

July 22, 1971

Mr. H. M. Armstrong, P. Eng.
Associated Corrosion Consultants Ltd.
343 Eleventh Avenue, SW.
Calgary 3, Alberta
Canada

Dear Mr. Armstrong:

Thank you for your letter expressing concern about the qualifying of personnel for corrosion control work. You will be happy to know that the Office of Pipeline Safety has no plans for qualifying natural gas pipeline personnel for this type work. The gas pipeline operator will be responsible for employing qualified personnel, or consultants, for this type work just as he is responsible for making sure of the abilities of all employees to perform their respective jobs in a proper manner.

Enclosed for your information is a copy of Part 192, Minimum Federal Safety Standards for the Transportation of Natural and Other Gas by Pipeline (including the recently issued subpart on corrosion control).

Again, thank you for your interest. I trust that the above information will be to your liking as it does not seem to be inconsistent with the thoughts in your letter.

Sincerely,

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety

June 14, 1971

The Secretary of Transportation,
Office of Pipeline Safety,
Washington, D.C. 20590
U.S.A.

Attention: Mr. W.C. Jennings,
Acting Director

Dear Sir:

Re: 49 CFR Part 192 -
Minimum Federal Safety Standards
for Gas Pipelines - Requirements
for Corrosion Control

As a Canadian, I appreciate that most of the standard you are about to adopt will be seriously considered for adoption here in Canada. Consequently, I feel obliged to comment.

As a licensed [sic] professional engineer in Canada, I am concerned not so much with the scope of your proposed standard as I am with the qualifications of those responsible for implementing it.

You refer to the use which has been made of the National Association of Corrosion Engineers Standard RP-01-69.

Your Standard reads in part as follows:

192.457 (b) "Each cathodic protection system must be designed and installed by, or under the direction of, a person qualified by experience and training in corrosion control methods."

and,

192.481 (b) "Each cathodic protection survey and installation must be made by or under the direction of a person qualified by experience and training in corrosion control methods."

Sooner or later the question will arise as to who is qualified and what qualifies a person under this standard.

You may also be fully aware of NACE's "Accreditation Program" for "Corrosion Specialists", etc., a copy of which is enclosed for your quick reference.

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I hope you are also fully aware that NACE is not a professional association, is not a learned society and is not licensing [sic] body.

I am concerned that NACE is maneuvering to place itself in a position to define who "qualifies" to apply your standard.

I believe that insofar as the public safety is concerned, in matters related to engineering, the professional engineering associations are not filling that role quite adequately. I would not like to see the role of the professional engineer usurped by a non-professional group.

The only qualification to become a member of the National Association of Corrosion Engineers, is payment of a membership fee!

NACE's "Accreditation Program" makes allowance for "previous recognition", grandfather clauses, and other consideration designed to enroll non-professionals. This may do a lot for the membership roles of NACE but just may not serve the public interest in the way intended.

Aside from important experience factors involved, it is my opinion that the first requisite of one qualified to assume direction of the implementation of your standard is that he be a licensed professional engineer, responsible to his professional association, and not to NACE.

I believe your State professional engineering associations, and the public, will agree with me!

As a matter of interest, in my province of Alberta, cathodic protection design has been legally declared professional engineering - no others need apply.

Respectfully submitted,

ASSOCIATED CORROSION CONSULTANTS LTD.

H.M. Armstrong, P. Eng.

Encls.