.
8700 Stemmons Freeway, Suite 407
Dallas, Texas 75247

January 25, 1973

U. S. Government
Department of Transportation
Office of Pipeline Safety
201 Fannin St., Room 319
Houston, Texas 77002

Dear Sirs:

In a recent meeting of the Dallas/Ft. Worth chapter of the American Society of Plumbing Engineers we discussed the Consulting Engineer's roll in the problem of pipeline corrosion. It is my understanding that your office is now the governing body for all pipeline installations as well as most natural gas piping installations.

We were informed that your jurisdiction is over any natural gas service line on private property if this line has two or more service risers. We would like to know exactly what your department expects from our firm as well as other Engineers in the design and construction supervision of various projects. We would also like the date on which these actions and regulations were placed in effect and if retroactive, to what date.

Please send our office any available material and information you have regarding pipeline corrosion as it applies to Consulting Engineers. This matter has for some time been of concern to many Engineers and we are glad to see it clarified by your department at this time.

Thank you very much for your cooperation and assistance in this matter.

Yours very truly,
A. Roy Whitelock
Plumbing Engineer