

October 17, 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

CENTRAL

November 3, 1994

MEMO TO: Richard Conley - Kerotest
Frank Volgstadt - Perfection
Jim VanHoutte - Dresser
Lu Lyall - R.W. Lyall Co.
Gene Palermo - Uponor
Tom Walsh - PPI
Mark Sievers - Keller & Heckman
Richard Sanders - DOT
Tom Cravens - Central Plastics
Bob Sehorn
Bob Shaffer
Rocky Wade
Phill Pourchot
Clay Hamilton
Terry Stiles
Bob Pourchot

FROM: Jim Inhofe

SUBJECT: Connecticut issue of code requirements for "Pop Up" visual indicators for electrofusion fittings.

The above subject challenge to electrofusion requirements by Mr. Phil Sher of the Connecticut Dept. of Utility Control has received the attached interpretation from the offices of DOT.

As you will note by Mr. DeLeon's letter, it is planned that his interpretation will be distributed to those offices affected.

This opinion is a direct result of efforts conducted in the name of the PPI Fuel Gas Committee and a Task Group formed from that committee to address the issue. Much appreciation is due Richard Sanders of the DOT/TSI School in Oklahoma City also.

At any rate, this opinion to be issued should negate any "opinions" or other negatives coming forth in the future from Mr. Phil Sher or others who may share his opinion.

This should put the issue at rest. If the problem should re-appear from another source or the same one, please advise me. I think we have the proper support to subdue any real negative effects should that occur.

J. Inhofe