Mr. Ray M. Kightlinger, Chief
Gas Department-Utilities Division
South Carolina Public Service Commission
P. O. Drawer 11649
Columbia, South Carolina 29211

Dear Mr. Kightlinger:

Thank you for your letter of September 17, 1971, requesting clarification of 49 CFR Section 192.455 relating to external corrosion control on buried or submerged pipelines installed after July 31, 1971. You posed two questions:

> "1.   Paragraph 192.455(a)(1) indicates these pipelines must have an external protective coating meeting the requirements of Paragraph 192.461. Does this mean all pipe must be externally coated or merely that if it is externally coated it must meet these requirements? (We assume intent to be that if the pipe is coated it must meet the requirements but does not exclude the use of bare pipe.)"

> "2.   We interpret Paragraph 192.455(d) to mean that all externally coated pipe installed after January 31, 1971, must be cathodically protected in accordance with Paragraph 192.455(a)(2), thereby indicating that Subparagraphs(b) and (c) of Paragraph 192.455 relate to bare pipe only. There are parties who disagree with our interpretations and we would like your comments."

The answer to these questions is that Section 192.455(a) requires all new pipe to be externally coated and cathodically protected in accordance with Section 192.461 and 192.463, unless that pipeline falls within the exceptions provided in Section 192.455(b) and (c). In the event the pipeline falls within the exceptions of paragraphs (b) and (c), there is no requirement for coating or cathodically protecting the pipe. However, if the operator should voluntarily elect to externally coat the pipe, the external protective coating must comply with Section 192.461, and under Section 192.455(d), the pipeline must be cathodically protected as well.

We trust that this interpretation clarifies these sections for you. Should you have additional questions please contact us.

Sincerely,
/signed/
Joseph C Caldwell
Acting Director
Office of Pipeline Safety