

August 4, 1994

Jim Inhofe
Director of Engineering
Central Plastics Company
P.O. Box 3129
Shawnee, OK 74801

Dear Mr. Inhofe:

Thank you for your letter of July 28, 1994, regarding the specimen joint that an individual must make in qualifying to join plastic pipe. Under 49 CFR 192.285(b)(1), the specimen joint must be “visually examined during and after assembly or joining and found to have the same appearance as a joint or photographs of a joint that is acceptable under the procedure.” You asked whether this requirement can be met on electrofusion joints that do not have a “pop-up” or other device to indicate a proper joint.

After passing visual inspection, electrofusion specimen joints are physically tested for integrity (49 CFR 192.285(b)(2)). So the preliminary visual inspection merely serves to screen out visibly unacceptable joints from further examination. A device to indicate a proper joint is unnecessary for this purpose. Screening can be accomplished by inspecting the joint for any visible irregularities, including incorrect insertion depth and misalignment. Moreover, such a device is unnecessary for safety under 49 CFR 192.285(b), because even if an unacceptable joint passes visual inspection, it will be rejected by the physical test.

Additionally, a device to indicate a proper joint is unnecessary for adequate inspection of joints under 49 CFR 192.273(c). Under this standard, each electrofusion joint in a pipeline must be inspected for compliance with applicable requirements of 49 CFR Part 192, Subpart F. An adequate inspection is provided by looking for visible joint irregularities, by observing control instruments during the joining process, and by confirming that proper joining procedures are followed.

Please let me know if you have any further concerns about the Department’s plastic pipe regulations. We will distribute this interpretation to all regional and state offices.

Sincerely,

Cesar De Leon
Deputy Associate Administrator
for Pipeline Safety