

September 14, 1976

Mr. David Charness
Secretary
Southview Investment Company
612 North Sepulveda Boulevard
Los Angeles, California 90049

Dear Mr. Charness:

This refers to your letter of July 19, 1976, requesting a waiver from the corrosion control requirements of 49 CFR 192.457(b). We have not accepted your letter as a petition for waiver since you have not stated why you are unable to comply with Section 192.457(b) by the August 1, 1976, deadline.

The August 1 deadline was established in 1971, allowing operators at least 5 years to make the necessary arrangements for compliance. 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 you are 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

Enclosure

July 19, 1976

Mr. Jack C. Overly, Chief,
Western Region
Office of Pipeline Safety Operations
Department of Transportation
Materials Transportation Bureau
Office of Pipeline Safety Operations
Western Section
831 Mitten Road,
Burlingame, California, 94010

Dear Mr. Overly:

This is to thank you for your comprehensive two page letter of July 15th in response to my telephone call of the other day.

I have noted the full contents of your welcome letter including Regulations for the Transportation of Natural and other Gas by Pipeline revised as of October 1, 1973, Recommending Practice, etc. revised January, 1972, Form Approved (In duplicate) OMB No. 04-R5608 and Instructions for Completing Form DOT F 7100.1-1, "Annual Report for Calendar Year 19__ , Distribution System".

I also have the list of Corrosion Consultants, including Pacific Corrosion Research, Inc., in Hawthorne, California, Telephone 679-5842. I spoke to a Miss Dorothy there and she said that there [sic] are now literally "swamped" with requests to make the necessary examinations under this situation. A Mr. James, President, is in charge and he will be away until next week. But he will call in, she said and she will give him my message and call.

We have decided that this firm in Hawthorne is the closest one to use of all that you mention.

Therefore, while we enter into an orderly program for compliance with the reporting requirements and safety standards for Park Royale Trailer Park, 7650 Balboa Boulevard, Van Nuys, California, 91406, the subject trailer park, with the aid of Pacific Pacific [sic] Corrosion Research, Inc., we respectfully request a waiver at this time of enforcement action pending the completion of the necessary inspections and the completion of the Form DOT F 7100.1-1 (10-70) which you have given to us in the mailing above.

We shall attend to this as soon as we can. Of course, we wish to ascertain the charge to be made to us by Pacific Corrosion and if same is reasonable we shall use this company. Thank you for your further courteous treatment to us.

Sincerely yours,

OPERATING PARK ROYALE TRAILER PARK Secretary