

PI-92-0102

April 30, 1992

Mr. Tom Hopkins
Vice President
Midwest Pipe Coating, Inc.
P.O. Box 127
Scherverville, IN 46375-0127

Dear Mr. Hopkins:

Your letter of March 31, 1992, requests an interpretation of the gas pipeline safety regulation regarding marking pipe and pipeline components, 49 CFR 192.63. You seek clarification of the requirements for marking pipe when you, a coating applicator, apply a protective coating that obliterates the manufacturers' original markings.

The intent of the regulation is that the product, pipe, valve, or fitting be clearly identified from manufacture to installation. Where pipe is coated before installation and the marking is covered, the coated pipe must be marked again unless another means of identification permitted by §192.63(a) is used.

The pipeline operator is the responsible party for assuring a means to identify each pipeline component until it is installed. 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 stenciling the pipe inside an end.

We trust that this responds satisfactorily to your request.

Sincerely,

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety

Midwest Pipe Coating, Inc.
P.O. Box 127
Scherverville, Indiana 46375-0127

March 31, 1992

Research & Special Programs Administration
400 7th Street S.W.
Washington D.C. 20590

ATTENTION: GEORGE TENLEY: ASSOC. ADMIN. FOR PIPELINE SAFETY

Dear Mr. Tenley:

Our company applies protective coating over the outside of steel pipe that will carry natural gas. The pipe will be buried.

We are required to mark each piece of pipe with certain data as Pipeline Safety regulations require the transmission and utility companies to have this data on each length of pipe.

Owner specifications require us to so provide certain information on each length of pipe - they normally enumerate the required information and as an added assurance that this is done they add the caveat "as required by the DOT regulation 192.63 titled Marking of Materials.

This regulation speaks to the pipe manufacturer's responsibility for required markings and does not speak specifically to a coating applicators responsibility.

The manufacturer does the required marking of a length of pipe: Item "a" each length of pipe must be marked and item "b" indicate size, material and manufacturer and grade item "d" each item is identifiable as to type, manufacturer and model.

The coating applicator includes all these items in our marking but do not - nor do owners ask us to include: pressure and temperature ratings. Under this regulation for pipe producers stamping as well as marking is allowable.

O.D. Coatings will likely obliterate markings and only cover up stampings and we as a secondary processor - not a pipe producer may cover up some of the producers required markings and are not required to re-establish the information on the coating. I would guess that "2.d" takes care of this wherein it states: "Specifications or standards giving pressure, temperature and other appropriate criteria be readily available" which must refer to paperwork, certifications and identification.

I wonder if the regulations should more clearly define the secondary processors requirements, also the regulations do not specify the location of markings or whether the information is 7 required in more than one location on the pipe.

When we liquid I.D. coat pipe we reproduce the information on the inside of the pipe we coat in the same area the producer marked it — at the end.

Yours truly,
Midwest Pipe Coating, Inc.
Tom Hopkins, Vice President