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Docket Management System
U.S. Department of Transportation
Docket Operations, M-30, Room W12-140
1200 New Jersey Ave., SE,
East Building, Second Floor
Washington, DC 20590-0001

Re: Continental Industries Letter of Support and Comments for
Docket No. PHMSA-2014-0098

Continental Industries is committed to the safe and efficient delivery of natural gas to millions of homes across the United States. Continental has supplied mechanical fittings for natural gas distribution systems since 1960 and has participated in the development of codes and standards related to these products. We appreciate the opportunity to offer this letter of support and comments for Docket No. PHMSA-2014-0098, the Notice of Proposed Rule Making known as the "Plastic Pipe Rule".

A. Tracking and Traceability

Continental Industries supports the proposal for Part **192.63 Marking of materials** to require plastic pipe and components to be marked with a 16 digit code to help identify characteristics such as manufacturer, lot code, date code, material type, component type, and size as described in ASTM F2897. We ask you to review the proposed **192.3 Definitions** for *Traceability information*. The ASTM F2897 bar-code does not include information about the products pressure rating or temperature rating.

D. Incorporation of PA-12

Continental Industries supports approval of Polyamide 12 (PA-12) for use in gas applications. Our company has manufactured and supplied PA-12 fittings for natural gas distribution since 2007. We believe that PHMSA's approval of PA-12 will allow local distribution companies to design, construct, and maintain



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infrastructure for the safe and reliable delivery of natural gas. It appears that the PA-12 material designation code, PA42316, needs to be added to the proposed **192.121 Design of plastic pipe** (e) Polyamide (PA-12) pipe.

E. Risers

Continental Industries supports the proposed section **192.204 Risers**, and the requirement that risers shall be designed and tested in accordance with ASTM F1973 "Standard Specification for Factory Assembled Anodeless Risers and Transition Fittings in Polyethylene (PE) and Polyamide 11 (PA-11) and Polyamide 12 (PA-12) Fuel Gas Distribution Systems". We ask you to consider adding to this section ASTM F2509 "Standard Specification for Field-assembled Anodeless Riser Kits for Use on Outside Diameter Controlled Polyethylene Gas Distribution Pipe and Tubing".

F. Fittings

Continental Industries supports the proposed changes and additions to section **192.281 Plastic Pipe** and section **192.367 Service lines: General requirements for connections to main piping**. Nearly all mechanical fittings manufactured by Continental Industries can provide Category 1 joints when properly installed. Achieving the 25% elongation requirement is not a problem with small diameter polyethylene pipe but might be a challenge for larger diameters or different thermoplastic materials. Although we support the proposed changes, Continental Industries is disturbed by the potentially misleading information provided in the background for PHMSA Advisory Bulletin ADB-08-02. Unsupported allegations related to mechanical coupling failures attributed to elastomer seal degradation are not helpful to the operators or manufacturers and eventually may negatively impact ratepayers.

Thank you for the opportunity to provide comments to the Plastic Pipe Rule. Please call me at your convenience if you have any questions.

Regards,



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