

April 14, 1975

Mr. Roger Fletcher
Commonwealth of Kentucky
Public Service Commission
Capital Plaza Tower-24th Floor
Frankfort, Kentucky 40601

Dear Mr. Fletcher:

Thank you for your recent letter addressed to Mr. Jim Abbee of this Office, asking:

Would a utility company be considered to have complied with [49 CFR 192.625] if the natural odor of the gas is detectable at the concentration of one-fifth of the lower explosive limit?

The purpose of Section 192.625 is to ensure that a concentration of combustible gas in air equal to one fifth of the lower explosive limit of the mixture is detectable by the sense of smell. To accomplish this objective, paragraph (a) of Section 192.625 requires that combustible gases be "odorized" in accordance with that Section.

If, however, a combustible gas is itself a natural odorant and can be smelled at the requisite concentration of gas in air, the requirement that the gas be odorized would not apply. At the same time, the other requirements in paragraphs (c)-(f) of Section 192.625, applicable to the odorant in combustible gases, must be met.

We trust this satisfactorily answers your inquiry.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety