

TR Number	24-35
Primary Reference	192.634
Secondary Reference	192.745, 192.179
Purpose	Provide guidance on what is considered alternative equivalent technology (AET) including guidance on whether curb valves are AETs or not.
Origin/Rationale	When TR22-35 was approved, Christine Maynard approved w/ Comment noting that we should consider whether the use of a check valve used as an AET requires notification to PHMSA. Discussion occurred relating to whether a check valve is even an AET. It was determined that it was out of scope of the original TR and should be considered as its own TR. The TR should consider not only whether a check valve requires notification but provide additional guidance on what qualifies as an AET.
Assigned to	O&M/OQ Task Group

Note: Revisions are shown in **yellow highlight** and **red font**.

Section 192.179

4.2 PHMSA notifications.

- (a) Manual valves can be considered as an alternative equivalent technology. If they are located at a continuously manned compressor station, notification to PHMSA is not required. Other locations are subject to notification. See §192.179(g).
- (b) Check valves and other technologies can be considered as alternative equivalent technology. Check valves used in this manner are subject to the PHMSA pre-installation notification.**
- ~~(b-c)~~ Requests for compliance deadline extensions may be submitted to PHMSA for each new pipeline on a case-by-case basis.
- ~~(c-d)~~ Extension requests document the economic, technical, operational, or other reasons why compliance deadline cannot be met, as well as safety.
- ~~(d-e)~~ If using alternative equivalent technology, see guide material under §192.18.
