

PI-79-0103

September 25, 1979

Mr. P. P. Petro  
Director – Technical Services  
3240 North Mannheim Road  
Franklin Park, Illinois 60131

Dear Mr. Petro:

This responds to your letter of July 6, 1979, asking if the rule in 49 CFR 192.281(a), stating that “plastic pipe may not be joined by a threaded joint or miter joint,” applies to the manufacture of fittings in a plant.

As indicated by section 192.271(b), neither section 192.281 nor any of the other provisions of subpart F concerning the joining of materials apply to joining that is performed during the manufacture of pipe or components (including fittings). The regulations do apply to any joining of pipe or components that occurs for gas pipeline transportation purposes outside the manufacturing factory. Such joining is normally performed at a pipeline construction site or in fabrication shops.

Sincerely,  
Cesar De Leon  
Associate Director for  
Pipeline safety Regulation  
Materials Transportation Bureau

Plexco  
3240 North Mannheim road  
Franklin Park, Illinois 60131

July 6, 1979

Mr. Ceasar De Leon  
Office of Pipeline Safety  
Department of Transportation  
Washington, D. C. 20590

Dear Mr. De Leon:

Our Company is involved in a program of testing and evaluating concepts used in Europe and Australia for manufacturing polyethylene fittings for pressure pipe applications.

One of the methods used for manufacture of the larger diameter polyethylene pipe fittings is fabrication of the fitting from pipe by "miter" fusion. The "miter joints" are formed utilizing special equipment with established and recognized butt fusion techniques.

Since these "miter joint" fittings will most probably be used for transport of natural gas within a distribution system or a low pressure transmission system covered by the regulations of the Office of Pipeline Safety, it is our desire to obtain a clarification of certain segments of Part 192, Title 49, Code of Federal Regulations.

In reviewing the regulations, paragraphs 192.271(b) "This subpart does not apply to joining during the manufacture of pipe or pipeline components," and 192.281(a) "Plastic pipe may not be joined by threaded joint or miter joint," we have interpreted these paragraphs to mean that

- (a) the regulations do not apply to the manufacture of fitting in a plant
- (b) the regulations do apply to fabrications in the field
- (c) the products must meet all the appropriate performance requirements of Part 192.

We would appreciate your response to our interpretation of the regulations.

Thank you.

Very truly yours,

PLEXCO  
P. P. Petro  
Director - Technical Services