

March 7, 1974

Mr. Charles E. Batten  
Director, Safety Department  
Florida Public Service Commission  
700 South Adams Street  
Tallahassee, FL 32304

Dear Mr. Batten:

This responds to your letter of February 20, 1974, asking whether a particular riser assembly manufactured by Robroy Industries complies with 49 CFR 192.123(b).

As you noted, in a letter to Mr. Thomas G. Giles, Marker Manager, Robroy Industries, we indicated that the assembly casing is not a pipeline and, therefore, the requirements for corrosion control are inapplicable to it. We added, however, that the casing's mechanical connection between the enclosed plastic pipe and a steel fitting above the ground must comply with section 192.281(e).

All of the Federal safety standards applicable to plastic pipe, such as section 192.123(b), must be met with respect to pipe enclosed in the casing. This does not mean that the riser assembly itself is governed by the same standards. Since we do not know the quality of insulation provided by the casing, if any, we cannot determine whether its use would enable enclosed plastic pipe to comply with section 192.123(b) in relevant situations.

If we may be of further assistance, please let us know.

Sincerely,

/signed/ Cesar DeLeon

Joseph C. Caldwell  
Director  
Office of Pipeline Safety

February 20, 1974

Mr. Joseph C. Caldwell  
Director  
Office of Pipeline Safety  
Department of Transportation  
400 Seventh Street, S.W.  
Washington, D. C. 20590

Dear Mr. Caldwell:

A copy of your letter to Mr. Thomas G. Giles, Market Manager of Robroy industries wherein you responded to his letter of January 22, 1974 was provided to this office. Upon reviewing this letter and the promotional material published by Robroy Industries, it appears that they are utilizing this letter to show that the Office of Pipeline Safety has reviewed the product and found that it complies with applicable requirements of the Minimum Federal Safety Standards. Not knowing the terms of his letter, it is difficult to determine if this was your intent or whether you answered a specific question relative to the cathodic protection requirements. At any rate, the promotional material distinctly shows the plastic pipe to extend above ground and thus it is also obvious that the product must also meet the provisions of Section 192.123(b). Without proof that the temperature exposure to the plastic pipe does not exceed 100°F for the thermoplastic or 150°F for reinforced thermosetting plastic pipe, no plastic pipe is allowed to be brought above ground in the manner shown on the attached promotional material since it is still the carrier pipe.

I ask you to review this information at the earliest possible time and advise me as to the position of the Office of Pipeline Safety relative to this product's compliance or noncompliance with Section 192.123(b). If this product complies with this Section without further experimental data to show compliance, then it would seem that plastic could [be, sic] brought out of ground to the meter set assembly, so long as it was sleeved to prevent mechanical damage and without the need for experimental data to prove that it does not exceed the temperature limitations. I am not adverse to approval of this riser, but that which applies to one inch of plastic above ground must also apply to all plastic above ground.

Sincerely,

Charles H. Batten  
Director  
Safety Department

**NOTE:ATTACHMENT**

February 2, 1974

Mr. Thomas G. Giles  
Market Manager  
Robroy Industries  
River Road  
Verona, PA 15147

Dear Mr. Giles:

We have reviewed the request in your letter of January 22, 1974, for an interpretation as to whether the coated flexible steel casing described in your letter requires cathodic protection.

We find that no cathodic protection is required for this protective flexible steel casing because the casing is not considered part of a pipeline as that term is defined in Section 192.3 of the Federal safety standards. However, the mechanical connection between the plastic service pipe and steel fitting just above the ground level must comply with Section 192.281(e) of the Federal standards.

Thank you for your interest. We trust this answers your question satisfactorily.

Sincerely,

/signed/

Joseph C. Caldwell  
Director  
Office of Pipeline Safety

January 22, 1974

Mr. Joseph C. Caldwell  
Director  
Office of Pipeline Safety  
400 Sixth Street SW  
Room 107  
Washington, D. C. 20590

Dear Mr. Caldwell:

Enclosed is information on the ROBROY RIZER-FLEX as manufactured by ROBROY INDUSTRIES. We are requesting an interpretation of this product meeting the OPS regulations as set forth in Part 192 Minimum Federal Safety Standards.

RIZER-FLEX is a PVC plastic coated flexible steel casing that incorporates a compression service adapter to make the transition at ground level from the plastic service line to the conventional outside meter setting. RIZER-FLEX is designed to give protection to the plastic service line brought to the ground level. The riser eliminates the need for cathodic protection and the use of an underground fitting near the foundation wall. The flexible steel casing permits gradual bending of the plastic service pipe during installation and also compensates for ground movement caused by settling or "heaving".

The casing or conduit approach to protecting the plastic service line is similar to that taken by others. It is our understanding that you have recently reviewed and acknowledged this concept. We look forward to receiving your interpretation.

Very truly yours,

ROBROY INDUSTRIES  
GAS PRODUCTS/COATINGS DIVISION

Thomas G. Giles  
Market Manager

**NOTE: ATTACHMENTS**