

June 22, 1973

Mr. John T. Stanclift
114 Woodlawn Street
Geneva, Ohio 44041

Dear Mr. Stanclift:

Your letter of May 23, 1973, questions two areas of the Federal gas pipeline safety regulations about which you say you are concerned as a result of actions taken by the East Ohio Gas Company.

You ask first for clarification regarding §192.453 and the company's action in transferring the monitoring and maintenance of cathodically protected pipelines from the corrosion department to the construction and maintenance department. Section 192.453, in pertinent part, requires that the operator's procedures for the operation and maintenance of cathodic protection systems be carried out by, or under the direction of, a person qualified by experience and training in pipeline corrosion control methods. The company letter of April 18, 1973, a copy of which you forwarded, explained certain steps that are being taken, but did not indicate a violation of §192.453, and your letter does not explain in what respect safety may be adversely affected by the company action. This office is not in a position to comment on a company's internal organization, and our concern is only that the procedures be carried out by, or under the direction of, properly qualified personnel as required by the regulation regardless of where the personnel are placed in the company's organization.

You also ask whether gas detection surveys must be made on the inside of buildings under the §192.723(b)(1) requirement that surveys be conducted yearly on distribution systems in business districts. The answer does not depend on the definition of business district, but rather on whether the lines in question are classed as service lines and thereby subject to the regulations. A service line is defined as a distribution line that transports gas from a common source of supply to a customer meter or the connection to a customer's piping whichever is farther downstream. In the usual case, the customer meter serving a building is at or near the building wall, and all piping downstream of the meter inside the building is customer's piping. Such piping is not included within the definition of service line and, therefore, is not subject to the gas detector survey requirements of §192.723.

If you have further questions in these areas, please contact us.

Sincerely,

/signed/

Joseph C.Caldwell
Director
Office of Pipeline Safety