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PUBLIC SERVICE  
COMMISSION

Gwen R. Pinson  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

**Louisville Gas and Electric  
Company**  
State Regulation and Rates  
220 West Main Street  
PO Box 32010  
Louisville, Kentucky 40232  
www.lge-ku.com

Rick E. Lovekamp  
Manager Regulatory  
Strategy/Policy  
T 502-627-3780  
rick.lovekamp@lge-ku.com

January 31, 2019

**RE: *Louisville Gas and Electric Company Alleged Failure to Comply with  
KRS 278.495, 807 KAR 5:022, and 49 C.F.R. Part 192  
Case No. 2017-00119***

Dear Ms. Pinson:

In accordance with the Kentucky Public Service Commission's Order of March 16, 2018, Ordering Paragraph No. 3 in Case No. 2017-00119, Louisville Gas and Electric Company ("LGE") hereby notifies the Commission that the removal of all remaining mechanical couplings on the LG&E transmission system is now complete.

The following three couplings were removed from LG&E's transmission system:

- 1) A bolted-style mechanical coupling installed in 1959 was removed from service on March 23, 2018. The lab report analysis is attached as Exhibit A.
- 2) A bolted-style mechanical coupling installed in 1962 was removed from service on April 6, 2018. The lab report analysis is attached as Exhibit B.
- 3) A nut follower-style mechanical coupling installed in 1959 was removed from service on January 3, 2019. The lab report analysis is attached as Exhibit C. The work required to remove this last coupling was delayed due to the time it took to obtain the required permits to work in the vicinity of a railroad.

Enclosed, please find the full reports on the removal effort in the above referenced matter.

Should you require anything further, please contact me at your convenience.

Gwen R. Pinson  
January 31, 2019

Sincerely,

A handwritten signature in blue ink, appearing to read "Rick E. Lovekamp". The signature is stylized with a large initial "R" and a long, sweeping underline.

Rick E. Lovekamp

Enclosure

## Bolt-Style Coupling (pressures > 3 psig)

This form will be completed when LG&E or LG&E contractors expose a bolt-style coupling in a system where the pressure is > 3 psig (medium and high pressure distribution and transmission) and the coupling will be backfilled. The purpose of the form is to provide Operations, Engineering and Gas Regulatory personnel with information about the bolt style coupling installation.

### Part A- Discovery of Coupling

#### Precautions:

1. Stop excavation upon discovering the bolt-style coupling in the excavation
2. Set-up a perimeter around the excavation to keep the public away from the excavation

#### General Information:

1. Contact Employee for the bolt style coupling found: Frank Rudolph E0003497
2. Date of exposure: 3/23/2018
3. Location: Kramer Ln and Beech Dr
4. Size of coupling (based on pipe size if not exposed enough to determine): 4"
5. Type of soil (circle one): Sandy Clay Gravel Topsoil Other (take picture and describe)
6. Soil Density test:  Type A  Type B  Type C Note: data not collected, this field was added after coupler was removed)
7. Status: x Removed  Abandoned in place  Backfilled- left in service

#### Pictures:

1. Take at least two pictures of the coupling. The pictures should be from different angles (additional pictures can be taken).
2. Email pictures to supervisor. Ensure pictures are attached to this form:

**Sketch:** Provide a sketch showing the coupling orientation (vertical/horizontal), nearby branches, pipe, valves and fittings, other utilities or structures, etc.

#### Leak Survey:

1. Use an instrument designed to detect natural gas to check for the presence of natural gas after backfilling the excavation. Include readings in the above sketch in relation to the coupling. If the contact employee is not leak survey qualified they should contact:
  - a. Their supervisor to call Gas Regulatory to complete the survey after the excavation is backfilled. Call [REDACTED]
  - b. If Gas Regulatory is not available contact Gas Dispatch to have the survey assigned to a Gas Trouble Technician.

Leak Survey completed at time of backfill (circle one) yes no

Include completed form in the main report and email a scanned copy of the completed form (back and front) to the Distribution Integrity Management (DIM) group.

