

September 10, 1976

Mr. Sam McNeill  
Yacht Harbor Mobile Park  
565 Esplanade, #215  
Redondo Beach, California 90277

Dear Mr. McNeill:

This refers to your letter of July 9, 1976, requesting "an extension of 120 days" to meet the corrosion control requirements of 49 CFR 192.457(b). Although 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 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