

Mr. L. B. Irish
Managing Director
National Association of Pipe
Coating applicators
2504 Flournoy-Lucas Road
Shreveport, LA 71108

Dear Mr. Irish:

This responds to your letter of February 3, 1975, asking for an outline of the Department's requirements for marking pipe. Specifically, you ask whether pipe should be marked on the outside or inside.

The regulations applicable to liquid pipelines, 49 CFR Part 195 (copy enclosed), require in section 195.112(c) that new pipe which is installed in a pipeline system be marked as follows:

"(c) Each length of pipe with an outside diameter of 4 inches or more must be marked on the pipe or pipe coating with the specification to which it was made, the specified minimum yield strength or grade, and the pipe size. The marking must be applied in a manner that does not damage the pipe or pipe coating and must remain visible until the pipe is installed."

Under this requirement, pipe may be marked on the outside or on the inside at any visible location. Because a marking must remain visible until the pipe is installed, if the pipe is marked on the inside, the marking must necessarily be near one end of the pipe.

The gas pipeline safety regulations, 49 CFR Part 192 (copy enclosed), require in section 192.63 that pipe and components used in pipelines be marked as follows:

"(a) Except as provided in paragraph (d) of this section, each valve, fitting, length of pipe, and other component must be marked as prescribed in --

"(1) The specification or standard to which it was manufactured; or

"(2) MSS Standard Practice, SP-25.

"(b) Surfaces of pipe and components that are subject to stress from internal pressure may not be field die stamped.

"(c) If any item is marked by die stamping, the die must have blunt or rounded edges that will minimize stress concentrations.

"(d) Paragraph (a) of this section does not apply to items manufactured before November 12, 1970, that meet all of the following:

"(1) The item is identifiable as to type manufacturer, and model.

"(2) Specifications or standards giving pressure, temperature, and other appropriate criteria for the use of items are readily available.

As you correctly state in your letter, this Office has interpreted section 192.63 to require that pipe and components be identifiable by marking from the time of manufacture until installation. Unlike the requirements of section 195.112(c) for liquid pipelines, under section 192.63, each length of gas pipe need not be marked in all cases.

Section 192.63 permits pipe and components to be identified by blanket marking, as on a bill of lading or purchase order, or on a bundle of pipe. Blanket marking will suffice, however, only if the items so identified are used at a single installation. If individual items covered by a blanket marking are used at separate installation, each item installed separately must be marked exclusive of the blanket marking.

In keeping with the requirement that gas pipe be identifiable by marking from the time of manufacture to installation, where an individual length of pipe must be marked, the pipe may be marked on the outside or inside near one end, as in the case of pipe for liquid pipelines.

Gas pipeline operators have asked the following questions regarding the marking requirements of section 192.63 as they relate to coating. You may find the responses helpful to your members:

Question: "May a mark required by section 192.63 be covered by coating?"

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

Question: "How is marking on coated pipe maintained?"

OPS Interpretation: . . . "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 (identification) 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."

Thank you for your interest in pipeline safety. If we may be of further assistance, please let us know.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety

Enclosures

Mr. Joseph C. Caldwell
Director
Office of Pipeline Safety
Office of the Secretary of Transportation
Washington, D. C. 20590

Dear Mr. Caldwell:

Members of our association are receiving purchase orders from operating companies stating that the pipe should be marked in accordance with DOT requirements. As we understand the order your department requires that basically identity of pipe shall be maintained from time of manufacture until final construction.

The purpose of this letter is to ask if it would be possible for you to give us a written outline of specifically what you require so we can pass it on to our members and to our customers. For instance, one of the problems that has been specifically asked is whether the pipe should be marked on the inside or the outside. Any specific instructions you can relate to us, that may be passed on will be sincerely appreciated.

Sincerely,

NATIONAL ASSOCIATION OF PIPE COATING APPLICATORS

L.B. Irish
Managing Director