

**Research and
Special Programs
Administration**

May 1, 1995

Mr. Terry Fronterhouse
Chief, Pipeline Safety Group
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

Dear Mr. Fronterhouse:

We have considered Mr. Weaklend's letter of October 7, 1994, taking exception to our opinion on the marking of plastic valves, as expressed in a letter to Massoud Tahamtani dated August 5, 1994. We advised Tahamtani that plastic valves are not thermoplastic fittings under § 192.63 and, thus, need not be marked according to the 1987 edition of ASTM D2513. We further advised that plastic valves need not be individually marked; they are acceptably marked if packaged together, with the required marking on the package, and the valves remain in the package until use.

You suggested that if plastic valves were manufactured to ASTM D2513, they would have to be marked according to the ASTM D2513 standards for plastic pipe. We do not agree. Section 192.63(a) requires plastic valves to be marked according to the specification or standard to which they were manufactured or to show certain other information. Although ASTM D2513 does not apply to plastic valves, even if a plastic valve were somehow made to ASTM D2513, there are no marking requirements in ASTM D2513 applicable to valves. Also, under § 192.63(a), operators may mark valves with information other than what the standard of manufacture specifies.

You further suggested that package marking is not sufficient to meet § 192.63(a). And you asked us to cite the code provision that supports our package marking opinion. That opinion was not based on a specific code provision. Rather, it was based on the purpose of § 192.63(a), which 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 package marking as long as the material remains in the package until use.

Sincerely,

Cesar DeLeon
Deputy Associate Administrator
for Pipeline Safety