



Material Verification

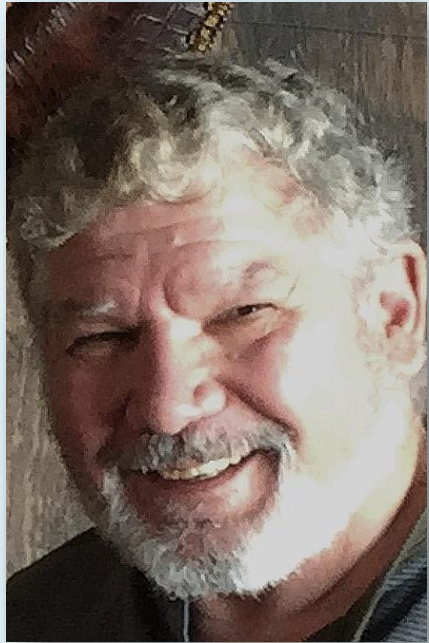
192.607

Montgomery, Alabama





Introductions



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Agenda

- **Overview of regulatory requirements (§ 192.607):**
 - **Applicability of the Rule,**
 - **Traceable, Verifiable, and Complete records,**
 - **Opportunistic Dig Definition,**
 - **Methods for Determining Material Properties,**
 - **Pipeline Populations and Sampling**
- **This presentation will not include**
 - **Pipeline components**
 - **Compliance considerations derived from FAQs**
 - **Possible inspection questions**
 - **Examples of lessons learned found during pilots**



Applicability (July 1, 2020 Revision)

- **§ 192.607 - Verification of Pipeline Material Properties and Attributes: Onshore steel transmission pipelines.**
 - (a) Wherever required by *this part*, operators of onshore steel transmission pipelines must document and verify material properties and attributes in accordance with this section.

Applies to both line pipe and certain components.



Compliance Dates

- **By July 1, 2020:**
 - **Operators must prepare and follow procedures (per §§ 192.13(c) and 192.605) addressing applicable regulations without timeframes explicitly defined in the Final Rule ---192.607 (if material verification is being used per § 192.712).**
- **By July 1, 2021:**
 - **Operators must develop and document processes for performing a spike test or material verification per §§ 192.506 and 192.607, if applicable.**

See FAQ-1.



Pipeline Attributes - § 192.607(b)

- Operators must capture the following physical pipeline characteristics and attributes:
 - diameter,
 - wall thickness,
 - seam type, and
 - grade (e.g., yield strength, ultimate tensile strength, or pressure rating for valves and flanges...).

These must be maintained for the life of the pipeline and be *traceable, verifiable, and complete*.



Pipeline Attributes - § 192.607(b)

- Charpy v-notch toughness values
- Needed for ECA or fracture mechanics requirements of § 192.712.
- Must be maintained for the life of the pipeline.

Metallurgical and Pipe Test Report MTR No.: 4600020362-4625
Sample No.: W06206474

SAW PIPES USA, Inc.
P.O. Box 2349
Baytown, TX 77622-2349
Phone: (281) 353-3300
Fax: (281) 353-0473

PO Number: 4600020362 PO Date: 11/04/05 Date: 08/15/06
Diameter (In): 42 Wall (In): 0.438 Grade: X70 PSL2 Heat No: S04825
Comments: AÆOVSTAL

Cust Spec: SPEC 101, REV 4, DATED 01-17-06
API 5L October 2004 43rd Ed LSAW MATERIAL AS-ROLLED 100% Weld seam inspection by ultrasonic testing method; Calibration standard: NIS notches and 1/8" through drilled hole

Customer
CENTERPOINT ENERGY GAS TRANSMISSION COMPANY
P.O. BOX 1374
HOUSTON, TEXAS 77251

Ship To
CENTERPOINT ENERGY GAS TRANSMISSION COMPANY
LOUISIANA ARMY NATIONAL GUARD, CAMP MINDEN 100 LOUISIANA
MINDEN, LOUISIANA 71055

Physical Analysis:

| | Cwidth (Inch) | Yield (PSI) | Tensile (PSI) | Elong (%) | Y T Ratio | Weld Tensile | Fracture Location |
|-----|---------------|-------------|---------------|-----------|-----------|--------------------|-------------------|
| TBT | 1.50 | 75006 | 87007 | 38 | 0.88 | BASE METAL | |
| TWT | 1.47 | | 89203 | | | Guided Band (WELD) | |
| | | | | | | Root OK | Face OK |

Hydrostatic Test
HYDRO PSI: 1402 HYDRO TIME (sec): 20
MINIMUM HYDROTEST PRESSURE FOR THIS HEAT IS 1402 PSI @ 98% MACRO OK

| Type | C | Mn | P | S | Si | Cu | Ni | Cr | Mo | Ti | Al | N | V | B | Nb | Ca | Zr | CE | Pcm | V+Nb+Ti |
|-------|------|------|-------|-------|------|------|------|------|------|-------|-------|-------|-------|--------|-------|-------|-------|------|------|---------|
| Ladle | 0.09 | 1.50 | 0.006 | 0.005 | 0.27 | 0.02 | 0.02 | 0.18 | 0.01 | 0.013 | 0.027 | 0.007 | 0.065 | 0.0005 | 0.054 | 0.002 | 0.000 | 0.39 | 0.19 | 0.13 |
| Prod1 | 0.08 | 1.53 | 0.007 | 0.007 | 0.26 | 0.01 | 0.01 | 0.15 | 0.00 | 0.017 | 0.035 | 0.004 | 0.059 | 0.0002 | 0.057 | 0.002 | 0.000 | 0.38 | 0.18 | 0.13 |
| Prod2 | 0.08 | 1.53 | 0.006 | 0.006 | 0.26 | 0.01 | 0.01 | 0.15 | 0.00 | 0.017 | 0.035 | 0.004 | 0.059 | 0.0001 | 0.057 | 0.002 | 0.000 | 0.38 | 0.18 | 0.13 |

CE MAX = 0.41%, Pcm MAX = 0.21%

Hardness Analysis
(HV10 - Scale)

| | | | | |
|---------|-----------|-----|-----------|-----|
| 1: 188 | 6: 19211 | 188 | 16: 21221 | 184 |
| 2: 188 | 7: 18012 | 192 | 17: 20622 | 184 |
| 3: 192 | 8: 18813 | 218 | 18: 18023 | 188 |
| 4: 192 | 9: 18414 | 218 | 19: 18824 | 184 |
| 5: 206 | 10: 19215 | 206 | 20: 18425 | 184 |
| 26: 180 | | | | |

