

February 16, 1994

Mr. Lance Loesberg  
M. E. B. Technology  
1701 W. Northwest Highway  
Grapevine, TX 76501

Dear Mr. Loesberg:

This responds to your inquiry to George W. Tenley, Jr. regarding the application of M. E. B. Technology Gas Plant Automation Product Delivery System with respect to Federal hazardous liquid regulations.

In my telephone conversation with you on January 31, 1994, you indicated that this delivery system is used in oil and gas plants and is designed to facilitate the loading of tank trucks with liquid products.

The Federal hazardous liquid pipeline regulations (49 CFR Part 195) are design, construction, and operation standards for the pipeline transportation of hazardous liquids. The Federal hazardous liquid regulations do not cover a loading arm system to load tank trucks in an oil and gas plant. Therefore, the M. E. B. product delivery system is not covered by the Part 195 regulations.

Sincerely,

Cesar De Leon  
Director, Regulatory Programs  
Office of Pipeline Safety