January 8, 1973

Mr. B. L. Keene
Manager, Gas Department
City Utilities of Springfield
P. O. Box 551
Springfield, Missouri 65801

Dear Mr. Keene:

this is in further response to your earlier inquires regarding interpretations of Sections 192.181(b), 192.199(g), and 192.203(b)(2), respectively.

Your questions and our answers are as follows:

Question: What minimum distance in feet is required between the inlet valve and the district regulator served through said valve?

Answer: Section 192.181(b) requires that the distance between the valve and the regulator station must be sufficient to permit operation of the valve during an emergency that might preclude access to the station. This requirement, as is true of each of the Part 192 safety regulations, is a performance requirement rather than a specification standard. Accordingly, it states the objective to be achieved and leaves the means to the person regulated. In this case, the minimum distance is not specified. The operator or designer of the system who has the expertise and is familiar with local conditions is in the best position to determine the minimum distance in a particular situation in order to comply with the regulation.

Question: Is the intent of §192.199(g) to require a physical separation of the district regulator and its overpressure protective device and, if so, what minimum distance in feet would satisfy this requirement when used basically with above ground installations?

Answer: The objective of §192.199(g) is to prevent any single incident from affecting the operation of both the overpressure protective device and the district regulator. A physical separation of both is one means of complying with the regulation. However, since this is a performance requirement, it does not specify any distance, not prohibit the use of any means of compliance, other than physical separation, which meets the regulation.

Question: Is a shutoff valve required in the downstream control or sensing line associated with a district regulator?

Answer: Yes. Section 192.203 is applicable to control systems. Since the downstream control or sensing line is an integral part of the control system, it is required to have a shutoff valve in accordance with §192.203(b)(2).

I trust that these answers provide you with the desired information. If you have any further questions, please advise.

Sincerely,

/signed/

Joseph C. Caldwell
Director
Office of Pipeline Safety

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