

November 30, 1970

Mr. J.J. Kocian
Manager of Pipelines
Union Carbide Corporation
1200 Travis, Suite 912
Houston, Texas 77002

Dear Mr. Kocian:

This is in reply to your letter of November 5, 1970, regarding applicability of 49 CFR, Part 192 to pipelines carrying ethylene.

It is our interpretation based on the information provided in your letter that the pipelines concerned are governed by the liquid line regulation. 49 CFR, Part 195, a copy of which is enclosed for your information. There are no requirements for odorization in this regulation.

If, after you consider the applicable provisions of 49 CFR, Part 195, you have further questions do not hesitate to ask.

Sincerely,

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety

Enclosure

Therefore, we suggest that you furnish all available information as to the transportation procedures used before _____ was issued and the precise nature and magnitude of the problem.

With regard to your letter on the qualification of steel pipe presently in inventory, our recent amendment to Section 192.55 and Appendix B should have alleviated much, if not all of the problem. If you still find that you have a large inventory that does not qualify under a listed specification or Section 192.55(d), you may wish to petition for a waiver. Should you elect to follow this course of action, I suggest that your petition contain the following information:

1. The magnitude of the problem in terms of quantity of pipe and its value.
2. The reasons why qualification of the pipe under Section 192.55 (a) (2) is not appropriate.
3. The basis upon which the waiver could be found not inconsistent with the pipeline safety.
4. A indication as to whether other companies might also be adversely affected (id the problem is widespread, a amendment might be more appropriate).
5. Suggested language for an amendment that would alleviate the problem while assuring an equivalent level of safety.

If we can be of further assistance, please do not hesitate to ask.

Sincerely,

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety