

December 28, 1976

Mr. Joseph A. Cox
Chairman, Utilities
Board of the City of Florala
1407 Wall Street
Florala, Alabama 36442

Dear Mr. Cox:

This refers to your letter dated September 27, 1976, in which you ask if the Utilities Board of the City of Florala's planned electrical survey consisting of "a pipe-to-soil survey, atmospheric corrosion survey, pH survey, and determination (and protection) of any 'hot spots'" meets the requirements of 49 CFR 192.457(b) and 192.465(e).

It is our opinion that the planned electrical survey as described above would meet the requirements of §§192.457(b) and 192.465(e) provided that it was carried out by or under the direction of a person qualified by experience and training in pipeline corrosion control methods.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

The Utilities Board Of The City Of Florala

September 27, 1976

Mr. Cesar DeLeon
Acting Director
Office of Pipeline Safety Dept.

Dear Mr. DeLeon:

The Utilities Board of The City of Florala planned to comply with the requirements of 49 CFR 192.457(b) and 192.465(e) by performing an electrical survey consisting of a pipe-to-soil survey, atmospheric corrosion survey, soil resistivity survey, P.H. survey, and the determination (and protection) of any "hot spots." However, a representative of the Alabama Public Service Commission informed us that this would not be acceptable to meet the requirements of an electrical survey. The Alabama PSC representative informed us that an electrical survey "must provide accurate measurements of corrosion rate, loss of metal relative to pipe wall thickness potential differences, and current flow." We contend that the test that we plan meet the requirements of providing accurate measurements of corrosion by indirect techniques. This interpretation seems to be consistent with the OPSO Advisory Bulletin No. 76-6. Please advise us whether our planned electrical survey will be acceptable to comply with the requirements of 49 CFR 192.457(b) and 192.465(e).

Thank you very much for your assistance.

Sincerely,

Joseph A. Cox,
Chairman

