



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Avenue SE
Washington DC 20590

OCT 15 2019

Mr. Jamey Hilleary
Elecsys Corporation
846 N Mart-Way Ct.
Olathe, KS 66061

Dear Mr. Hilleary:

In a July 9, 2019, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA), you requested an interpretation of 49 CFR Parts 192 and 195. Specifically, you requested an interpretation on remote monitoring systems to satisfy the cathodic protection monitoring requirements under Subpart I of Part 192 and Subpart H of Part 195.

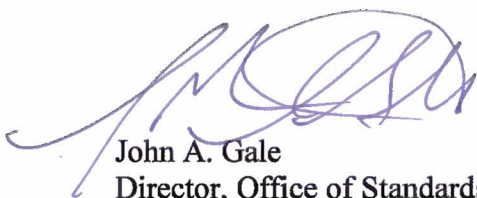
You stated Elecsys produces and sells remote monitoring systems for test point station, critical bond and rectifier monitoring requirements that provide data on voltage and current measurements related to cathodic protection of pipelines. You stated the remote monitoring systems can provide cathodic protection monitoring consistently by transmitting measurement data in real-time to operators by means of a secure interface to web-based applications that enable identification of any protection system failure without delay.

You stated that there is some uncertainty about whether remote monitoring systems do satisfy the Parts 192 and 195 cathodic protection monitoring requirements. Therefore, you asked clarification and interpretive assistance with regards to remote monitoring systems and the cathodic protection monitoring requirements under §§ 192.465 et seq. and 195.563 et seq.

The purpose of both Subpart I of Part 192 and Subpart H of Part 195 is to prescribe minimum requirements for protecting steel pipelines against corrosion. The rule does not prescribe a means of inspection. Therefore, an operator must have procedures that define the technology to be utilized and must conduct its inspections utilizing technology or means it chooses if the testing method used accurately monitors the cathodic protection levels and provides information on the protection criteria that it is monitoring is at least equivalent to the Subpart I of Part 192 or Subpart H of Part 195 corrosion protection level requirements.

If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely,



John A. Gale
Director, Office of Standards
and Rulemaking



A LINDSAY COMPANY

July 9, 2019

Mr. John Gale
Director of Standards and Rulemaking Division
Office of Pipeline Safety (PHP-30)
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Ave. S.E.
Washington, D.C. 20590-0001

Dear Mr. Gale:

I am writing to request from the Pipeline and Hazardous Materials Safety Administration (PHMSA) informal guidance and interpretive assistance, consistent with 49 CFR 190.11, regarding the permissibility of using remote monitoring systems to satisfy the cathodic protection monitoring requirements under 49 CFR 192 and 49 CFR 195.

Elecsys produces and sells remote monitoring systems for test point station, critical bond and rectifier monitoring requirements. These systems provide data on voltage and current measurements related to cathodic protection of pipelines. Our remote monitoring systems can not only provide assured cathodic protection monitoring, they do so consistently, transmitting measurement data in real-time to operators via a secure interface to web-based applications, enabling identification of any protection system failure without delay.

While PHMSA's regulations and guidance on cathodic protection monitoring under CFR 192 and 195 are performance-based, and not specific to certain technologies (as outlined in Interpretation PI-ZZ-080 and PI-81-011), there is some uncertainty about whether remote monitoring systems do satisfy these requirements. Customers and contractors periodically ask us for citations in the CFR that refer to or are inclusive of remote monitoring to assure them that these systems are acceptable because, in general, they are not explicitly addressed in the CFR or guidance. Portions of the CFR regulations and guidance may lead to confusion as to whether remote monitoring systems are suitable. Specifically, there are references to specific timeframes and length intervals for pipeline CP testing referenced in Part 192.465 and Part 195.571-575 that can imply a need for manual inspections. Further, certain terms used such as "tested", "electrically tested", "electrically checked", "inspected/inspection" and "electrical survey", are unclear if they are encompassing of remote monitoring.

For these reasons, Elecsys would appreciate PHMSA's clarification and interpretive assistance with regards to remote monitoring systems and the cathodic protection monitoring requirements under 49 CFR 192.465 et seq. and 49 CFR 195.563 et seq.

Should you have any questions about this request, or wish to discuss further, please do not hesitate to contact:

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Olathe, KS 66061
(913) 742-4401 (office)
(913) 515-3841 (cell)
jamey.hilleary@elecsyscorp.com

Thank you for your consideration of this request.

Sincerely,

Mike Morgan
President
Elecsys Corporation