Richard B. Bender

January 17, 1974

Mr. Joseph Caldwell
Office of Pipeline Safety
Department of Transportation
Washington, D.C. 20590

Dear Mr. Caldwell:

We are concerned with Section 192.463 of the 49 CFR. We have been finding numerous situations where plastic pipe has been used in service lines up to the point just below the house regulator or meter, at this point a transition fitting and steel riser (coated steel) is connected underground and rises above ground to the regulator or meter. We have found a number of these metal risers developing corrosion leaks simply because they ar not isolated from the house piping (which connects the short section of riser to the copper water system underground at the house). We have also found fairly aggressive pitting even when the coated steel riser pipes are isolated but not cathodically protected.

Our interpretation on these steel gas risers is that they have to be coated, isolated and placed under cathodic protection. Are we correct? Or is the criteria of protection removed from this.

I have raised this question because a local gas company in one of the towns that we have been working has informed the plumbers who have been installing these plastic services and steel meter risers "that insulating fittings and anodes are not necessary on this short section of pipe," yet it is in one of the most hazardous locations (particularly when under concrete slabs and paved parking areas) that which we have to concern ourselves. In many areas a gas leak at this location particularly when it is intermediate pressure upstream from the regulator is more hazardous than a gas leak ten, twenty or thirty feet away on a service. I need an answer to this question in a manner that will convince them that the Federal law is as written.

Sincerely,

\signed\

RICHARD B. (Pipe) BENDER

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