

June 26, 1973

Mr. Gordon H. Allen  
President, Lineguard, Inc.  
P.O. Box 426  
Wheaton, Illinois 60187

Dear Mr. Allen:

Your letter of May 23, 1973, asks whether detectable marking tape, such as your product with the trade name "Lineguard," qualifies as a means of locating plastic pipe under §192.321(e) of the Federal natural gas pipeline safety regulations.

Section 192.321(e) requires that plastic pipe that is not encased must have an electrically conductive wire or other means of locating the pipe while it is underground. You question whether the marking tape qualifies as "other means" within the wording of the regulation.

As you describe it, the detectable marking tape is made of long-life 2-inch wide plastic that is suitably colored and inscribed. The tape is installed above plastic pipe at a depth of 4 to 10 inches below the surface of the ground where it serves the dual purpose of warning and locating.

Detectable marking tape having the physical characteristics and installed as you have described it meets the requirements for "other means" of locating pipe in accordance with the requirements of §192.321(e).

The Federal gas pipeline safety regulations are performance type standards rather than specification standards. In general such regulations state an objective requirement but leave the specific means of compliance to the selection of the operator. Thus, with regard to locating plastic pipe, there may conceivably be many means other than plastic tape, and it would be impractical to include detailed specifications for each means within the regulation. Therefore, it would not be appropriate to amend

§192.321(e) as you have suggested to make specific provision for your tape even though it appears to meet the present standard.

Thank you for informing us about your product. If we may be of further assistance, please call on us.

Sincerely,

Joseph C. Caldwell  
Director  
Office of Pipeline Safety