

July 23, 1975

Mr. Earl L. Kirkpatrick
Manager Corrosion Services
Control Incorporated
P.O. Box 701
Oneonta, Alabama 35121

Dear Mr. Kirkpatrick:

In response to your letters of June 20 and July 2, 1975, concerning your company's program to determine areas of active corrosion in lieu of electrical survey, a copy of our response to Mr. Searcy dated July 7, 1975, is enclosed.

We believe the July 7 letter should clarify answers to your questions about Federal requirements applicable to the use of your program.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline Safety
Operations

Enclosure

Control INCORPORATED

July 2, 1975

Mr. Joseph Caldwell
Department of Transportation
Office of Pipeline Safety
2100 2nd Street, SW
Washington, D.C. 20590

Dear Mr. Caldwell:

Re: John Searcy's letter to you dated June 26, 1975
My letter, dated June 20, 1975

We forwarded a copy of my letter to you dated June 20, 1975, to each of the State Public Service Commissions referred to in this letter so that they would be informed of our submittal to your office. We must apologize for the poor choice of the word "approval" in paragraph two of my letter to you.

Mr. R. E. Wood and the writer visited Mr. Searcy in his office on June 14, 1975, to discuss our program and to obtain his assurance that it would comply with the Federal and State codes of the State of Tennessee, in his opinion. During the meeting, we received no negative reaction to our proposal. Subsequently, we received his letter dated June 15, 1973. From this, we assumed that our program was satisfactory in the State of Tennessee.

Copies of all seven state letters were hand carried to Mr. J. C. Thomas on June 19, 1975. If you wish us to forward you copies of these letters or provide you with any additional information, please contact me at your earliest convenience.

Sincerely yours,

CONTROL INCORPORATED

Earl L. Kirkpatrick
Manager Corrosion Services

Control INCORPORATED

June 20, 1975

Mr. Joseph C. Caldwell, Director
Office of Pipeline Safety
Department of Transportation
Washington, D.C. 20590

Dear Mr. Caldwell:

I am enclosing three copies of an outline of our "Bare Line Leakage and Corrosion Control Program" for your review and consideration. We propose to use this system in lieu of a detailed electrical survey to determine areas of active corrosion that will require cathodic protection, for systems installed prior to August 1, 1971. We feel that this program is more comprehensive than the electrical survey called for in the code and will go further to assure public safety. Should you agree that this program will meet the code intent and requirements we would appreciate receiving a letter stating that at your earliest convenience.

To date, we have received tentative approval of our program from the states of: Alabama, Florida, Georgia, Kentucky, Mississippi, South Carolina, and Tennessee. In some systems we have been operating this program for two years or more. Should you have any questions regarding the scope of our intent or program, please do not hesitate to contact me immediately.

Sincerely yours,

CONTROL INCORPORATED

Earl L. Kirkpatrick
Manager Corrosion Services

Enclosures: 2

July 7, 1975

Mr. John Searcy
Engineering Division
Tennessee Public Service Commission
Cordell Hull Building
Nashville, Tennessee 37219

Dear Mr. Searcy:

This refers to your letter of June 26, 1975, enclosing (1) a copy of a letter to this Office from Earl Kirkpatrick of Control Incorporated concerning the use of its "Bare Line Leakage and Corrosion Control Program" in lieu of an electrical survey to determine areas of active corrosion; and (2) a copy of your June 15, 1975, letter to R. E. Wood of Control, discussing, among other things, compliance with 49 CFR 192.457(b).

Section 192.457(b) requires in part:

The operator shall determine the areas of active corrosion by electrical survey, or where electrical survey is impractical, by the study of corrosion and leak history records, by leak detection survey, or by other means.

In your June 15 letter, you state that "A procedure which would determine areas of corrosion by leak detection survey would be in compliance with Section 192.457(b)." We are concerned that this statement is misleading. A more precise interpretation of the requirement is that a procedure which determines areas of active corrosion by leak detection survey would comply with Section 192.457(b) only where determination by electrical survey is impractical. We believe this distinction is significant not only from a legal and safety standpoint, but from a compliance standpoint in view of Control's apparent efforts to market its program as an alternative to the electrical survey method.

We intend to so advise Mr. Kirkpatrick when we formally receive his letter. Meanwhile, we suggest that to clarify the situation you amend your advice given to Mr. Wood in accordance with our interpretation.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety

TENNESSEE PUBLIC SERVICE COMMISSION

June 26, 1975

Mr. Joseph Caldwell
Department of Transportation
Office of Pipeline Safety
2100 2nd Street, SW
Washington, D.C. 20590

Dear Mr. Caldwell:

Enclosed is a letter of June 20, 1975 to you from Mr. Earl Kirkpatrick of Control Incorporated. In the second paragraph of the letter he states that they have received "tentative approval" of their "Bare Line Leakage and Corrosion Control Program" from Tennessee. We do not "approve" and have not approved their program. The enclosed letter dated June 15, 1973 concerns the compliance of a general procedure with Part 192, and is not to be misconstrued as an approval of any specific program.

Sincerely,

John Searcy, Engineer
Engineering Division

Enclosures