Inspection Guidelines for Section 192.465(d):

(d) Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.

A violation of Section 192.462(d) exists if:

Prompt remedial action is not taken to correct a deficiency indicated by monitoring.

Inspection guidelines for Section 192.465(d)

The definition of "prompt" will vary with the circumstances. Enforcement should be sought only when the investigator is convinced that corrective action was unreasonably delayed. Investigator must state why he determined the delay to be unreasonable.

The operator should be required to have procedures (per 192.453) for responding to deficiencies found by the required monitoring. Those procedures should include as a minimum:

1. A time frame for evaluating data and determining a course of action.

2. A time frame for any new installation to be operational and Cathodic Protection to be in the adequate range.

These time frames should give consideration to the population density and environmental concerns of the area that could potentially be affected by released product. They may also consider climatic conditions, availability of material, work loads, and an estimate of a relative rate of detrimental corrosion. As a rule of thumb, the OPS would expect that, under normal conditions, the operator should have the evaluations and decisions made and action started within a few months, (proportionally less where required monitoring is less than a year or where deficiencies could result in an immediate hazard to the public), and correction completed by the time of the next scheduled monitoring. If the operator has no procedure for promptly responding and deficiencies exist, it is a violation of 192.465(d). If you can demonstrate that the operator's established time frame for action is inadequate, you may cite him for a violation or proceed with a notice of amendment or both.

NOTE: This will be in the Office of Pipeline Safety's Operation and Enforcement Manual.