DWTT Analysis

| Temp | Shear 1 (%) | Shear 2 (%) | Shear Avg (%) |
|------|-------------|-------------|---------------|
| 32 F | 100 | 97 | 99 |

Charpy Impact Analysis

| Dir/Notch | Spec Size | Temp | Ft lb1 | Ft lb2 | Ft lb3 | Ft lb avg | Shear1 (%) | Shear2 (%) | Shear3 (%) | Shear Avg (%) |
|-----------|-----------|------|--------|--------|--------|-----------|------------|------------|------------|---------------|
| TBC | 10x10 mm | 32 F | 128 | 133 | 173 | 145 | 100 | 100 | 100 | 100 |
| THC | 10x10 mm | 32 F | 110 | 115 | 112 | 112 | 100 | 100 | 100 | 100 |
| TWC | 10x10 mm | 32 F | 89 | 81 | 86 | 85 | 100 | 100 | 100 | 100 |

Fracture Toughness Criteria: As per API 5L, PSL2, SR5A @ 32 F, SR5B @ 30 F, SR6 @ 32 F
The material has been manufactured, sampled, tested, and inspected in accordance with this spec(API5L) and has been found to meet the requirements. I/We certify the above to be correct as contained in the records of the company.



Material Verification: TVC Records

- **If an Operator determines they do not have TVC records, they must implement procedures for gathering these material properties [§ 192.607(b)].**
- **This is nothing new for operators – See *Pipeline Safety: Verification of Records* (77 FR 26822).**
 - **Advisory Bulletin issued by PHMSA in 2012**

<https://www.federalregister.gov/documents/2012/05/07/2012-10866/pipeline-safety-verification-of-records>



TVC Records: Review

Traceable, Verifiable, & Complete (TVC) Records

- **Traceable: Records that can be clearly linked to original information about pipeline segment or facility.**
 - **Examples: pipe mill records, which include mechanical and chemical properties; purchase requisition; as-built documents indicating minimum pipe yield strength, seam type, wall thickness, and diameter.**



TVC Records: Review

Traceable, **Verifiable**, & Complete (TVC) Records

- **Verifiable: Records are those in which information is confirmed by other complementary, but separate documentation.**
 - **Examples: pressure test of a segment complemented by pressure charts or field logs; purchase order to a pipe mill with pipe specifications verified by a metallurgical test of a coupon pulled from the same pipeline segment.**



TVC Records: Review

Traceable, Verifiable, & **Complete** (TVC) Records

- **Complete: Records finalized as evidenced by a signature, date, or other appropriate marking such as a corporate stamp or seal.**
 - **Example: Complete pressure testing record that identifies a specific segment of pipe, who conducted test, duration, medium, temperatures, accurate pressure readings, and elevation information, as applicable.**

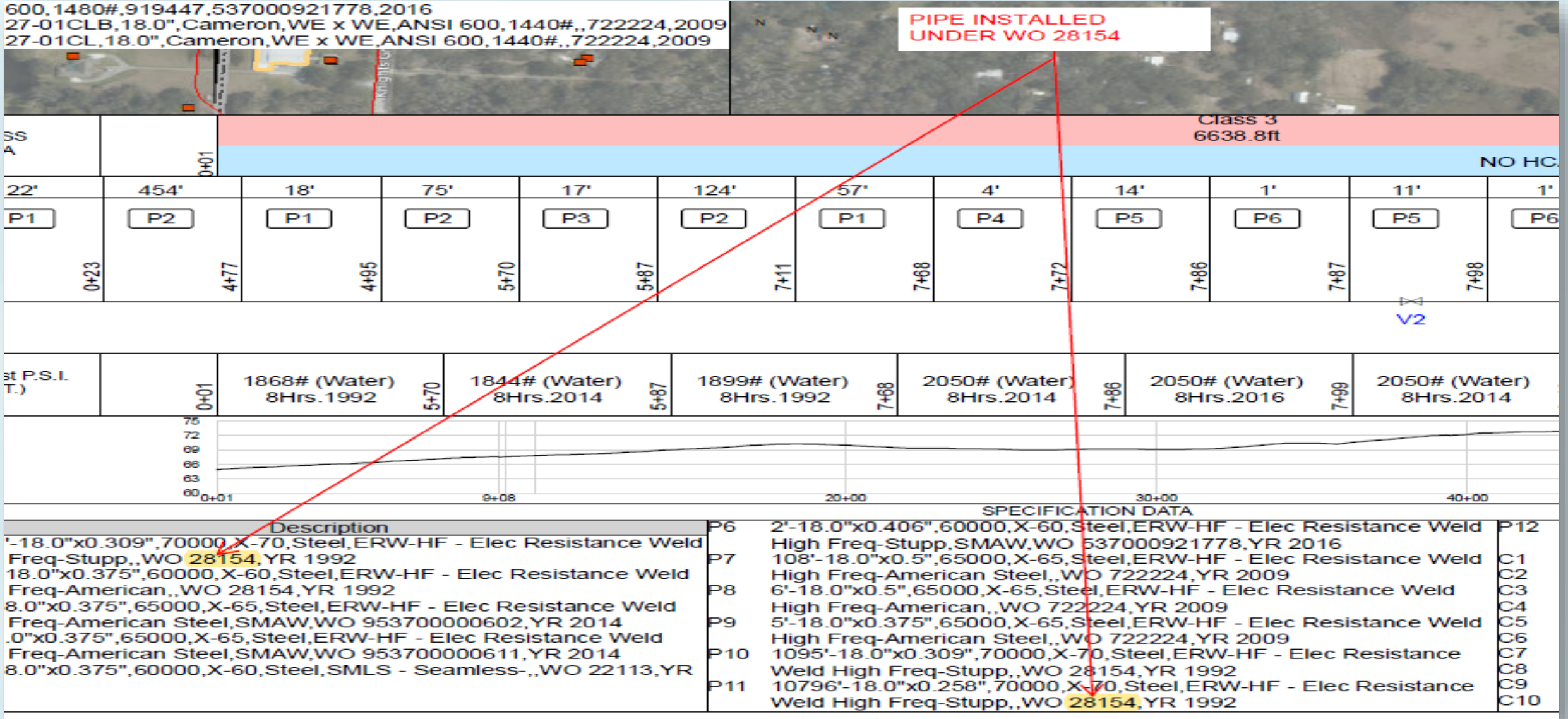


TVC Records: An Example

- Florida Gas Transmission provided GRIT (PHMSA's Gas Rule Implementation Team an example of TVC records for an MAOP determination for a single pipeline segment.
- Records provided:
 - Alignment sheet,
 - Hydrostatic test log and pressure chart, and
 - Mill test report.
- Records are *complete* (met requirements of Part 192).
- FGT was able to link each record together to show that the information was *verifiable* and *traceable*.