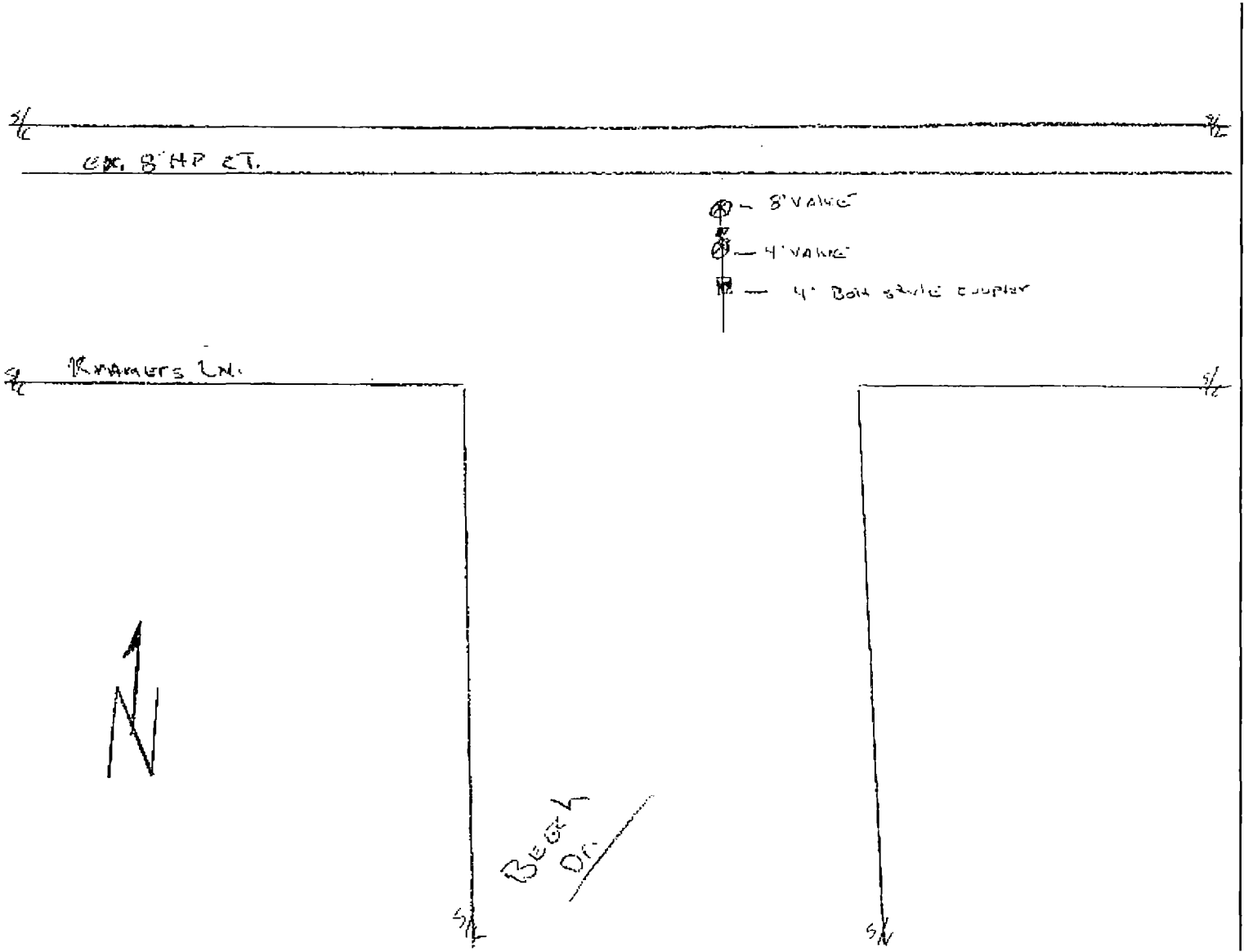
Field Pictures







Sketch



**Part B- Coupling Information**

General Information		Tracking #: 2018-004	
Date 7/3/2018	Expense Org 004385	Project 134829	Task LAB
Address/Location Kramers Ln & Beech Dr			
Size 4- inch	Material Steel	Coating Coal Tar	MAOP 305
Main/Service Number 184337	Soil Type (from Part A) Unavailable	Manufacturer Dresser	Model 4-inch Style 39
Pipe Connection:	Steel to Steel	Steel to Plastic	Plastic to Plastic

Historical Information	
Installation Date 6/14/1962	Document Source Main Report
Installation Company Unknown	Document Source Main Report
Foreman F.G. Briel	Document Source Main Report
Welder Unknown	Document Source Main Report

GIS Information	
Sys Id (of Coupler) 73247224	
Screen Capture	
<p>The screen capture shows a GIS map of a pipe network. A prominent orange line runs diagonally across the map. Several red circular markers with a cross inside are placed along this orange line. Other lines in purple, blue, and grey are visible, representing different pipe types or materials. A label '73247224' is visible at the bottom of the map area.</p>	



