

May 17, 1989

Mr. Williams E. Smeigh, Jr.,
Supervisor
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17120

Dear Mr. Smeigh:

Your May 9, 1989, letter requests guidance as to the meaning of "feasible" under 49 CFR 192.365(b), which reads:

- (b) **Outside valves.** Each service line must have a shut-off valve in a readily accessible location that, if feasible, is outside of the building.

Under Part 192, ordinary words, such as "feasible," that are not defined in §192.3 and do not have a special pipeline meaning are used as they are commonly understood by English speaking people in the U.S. In this sense, the word "feasible" means capable of being done or accomplished. Given this understanding, we believe a situation would seldom occur in which it is not feasible to install a service line shut-off valve outside a building in a readily accessible location. Certainly, none of the excuses put forth in your letter allows an operator to avoid outside installation under §192.365(b). Outside installations by the other operators under your jurisdiction in similar situations should readily support this position.

Sincerely,

Richard L. Beam
Director
Office of Pipeline Safety