

Jun 16 1976

Mr. Robert Thomas
OEM Sales Manager,
Dekoron Division
Samuel Moore and Company
Aurora, OH 44202

Dear Mr. Thomas:

In your letter of May 3, 1976, you ask if there is anything in the regulations (49 CFR Part 192) which prohibits the use of your company's product, "Tripl-dek," for gas service applications. Your description indicates that "Tripl-dek" consists of aluminum tubing with an internal copolymer coating and an external polyethylene jacket.

Absence of specifications for a given material in 49 CFR Part 192 does not necessarily preclude its use provided the general requirements that are applicable to all materials are met.

The requirements of 49 CFR Part 192 apply to all pipelines regardless of material. In addition, some sections specify specific limits for design or operating conditions of certain materials. Part 192 does not presently specify design criteria for aluminum pipe; however, such pipe would have to be capable of meeting the general requirements and level of safety otherwise prescribed by the regulations. Since the regulations contain no specific design or material specifications for aluminum pipe, it would be appropriate to consider the engineering properties of aluminum and follow design procedures similar to those required for other materials. This particular product would be similar to plastic coated steel tubing that is being used in the gas industry. You should also note that the external coating must comply with the requirements of Section 192.461, External corrosion control: protective coating.

Thank you for your interest in pipeline safety.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

SAMUEL MOORE and COMPANY

May 3, 1976

Mr. Cesar DeLeon
Acting Director M.T.P.-1
Office of Pipeline Safety Operations
Trans Point Building
2100 2nd Street, S.W.
Washington, D.C. 20590

Dear Mr. DeLeon:

To meet a need in the gas utility industry for a gas service tubing which combines the corrosion resistance of a tough thermoplastic with the formability and strength of a metal tubing, our Dekoron Division has developed and made available to the industry tripl-dek gas service tubing.

Tripl-dek is a plastic/aluminum composite tubing which consists of an aluminum core tube, a copolymer film and a polyethylene jacket. All three layers are bonded into a homogeneous cross section which minimized internal oxidation, provides protection against hydrogen migration, assures superior corrosion resistance and strength, provides longer life and eliminates snap-back problems encountered with some types of gas tubing.

Laboratory tests and field installations have revealed that tripl-dek is a durable and totally safe gas service tubing. Therefore, we humbly request your interpretation of the Office of Pipeline Safety Operations regulations to determine if there is anything in the regulations which prohibits the use of a plastic/aluminum composite tubing for gas service applications.

Please feel free to contact us or Mr. Robert Klein, our Washington representative, if you require additional information about our Dekoron tripl-dek gas service tubing or our company.

We look forward to hearing from you and thank you in advance for your interpretation of the OPS regulations relating to the use of our product for gas service installations.

Very truly yours,

SAMUEL MOORE AND COMPANY

Robert Thomas

OEM Sales Manager
Dekoron Division