

August 29, 1974

Mr. J. C. Caldwell  
Director Office of Pipeline Safety  
Office of Secretary of Transportation  
Washington, D.C. 20590

Dear Mr. Caldwell:

We have segments of cast iron mains in Columbus and Portsmouth, Ohio which are scheduled for repair as the result of joint leakage detected in our leakage survey program. These cast iron mains presently have clamped joints and currently operate at 35 psig.

The requirements of 49 CFR 192.753(a) require that the joints of the above mains be sealed by "mechanical leak clamps." We have recently conducted an evaluation of the "Avonseal" process and believe this would be a superior technique for sealing these joints. However, we question whether this particular process would meet the current requirements of 192.753(a) for "mechanical leak clamps." Even though the "Avonseal" process results in a positive joint and is in a sense mechanical, we do not believe it meets the original intent of the current regulations.

Therefore, we would like to request a waiver to use the "Avonseal" process on these mains on an experimental basis. We believe this experimental usage of "Avonseal" process will result in more effectively sealed cast iron joints. In addition, our experience with this process could prove of value, if at such time a decision is made to consider a revision to the present regulations to allow for this type of technology for the sealing of cast iron joints.

We would like to move ahead with this program as soon as possible. Therefore, we would appreciate your prompt attention to this request for waiver for the specific application mentioned above.

Very truly yours,

Eugene J. Walsh