

Jan 25 1974

Mr. Larry E. Waldrop
Alabama Public Service Commission
P.O. Box 991
Montgomery, AL 36102

Dear Mr. Waldrop:

Your letter to Mr. Frank Fulton dated January 7, 1974, asked if certain service risers made for use with plastic service piping would meet Office of Pipeline Safety's regulations. You specifically named items made by Perfection Corporation and Kerotest Manufacturing Corporation, both of which consist of a metal sheath used as a protective shield over a plastic service riser assembly. From the information provided it appears that if these risers are installed so that all the below ground gas containing materials are plastic, no cathodic protection is required. The metallic sheath is not considered part of a pipeline as that term is defined in Section 192.3 of the Federal safety standards. However, the installation must still comply with the requirements of Section 192.375, Service lines: plastic, and the limitations of Section 192.123, Design limitations for plastic pipe, are applicable.

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

Sincerely,

\signed\

Joseph C. Caldwell
Director
Office of Pipeline Safety

STATE OF ALABAMA

January 7, 1974

Mr. Frank Fulton, Chief Engineer
Office of Pipeline Safety
Department of Transportation
Washington, D.C.

Dear Mr. Fulton:

As per our conversation this date on whether or not the riser put out by the Perfection Corporation would meet OPS's regulations, enclosed is the material that I have on this riser. I am also enclosing a riser put out by Kerotest Manufacturing Company.

We would like your opinion at your earliest convenience as to whether either, both, or none of these risers would meet OPS's regulations. Your prompt reply would be appreciated.

Yours very truly,

\signed\

Larry E. Waldrop
Utilities Engineer

Enclosures

POWER, WATER & GAS DEPARTMENT

December 20, 1973

Mr. Larry E. Waldrop
Utilities Engineer
Alabama Public Service Commission
P.O. Box 991
Montgomery, Alabama 36102

Dear Larry:

You will recall some discussions that we have had recently regarding service risers and some of the questions that have been raised regarding pressurized risers, plastic insertion, temperature rise, etc. Jerald Mitchell has been interested in this subject and has had considerable discussion with us during recent visits and phone conversations.

One item that we have all been particularly interested in is a prefabricated riser produced by Perfection Corporation and distributed by Mike Deason with Empire Pipe and Supply Company, Inc. of Birmingham, Alabama.

Mike is an excellent salesman, and I think had convinced us that the Perfection riser answered all of our problems, including the need for cathodic protection on the riser.

I felt that this item might indeed solve some of the problems involved with plastic services and understood from Mike that the item does meet all of the Department of Transportation requirements. However, to be on perfectly safe ground, I asked that Perfection Corporation provide us with evidence from DOT that this riser is approved by them.

I enclose a copy of a letter in response to my inquiry, and my reaction to the letter is that I am highly disappointed because it indicates to me no approval by DOT whatever.

I should appreciate very much having comments from you and Jerald regarding your interpretation of the content of the letter and what your reaction to the use of this item would be.

Very truly yours,

\signed\

R.A. Azbell, General Manager

PERFECTION CORPORATION

December 14, 1973

City of Sheffield, Alabama
Power, Water and Gas Department
Sheffield, Alabama 35660

Attention: Mr. R.A. Azbelle
General Manager

Dear Mr. Azbelle:

We have been asked by our representative, Mr. Mike Deason of Empire Pipe and Supply, Birmingham, Alabama, to relate to you why our Perfection service line riser does not need to be cathodically protected.

It is in our estimation, the steel in this service line riser acts as no more than a protective shield for the plastic contained therein, and it is not considered a part of the pipe line as that term is defined in Section 192.3 of the Federal safety standards. Of course, that particular portion of the service line riser that carries gas is above ground, and there are no D.O.T. requirements that we know of that require to cathodically protect a gas carrier, be it steel or any other material, that is above ground.

We hope this has answered your inquiry satisfactorily, and we thank you for your continued interest in Perfection Corporation products. If there are any more questions, feel free to call us at any time.

Sincerely,

PERFECTION CORPORATION
\signed\

J. Edward Matz
General Sales Manager

Attachments