August 14, 1972

Mr. Alban T. Russell
Vice President - Marketing
Kerotest Manufacturing Corp.
2525 Liberty Avenue
Pittsburgh, Pennsylvania 15222

Dear Mr. Russell:

We have reviewed the request in your letter of August 4, 1972, for a determination as to the possible need for cathodic protection of the galvanized steel sheath used as a protective shield over your plastic service riser assembly.

We find that no cathodic protection is required for this protective steel sheath, because the sheath is not considered part of a pipeline as that term is defined in Section 192.3 of the Federal safety standards.

Thank you for your interest. We trust this answers your question satisfactorily.

Sincerely,

\signed\

Joseph C. Caldwell
Director
Office of Pipeline Safety

KEROTEST MANUFACTURING CORP.

August 4, 1972

Mr. J. C. Caldwell
Director Office of Pipeline Safety
Department of Transportation
400 6th St. S.W.
Washington, D.C. 20024

Gentlemen:

The purpose of this letter is to request a specific clarification and interpretation of the Code of Federal Regulations specifically with respect to a product manufactured by us.

Enclosed is Kerotest drawing number D-9994X01 titled "Riser Assembly for use with 1/2" IPS polyethylene service lines". Drawings, test results, and actual samples of this product were reviewed personally by your Mr. Lance Heverly and Mr. Paul Corey on August 2, 1972, when Mr. Bill Borin of Kerotest and I visited your offices. The question regarding this product and the necessity for the interpretation arose during our discussions with Mr. Corey and Mr. Heverly.

Briefly, the intended use of the product is as a meter riser of plastic service lines and the key feature is that it provides a way to connect the plastic service line to the meter with no plastic pipe above ground and no steel pipe below ground, thus being consistent with the latest DOT regulations and eliminating the necessity for gas companies to use steel meter risers that must be cathodically protected and checked on a basis of 10% per year.

You will note that the riser assembly is encased in a galvanized steel sheath identified as item 9 - conduit on the bill of materials. You will also note that this conduit is secured to the assembly by an end plug, item 10 as well as with an epoxy seal at the top where the steel nipple fits into the fiberglass riser pipe. The intent of this conduit sheath is to provide protection for the fiberglass riser pipe against external damage above ground as well as to provide a measure of rigidity to the assembly for ease of handling and installation. This galvanized steel conduit sheath in no way is

pressure containing or gas bearing and its presence or absence does not affect the integrity of the assembly as a gas bearing element in any way.

The specific interpretation we are requesting relates to the definition of "pipeline" as found in volume 35 no. 161 part II title 49 section 192.3 page 13258. If the conduit is interpreted to fall within the definition of pipeline then not only must it be cathodically protected, but is also subject to the 10% check. If the conduit is not interpreted to be a "pipeline" then it is not subject to the 10% check and fulfills the design intent of the whole product.

It is Kerotest's contention that the conduit does not fall within the definition of a pipeline, but rather is a casing or sleeve which had a purpose completely separate from any gas bearing considerations, even though this conduit is "attached" to the actual riser assembly that is gas bearing. We cite of your reference the very common practice in the gas distribution industry of making plastic pipe insertions in old existing steel service lines. In this case the old steel service is then no longer either cathodically protected or checked since it becomes merely the casing for the plastic service line.

We at Kerotest sincerely feel that our new plastic pipe riser assembly is a product that will enhance safety in the gas industry and provide a means for gas companies to minimize risks of danger as well as conform with the intent of the recent DOT regulations. The concept of joining the plastic pipe to a fiberglass riser pipe below ground level thus eliminating the danger of plastic above ground, and then joining the steel nipple to the other end of the fiberglass riser pipe well above ground level thus avoiding the potential corrosion problems of steel below ground is a unique and very desirable solution from the viewpoint of both the operating companies and the Office of Pipeline Safety.

We are ready to release this product to the industry pending only the interpretation requested in this letter. Therefore, your earliest possible attention to this matter will be greatly appreciated.

Very sincerely,

KEROTEST MANUFACTURING CORP.
\SIGNED\

Alban T. Russell
Vice President - Marketing