

Int 195.1 Baker Petrolite Corporation

May 3 1999

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