Pictures

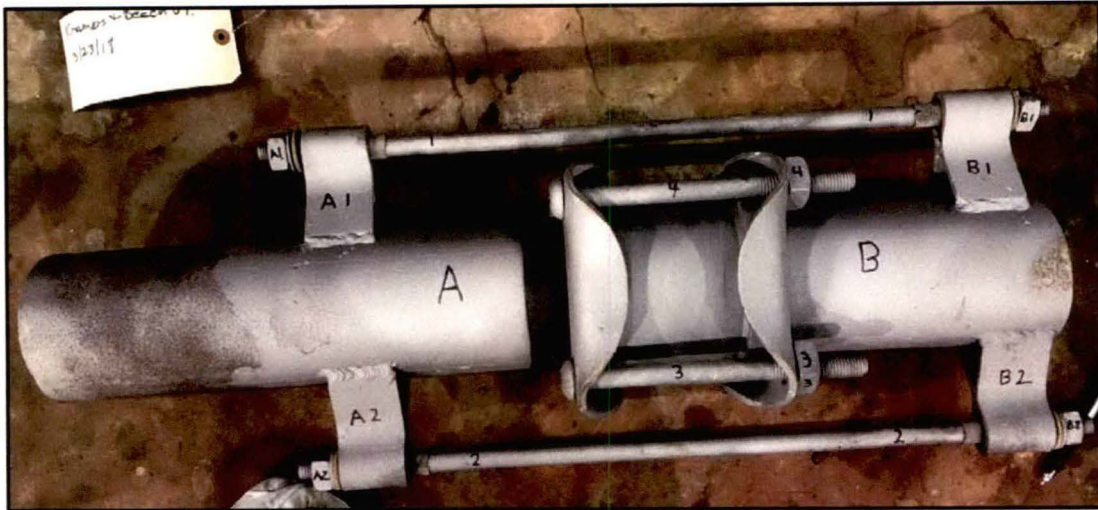


Figure 1- Top View



Figure 2- Front View



Figure 3- Back View

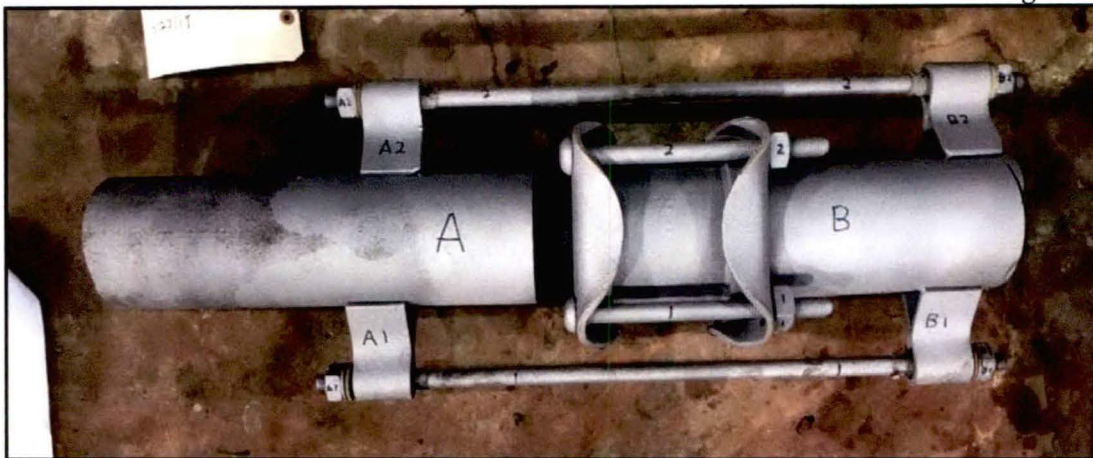


Figure 4- Bottom View



Figure 5- Left Side View

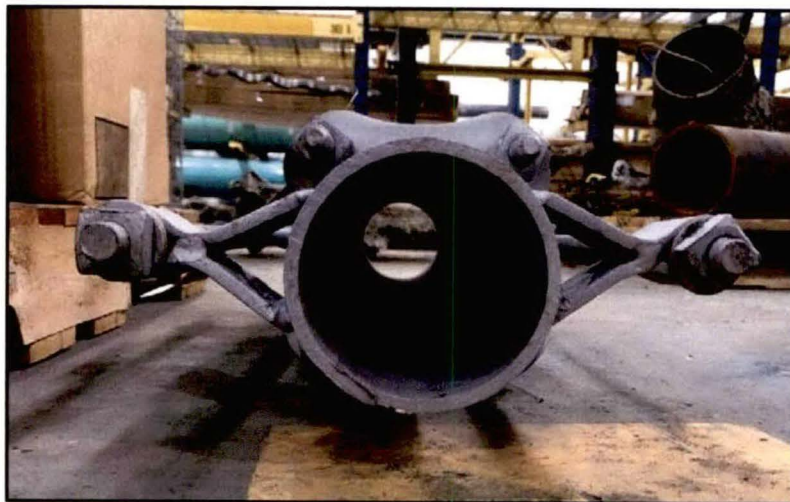


Figure 6- Right Side View

**Part C- Inspection of Coupling**

Visual Inspection Performed by: Chad Augustine [REDACTED] & Elliott Bauer [REDACTED]