TVC Records: An Example



Alignment sheet mentions WO 28154.



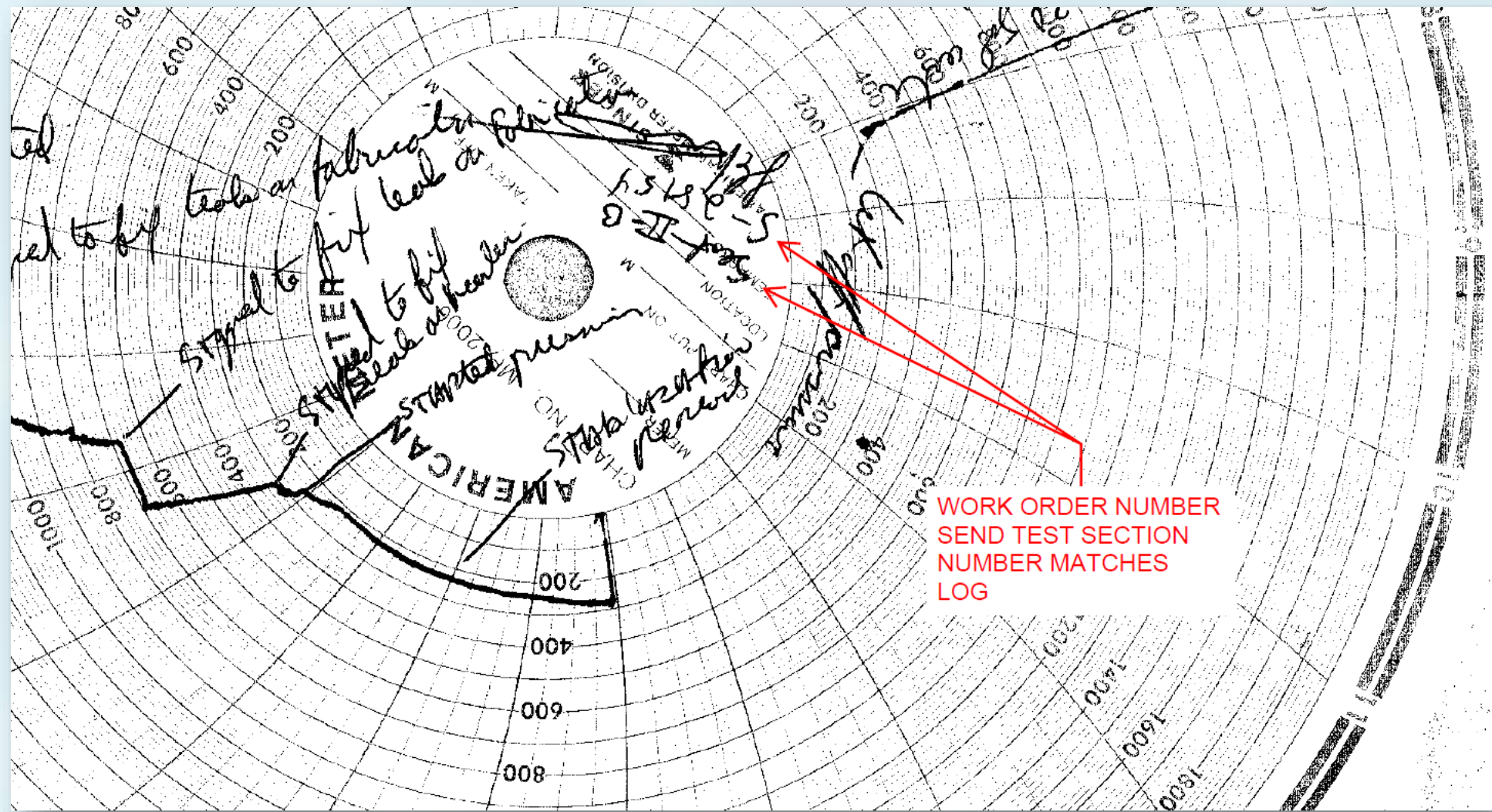
TVC Records: An Example

| | | | | | | | |
|---|---|-------------------------------|----------------------|---|-----------|------------------------------|---------|
| ENRON GAS PIPELINE GROUP | Engineering Standards | | Standard | 8116 | | | |
| | FACILITY PRESSURE TEST SUMMARY PIPELINES | | Page | 2 of 2 | | | |
| | | | Issue Date | 06/86 | | | |
| | | | Rev. No. | 1 | | | |
| | | Date | 04/87 | | | | |
| STATIONING MATCHES ALIGNMENT SHEET | | WO MATCHES ALIGNMENT SHEET | | Minimum Pressure matches alignment sheet | | | |
| Line No. | Plant Oper. | Work Order | Test Fluid | Date | | | |
| | | S-28154 | WATER | Start Test | End Test | | |
| | | TEST SECTION RESULTS | | 10-18-90 | 10-18-90 | | |
| Test Section Number | Station - Station | Class Location | Req. Min. Test Pres. | Actual Difference in Elevtn. | Test Dur. | Actual Test Pressure Minimum | Maximum |
| 2-B | 1001-1901+39.6 | 3 | 1806 | | 8HRS | 1899 | 1901 |

Hydro Test Log links WO 28154 and proper stationing to Alignment sheet.



TVC Records: An Example



Pressure Chart links to WO 28154.



