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Docket Management System
Pipeline and Hazardous Materials Safety Administration (PHMSA)
Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590

Subject: **Docket ID: PHMSA-2014-0098 Plastic Pipe Rule**

PHMSA has issued this docket, called the Plastic Pipe Rule, to amend and update 49 CFR 192 to address errors, inconsistencies, and response to petitions for rulemaking. These proposals address issues of tracking and traceability, PE pipe design factors, mechanical fittings, expanded guidelines for PA-11 and PA-12, and updated and additional standards for pipe and fittings.

Kerotest agrees that the proposed changes will go a long way to improve safety and to also realize the benefits of improved materials. However, there are a few comments we would like to propose for consideration;

In Section I.1 under Incorporation by Reference for 192.7

1. Currently, ASME/ANSI B16.40-08 is proposed. Kerotest encourages the use of the **2013** edition because of the explicit use of the PE 2708 and PE 4710 polyethylene materials in the 2013 edition as opposed to PE 2406 and PE 3408 in the 2008 edition. These newer materials are referenced within several documents under proposed adoption with this NPRM, including ASTM D2513, F2620, F2897, and others. Using the 2008 edition will cause potential confusion with allowable materials.
2. Currently, ASTM F1055-98 (2006) is proposed. As above, Kerotest encourages the use of the **2013** edition because of the use of the newer PE 2708 and PE 4710 polyethylene materials along with the requirement to have HDB and HDS properties listed for these materials in PPI TR-4.

Thank you for providing the opportunity to comment on PHMSA-2014-0098.

Respectfully submitted,

David Frederick
VP of Engineering