

February 6, 1979

Mr. Donald E. McCoy
Transportation Safety Institute
6500 S. MacArthur Boulevard
Oklahoma City, Oklahoma 73125

Dear Mr. McCoy:

This is in response to your recent letter asking how much time is permitted under Part 192 to make system changes (in particular odorization) necessitated by class location changes.

While §192.613(a) requires an operator to make necessary changes, no time period for compliance is specified. However, a similar provision under §192.611(c) requires confirmation or revision of MAOP within 18 months after a change in class location. In view of this similarity, it appears that an 18-month compliance period is appropriate to apply under §192.613(a). In a previous interpretation, we have stated that the 18-month period begins to run upon completion of a structure which results in a new class location (see May 12, 1978 memo to DMT-213.)

Sincerely,

Cesar DeLeon
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau