

November 23, 1992

Mr. Dan H. Weaklend
Chief, Pipeline Safety Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

Dear Mr. Weaklend:

Thank you for your letter of July 29, 1992, regarding cathodic protection tests. You asked if a pipeline's cathodic protection is acceptable if a test point on the pipeline meets one of the criteria in Appendix D of 49 CFR Part 192 but fails under another of the criteria.

The Part 192 standards relevant to your inquiry are §§ 192.463(a) and 192.465(a). Under § 192.463(a), each cathodic protection system on a pipeline must provide a level of protection that complies with one or more of the Appendix D criteria or its equivalent. Section 192.465(a) requires operators to test each pipeline under cathodic protection to determine if § 192.463(a) is met.

As we apply these standards, an operator is in compliance with § 192.463(a) as long as each point tested under § 192.465(a) meets any one of the Appendix D criteria or its equivalent. No further test data are required if one of the criteria is met. In addition, the operator's corrosion control procedures under § 192.453 should, at a minimum, specify the criterion used for each segment of pipeline.

I apologize for the delay in answering your letter. For a prompt reply to any of your concerns, please call Jim Thomas, Director, Southwest Region, at (713) 750-1746.

Sincerely,

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety