

PI-79-0104

November 15, 1979

Mr. Ronald T. Powell
R.D. #1, Box 69-A
Bolivar, PA 15923

Dear Mr. Powell:

Your letter of August 30, 1979, asks five specific questions concerning the requirements for monitoring external corrosion control of gas pipelines under 49 CFR 192.465. Your questions and the MTB responses are as follows:

Question 1: Section 192.465 (a) – What does the DOT mean by survey of a minimum of 10% each year for short service lines and mains, and is this required to be done? If so, does this mean an electrical pipe to soil survey?

MTB Response: Section 192.465(a) requires all pipelines under cathodic protection to be tested at least once each calendar year to determine compliance with §192.463. An exception is provided for service lines and short sections of protected mains 100 feet or less in length, permitting these to be tested on a sampling basis. The sampling of these short sections must be done in a manner that at least 10% of the total number of such short piping segments in the pipeline system are tested each calendar year. Failure to conduct these tests in accordance with the required schedule is a violation of this section. The tests required must determine whether the cathodic protection requirements of §192.463 are being met. Section 192.463 states that the applicable criteria for such tests are contained in Appendix D of Part 192. In a telephone conversation with a member of the MTB staff, it was determined that the question assumes steel pipelines. Referring to Appendix D, it is clear that all of the tests mentioned for use on steel pipelines are electrical tests.

Question 2: Section 192.465(c)-Concerning two month bonds, I have been led to believe that the two month interval only has to be adhered to where a foreign structure would jeopardize our lines. My question, what about insulated flanges, valves, or any interference from our own crossings on rectified lines requiring a bond with current flow? Should this not also be included on a two month interval read since it would jeopardize our own structures? What is meant by other interference bonds that are checked at least once each calendar year but not exceeding 15 months?

MTB Response: Section 192.465(c) sets requirements for monitoring the effectiveness of equipment installed to prevent damage due to stray currents. Section 192.473(a) requires each operator to minimize the effects of stray currents on its pipeline and (b) to minimize the effects of stray currents from its cathodic protection system on existing adjacent underground metallic structures. No mention is made of ownership of these structures. Thus, if stray currents from a pipeline cathodic protection system is causing damage to another underground metallic pipeline system (owned by the same operator or others), the operator must minimize the detrimental effects of such currents.

“Other interference bonds” as referred to in §192.465(c) are those bonds whose failure would not jeopardize structure protection.

Question 3: We have several hundred gas meters on rectified transmission pipelines. In many cases, the rectifiers are damaging the service lines of consumers. Who is obligated to monitor and/or correct any corrosive situations cause by rectifier interference? Most of these service lines are owned by the consumer who has very little knowledge of what is going on.

MTB Response: We assume that the lines involved are located downstream from the meters you mentioned and that

these meters are customer meters. In this case, under the definition of “service line” in §192.3, you would be responsible for the lines if you own them. Customer owned lines lying downstream from the meters are outside the scope of Part 192, and you would not be responsible under the regulations to protect them against corrosion. However, §192.473(b) requires both impressed current and galvanic anode cathodic protection systems to be designed and installed so as to minimize any adverse effects on existing adjacent underground metallic structures. Where an adverse effect is determined to exist on an adjacent underground structure, §192.473(b) would require corrective action. In addition, you may have some other legal responsibility for the damage done by your rectifiers.

Question 4: What time frame does a company have to start the above?

MTB Response: Compliance with a given requirement is mandatory on and after the effective date. Section 192.465 became effective on August 1, 1971, and §192.473 on July 31, 1973. Regarding question 3, service lines subject to Part 192 installed after July 31, 1971, must have had a cathodic protection system in place within 1 year after the line was installed (§192.455). Under §192.457, other service lines were required to be electrically surveyed for areas of active corrosion and cathodically protected in those areas by August 1, 1976.

Question 5: What penalties might be imposed upon a company for violation of DOT requirements described above?

MTB Response: The Natural Gas Pipeline Safety Act of 1968 (49 U.S.C.1671 et seq.) permits MTB to impose civil penalties of up to \$1,000 per day per violation, except that the maximum civil penalty shall not exceed \$200,000 for any related series of violation.

Thank you for your interest in pipeline safety.

Sincerely,
Cesar DeLeon
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

Mr. Ronald T. Powell
R.D. #1, Box 69-A
Bolivar, Pa. 15923

August 30, 1979

Mr. Caesar D. E. Leon DMT-30
Associate Director for Office of Pipe Line Safety
Material Transfer, Dept. of Transportation
Washington, D. C. 20590

Dear Sir:

I recently talked with Mr. Paul Croy of your department concerning some interpretations of the Federal requirements pertaining to the "Natural Gas Pipe Line Industry". I am requesting a written interpretation of parts of D. O. T. requirements for corrosion control as follows from 192.465, Federal Register, Vol. 36, No. 126:

1. 192.465 (a) - What does the D. O. T. mean by survey of a minimum of 10% each year for short service lines and mains, and is this required to be done. If so, does this mean an electrical pipe to soil survey?
2. 192-465 (c) - Concerning two month bonds, I have been led to believe that the two month interval only has to be adhered to where a foreign structure would jeopardize our lines. My question, what about insulated flanges, valves, or any interference from our own crossings on rectified lines requiring a bond with current flow. Should this not also be included on a two month interval read since it would jeopardize our own structures. What is meant by other interference bonds that are checked at least once each calendar year but not exceeding 15 months.
3. I am not sure to what sections this question would refer to. - We have several hundred gas meters on rectified transmission pipe lines. In many cases the rectifiers are damaging the service lines of consumers. Who is obligated to monitor and/or correct any corrosive situations caused by rectifier interference. Most of these service lines are owned by the consumer who has very little knowledge of what is going on.

What time frame does a company have to start the above?

What penalties might be imposed upon a company for violation of D.O.T. requirements described above?

If necessary, would it be possible to have a representative from D. O. T. come to Pittsburgh to explain this to a company?

Would you please send an up-to-date copy of "Subpart I - Requirements for Corrosion Control, Federal Register Vol. 36, No. 126" as my copy is dated 6/30/71.

Thanking you in advance for your prompt reply.

Very truly yours,
Ronald T. Powell