

October 15, 1976

**DEPARTMENT OF TRANSPORTATION**  
**Materials Transportation Bureau**

**[Docket No. OPSO-35]**  
**TRANSPORTATION OF LIQUIDS BY**  
**PIPELINE**

**Operating Pressure for**  
**Platform Piping; Interpretation**

By letter dated September 14, 1976, the American Petroleum Institute (API) petitioned for reconsideration of the amendment to 49 CFR 195.106 published on August 12, 1976, in Docket No. OPSO-35 (41 FR 34035).

The amendment to ?195.106 provides that a design factor of 0.60 (rather than 0.72 as now required) must be used in the design formula for steel pipelines, including risers, on offshore platforms and on platforms in inland navigable waters. The amendment becomes effective August 1, 1977, and in accordance with ?195.100, applies to pipelines constructed, replaced, relocated, or otherwise changed on that date and thereafter.

As a basis for the petition, API refers to ?195.406(a)(1) which requires that the operating pressure of a pipeline may not exceed the internal design pressure of pipe determined in accordance with ?195.106. API points out that ?195.406 applies retroactively to all existing pipelines, including those installed using the existing design factor of 0.72. As a result, API states that ?195.406(a)(1) could be interpreted to require a reduction in operating pressure for pipelines not designed using the new factor of 0.60. Since the rulemaking in Docket OPSO-35 with respect to ?195.106 was not intended to require a reduction in operating pressures for existing pipelines. API suggests that the matter be clarified.

The Materials Transportation Bureau has reviewed the problem raised by API and interprets ?195.406(a)(1) as prohibiting a carrier from operating a pipeline at a pressure higher than the "internal design pressure" which ?195.106 requires to be determined during the pipeline's design phase.

Thus, ?195.406(a)(1) only applies to pipelines to which ?195.106 applies (i.e., pipelines which are constructed, replaced, relocated, or otherwise changed on and after April 1, 1970, the effective date of ?195.106). Likewise, the limit on operating pressure under ?195.406(a)(1) as a result of the new design factor of 0.60 in ?195.106 only applies to pipelines which are constructed, replaced, relocated, or otherwise changed on and after August 1, 1977. Where ?195.406(a)(1) is inapplicable, one of the other standards in ?195.406(a) would govern the maximum allowable operating pressure.

Therefore, the petition for reconsideration is hereby granted to the extent that the above interpretation clarifies the reference to ?195.106 in ?195.406(a)(1).

(Sec. 6, Pub. L. 89-670, 80 Stat. 937, (49 U.S.C. 1655; 18 U.S.C. 831-835); 40 FR 43901, 49 CFR 1.53)

Issued in Washington, D.C. on October 15, 1976.

James T. Curtis, Jr.,  
Director,  
Materials Transportation Bureau.