

PI-00-0101

August 1, 2000

Mr. Charles D. Schmidt
President/CEO
Buffalo Gauge, Inc.
4252 Ridge Lea Road
Buffalo, NY 14226-1016

Dear Mr. Schmidt:

I am responding to your letter of June 8, 2000, regarding your company's Neupmatic Valve, a remote gas shutoff system. You requested comments on whether this valve system would qualify for use under 49 CFR 192.365, the federal regulation that governs the location of service-line valves.

Of particular interest is § 192.365(b), which requires each service line valve to have "a shut-off valve in a readily accessible location that, if feasible, is outside of the building." This regulation is intended to facilitate the control of gas flow to a building in an emergency. The literature you provided indicates that although part of the Neupmatic Valve system is designed to be installed inside a building, the valve system's manual control device is designed to be installed outside the building. Given this configuration, which enables the shut-off of gas from a location outside a building, we think the valve system could be used to meet § 192.365(b).

I hope you find this information useful. If we can be of further assistance, please phone me at (202) 366-4565.

Sincerely,

Richard D. Huriaux, P.E.
Manager, Regulations
Office of Pipeline Safety