November 12, 1992

Mr. Robert J. Seidler Supt. of Dist./Systems Maint. Div. Long Beach Gas Department City of Long Beach 2400 East Spring Street Long Beach, CA 90806-2285

Dear Mr. Seidler:

This responds to your letter of September 15, 1992, pertaining to qualification of persons to make joints in plastic pipe. You asked if an individual who qualifies to make plastic pipe joints from pipe of a particular diameter and material would also be qualified to make pipe joints from pipe of a smaller diameter with identical material.

The qualification of persons to join plastic pipe is governed by 49 CFR 192.285, **Plastic Pipe**; **qualifying persons to make joints.** Section 192.285(a) provides: "No person may make a plastic pipe joint unless that person has been qualified under the applicable joining procedure by: (1) Appropriate training or experience in the use of the procedure; and (2) Making a specimen joint from pipe sections joined according to the procedure that passes the inspection and test set forth in paragraph (b) of this section."

Qualification under § 192.285 is based on the joining procedure. Thus, a person that qualifies to use a particular joining procedure with pipe of a particular size also qualifies to join pipe of identical material in a smaller size if the same joining procedure is used in both cases. If smaller size pipe is to be joined by a different procedure, the person would first have to qualify in the use of that procedure.

I trust this adequately responds to your request.

Sincerely,

Cesar De Leon Director, Regulatory Programs Office of Pipeline Safety