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

Dear Sir:

192.201 states that pressure relieving or limiting station must have enough capacity and be set to operate to prevent the pressure from exceeding the maximum allowable operating pressure plus 10%.

We believe this close tolerance is impractical, almost impossible to obtain, and does not add to safety when the operating pressure is below 60 pounds.

To prevent unnecessary blowing the gas, a relief valve should be set at least 1 lb. and preferably 2 lbs. above the maximum operating pressure and then be allowed to build up 10% above that.

This would make a build up on a 10 lb. outlet station of about 3 lbs. or 30%. This would be practical for stations with capacities above 100,000 cu. ft. per hr.

For smaller stations, a spring or wright loaded relief valve greatly reduces the cost but to make this type of relief possible, a 50% allowable buildup would be desirable when the station pressure is 10 lbs. or less.

Full capacity of a relief valve is seldom required in actual practical so it is unlikely that the pressure would ever be more than 25% above the maximum operating pressure.

Since it is common for lines to be tested at 90 lbs. or 1½ times operating pressure, we do not believe a possible buildup to 1½ operating pressure in the 1-60 lb. range should be considered hazardous.

We would like to have this subject reviewed to see if overpressure tolerance could not be increased.

Your truly,

DB
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CENTRAL TELEPHONE & UTILITIES CORPORATION

W. E. Mickelson
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