

Mr. H. F. Cain
Measurement Superintendent
Piedmont Natural Gas Company, Inc.
P.O. Box 1968
Charlotte, North Carolina 28201

Dear Mr. Cain:

This is in response to your letter of October 25, 1972, in which you question whether the company practice with regard to cutting off service remains an acceptable procedure under the recently adopted amendment 192-8 to 40 CFR Part 192.

Under the amendment, Sections 192.379(d) and 192.727(d)(2) now provide for the inactivation of lines by use of a mechanical device or fitting installed in the service line or in the meter assembly to prevent the flow of gas. Your practice is to valve off the service cook, break the meter inlet connection, and insert a tin shut off seal in order to prevent unauthorized use of gas.

The use of a shut off seal or disc is a commonly used method to prevent the flow of gas, and the procedure you have described is one of the methods we had in mind in adopting this alternative method in the amendment.

Your interpretation of the regulations, which permits the use of the procedure as described, is correct.

Your interest in pipeline safety is appreciated.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety

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