

PI-74-0125

July 18, 1974

Mr. Charles H. Batten
Director, Safety Department
Florida Public Service Commission
700 South Adams Street
Tallahassee, FL 32304

Dear Mr. Batten:

Pursuant to my conversation with a member of your staff, I am enclosing a subsequent interpretation to the interpretation which was included in our Advisory Bulletin no 74-5. I hope this interpretation will clarify and answer the specific comments contained in your letter of June 7, 1974.

If you need further clarification in this matter, please let us know.

Sincerely,
SIGNED
Cesar DeLeon
Deputy Director
Office of Pipeline Safety

March 18

Mr. Stephen C. Stinson
Middle Tennessee Natural Gas
Utility District
P.O. Box 231
Smithville, Tat 37166

Dear Mr. Stinson:

Thank you for your letter to Mr. Frank Fulton of February 12, 1974. In response to the questions you ask, we offer the following:

Question: In section 192.63 you say each piece of pipe must be marked. What happens when this is covered by coating?

Answer: The intent of the regulation is that the product, pipe, fitting, etc., must be clearly identified from point of manufacture to installation. Where pipe is coated before installation, covering the marking, the coated pipe must be remarked unless some other means of identification permitted by section 192.63 is used.

Question: If the specifications of the pipe are listed on the bill of lading and the original purchase order, is a blanket identification sufficient?

Answer: A blanket identification where permitted under section 192.63 is sufficient only if the items involved are clearly identified from point of manufacture to installation, as when all items so identified are used at a single installation. Where individual items covered by a blanket identification are used separately, each item must be marked exclusive of the blanket identification.

Question: How have people maintained marking that was put on the coating? As you know, ultra violet light attacks PVC and ink on it. Do you require identification to be maintained on coal tar? If so, how do you identify field coated pipe?

Answer: For coated pipe in short term storage or protected storage, a marking on the coating or coating wrapper will normally remain legible until installation. For coated pipe in long term storage, marking is usually maintained by painting the pipe inside each end. Also, some operators paint a color code on pipe. It is an operator's responsibility to use markings that will identify material until it is installed. Section 192.63 does not require that markings be maintained after installation, but materials used in any segment of pipeline must be identifiable for the life of the facility to ensure proper operation and maintenance. This is accomplished by maintaining appropriate records.

We hope that this sufficiently answers your questions. If we may assist further, please let us know.

Sincerely,

Original signed by:

Joseph C. Caldwell

Director

Office of Pipeline Safety

Florida Public Service Commission
700 South Adams Street
Tallahassee 32304

June 7, 1974

Mr. J. C. Caldwell, Director
Office of Pipeline Safety
Department of Transportation
400 Seventh Street, SW
Washington, D. C. 20590

Re: Advisory Bulletin 74-5

Dear Mr. Caldwell:

Upon reading the interpretation contained in the referenced "Advisory Bulletin", I have studied in detail Section 192.63 and have the following comments:

1. It can be seen how the interpretation was developed by reading the words contained in Section 192.63, but one would have to ignore the intent when this regulation was developed.
2. It can also be seen how the interpretation could have been made to require marking only as prescribed within the applicable standard by reading the same words and this interpretation would be backed up by the intent as well as existing practice. This way individual lengths under certain sizes would not require marking except by bundle.
3. Our experience shows that we are just now getting through to the coating mills that pipe delivered to systems in this State must be marked according to the specification under which the pipe was manufactured. We have been informed that with the shortage of steel that they do not need to sell pipe in this State if we insist upon marking. In other words, they will sell to companies in states that are not enforcing the regulations.
4. For us to enforce this new interpretation, we will have to install something other than steel pipe or the user will have to mark the pipe when he breaks a bundle of small diameter pipe and order pipe only in full bundles. This does not cause any insurmountable problem if the company can get steel pipe; but the majority of companies use only one specification pipe, thus this added marking serves no useful purpose. Your interpretation leaves no latitude for this type operation and thus is overly restrictive.

Enforcement of the marking requirement in some of the states places systems in an untenable position already, but this new interpretation makes for an overly restrictive requirement and for those systems which purchase under one specification, this added requirement accrues no benefit.

We ask that your office reconsider the interpretation so as to make marking required only as set forth in the specification of manufacture or at least provide flexibility for systems which purchase only under one specification.

Sincerely yours,
Charles H. Batten Director
Safety Department

OIL & GAS JOURNAL, February 4, 1974, "Canada, U.S. Pipeliner Set Sights on Big arctic Projects," Jim West, Mid-Continent Editor; February 11, 1974, "Exxon Completes 32-Line River Crossing," Robert C. Ewing, Pipeline Editor; February 25, 1974, "In-House Testing Program for Gas Lines pays off," Staff Report; "Watch for AC-Induced Interference on Lines," Gharles G. Siegrfied, Ebasco Services, Inc.

PIPELINE & GAS JOURNAL, Handbook Issue, March 15, 1974, "Minimum Federal Safety Standards for Liquid Pipelines," "Minimum Federal Safety Standards for Gas Lines," "Leak Reporting Requirements for Gas Lines," Reprints of OPS Regulations.

PIPE LINE NEWS, March 1974, "Multiple Output Rectifiers for Pipelines," Tom P. Wilkinson, Good-All Electric, Inc.; "Pipe Line News Annual Corrosion Symposium," Oliver Klinger, Jr., Editor.

PIPELINE AND UNDERGROUND UTILITIES CONSTRUCTION, March 1974, "Big Three Automatic Welders Tested on Oklahoma Line," William R. Quarles, Editor.

GAS INDUSTRIES—Natural Gas Edition, March 1974, "New Life for Old Service Mains," George F. Steinmetz, Jr., Baltimore Gas and Electric Company.

MATERIALS PERFORMANCE, March 1974, "Corrosion Control in Idle Pipelines," J.P. Fraser, Shell Development Company; "On IR Drops," J.B. Lankes, Virginia Electric & Power Company.

ENERGY PIPELINES AND SYSTEMS (nee Gas Magazine), March 1974, "Industry Usage of Plastic Pipe Continues to Grow," Ken Kridner, Editor.

AMERICAN GAS ASSOCIATION MONTHLY, March 1974, "Gas Pilot Lights—Extinguishing Top Burner Pilot Lights Would Create a Safety Hazard."

INTERPRETATIONS OF REGULATIONS

Relates
to 49 CR2,
§.192.63

Question: does the intent of Section 192.63 require marking of individual lengths of pipe removed from a bundle and installed separately?

OPS Interpretation: . . . "Under L092.63, pipe must be clearly identified from point of manufacture to installation. In the case of bundle marked pipe, this requirement is satisfied where the bundle is used at a single installation. However, if lengths of pipe are taken Out of the bundle and used at separate installations, each length removed must he marked exclusive ct the bundle marking to comply with the requirement."

Joseph C. Caldwell
Director
Office of Pipeline Safety

The Secretary of Transportation has determined that publication of this periodical is necessary in the transaction of the public business required by law of this Department. Use of funds for printing this periodical has been approved by the Director of the Office of Management and Budget through November 30, 1976