

March 1975

Mr. Roy Terada  
Chief Engineer  
State of Hawaii  
Public Utilities Commission  
P. O. Box 541  
Honolulu, Hawaii 96809

Dear Mr. Terada:

This responds to your letter of February 26, 1975, asking whether the leak reported by Gasco, Inc. on Form DOT-F-7100.2 dated February 19, 1975, should have been telephonically reported under 49 CFR 191.5 (a) (2). This reporting requirement reads:

"(a) At the earliest practicable moment following discovery, each operator shall give notice in accordance with paragraph (b) of this section of any leak that ...

(2) Required the taking of any segment of transmission pipeline out of service."

As provided in Section 191.1, the leaks which must be reported under Part 191 are those unintended by the operator that require immediate or scheduled repair. Within that general guide, the criteria under Section 191.5 identify leaks that are significant enough to necessitate early notice so that this Office may promptly investigate the incident. To this end, when discovery of a leak on a transmission line causes the operator to immediately take a segment of the line out of service (i.e., by shutting down the segment) to make a repair, the leak is reportable under Section 191.5 (a) (2).

The synopsis which you enclosed of the incident in question, prepared by G. Fujita of Gasco, states that immediately following the incident, the damaged section was isolated by closing two 16-inch valves. The gas supply to a nearby town was maintained by increasing the pressure in an 8-inch line. Soon thereafter, repairs were made to the damaged section of line by installing new pipe.

Under these circumstances, where after discovery of the leak the line was immediately shut down for purposes of repair, the incident was reportable under Section 191.5 (a) (2).

Sincerely,

Joseph C. Caldwell  
Director

dal\191\5\75-03-00

Office of Pipeline Safety

February 26, 1975

Office of Pipeline Safety  
400 Sixth Street, S. W.  
Washington, D. C. 20590

Attention: Mr. Joseph C. Caldwell, Director

Gentlemen:

As required by Title 49, Part 191.15, we enclose Transmission Failure Report on form DOT F 7100.2 and a synopsis report by Gasco, Inc. of the 16" transmission line rupture January 24, 1975 in Honolulu, Hawaii.

When notified of the rupture, we informed Gasco, Inc. that by our interpretation of Part 191.5 (a) (2) this leak required notice by telephone.

Mr. George Fujita, Distribution Manager at Gasco, Inc., called on the priority list shown on your letter of June 1, 1973 and reported to Mr. Paul J. Cory. Mr. Cory received the report but informed Mr. Fujita he did not feel this was a leak requiring a telephone report.

We would appreciate an interpretation of Part 191.5 (a) (2) for future guidance. No early estimate of the costs of repair were made so the decision to report was based entirely on "the taking of a segment of transmission pipeline out of service."

Very truly yours,

Roy Terada  
Chief Engineer

Encl.

dal\191\5\75-03-00