

August 18, 1974

Mr. Don W. Miller, President
Miller Pipeline Corporation
210 South Broadway
Green Springs, OH 44836

Dear Mr. Miller:

Thank you for your letter of July 8, 1974, asking whether the "Avonseal" process may be used to meet the requirement of 49 CFR 192.753(a). This rule reads as follows:

"Each cast iron caulked bell and spigot joint that is subject to pressures of 25 p.s.i.g. or more must be sealed with mechanical leak clamps."

Based on our review of the supportive material which you provided, we have concluded that the "Avonseal" process would not meet the requirement of §192.753(a). This process does not produce a seal by the use of "mechanical leak clamps" as the standards requires. The seal produced is primarily due to chemical bonding rather than to mechanical application of forces by a "clamp" in the ordinary sense of the word.

We believe, however, that the effect of the "Avonseal" process in sealing caulked bell and spigot joints may be the same or better than "mechanical leak clamps." Therefore, we are considering your letter as a petition for rule making to amend §192.753(a) to permit the use of the "Avonseal" and similar sealing processes. A notice of proposed rule making will be issued and published in the Federal Register to invite public comment on the proposed rule change.

Your letter and supportive material are included in Docket No. Pet. 74-11. Please refer to this number in any future communication on the matter.

We appreciate your interest in pipeline safety.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety