

Railroad Commission of Texas Pipeline Evaluation System Evaluation Report

Inspection Package Number: 126141

Activity/Classification: Specialized/Complaint

Investigation Data

Complaint #: 14832
 Start Date: 3/24/2020 End Date: 3/27/2020
 Initiated By: Ron Perez
 Type of Facility: Transmission
 Type of Pipeline: Transmission - N/A
 Material Transported: Natural Gas - N/A
 New Construction Number: 19-NC-226
 Latitude & Longitude: N/A
 Location: 77 RR 32, Blanco Texas 78606
 City: Blanco
 County: BLANCO

Contacts

Contact Type	Name	Company / Affiliation	Phone Number
Pipeline Operator	Jason Hartman	Director ? Midstream Project	903-472-8055

Executive Summary

On March 25, 2020 RRC inspectors Pete Longoria and Jonathan Saucedo met with Kinder Morgan Texas Pipeline LLC personnel in Blanco, TX to discuss the concerns expressed under Complaint #14832, received by the RRC on March 16, 2020. The concerns surrounded the potential degradation of the pipeline coating due to exposure from ultraviolet sunlight and rain.

System Details

The Kinder Morgan Texas Pipeline LLC, Permian Highway Transmission PIP pipeline system, (PES System ID: 966431), is a 42-inch Natural Gas Transmission pipeline that will span a total of approximately 428.8 miles beginning in Reeves County and ending in Colorado County. The pipeline system will be composed of pipe segments manufactured by Welspun Tubular and JSW Steel (USA) Inc. in accordance with API 5L PSL 2, with wall thicknesses ranging from .600 inches to .864 inches, and a pipe grade of x70. The pipeline features a longitudinal seam that was created by the Helical Submerged Arc Weld process. The pipeline segments manufactured by Welspun Tubular feature a Valspar Pipeclad 2000 Fusion Bonded Epoxy (FBE) coating as well as a Valspar Pipeclad 2040 Abrasive Resistant Overcoat (ARO) on applicable segments. The pipeline segments manufactured by JSW Steel (USA) Inc. feature an Axalta Nap-Gard 2610 ARO coating.

Investigation Details

RRC Inspectors Pete Longoria and Jonathan Saucedo conducted a record review as well as a field verification of randomly selected pipeline segments for coating degradation issues. The following documentation was reviewed for pipe specimens currently stored in the Kinder Morgan Texas Pipeline, LLC Blanco, TX pipe yard. Inspection Test Procedures for FBE and ARO coatings found in document "ITP/LR/LDCP/002/2019-FBE&ARO REV 4. 06/06/2019" outlining the process to be followed by Welspun Tubular for storage, preparation, application and final inspection of coatings materials once applied. A final inspection conducted by Welspun Tubular "Welspun Quality Control QC/F/KMGCX/214 Thickness Inspection Report", verified coating thickness was within standards outlined in Kinder Morgan Specification M8370 Plant Application of Single-Layer and Dual-Layer Fusion-Bonded Epoxy Coating dated January 1, 2015 with approved exceptions document dated April 5, 2018 as referenced in the Inspection Test Report Procedure. An additional inspection was completed by a third party upon receipt of the pipe segments at the storage yard and is documented in "Hawk

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Services Inspection Report" dated June 11, 2019. This inspection ensured that segments were evaluated upon arrival for any damages that may have occurred during transportation of the pipeline segments from the manufacturer to the storage yard. After review of the documentation it was determined that coating was properly applied to pipeline segments produced by Welspun Tubular and procedures had been followed for addressing pipeline segments that did not meet the criteria determined by Kinder Morgan Texas Pipeline, LLC. The final documentation reviewed for pipeline segments manufactured by Welspun Tubular was a letter from Sherwin Williams addressed to Kinder Morgan regarding Pipeclad 2000 and Pipeclad 2040 Flex UV degradation. The letter stated there is no special protection required to protect coated pipeline from UV degradation for outdoor storage less than one year. The earliest pipeline segments currently stored at the pipe storage yard in Blanco, TX were received by Kinder Morgan on June 10, 2019. "Quality Assurance Plan ARO Coating QAP NO: RCH-248048 REV. NO: 00", dated September 16, 2019 outlined the standards and procedures to be followed by JSW Steel (USA) Inc. for storage, preparation, application and final inspection of coatings materials once applied. A coating thickness verification in accordance with Kinder Morgan Specification M8370 Plant Application of Single-Layer and Dual-Layer Fusion-Bonded Epoxy Coating dated January 1, 2015 with approved exceptions document dated April 5, 2018 was documented in "Hawk Technical Services, LLC FBE/ARO Coating Report JSW", dated November 27, 2019. An additional inspection was complete by a third party upon receipt of the pipeline segments at the storage yard and is documented in "Hawk Services Inspection Report" dated March 11, 2020. After review of the documentation it was determined that coating was properly applied to pipeline segments produced by JSW Steel (USA) Inc. and procedures had been followed for addressing pipeline segments that did not meet the criteria determined by Kinder Morgan Texas Pipeline, LLC. The field verification consisted of completing a coating thickness test on the following pipeline joint segments manufactured by Welspun Tubular and coated with the Valspar Pipeclad 2000 FBE Coating: A19026682, A19027401, A19026466, A19025079, A19023663, A19033185, A19029294. The field verification was conducted using a 6000 Series DeFelsko PosiTector Thickness Tester (Serial Number: 298528), that was last calibrated on December 23, 2019 by Accura Calibration in Garland, TX and found to be within tolerance, with the next calibration cycle due on December 23, 2020. The coating thickness test was conducted on an additional pipeline joint segment manufactured by JSW Steel (USA) Inc. and coated with Axalta Nap-Gard 2610 ARO coating, R191921

Findings and Contributing Factors

RRC Inspectors Pete Longoria and Jonathan Saucedo determined at the time of inspection Kinder Morgan Texas Pipeline LLC was in compliance with applicable regulations outlined in 49 CFR 192 regarding protective coatings.