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Office of Pipeline Safety

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<http://ops.dps.mn.gov>

MNOPS Alert Notice – 02-2016

Interpretation of §192.739 –

Pressure Limiting and Regulating Stations: Inspection and Testing.

Nov. 17, 2016

Purpose

This Minnesota Office of Pipeline Safety (MNOPS) Alert Notice notifies gas pipeline operators about an interpretation issued to MNOPS by the Pipeline and Hazardous Materials Safety Administration (PHMSA). The interpretation relates to the inspection and testing of pressure limiting and regulating stations.

Applicable Code

49 CFR §192.739 — Pressure limiting and regulating stations: Inspection and testing.

Scope

This Alert Notice applies to all Minnesota intrastate pipeline operators subject to 49 CFR Part 192 with pressure limiting and regulating stations.

MNOPS Question

Does §192.739 require a test to physically operate ("pop") the relief device?

PHMSA Interpretation

Yes, §192.739 requires a test to physically operate the relief device. Section 192.739 requires inspection and testing of pressure limiting stations, relief devices (except rupture discs), and pressure regulating stations at intervals not exceeding 15 months, but at least once each calendar year. These devices must be inspected and tested to comply with §192.739 using any practicable method that will demonstrate the presence or absence of the listed qualities.

Physical operation and activation of a relief device are part of the inspection and testing. Tests must operationally activate the relief device, and demonstrate pressure control or relief at the correct pressure consistent with the pressure limits in order to comply with §192.739. In addition, specific procedures should be documented in the operator's operating and maintenance plan prescribed by §192.605.

Requirements

Natural gas transmission and distribution pipeline companies subject to 49 CFR Part 192 are required to ensure compliance with the requirements of §192.739. As noted in the referenced interpretation correspondence, operators shall ensure that procedures, records, and training meet the inspection and testing requirements of §192.739. This maintenance function shall include physically operating the actual relief device without regard to pilot configurations. The MNOPS 2017 inspection plan will bring continued focus to this regulatory requirement.

Please contact our office if you have any questions regarding this alert notice.

Enclosures: PHMSA Pipeline Interpretation 16-0009
MNOPS Request for Interpretation: 192.739



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Avenue SE
Washington DC 20590

OCT 26 2016

Mr. Jonathan C. Wolfgram
Chief Engineer
Minnesota Department of Public Safety
445 Minnesota Street, Suite 147
Saint Paul, MN 55101-4145

Dear Mr. Wolfgram:

In a July 25, 2016, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA), you requested an interpretation of 49 CFR Part 192. You specifically requested an interpretation of § 192.739 for the regulatory requirements of inspection and testing of pressure limiting and regulating stations. You asked whether § 192.739 requires a test to physically operate ("pop") the relief device.

Yes, § 192.739 requires a test to physically operate the relief device. Section 192.739 requires inspection and testing of pressure limiting stations, relief devices (except rupture discs), and pressure regulating stations at intervals not exceeding 15 months, but at least once each calendar year. These devices must be inspected and tested to comply with § 192.739 using any practicable method that will demonstrate the presence or absence of the listed qualities. Physical operation and activation of a relief device are part of the inspection and testing. Tests must operationally activate the relief device, and demonstrate pressure control or relief at the correct pressure consistent with the pressure limits in order to comply with § 192.739. In addition, specific procedures should be documented in the operator's operating and maintenance plan prescribed by § 192.605. If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely,

Cameron H. Satterthwaite
Acting Director, Office of Standards
and Rulemaking



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July 25, 2016

Mr. John Gale
Director of the Office of Standards & Rulemaking
Office of Pipeline Safety (PHP-30)
PHMSA, U.S. Department of Transportation
1200 New Jersey Ave. S.E.
Washington, D.C. 20590-0001

Mr. Gale,

I am contacting you in regards to an interpretation of the regulatory requirements for inspection and testing of pressure limiting and regulating stations noted in Title 49 Code of Federal Regulations §192.739. The regulatory requirements include inspections and tests at intervals not exceeding 15 months, but at least once each calendar year to determine pressure limiting devices (relief devices) are:

1. In good mechanical condition;
2. Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;
3. Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of §192.201(a); and
4. Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.

My question for you is, in addition to validating the set-point of the relief device, do annual inspections and testing involve a method to physically test the working of the device? This would be accomplished either by using natural gas or nitrogen to physically “pop” the device or by testing to ensure the pilot regulator and / or relief device components meet the requirements of §192.739.

I appreciate any clarification that you can provide in this manner.

Sincerely,

Jonathan C. Wolfgram, P.E.
Chief Engineer