TVC Records: An Example

WORK ORDER MATCHES

| ENGINEERING DESIGN | | | FLORIDA GAS TRANSMISSION COMPANY | | | | RUN DATE: 03/10/92 | | | |
|---|-------------|---------------------------|--|--------------------|----------------------------|-------------------|------------------------|----------------------|-------------------|--------------------|
| PROJECT NUMBER: 528154 | | | MATERIALS LIST | | | | RUN TIME: 17:08:25 | | | |
| PROJECT NAME: ST. PETE/SARASOTA 18" CONNECTOR | | | | | | | PAGE 1 OF 27 | | | |
| CTR FUR | MARK NUMBER | REQUEST QUANTITY AND UNIT | ITEM DESCRIPTION | UNIT NO. PRIME-SUB | PURCHASE ORDER OR TRANSFER | QUANTITY RECEIVED | QUANTITY NOT ACCOUNTED | QUANTITY TRANSFERRED | QUANTITY SURPLUS | QUANTITY INSTALLED |
| | P-0001 | 129630 FT | 999 PIPE-AS DESCRIBED BELOW: ITEM NUMBER - 10-999-0001 NOTES: PIPE, LINE-18.000" O.D. X 0.258" W.T. (48.89 LB/FT), ERW, API5L, GR X 70, SWEET GAS SERVICE. <i>Mfg. Stupp</i> COATED WITH 16 MILS AVERAGE FUSION BONDED EPOXY (14 MILS MINIMUM). PIPE TO BE 60 FEET AVG LENGTHS, 45 FEET MINIMUM - 70 FEET MAXIMUM PIPE TO BE DESIGNED, MANUFACTURED, TESTED AND INSPECTED IN ACCORDANCE WITH ENRON E.S. 4905, REVISION 7, DATED 11/91, ATTACHED HERETO. FBE TO BE APPLIED PER ENRON E.S. 6624, REVISION 4, DATED 10/91. | 344-18 | 06225783 | 129,809.2 | (238.12) | TC21020012 (4103) | 4102.9 | 125,709.08 |
| | P-0002 | 49409 FT | 999 PIPE-AS DESCRIBED BELOW: ITEM NUMBER - 10-999-0001 NOTES: PIPE, LINE-18.000" O.D. X 0.309" W.T. (57.36 LB/FT), ERW, GR X 70, SWEET GAS SERVICE. <i>Mfg. Stupp</i> COATED WITH 16 MILS AVERAGE FUSION BONDED EPOXY (14 MILS MINIMUM). PIPE TO BE 60 FEET AVERAGE LENGTHS, 45 FEET MINIMUM - 70 FEET MAXIMUM. PIPE TO BE DESIGNED, MANUFACTURED, TESTED AND INSPECTED IN ACCORDANCE WITH ENRON E.S. 4905, REVISION 7, DATED 11/91. FBE TO BE APPLIED PER ENRON E.S. 6624, REVISION 4, DATED 10/91. | 344-18 | 06225725 | 49,660.1 | | TC21020014 (1179) | 1258.9 | 49,660.1 |
| | P-0003 | 833 FT | PIPE, LINE-18" O.D. X, 0.309" WALL, ERW, API5L, GR X70, SWEET GAS SERVICE, CONCRETE COATING PER ENRON STD. <i>Mfg. Stupp</i> ITEM NUMBER - 10-010-0861 NOTES: | 344-18 | 06225783 | 850 | (10.0) | TC21020017 (80) | | 850 |

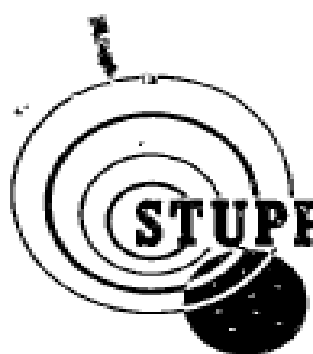
PIPE SPECS MATCH

PO NUMBERS MATCH MTRS

Pipeline material list links to WO 28154 and mentions PO numbers...



TVC Records: An Example



STUPP CORPORATION

MANUFACTURER OF CUSTOM STEEL LINE PIPE FOR THE OIL AND GAS INDUSTRY

P.O. BOX 3558 • BATON ROUGE, LA. 70821-3558
TELEPHONE 504-775-8500

cc JAKE K
DAVIS
5-26-92

CERTIFICATE OF TESTS

DATES ALIGN WITH PROJECT TIMELINE

DATE 4-13-92 ER 7126 Ordered Footage 138,050.0 Ft
 Customer PO 062257B3 Complete Shipped Footage Ft
 Size/Wall/Grade 18" x .258" API5L X70 EAW
 Test Pressure 2010 psi @ 20 sec. Seam Annealed Min 1650 F API 37 Edition
 ELECTROMAGNETIC & ULTRASONIC - 1/8" DRILL HOLE - N-10 NOTCH P08000-92
 P09004-92

PO NUMBER MATCHES MATERIAL LIST

PIPE SPECS MATCH

CUSTOMER ENRON CORPORATION

CHEMICAL AND PHYSICAL TESTS

Transverse Specimen Size 1 1/2" x 2"

| Heat No | 58333 | 58333 | 58374 | 21718 | 43433 | | | |
|----------|--------|--------|--------|--------|--------|--|--|--|
| Yield | 82886 | 79006 | 86750 | 86664 | 86149 | | | |
| Tensile | 102145 | 97190 | 100339 | 103491 | 102150 | | | |
| W. TENS. | 109013 | 108067 | 105250 | 108436 | 108156 | | | |

Mill Test Report links to WO 28154, proper pipe specs, PO, etc.



Material Verification: Procedure Overview

- **Definition of Opportunistic Digs**
- **Nondestructive and Destructive Testing methods**
- **Population Groups and Sampling**
- **Components**
- **Required Notifications to PHMSA**



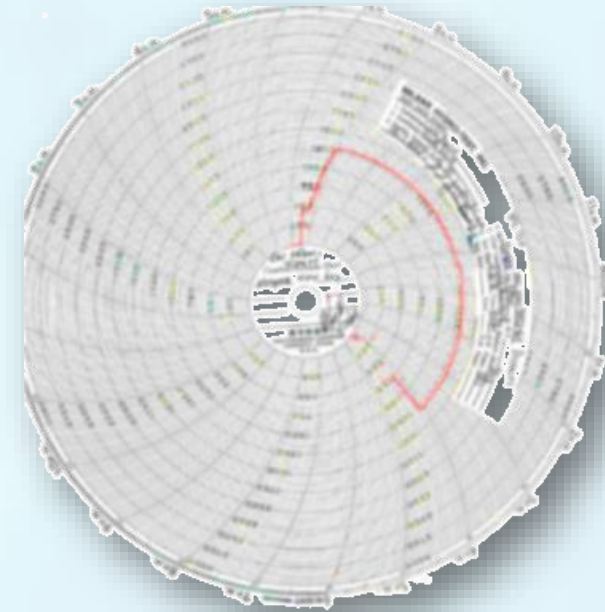
Opportunistic Digs - § 192.607(c)

