

November 7, 1972

Mr. Charles Kirklen
Corrosion Specialist
NACE Accreditation No. 21
931 Blue Lake Circle
Richardson, Texas 75080

Dear Mr. Kirklen:

This is in response to your letter of October 17, 1972, regarding the applicability of Subpart I, 49 CFR Part 192, to the natural gas system serving an apartment complex. As you describe the system, the owner of an apartment complex purchases gas from a public utility through one or more central meters located on the apartment property and distributes the gas by an underground piping system. Each building in the complex is then served by a riser, with attached regulator, from the underground system.

You ask whether steel underground pipes and steel risers from underground plastic pipes of such a system are subject to the corrosion control requirements of Part 192. If so, you further ask whether the owner is required to file an annual report.

Your description of the system does not disclose the disposition of the gas once it leaves the riser in each apartment building. If the gas is being distributed to individual apartment units for further consumption by persons other than the apartment complex owner, then the mains and service lines downstream of the master meter extending to the outlet side of each individual apartment (customer) meter (or if there is no meter, to a point where a customer meter would normally be) are considered a distribution system and the apartment owner an operator. In this situation, the distribution system is required to conform to the requirements of Part 192 including corrosion control. As part of the distribution system, the risers are subject to the corrosion control requirements to the extent indicated in Subpart I.

On the other hand, if the gas is being distributed only to a central heating or air conditioning unit inside each apartment building so that individual apartment units do not receive gas but are furnished heat or air conditioning, then the gas remains the property of the apartment complex owner. Such a system would normally not be a distribution system subject to the requirements of Part 192.

With reference to your other question, there are no annual reporting requirements in connection with Subpart I of Part 192. However, §191.11 requires that each operator of a distribution system submit an annual report. Therefore, if the owner or landlord is the operator of a

distribution system as explained above, he is required to submit an annual report in accordance with §191.11

I trust this answers your inquiry.

Sincerely,

/signed/

Joseph C. Caldwell
Director
Office of Pipeline Safety