

September 20, 1976

Ms. Victoria Bandi
Union Real Estate Company
428 Forbes Avenue
Pittsburgh, Pennsylvania 15219

Dear Ms. Bandi:

This is in reply to the questions posed in your letter of August 31, 1976.

Question 1: Is an underground gas line from the curb to an existing apartment building required to be tested by a cathodic engineer?

Answer: Presuming that the gas line is used in the distribution of gas subject to the jurisdiction of the Federal gas pipeline safety standards in 49 CFR Part 192, it must be tested in accordance with Section 192.465. Also, if the line was installed before August 1, 1971, Section 192.457(b) requires that the line be electrically surveyed for active corrosion. Section 192.453 requires that the survey and tests be performed or directed by a person qualified by experience or training in corrosion control methods. The term "cathodic engineer" is not used in the Federal standards.

Question 2: If so, whose responsibility would it be to make such test; the supplying gas company or the owner of the apartment building?

Answer: The "operator" of the line as defined in Section 192.3 would be responsible for making the test. Since your letter does not contain information about the disposition of the gas transported in the pipeline, who owns the pipeline, and the location of all meters involved, we are unable to tell which person is the "operator."

Question 3: If such test is required, when is such test to be made?

Answer: The various time requirements as appropriate are set out in the applicable safety standards.

We have enclosed a copy of the Natural Gas Pipeline Safety Act of 1968 and the Federal standards.

Sincerely,

\signed\

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

UNION REAL ESTATE CO.

August 31, 1976

Director
Office of Pipeline Safety
Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

Good Morning,

I would very much appreciate receiving a reply to the following questions as well as a copy of the Act and the Sections pertaining thereto:

1. Is an underground gas line from the curb to an existing apartment building required to be tested by a cathodic engineer?
2. If so, whose responsibility would it be to make such a test; the supplying gas company or the owner of the apartment building?
3. If such test is required, when is such test to be made?

Very truly yours,

UNION REAL ESTATE COMPANY

\signed\
Victoria Bandi

September 18, 1976

Mr. Cesar DeLeon
Acting Director,
Office of Pipeline Safety Operations,
Department of Transportation
Materials Transportation Bureau
Washington, D.C. 20590

Dear Mr. DeLeon:

We have your kind letter of September 14, 1976 and can appreciate the reasons for not granting a waiver at this time as requested by this company.

While it is no excuse, frankly we did not know of the enactment of the Pipeline Safety Act for Gas. As soon as we learned of it, we called almost every governmental office that could have been involved and no one seemed to know anything about this act. When we called the Gas Company that serves our Trailer Park, we were also told that it knew nothing of this act.

However, at a later date it told us that we should contact a Mr. Jack C. Overly, Chief Western Region, Office of Pipeline Safety Operations at Burlingame, California. This we did at once.

He was most obliging and gave us the names of a few companies that could do the required survey and work and complete the prescribed forms. Since July 19, 1976 we were promised by a Mr. James of Pacific Corrosion research Inc that the required work and form work would be done at once. This company is at 11934 South Hawthorne Boulevard, Hawthorne, California 90250.

Numerous telephone calls to this company and Mr. James at 679-5842 brought no results but only promises to do the work. Now we have engaged a licensed and capable (we think) plumbing firm known as Century Plumbing (I believe that is the name) and a Mr. Dennis Bailey in charge has examined our trailer park and made (he said) five calls to your offices to proceed. We are sure he will do the required work soon.

We want to comply fully at once. We are doing all we can. If you have someone who can do the work sooner and forthwith, let us know. Mr. Bailey promises to get it done now and he is buying certain meters for the work.

JT

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We will keep to touch. As a former (sometime) governmental agency associate I know what it is to respond to all requirements.

Sincerely yours,
\signed\