

U.S. Department
of Transportation

400 Seventh Street, SW
Washington, DC 20590

**Research and
Special Programs
Administration**

October 20, 1995

Mr. Gary A. Smith
Chief, Safety Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

Dear Mr. Smith:

This responds to your letter of August 22, 1995, about marking plastic valves. You asked us to reconsider our interpretation of May 1, 1995, that 49 CFR 192.63(a) does not require plastic valves to be individually marked. We further said that plastic valves are acceptably marked if packaged together until use, with the required marking on the package. This interpretation was first stated in a letter dated August 5, 1994, to Massoud Tahamtani of the Virginia State Corporation Commission.

You suggested that if plastic valves are manufactured to ANSI B16.40, they must be marked according to ANSI B16.40. This code specifies certain markings, and provides that two of the markings must be permanently affixed to, or incorporated as part of, the valve. The other markings may be affixed by any means.

We still believe you are viewing §192.53(a) too rigidly. The rule requires plastic valves to be marked either as prescribed in the specification or standard to which they were manufactured or to indicate certain other information. Because the rule permits valves to be marked with information other than what the standard of manufacture specifies, without dictating the method of marking, any marking method that satisfies the purpose of the rule is sufficient for compliance. As we said previously, the purpose of §192.63(a) is to require that the identity of pipeline materials be shown from the time of manufacture to the time of use. This purpose is met by proper package marking as long as the material remains in the package until use.

Sincerely,

Richard D. Huriaux, P.E.
Director for Technology and
Regulations
Office of Pipeline Safety