- **The Rule allows Operators to gather these material properties “opportunistically.”**
 - **Operators must define what an “Opportunistic Dig” means to them in its procedures – pretty much any time the operator is going safely expose the pipe.**
- **The Rule and preamble gives some guidance...**



Opportunistic Digs - § 192.607(c)

- **Opportunistic Digs – From the rule:**
 - **Anomaly direct examinations,**
 - **In situ evaluations,**
 - **Repairs,**
 - **Remediations,**
 - **Maintenance,**
 - **Excavations that are associated with replacements or relocations of pipeline segments that are removed from service, and**
 - ***Other opportunities defined by the Operator....***





Opportunistic Digs - § 192.607(c)

- **Operators must define criteria that would render an exposure inappropriate for material verification.**
 - **Unsafe conditions, e.g. confined spaces or unstable excavations.**
- **In most cases, an operator should be able to conduct material properties tests after completing an immediate repair – or make plans to go back after emergency abates.**

See FAQs-24 and 25.



Methods for Gathering Pipeline Properties

- **Tests, examinations, and assessments used by Operators “must be appropriate for verifying the necessary material properties and attributes.”**
- **Operator must have procedures for gathering material properties using both NDT and DT methods.**

See § 192.607(c)(3).



Methods for Gathering Pipeline Properties

- **Nondestructive Testing Methods**
 - **“...at each test location, material properties for minimum yield strength and ultimate tensile strength must be determined at a minimum of 5 places in at least 2 circumferential quadrants of the pipe for a minimum total of 10 test readings at each pipe cylinder location.”**

See § 192.607(c)(1).



Methods for Gathering Pipeline Properties

- **Destructive Testing Methods**
 - **“...a set of material properties tests for minimum yield strength and ultimate tensile strength must be conducted on each test pipe cylinder removed from each location, in accordance with API Specification 5L.”**

See § 192.607(c)(2).



Gathering Toughness Properties

- **Toughness properties**
 - **If an Operator needs to verify toughness properties, the procedures must include accepted industry methods.**

See § 192.607(c)(4).





Special Considerations for Nondestructive Testing - § 192.607(d)

- **The Rule requires that if Operators use nondestructive testing, special considerations must be taken.**
- **These must be captured in the Operator's procedures:**
 - **(1) Use methods, tools, procedures, and techniques that have been validated by a subject matter experts...,**
 - **(2) Account for measurement inaccuracy and uncertainty using reliable engineering tests and analyses; and**
 - **(3) Use test equipment that has been properly calibrated for comparable test materials prior to usage.**



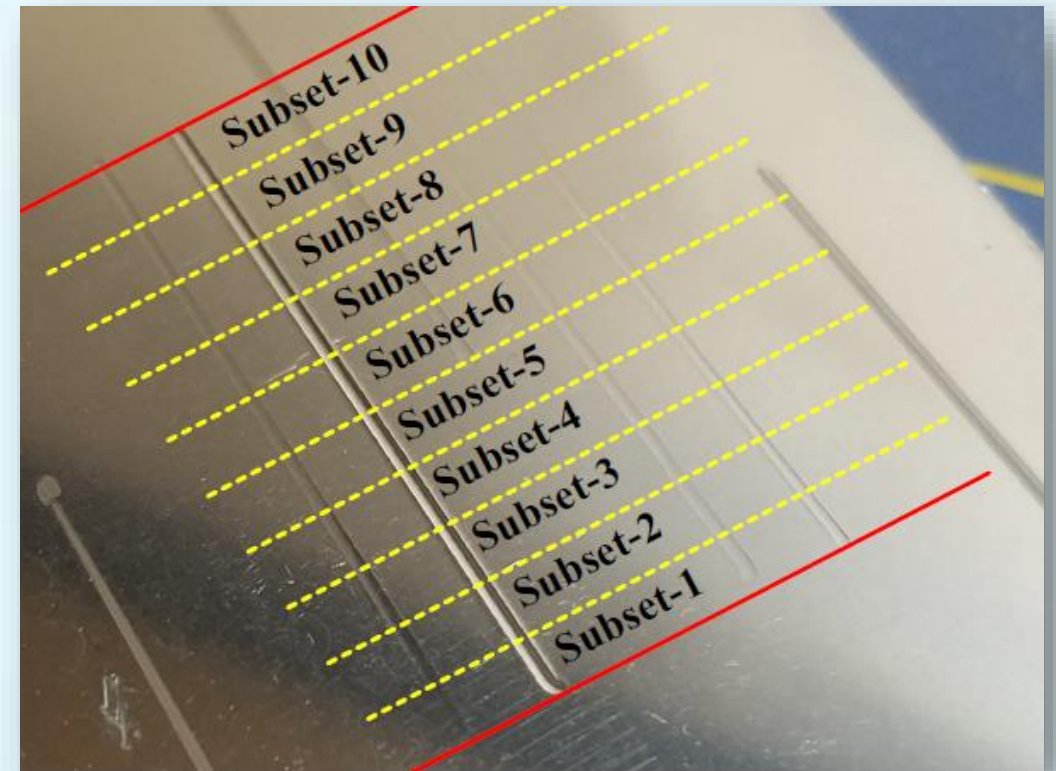
Nondestructive Testing Methods

- **Overview of some nondestructive testing methods for material testing.**
- **Examples the GRIT team saw during pilot inspections.**
- **PHMSA does not endorse these companies, this is just to help inspectors familiarize themselves with the methods out there.**
 - **MMT – HDS overview (hardness, ductility, strength)**
 - **TDW – Positive Material Identification (PMI)**



MMT Material Testing Methods

- **§ 192.607(c)(1) NDE Test Locations.**
- **Performs at least 1 HSD test in 2 circumferential quadrants.**
- **For each HSD test, more than 50 samples collected.**

