

MEMORANDUM

SUBJECT: Leak Reporting August 22, 1978

FROM: Associate Director for
Pipeline Safety Regulation, DMT-30

TO: Associate Director for
Operations and Enforcement, DMT-10

We have been asked whether ?191.9 permits more than one reportable leak to be reported on a single Form DOT-F-7100.1. The question arises because some operators have used the Form to report what they call "multiple leaks."

Although ?191.9 requires that certain leaks (reportable leaks) be reported on the Form, the rule, itself, is unclear whether a single Form may be used to report more than one reportable leak. The answer to this question becomes evident, however, upon a careful reading of the Form. The questions that are asked can only be answered in an understandable manner by providing information about one reportable leak. Filling in the appropriate blanks on the Form with respect to more than one reportable leak would in most cases result in confusion. Thus, we believe that ?191.9 requires that each reportable leak be reported on a separate Form.

There are situations, however, where more than one actual leak should be considered as a single reportable leak under ?191.9. These situations may be the ones operators have reported as "multiple leaks." Since the term "leak" is not defined in Part 191, it must be construed according to its meaning in the industry. This meaning includes situations where many actual leaks in close proximity have resulted from the same cause. For example, a small area of general corrosion may contain several holes that release gas, but the entire area is viewed as a single leak. This meaning is consistent with the purpose of Part 191 which is to determine the types and causes of leaks. Thus, this type of "multiple leak" condition may be reported on one Form as one reportable leak.

Cesar DeLeon