Mr. George A. Rood, Director
Engineering Code Department
Northern Natural Gas Company
2223 Dodge Street
Omaha, NB 68102

Dear Mr. Rood:

This is in reply to you letter of December 2, 1974, requesting an interpretation to 49 CFR 192.165. You asked, "Do vessels previously qualified under the requirements of the API-ASME Code meet the requirements of Section 192.165(b)(3)?" Your particular interest was with liquid separators.

Your letter indicated that the API-ASME Code was developed years ago and when Section VIII of the ASMS Boiler and Pressure Vessel Code was revised from a 5:1 to a 4:1 safety factor, it became essentially consistent with the API-ASME Code. The API-ASME Code was then discontinued.

In general, the regulations in 49 CFR Part 192 allow the continued use of liquid separators installed prior to the effective date of the regulations even if they were not manufactured according to specifications incorporated by reference in the regulations. If the liquid separators are removed and reinstalled, they may be reused only if they can be verified to meet the requirements in the regulations for new liquid separators.

In particular, Section 192.165(b)(3) requires liquid separators to be manufactured in accordance with Section VIII of the ASME Boiler and Pressure Vessel Code (except for separators constructed of pipe and fittings without internal welding). The 1968 edition of the ASME Code is presently referenced in the regulations. The reuse of the liquid separators to which you refer is allowed it can be verified that at least the requirements of the 1968 edition of the ASME Code were met in their manufacture.

IF this cannot be verified, you may want to consider requesting a waiver from compliance with Section 192.165(b)(3). A waiver request must be fully justified, including showing why the section of the regulations is not appropriate, why the public interest would be served by the proposal, and the basis upon which the proposal would not be inconsistent with gas pipeline safety.

We trust that this has answered your particular question.

Sincerely,

Joseph C. Caldwell, Director

Director
Office of Pipeline Safety
Department of Transportation
Washington, D. C. 20590

Re: Interpretation of Section 192.165, Part 192 Title 49 of the Code of Federal Regulations

Dear Sir:

The requirements of Section 192.165(b)(3) are that compressor station liquid separators must be manufactured in accordance with Section VIII of the ASME Boiler and Pressure Vessel Code except for separators constructed of pipe and fittings.

Our question is: Do vessels previously qualified under the requirements of the API-ASME Code meet the requirements of Section 192.165(b)(3)?

It is our understanding that the API-ASME was developed years ago when the ASME Code utilized a 5:1 safety factor. Later, when Section VIII of the ASME Code was changed to require a 4"1 safety factor, it became essentially consistent with the API-ASME Code. The API-ASME was then deactivated as it no longer served any purpose.

We have numerous vessels qualified and stamped under the old API-ASME Code that have been operating satisfactorily for years in compressor stations and treating plants. As our facility requirements and needs change, we see an economic benefit in the reuse of these vessels as compressor station liquid separators without compromising safety.

Provided the reuse of these vessels is permissible under Section 192.165, we would propose a complete inspection by a qualified National Board inspector and a hydrotest to 1.5 times its maximum allowable working pressure to insure the original qualification and the existing safe condition.

In summary, we ask for your interpretation of Section 192.165 and the words "manufactured in accordance with ..." with respect to the application of API-ASME vessels. We suggest that the similarity of the now discontinued API-ASME Code with the requirements of the ASME Boiler

and Pressure Vessel Code, Section VIII, Division 1 (1968 edition) is sufficient to merit acceptability with equal safety.

We appreciate your consideration of this matter and stand ready to answer any questions you may have.

Sincerely,

George A. Rood, Director
Engineering Code Department

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