

September 28, 1993

Mr. Stanley A. Mruk  
Executive Director  
Plastic Pipe Institute  
Wayne Interchange Plaza II  
155 Route 46 West  
Wayne, NJ 07470

Dear Mr. Mruk:

This responds to your letter of January 29, 1993, and March 19, 1993, concerning the acceptability of using nylon or composite plastic mechanical fittings in federally regulated natural gas pipelines. Your concern stems from an Office of Pipeline Safety (OPS) memorandum dated August 13, 1992, to the Transportation Safety Institute (TSI) in which we stated the "nylon or composite plastic pipe may not be used in federally regulated gas pipelines."

As stated in your letters, OPS issued an opinion letter to Continental Industries, Inc. dated April 4, 1988, regarding the issue of whether 49 CFR 192.191(b), **Design of plastic fittings** includes mechanical fittings within the scope of the regulation. That opinion, which indicated that the regulation did not apply to mechanical fittings, is still in effect; and our memorandum to TSI regarding nylon pipe did not apply to nylon fittings.

The interpretation of § 192.191(b) was based on our understanding that the 1987 edition of ASTM D2513 referenced in § 192.191(b) did not have standards for mechanical fittings. However, we understood that shortcoming would be rectified shortly and the standards for mechanical fittings would be incorporated into either ASTM D2513 or D2517, as appropriate. As you indicated, the ASTM D2513 committee is currently developing mechanical fittings standards. I urge that committee to complete this incorporation as soon as possible.

I am sorry for the long delay in responding to your letters.

Sincerely

Cesar De Leon  
Director, Regulatory Programs  
Office of Pipeline Safety