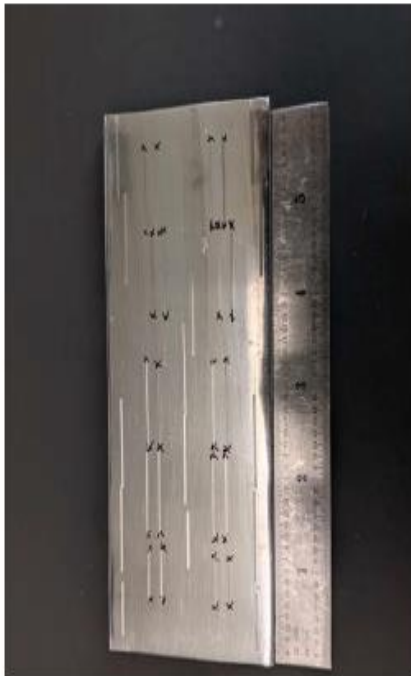




MMT Material Testing Methods

- Field testing process:

HSD Daily Calibration



Field Surface Preparation



HSD Testing and Seam Characterization



Full Chemistry and Metallography



Instant Data QA/QC
(Final Report in
5-10 business days)

MMT Massachusetts Materials Technologies LLC
167 Compact Street, Unit 4
Woburn, MA 02451
800-888-8888
www.mmt.com

Hardness, Strength, and Ductility (HSD) Tester - Base Metal Report

Testing Information

| | |
|--------------------------------|---------------------------|
| Customer: [Redacted] | Report No: MMT1110011 |
| HSD Operator: [Redacted] | Test Date: 11/11/2011 |
| Service ID: [Redacted] | HSD Test No: MMT1110011 |
| Field Name: [Redacted] | Operator Name: [Redacted] |
| Sample Description: [Redacted] | Sample Type: [Redacted] |

Measurements

| Station | Hardness | Strength | Ductility |
|-----------|----------|----------|-----------|
| Station 1 | 111.0 | 45.0 | 10 |
| Station 2 | 111.0 | 45.0 | 10 |
| Station 3 | 111.0 | 45.0 | 10 |
| Station 4 | 111.0 | 45.0 | 10 |

Base Metal Chemical Composition, Ltd. %

| Element | Wt. % |
|---------|-------|
| C | 0.15 |
| Mn | 0.30 |
| P | 0.010 |
| S | 0.005 |
| Si | 0.030 |
| Fe | 99.30 |
| Ni | 0.005 |
| Al | 0.005 |
| Cu | 0.005 |
| Cr | 0.005 |
| Mo | 0.005 |
| Nb | 0.005 |
| As | 0.005 |
| Se | 0.005 |
| Ag | 0.005 |
| Cd | 0.005 |
| Sr | 0.005 |
| Zn | 0.005 |
| B | 0.005 |
| Pb | 0.005 |
| Sn | 0.005 |
| Co | 0.005 |
| N | 0.005 |
| O | 0.005 |
| H | 0.005 |
| Other | 0.005 |

Comments

Prepared: [Signature] Tested Surface: [Signature] Approved: [Signature] Date: 11/11/2011



TDW – Positive Material Identification

- **The TDW Non-Destructive Evaluation process consists of five methods:**
 - **Ultrasonic thickness testing (UTT)**
 - **AUT B-scanner (C-scan display)**
 - **Automated Ball Indenter (ABI)**
 - **Optical Emissions Spectrometry (OES)**
 - **Magnetic Particle Testing (MT)**



