

September 10, 1976

Mr. Kenneth H. Valley
Director of Public Works
City of Coalinga
Coalinga, California 93210

Dear Mr. Valley:

This refers to your letter of July 30, 1976, requesting "an extension to December 1, 1977" to meet the corrosion control requirements of 49 CFR 192.457(b). Since compliance with your request would involve the granting of a "waiver" within the meaning of Sec. 3(e) of the Natural Gas Pipeline Safety Act of 1968 (49 USC 1672(e)), we have assigned the matter Docket No. Pet. 76-21W.

You have stated that you are unable to comply with Section 192.457(b) by the August 1, 1976, deadline because of "manpower shortages and economic considerations." We do not find that this assertion by itself is sufficient justification for granting a waiver. The August 1 deadline was established in 1971, allowing operators at least 5 years to make the necessary arrangements for compliance. Accordingly, your request is denied.

It is our policy not to grant waivers except upon a showing of cogent reasons why a general safety standard should not be followed in a particular situation or an alternative standard is more appropriate. In contrast, it appears from your letter that the City is taking steps to achieve compliance as soon as possible.

We have enclosed a copy of our recently published notice on corrosion control which may be helpful to you in complying with the requirements.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

City of Coalinga

July 30, 1976

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

Gentlemen

We, the City of Coalinga, Coalinga, Calif. request an extension be granted in regard to the August 1, 1976 deadline for Cathodic Protection under the provisions of Department of Transportation, OPS, Title 49, CFR Part 1, Subpart 192.455 and 192.457.

Our lack of compliance is the direct result of manpower shortages and economic considerations.

Our Cathodic Protection program to date follows:

1. We have employed the services of a professional consulting firm for compliance (November, 1975).
2. We had determined areas of active corrosion by a leak survey and electrical survey; these areas will be Cathodically protected (-.850 volts) as soon as insulators and anodes can be installed.
3. All new services installed are plastic; the steel riser has an anode attached by manufacture design.
4. A comprehensive gas leak survey, using flame inization [sic] over the entire systems, is conducted annually the commercial area is checked semi-annually and all "B" and "C" leaks are rechecked several months after repair to determine effectiveness of repair. Therefore, in areas where active corrosion is not found, leakage surveys monitor changes in the corrosive condition of the pipeline. Electrically surveys also compliment our leakage surveys.

We have established the following time table:

1. In areas of active corrosion, Cathodic Protection shall be established by August 1, 1977. Anode installation has begun, along with insulators.

2. Annually leakage surveys over the entire system shall continue, along with our recheck program.
3. Complimentary electric survey with leakage on an annual basis.
4. Our gas distribution system shall be in compliance with the federal regulations by December 1, 1977.

We therefore request an extension to December 1, 1977, be granted in lieu of our above stated purpose.

Sincerely,

Kenneth H. Valley
Director of Public Works