Mr. Thomas P. VanArsdel, P.E. Director, Pipeline Safety Division Indiana Public Service Commission 901 State Office Building Indianapolis, IN 46204

Dear Mr. VanArsdel:

Your letter of May 10, 1976, requests the Office of Pipeline Safety Operations (OPSO) official opinion on Dekoron Tripl-dek aluminum tubing for use in gas distribution systems.

OPSO does not approve, disapprove, or endorse proprietary items. The brochure included with your letter 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 continued interest in pipeline safety.

Sincerely,

Cesar DeLeon Acting Director Office of Pipeline Safety Operations

STATE OF INDIANA PUBLIC SERVICE COMMISSION

May 10, 1976

Mr Cesar DeLeon, Acting Director Office of Pipeline Safety Operations Materials Transportation Bureau U.S. Department of Transportation Washington, D.C. 20590

Dear Mr. DeLeon:

Would you please give us OPSO's official opinion on Dekoron Tripl-Dek.

We have some doubts that it meets the requirements of Part 192. If it is considered a plastic pipe, the temperature rating listed by the manufacturer is too high. If it is considered Aluminum tubing, it must be cathodicly [sic] protected and will the lapped construction of this tubing, by its-self, carry distribution pressure?

Your prompt reply will be appreciated.

Yours very truly,

Thos. P. VanArsdel, P.E. Director, Pipeline Safety Division