

PI-80-0105

November 14, 1980

Mr. Alan Bieber  
Montview Engineering Co.  
78 Town Woods Road  
Lyme, Conn. 06371

Dear Mr. Bieber:

Thank you for your letter of September 5, 1980, regarding the use of indirect techniques, such as side-scanning sonar, for locating underwater pipelines.

Underwater pipeline inspections are required by 49 CFR 195.412(b) to determine the condition of pipelines crossing navigable waterways. The purpose of the inspections is to check for conditions that could endanger safe pipeline operations, such as washouts above or below the pipeline. Although identifying a pipeline's alignment or location with respect to the river bottom, which the indirect techniques you have described seem capable of doing under favorable conditions, is a condition to examine under Section 195.412(b), it is not the only condition to consider. The inspection method must also be capable of detecting other problems, such as below-grade washouts and physical damage to the pipeline or coating. Thus, while the indirect techniques would be of value in making the required inspections, they are not sufficient to furnish all the information needed to comply with Section 195.412(b). For full compliance, they would have to be complemented by direct observational techniques.

Sincerely,

SIGNED

Melvin A. Judah

Acting Director for

Pipeline Safety Regulation

Materials Transportation Bureau

Montview Engineering Co.  
78 Town Woods Road  
Lyme, Conn 06371

September 5, 1980

Mr. Melvin A. Judah  
Acting Associate Director  
Office of Pipeline Safety Regulations  
Materials Transportation Bureau  
Department of Transportation  
400 7th St., S.W.  
Washington, D.C. 20590

Dear Mr. Judah:

Several weeks ago I discussed with Mr. Heverly the techniques which we use for locating and determining the position and cover for pipeline river crossings, both for initial acceptance and periodic inspection. Many of our clients feel that the present method of using a diver to "walk" the line is not effective; having done black-water diving in the past I tend to agree. The diver can't see the pipe and must probe for it; and it is very difficult, particularly in swift currents, to accurately plot the diver's position.

Our clients have asked that we get a determination from you permitting the use of our methods for these inspections. After describing the procedures to Mr. Heverly, he felt there should be no problem in this regard, but suggested I formally request this determination from you.

I have enclosed several copies of a technical brochure describing our methods for your information and to aid you in making this determination. I would appreciate hearing from you at your earliest convenience.

Very truly yours,  
Alan Bieber