

PI-99-0101

U.S. Department of Transportation  
Research and  
Special Programs Administration  
400 Seventh Street, S.W. Washington, D.C. 20590

MAY - 3 199

Mr. Brian Friedman  
Environmental Engineer  
Health, Safety, Environmental Quality & Regulatory Affairs Baker Petrolite Corporation  
12645 West Airport Blvd,  
Sugar Land, TX 77478  
Dear Mr. Friedman:

This responds to your inquiry about the hazardous liquid pipeline safety standards in 49 CFR Part 195. You asked if Part 195 applies to containers of drag reducing additives that are temporarily stored at hazardous liquid pipeline sites and then used to inject additives into hazardous liquid pipelines to reduce line friction and improve flow rate.

Except for certain pipeline transportation, Part 195 applies to pipeline facilities and the transportation of hazardous liquids associated with those facilities (§ 195.1(a)). The term "pipeline facility" means new and existing pipe, rights-of-way and any equipment, facility, or building used in the transportation of hazardous liquids or carbon dioxide (§ 195.2).

In our view, because the containers in question facilitate the pipeline transportation of hazardous liquids, they are "pipeline facilities" under the above definition, whether connected to a pipeline or in temporary storage at a pipeline site awaiting connection to a pipeline. When such containers are used in pipeline transportation subject to Part 195, they are subject to

Part 195 standards governing pipeline facilities.

If you need further assistance, please contact Mr. Buck Furrow at (202) 366-4559.

Sincerely,  
Richard B. Felder  
Associate Administrator for Pipeline Safety

Baker Hughes  
12645 West Airport Blvd.  
Sugar Land, TX 77478 USA

April 7, 1999

Mr. Buck Furrow  
Office of Pipeline Safety  
US Department of Transportation  
400 7<sup>th</sup> Street SW  
Washington, DC 20590

Subject: Definition of Pipeline Facility 49 CFR 195.2

Dear Mr. Furrow:

Baker Petrolite Corporation (BPC) requests clarification of the above definition as it applies to the application of treatment chemicals to pipelines. As per 49 CFR 195.2, a **pipeline facility** means *new and existing pipe, rights-of-way and any equipment, facility, or building used in the transportation of hazardous liquids or carbon dioxide*. **Pipeline or pipeline system** means *all parts of a pipeline facility through which a hazardous liquid or carbon dioxide moves in transportation, including, but not limited to, line pipe, valves, and other appurtenances connected to line pipe, pumping units, fabricated assemblies associated with pumping units, metering and delivery stations and fabricated assemblies therein, and breakout tanks*.

Baker Petrolite Corporation provides Drag Reducing Additives (DRA) to crude oil and liquefied petroleum gas (LPG) transporters to reduce pumping costs and maintain product quality. The DRA, injected into the pipeline to reduce fluid friction, thus improving the flow of crude oil and refined fuels. The material is a vital component of the pipeline fluid and is formulated to meet Department of Transportation specifications. The DRA chemicals are applied directly and continuously into the pipeline. The chemical is shipped to the site in DOT- approved Iso-containers. These same containers are used to apply the chemical to the pipeline. When empty, the Iso-container is returned to the point or origin for refilling.

It is clear that, while in transportation to the site, the C-containers are regulated by DOT. BPC would like concurrence that while connected to the pipeline or temporarily stored while awaiting connection to the pipeline the containers are also DOT-regulated in accordance to 49 CFR 195.1. As you are aware, this regulation applies to pipeline facilities and the transportation of hazardous liquids associated with those facilities in or affecting interstate commerce.

BPC is requesting concurrence to better define the impact of the Risk Management Program of 40 CFR 68 as administered by the US Environmental Protection Agency on our operations within this portion of our business.

We would appreciate your concurrence regarding the above discussion. If you have any questions or need additional information, please contact me at (281) 275-7477 or Brian J. Keller, P.E., at (281) 275-7434.

Sincerely,  
Brian Friedman  
Baker Petrolite  
Environmental Engineer