

February 14, 1979

H.R. Garabrant, P.E.
Gas Utilities Safety Engineer
Utilities Division
Arizona Corporation Commission
2222 West Encanto Boulevard
Phoenix, Arizona 85009

Dear Mr. Garabrant:

This responds to your letter of October 20, 1978, regarding the applicability of sections 192.619(b) and 192.621(b).

Your letter notes that sections 192.619(b) and 192.621(b) are operation requirements which are not "grandfathered" and are continuing regulations that are applicable to all pipelines. Your letter mentions that both of these sections reference section 192.195 which states, in part, that "...must have pressure relieving or pressure limiting devices that meet the requirements of sections 192.199 and 192.201." As you noted, sections 192.195, 192.199, and 192.201 are design requirements which only apply to pipelines readied for service after March 12, 1971, or replaced, relocated, or otherwise changed after November 12, 1970. You inquire if you are correct in interpreting that all district regulators including those readied for service before March 21, 1971, must meet the requirements of section 192.621(b).

Because section 192.195 is incorporated by reference in sections 192.619(b) and 192.621(b), which are operating requirements, the provisions of section 192.195 apply to those pipelines readied for service before March 21, 1971, if section 192.619(b) or section 192.621(b) applies to the pipelines concerned.

We trust that this adequately responds to your inquiry.

Sincerely,

Cesar DeLeon
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau