



**NATIONAL ASSOCIATION OF PIPELINE SAFETY REPRESENTATIVES  
RESOLUTION**

**Central Region  
State of Illinois  
Resolution 2008-03-AC 1**

**Action Category 1**

**URGING PHMSA TO ADOPT A MORE FLEXIBLE PLASTIC PIPE JOINER  
REQUALIFICATION INTERVAL**

**WHEREAS** - 49 C.F.R. §192.285(a) requires that persons making plastic pipe joints be qualified under the applicable joining procedures;

**WHEREAS** - 49 C.F.R. §192.285(c) further requires that: “a person must be requalified under an applicable procedure, if during any 12-month period that person: (1) Does not make any joints under that procedure; or (2) has 3 joints or 3 percent of the joints made, whichever is greater, under that procedure that are found unacceptable by testing under §192.513;”

**WHEREAS** - A requalification interval not exceeding 12 months requires subsequent qualification to be performed prior to the end of the 12<sup>th</sup> month in order for an individual to remain qualified, creating a regressing requalification deadline and tracking and scheduling issues;

**WHEREAS** - Meeting this requirement prohibits some operators from performing tests at the most advantageous time from a cost and quality perspective;

**WHEREAS** - In most other areas of the pipeline safety standards the U.S. Department of Transportation has already recognized the benefits of providing a window of opportunity for compliance rather than a “not to exceed 12 months” type requirement. Other similar joining qualification requirements have schedules that allow the operator more flexibility in establishing schedules that don’t ratchet the timing of requalification into the construction season. As an example, 49 C.F.R §192.229(d)(1) sets the qualification of welders to “within the preceding 15 calendar months, but at least once each calendar year;”

**WHEREAS** – Most of the states granting waivers have also required that the allowed number of production joint failures during pressure testing before requalification is required be reduced from three to one, to insure that joiners in need of requalification due to poor quality joints can be identified sooner; and,

**WHEREAS** - The Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) has not opposed the waivers of the 49 C.F.R. §192.285(c) scheduling requirements that have been granted by a number of state regulatory commissions after appropriate state and federal reviews of safety impacts.

**NOW THEREFORE BE IT RESOLVED:** That the benefits of a more flexible requalification interval, having been recognized by numerous operators and states, be extended to all operators, also eliminating one of the rare remaining set of inflexible intervals in Part 192; and

**BE IT FURTHER RESOLVED:** That PHMSA amend 49 C.F. R. §192.285(c) as follows:

(c) A person must be requalified under an applicable procedure at least once each calendar year at intervals not exceeding 15 months, or after any production joint is found unacceptable by testing under §192.513. (And striking §192.285(c)(1) and (2)).