

April 11, 1983

Mr. Philip K. Gilbert  
CIBA - GEIGY Pipe Systems  
Suite 190  
7676 Hillmont  
Houston, TX 77040

Dear Mr. Gilbert:

A formal interpretation of 49 CFR §192.281, Plastic pipe, paragraph (a) as requested by your letter of March 23, 1983, is enclosed.

Sincerely,

Richard L. Beam  
Associate Director for  
Pipeline Safety Regulation  
Materials Transportation Bureau

Enclosure

No. 83-3  
Date: April 11, 1983

DEPARTMENT OF TRANSPORTATION  
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION  
MATERIALS TRANSPORTATION BUREAU

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PIPELINES SAFETY REGULATORY INTERPRETATION

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Note: This pipeline safety regulatory interpretation applies a particular rule to a particular set of facts and circumstances, and as such, is binding only on the operator to whom the interpretation is specifically addresses.

SECTION: 192.281

SUBJECT: Joining plastic pipe with a plastic mechanical fitting that is threaded to provide gasket pressure.

FACTS: None.

QUESTION: Would DOT consider the CIBA-GEIGY Pronto-Lock, Pronto-Lock II, and Pronto-Lock III mechanical coupling systems as threaded joints or as mechanical joints?

INTERPRETATION: The Pronto-Lock, Pronto-Lock II, and Pronto-Lock III mechanical coupling systems are "mechanical joints" and would not be considered as "threaded joints" which are prohibited under §192.281(a).

The threaded portions of these joints are used to apply compressive stress to a gasket or O-ring seal similar to many other joint systems now used in gas piping systems. Threads are designed to minimize stresses and are not used as a gas seal.

Richard L. Beam  
Associate Director for  
Pipeline Safety Regulation  
Materials Transportation Bureau

March 23, 1983

Mr. Richard L. Beam  
Assoc. Director for Pipeline Safety Regulations  
Material Transportation Bureau  
Department of Transportation  
Washington, D.C. 20590

Ref: Title 49 Of The Code Of Federal Regulations Interpretation Of Part 192, Section 192.281

Dear Mr. Beam:

This letter is a formal request for written interpretation of the referenced section. The question has been raised whether the D.O.T. would classify our Pronto-Lock<sup>®</sup>, Pronto Lock II, or Pronto-Lock III mechanical coupling systems (see enclosed literature) as a "threaded joint" or a "mechanical joint".

In recent telephone conversations with Mr. Paul Cory of your department, he indicated that since the seal was effected by an "O"-ring instead of the threads, the coupling systems would be considered mechanical coupling systems. We did not discuss the Pronto-Lock III coupling system but it seals by a lip seal gasket and not by thread interference.

If you have any questions, or would like to see actual joint samples, I would be pleased to help in any way I can.

Thank you for handling this matter and I look forward to hearing from you soon.

Sincerely,

Philip K. Gilbert  
Engineer