Mr. B. J. Milleville, Vice President
Valve Engineering & Research
Rockwell Manufacturing Company
400 N. Lexington Avenue
Pittsburgh, Pennsylvania 15208

Dear Mr. Milleville:

This is in reply to your letter of December 15, 1970, addressed to Mr. Frank Fulton and your letter of December 14, 1970, addressed to Mr. William Broderick. The first requested an interpretation of Section 192.363(c). You state, "one major subject for consideration is the intent of the term "specialized tools." Is it intended simply to require something beyond a screwdriver or pair of pliers? , or do we really mean that if a tool you can buy at Sears will do it, it's not acceptable?

"Specialized tools" refer to tools which are designed specifically for the removal of a service line valve core and which would serve no other purpose. The requirement presumes that such a tool would not normally be in the hands of anyone other than a gas company employee or other authorized persons. The ANSI B31.8 Committee considered this requirement important enough to have made it part of their Code (Section 849.12(d) and it therefore was contained in the Interim Federal Safety Standards for two years. In establishing the minimum standards of Part 192, we saw no reason for deleting it. We recognize that "tamperproof" valves are not presently manufactured in sizes over 2 inches. However, we consider a locking device on the valve or a locked enclosure such as a fence or building around the valve as meeting the requirement to "minimize the possibility of removal of the core of the valve with other than specialized tools."

In your letter of December 14, 1970, to Mr. Broderick you state, "Paragraph 192.145(2)(d) (in Volume 35 Number 161 of the Federal Register) provides that" no valve having pressure containing parts made of ductile iron may be used in gas pipe components of compressor stations. Many valves in very general use have cast iron (not ductile iron) plugs or balls in combination with steel shell components (bodies, covers). Can it be confirmed that such construction is acceptable?

It was our intent in Section 192.145 to adopt as requirements those contained in paragraph 831.11(c) of the ANSI B31.8 Code (1968 edition), which permits the use of cast iron plugs or balls combination with steel shell components.

If you have further questions, do not hesitate to ask.

Sincerely,

/signed/
Joseph C. Caldwell, Director

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