

Mr. David M. Lakatos, P.E.
Engineering Manager
Kerotest Manufacturing Corp.
5500 Second Avenue
Pittsburgh, PA 15207-1807

Dear Mr. Lakatos:

This is in response to your recent letters, in which you have provided your justification for using air as the test medium for testing valves during their manufacture in lieu of water as required by API 6D which is referenced in 49 CFR § 192.145. In support of your justification, you provided us reasons and enclosed a copy of Technical Report NE-169, "Weldball Valve Leakage Analysis, Air versus Water". You indicated that the term "or equivalent" in § 192.145 allows you to choose other standards such as ISO 5208 that allow air as the test medium and provide an equivalent level of safety to API 6D, including structural integrity and leak tightness.

We have enclosed a copy of the Research and Special Programs Administration's response to an inquiry from the Americas Marketing Group, Inc., requesting an interpretation of "or equivalent of API 6D" in § 192.145. We believe that our interpretation will answer any questions you might have.

Sincerely,

Richard B. Felder
Associate Administrator
for Pipeline Safety

Enclosure

Richard E. Sanders, TSI

DPS-11/10/2/1;
Misrani:interp.192:March 7, 1996

Mr. Mike T. Deason
President
Americas marketing Group, Inc.
P. O. Box 10084
Birmingham, Alabama 35210

Dear Mr. Deason:

This is in response to your recent letters, which you requested an interpretation of 49 CFR §192.145, in regards to testing valves. As you noted in your letter, Section 192.145 requires that valves meet the minimum requirements, or equivalent, of API 6D.

According to your letter, in your conversation with the American Petroleum Institute you were told that there was no accepted equivalent to the hydrostatic test listed in API-6D. You also indicated that you were unable to get written statements from the American National Standards Institute (ANSI) and the Manufacturers Standardization Society (MSS) that the testing requirements for valves in their standards were equivalent to API 6D standard. This lead you to conclude that their [sic] were no equivalent testing requirements to API 6D. Therefore, you requested interpretation of "or equivalent" in Section 192.145, and request that we advise you of an equivalent to the hydrostatic test.

Published standards do not cover all types and sizes of valves that are manufactured. However, there are certain basic safety features that can be applied to all valves. In Section 192.145, the word "or equivalent" is used in the sense of accepting another standard that provides an equivalent level of safety to API 6D, including quality control and inspection to API 6D. The term "or equivalent" is not necessarily used with regard to hydrostatic or air test or any other specific features of industry standards.

Other nationally recognized testing and valve standards such as API 598, Valve Inspection and Testing, API 608, Metal Ball Valves - Flanged and Butt-weld Ends, and MSS-SP-61, Pressure Testing of Steel Valves, allow the use of air as the test medium. In addition, we have enclosed a copy of Technical Report NE-169, "Weldball Valve Leakage Analysis, Air versus Water" supplied by Kerotest Manufacturing Corporation, that may help you in identifying equivalent standards, such as ISO 5208 that is referenced in the report.

By not restricting minimum requirements to meet only API 6D standard, we are, in fact encouraging new developments in manufacturing and testing of valves, due to the changes in technology.

We trust that this interpretation will answer any question you might have.

Sincerely,

Richard B. Felder

05/11/99

192.145
96-03-07.doc

Associate Administrator
for Pipeline Safety

copy: Richard E. Sanders, TSI

DPS-11/10/2/1;
Misrani:interp.192:<Date>