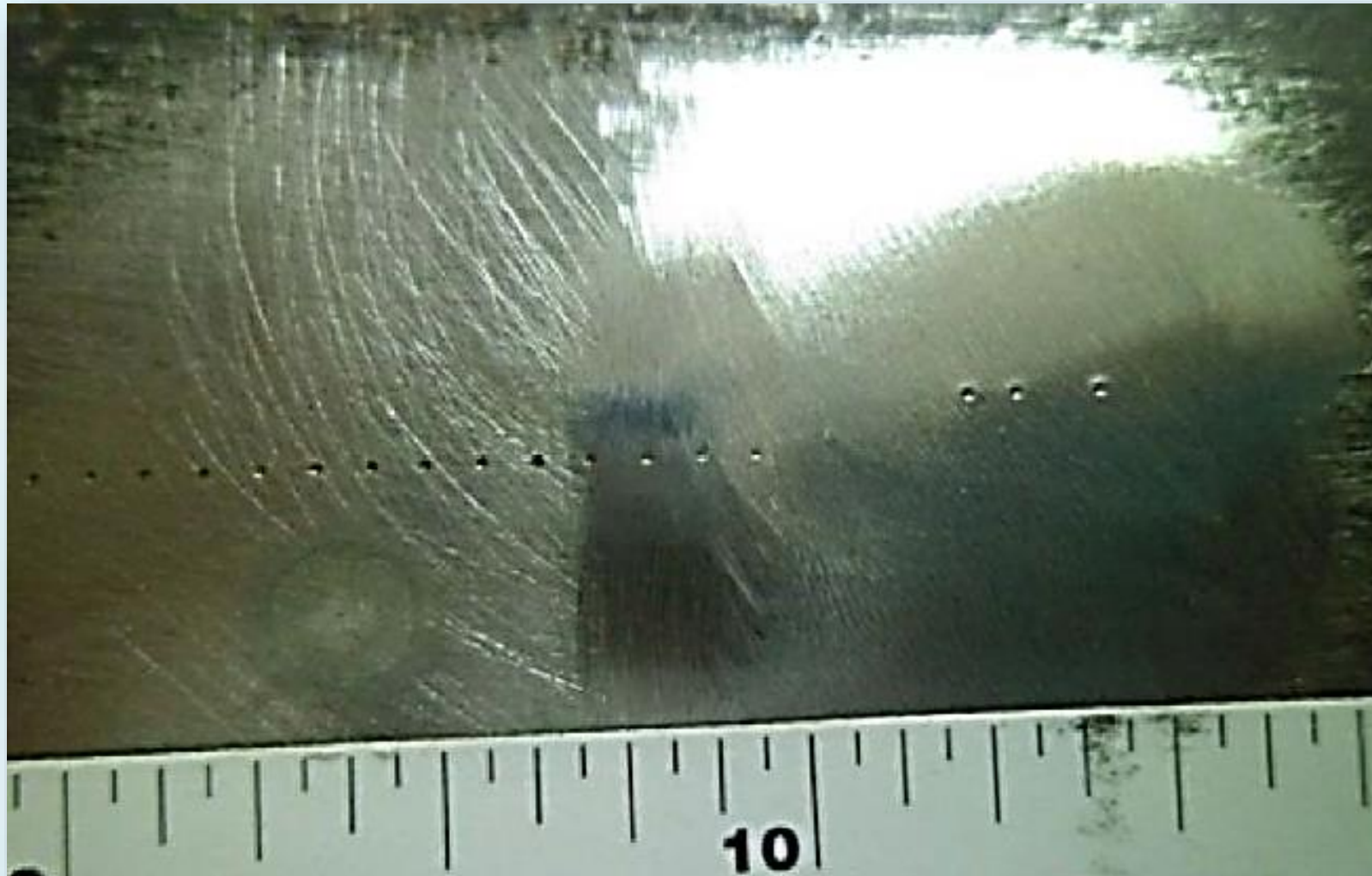
TDW – Positive Material Identification

- **Automated Ball Indenter (ABI) uses sophisticated algorithm to determine material yield strength based on stress strain curve generated by equipment software.**





TDW – Positive Material Identification



- **A ball indenter sequentially applies a load fifteen times at a single location.**



TDW – Positive Material Identification



- **ABI – Automated Ball Indenter**





Validation of “New” Material Testing

- In 2013, Kiefner & Associates performed some testing on TD Williamson’s material properties field testing processes and results.
 - *Positive Material Verification Process*
- Used actual pipe from a cooperating Operator’s system.
- Compared PMI results to laboratory results – concluded that the PMI results should only be used for *quantitative purposes such as grade comparisons.*

Table 1. Mechanical Property Results

| Pipe Sample | Lab Yield Strength | Lab Tensile Strength | TDW Yield Average | TDW Tensile Average | Yield Diff | Tensile Diff |
|-------------|--------------------|----------------------|-------------------|---------------------|------------|--------------|
|-------------|--------------------|----------------------|-------------------|---------------------|------------|--------------|



Material Testing

- **Items to look for in the procedures:**
 - **Qualifications**
 - *Operator Qualifications* – Operator OQs versus Operator-accepted certifications
 - *Special Certifications* – Contractor employees should have the required certifications (e.g. specific training/experience on equipment)
 - **Equipment – Calibration requirements**
 - Is equipment calibrated ahead of time?
 - Does equipment need to be calibrated once it's mounted on the pipe?



Material Testing: Field Inspections

- **Test set up - *surface preparation of pipe required?***
- **Equipment set up – *has equipment been properly calibrated?***
- **Results acceptance criteria**
 - *Operators comparing NDT results to more traditional lab results of the same pipeline segment?*
- **Report outputs – *what documentation will Operator receive?***

Remember: All of this is memorialized in the contractor's procedures.



Material Testing: Opportunistic Digs

- **This dig is opportunistic dig – why else is the Operator here?**
Is the Operator's following those procedures?
 - **Anomaly dig,**
 - **Verification dig,**
 - **Repairs/remediations,**
 - **Valve replacements/installations, or**
 - **Test lead installations...**



Sampling Multiple Segments of Pipe - § 192.607(e)

- **Operators can use a sampling program to gather unknown pipeline material properties.**
- **Rule requires Operators to determine “populations” of similar pipeline segments.**
- **The total mileage of each “population” is the cumulative mileage of pipeline segments with these similar properties.**
- **The pipeline segments need not be continuous.**



Creating Pipeline Populations for Material Verification - § 192.607(e)

- **When Operators create pipeline populations, they must contain combinations of the following properties:**
 - **Nominal wall thicknesses,**
 - **Grade,**
 - **Manufacturing process,**
 - **Pipe manufacturing dates, and**
 - **Construction dates.**
- **If the dates between the manufacture or construction of the pipeline segments exceeds 2 years, these segments cannot be in the same population.**

See FAQ-18.



Creating Pipeline Populations for Material Verification - § 192.607(e)

- **Operators can only split populations based on *known* attributes.**
- **Separate populations of pipe segments should be created where attributes are unknown.**
- **Operators can initially group pipe segments with no known material properties into a single population.**
 - **Once material properties are discovered, these segments should be incorporated into populations with similar attributes.**

See FAQs-19 and 20.



Creating Pipeline Populations for Material Verification - § 192.607(e)

- **Operators can use inline inspection data to create pipeline populations for material verification.**
 - **Diameter**
 - **Wall thickness, etc.**
- **Like any inline inspection – Operators must establish “acceptance criteria.”**
- **Considered an “alternative method” so must notify PHMSA per § 192.18.**

See FAQ-21.



How Many Samples?

- **Once the Operator defines population groups, it must complete:**
 - (i) **One excavation per mile rounded up to the nearest whole number; or**
 - (ii) **150 excavations if the population is more than 150 miles.**
- **Operators can use prior material property testing performed during *a single excavation* if the Operator can show it meets the requirements of § 192.607.**
 - *It will be counted as a single sample for that specific population.*



Material Verification: Inconsistent Findings

- If the Operator performs material property testing and finds properties inconsistent with what is expected in the population...
- **They MUST expand the sampling program!!**



See FAQ-28.



Material Verification: Inconsistent Findings - § 192.607(e)(4)

- **Operators must define what “not consistent” means in its procedures.**
- **Rule requires some statistical analysis for the expanded sampling program.**
 - **“...must use valid statistical bases designed to achieve at least a 95% confidence level that material properties used in the operation and maintenance of the pipeline are valid.”**
 - **Operators must show how this expanded sampling program will address inconsistencies.**

See FAQ-28.



Alternative Sampling Methods - § 192.607(e)(5)

- **Alternative sampling methods can be used – similar to the requirements of an “expanded sampling program”**
 - **“...must use valid statistical bases designed to achieve at least a 95% confidence level that material properties used in the operation and maintenance of the pipeline are valid.”**
 - **Operators must show how this alternative sampling program will address inconsistencies.**





Expanded and Alternative Sampling Program - § 192.607(e)

- **Both Expanded Sampling Programs and Alternative Sampling Programs require the Operator to notify PHMSA per the requirements of § 192.18.**

§ 192.18 How to notify PHMSA.

