

December 31, 1974

Mr. C. T. Kutschke  
NIPAK, Inc.  
P. O. Box 2820  
Dallas, TX 75221

Dear Mr. Kutschke:

This responds to your letter of November 20, 1974, asking whether the restrictions in 49 CFR 192.281(a), last sentence, "Plastic pipe may not be joined by a threaded joint or miter joint", apply to certain fittings you propose to manufacture. In your letter you question the meaning of 49 CFR 192.271(b), Scope, which reads, "This subpart does not apply to joining during the manufacture of pipe or pipeline components." Section 192.271(b) limits the applicability of Section 192.281(a) such that it does not apply to the manufacture of fittings. Other requirements of 49 CFR Part 192 would still apply where appropriate.

Thank you for your interest in pipeline safety.

Sincerely,

/signed/

Joseph C. Caldwell  
Director  
Office of Pipeline Safety

November 20, 1974

Mr. Joseph C. Caldwell, Director  
Office of Pipeline Safety  
Department of Transportation  
Washington, D.C. 20590

Dear Mr. Caldwell:

In the near future, Nipak, Inc., proposes to embark on a program of testing and evaluating a concept widely used in Europe for manufacturing polyethylene fittings for pressure piping applications.

These fittings will be "miter joint" fabricated with the miter joint being performed by established and recognized butt fusion techniques.

As there is every probability polyethylene pipe systems, with these miter fittings included, will be used for the transportation of natural gas within a distribution system, it is our desire to ascertain the position of the Office of Pipeline Safety of this fittings's acceptability as relating to the transportation of natural gas by pipeline.

In the review of the code, paragraphs 192.271(b), "This subpart does not apply to joining during the manufacture of pipe or pipeline components," and 192.281(a), last sentence in statement, "Plastic pipe may not be joined by a threaded joint or miter joint," does not clarify, in our minds, the acceptability of factory fabricated fittings with miter joints.

We earnestly solicit your attention to this interpretation and assure you your determination of the acceptability of this technique will in no way indicate an endorsement on your part of a propriety item.

Sincerely,

NIPAK, INC.

C. T. Kutschke