

Mr. B. C. Trueschler
Vice President
Baltimore Gas & Electric Company
Gas & Electric Building
Baltimore, Maryland 21203

Dear Mr. Trueschler:

This is in further reply to your letter of September 30, 1971, requesting an interpretation of the corrosion control regulations as they apply to the use of the Bonded Products Epi-Seal process.

We have considered your letter and we find that the process does not meet the requirements of §192.59(a)(1) for plastic pipe. For that reason, we cannot accept the Bonded Products Epi-Seal process of internal lining as equivalent to plastic insert pipe. It will, therefore, be necessary to comply with the corrosion regulations for ferrous pipe.

In the event you are not in accord with this determination, you may petition for a waiver from the applicable requirements in Subpart I to permit the use of steel pipe in which the plastic lining materials is used. Your petition should include detailed justification in support of your position. A public hearing will be held in the event that you petition for a waiver, and we will appreciate your advice regarding acceptable dates.

Sincerely,

/signed/

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety