

September 2, 1976

Mr. M. J. Schiff
M. J. Schiff and Associates
1291 North Indian Hill
Claremont, California 91711

Dear Mr. Schiff:

This refers to your letter of July 26, 1976, asking whether this office is considering an extension of the deadline for corrosion control under §192.457(b) with respect to mobile home park operators.

Your letter indicates that an extension is necessary because these operators did not have the five year lead time that most gas operators had and where only recently notified that they were subject to the regulations.

Section 192.457 was published in the Federal Register on June 30, 1971, and the five year lead time for compliance provided in the regulation itself applied to all gas pipeline operators, including operators of systems in mobile home parks. Although it may be true that many mobile home park operators did not become aware of the regulation until recently, we do not feel that this would be sufficient reason to extend the deadline for compliance with respect to those operators. As a matter of policy, we will, of course, take into account all extenuating circumstances in enforcing the August 1, 1976, deadline.

As you requested, we are forwarding copies of our Annual Reports.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

M. J. SCHIFF & ASSOCIATES

July 26, 1976

Office of Pipeline Safety Operations
Department of Transportation
Washington, D.C. 20590

Gentlemen:

Thank you for Advisory Bulletin No. 76-7. It has answered a number of questions which I had previously written about. It also may relieve the minds of some very small mobile home park operators who may not be able to meet the August 1, 1976 deadline.

Is consideration being given to extension of this deadline for mobile home parks since they did not have the same five year lead time that most gas operators had? I believe mobile home park operators were notified that they were covered by the act only within the last couple of years.

We would appreciate a copy of the Eight Annual Report as well as any previous copies that may still be available. We do not have any annual reports in our files at this time.

Thank you.

Very truly yours,

M. J. Schiff
M. J. Schiff and Associates
Consulting Corrosion Engineers