(a) ...

(c) Unless otherwise specified, if the notification is made pursuant to § 192.607(e)(4), § 192.607(e)(5), ... to use a different sampling approach....the operator must notify PHMSA at least 90 days in advance of using the other technology.



“Alternative Method” for Populations - § 192.607(e)

Washington, DC 20590

To whom it may concern,

In accordance with §192.18, Gulf South Pipeline Company, LP (Gulf South) is hereby notifying PHMSA of its intent to use an alternative statistical sampling approach as outlined in §192.607(e)(5). Gulf South intends to use Rosen’s RoMAT PGS in-line inspection pipeline grading tool on Gulf South’s Index 915-6 in Escambia County, Florida on or around August 26, 2021.

As clarified in FAQ-21 ^[1], the data collected from Rosen’s RoMAT tool will be used to determine pipeline population groups under §192.607(e). Also as stated in FAQ 22 ^[1], ILI can be used to determine pipeline material properties and attributes. The RoMAT tool is capable of collecting material properties and attributes on every pipe joint and every bend. This approach far exceeds the sampling frequency required by §192.607(e)(2) (one per mile in each population) and meets the requirements of §192.607(e)(5) ensuring that the material properties and attributes are valid.

Rosen’s analysis of the ILI data will be based on a statistical analysis to achieve at least a 95% confidence level that the material properties are valid. Furthermore, Rosen’s analysis will be supplemented with in-ditch non-destructive and/or destructive testing once population groups are established. The frequency of the in-ditch testing will be defined after the ILI data analysis is completed.



“Alternative Method” for Populations - § 192.607(e)

- **On August 4, 2021, Gulf South notified PHMSA requesting an alternative population determination and sampling program for material verification.**
- **Notification for an ILI run in Escambia County, Florida on or around August 26, 2021.**
 - **“As clarified in FAQ-21, the data collected from Rosen’s RoMAT tool will be used to determine pipeline population groups under §192.607(e). Also as stated in FAQ 22, ILI can be used to determine pipeline material properties and attributes.”**



“Alternative Method” for Populations - § 192.607(e)

- **PHMSA responded to Gulf South’s notification:**
 - **Essentially, PHMSA granted permission for Gulf South to use ILI to determine population groups...**
 - **BUT Gulf South must come back to PHMSA once population groups are determined and provide more information before the Operator is allowed to use the proposed sampling approach.**
 - **“PHMSA supports Gulf South’s usage of “other technology” (ILI verification process) to determine pipeline “population groups” (diameter, wall thickness, grade, and seam type) to meet 49 CFR 192.607.”**



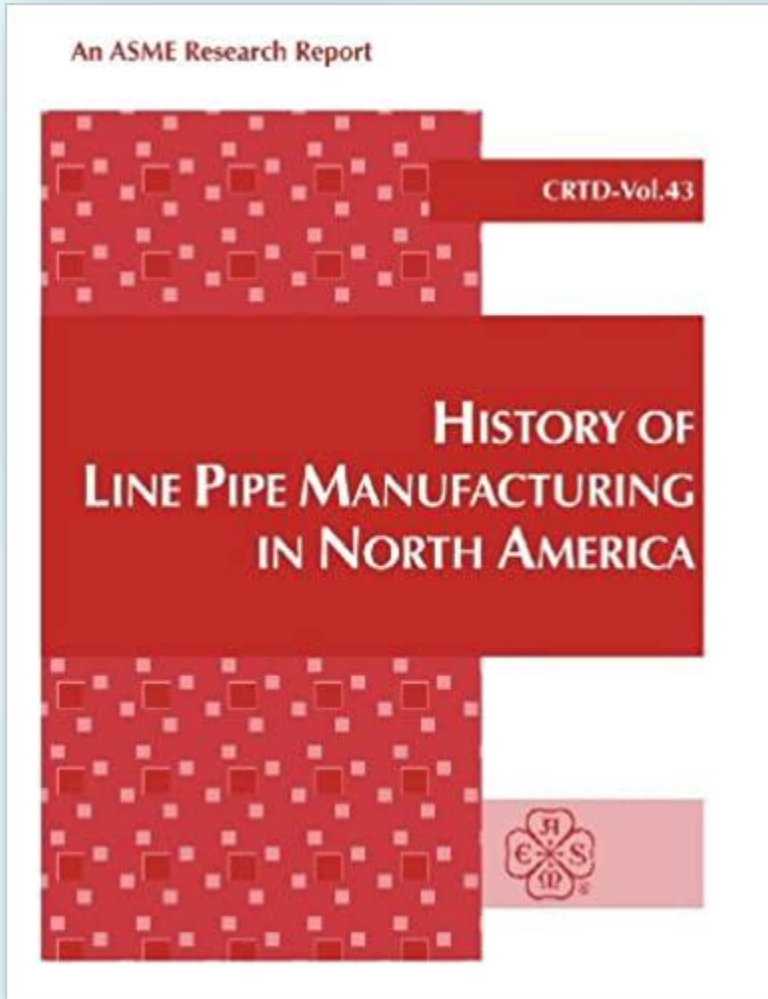
Material Verification: Upgrading § 192.607(g)

- **Operators cannot use the material properties determined from the destructive or nondestructive tests required by this section to raise the grade or specification of the material**
 - unless the original grade or specification is unknown, **AND**
 - the MAOP is based on an assumed yield strength of 24,000 psi in accordance with § 192.107(b)(2).



Expanded and Alternative Sampling Program – CRTD-91

- *Applications Guide for Determining the Yield Strength of In-Service Pipe by Hardness Evaluation (2009)*
- **Report originally written as an alternative process for gathering pipeline hardness values outside of Part 192.**
 - “This Guide describes a complete process for conducting field hardness testing to estimate the yield strength of pipeline steel.”
- **Operators are now considering using it as an alternative sampling method – to reduce the number of digs, but to still maintain 95% confidence (but below the one dig per mile).**



This document's purpose is to provide pipeline operators with historical data on line pipe. The document is comprised of four major sections.

- Manufacturing processes that have been and are being used to make line pipe.
- Tables by type of pipe listing the manufacturers of line pipe, past and present, in North America.
 - some techniques for identifying unknown pipe samples
- API line pipe specifications as they have evolved since 1928 are reviewed.
- A glossary of terms frequently associated with line pipe manufacturing.