

ACF INDUSTRIES

April 18, 1977

Director, Office of Pipeline Safety
Department of Transportation
400 7th Street S.W.
Washington, D.C. 20590

Subject: Title 49 of the Code of Federal Registrations, Part 192

Dear Sir:

W-K-M is a manufacturer of valves which are used in all types of industrial, pipeline and oilfield applications. Occasionally we have a customer who requires certification of our valves compliance to the above regulation. This is a simple matter for valves 2" and larger. Our concern is that we do not know the position of the D.O.T. for valves smaller than 2" (especially NPT threaded end). These sizes are not within the scope of any of the standards listed in part 192.145(a), nor is there any equivalent standard for these sized. Your response to the following questions would be greatly appreciated.

1. Are valves smaller than 2" within the scope of CFR Title 49, Part 192?
2. If yes to above, what is considered an equivalent applicable standard?
3. If no to above, what requirements must be met to assure conformance to CFR 49, Part 192?

I wish to thank you in advance for your prompt attention to this matter.

Sincerely,

Charles C. Partridge, P.E.
Product Engineering
Engineering & Research

May 13, 1977

Mr. Charles C. Partridge
Product Engineering
ACF Industries, Inc.
P.O. Box 2117
Houston, Texas 77001

Dear Mr. Partridge:

This responds to your letter of April 18, 1977, in which you ask about the applicability of 49 CFR 192.145 to valves smaller than 2 inches.

The Materials Transportation Bureau's position is that Section 192.145 is applicable to all sizes of valves used in "pipelines" or "pipeline facilities" as those terms are defined in Section 192.3.

Published specifications do not exist for all types and sizes of valves that are manufactured. However, there are certain basic safety design features that can be applied to all valves. In Section 192.145, the word "equivalent" is used in the sense of providing an equivalent level of safety. Thus, although the specifications listed in Section 192.145 do not cover all sizes and types of valves, the valves not covered must at least meet the applicable level of safety prescribed by the listed specifications.

I trust this satisfactorily responds to your inquiry. If I can be of further assistance, please let me know.

Sincerely,

Cesar DeLeon
Acting Director