Component Quantities	
Number of Bolts on Coupler Body	4
Number of Reinforcement Rods	2
Number of Lugs	2 (2 each rod)

Corrosion						
	Pipe A	Pipe B	Coupler Body	Bolts	Rods	Lugs
General External Corrosion Present?	No	No	No	No	No	No
Localized Corrosion Present?	No	No	No	No	No	No
Pit Depths	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Internal Corrosion?	No	No				

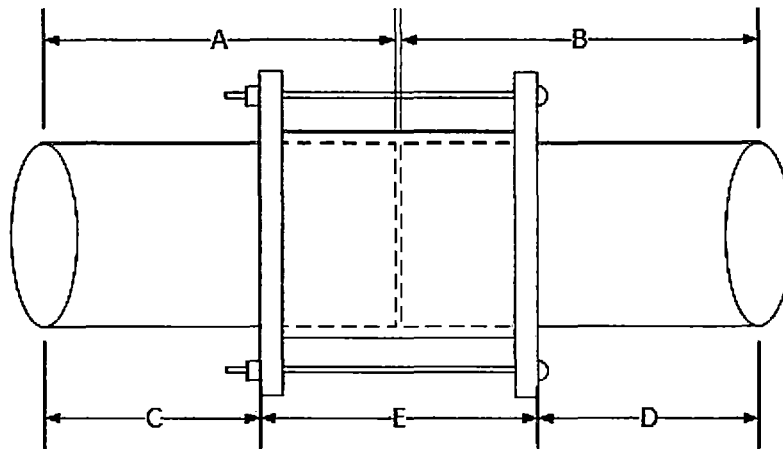
Coupler Body				
Length of Coupler (in.):	6.25"			
Bolt	Washer Present	Nut present?		
1	No	Yes		
2	No	Yes		
3	No	Yes		
4	No	Yes		

Reinforcement Rods						
Rod	Length (in.)	Diameter (in.)	Washer present at head of bolt?	Washer present at end of bolt?	Nut Present? Type?	Type of rod?
1	24"	.627" (16mm)	Yes No head on rod See Figures 7 & 8	Yes	Yes. Square.	All Thread(?)
2	24"	.644" (16mm)	Yes No head on rod See Figures 9 & 10	Yes	Yes. Square.	All Thread(?)

Lugs (Measurements)				
Pipe Side	Lug Number	Thickness (in.)	Circumference (in)	
			Distance to next lug, clockwise	Distance to next lug, counter-clockwise
A	1	.245"	To A2 along top: 6.75"	To A2 along bottom: 7.50"
B	1	.249"	To B2 along top: 6.375"	To B2 along bottom: 8.0625"
A	2	.252"	To A1 along top: 6.75"	To A1 along bottom: 7.50"
B	2	.269"	To B1 along top: 6.375"	To B1 along bottom: 8.0625"

Lugs (Observations)				
Lug	Lug	Assembly sets aligned?	Deformed?	Deflected? (angle of)
A1	B1	In line with each other, not centered on circumference of pipe	None Observed	0°
A2	B2	In line with each other, not centered on circumference of pipe	None Observed	0°

Lugs (Weld Quality)						
Pipe Side	Lug Number	Any part detached from pipe?	Welded on all sides of exterior? If no, describe	Are welds on exterior continuous? If no, describe	Welded on all sides of interior? If no, describe	Are welds on exterior continuous? If no, describe
A	1	Not completely.	No, no weld on outside of bottom leg. (Figure 11)	Yes on the top leg. No exterior weld on bottom leg.	No, no weld on inside of top leg. (Figure 11)	No, the interior weld on the bottom leg is not continuous. No interior weld on top leg.
A	2	Not completely.	No, no weld on outside of bottom leg. (Figure 12)	Yes on the top leg. No exterior weld on bottom leg.	No, no weld on inside of top leg. (Figure 12)	Yes on bottom leg. No interior weld on top leg.
B	1	Not completely.	No, no weld on outside of bottom leg. (Figure 13)	Yes on the top leg. No exterior weld on bottom leg.	No, no weld on inside of top leg. (Figure 13)	Yes on bottom leg. No interior weld on top leg.
B	2	Not completely.	No, no weld on outside of bottom leg. (Figure 14)	Yes on the top leg. No exterior weld on bottom leg.	No, no weld on inside of top leg. (Figure 14)	Yes on bottom leg. No interior weld on top leg.



Stab Depth					
	A	B	C	D	Stab Depth (A-C) or (B-D)
Pipe Side A	18.3125"		15.5625		2.75"
Pipe Side B		11.0000"		8.2500"	2.75"
	Sum of stab depths				5.5"
	Coupler Length (E)				6.25"
	Difference				0.75"

Additional Comments and General Observations

- This is an insulating coupler. Insulating washers were present on all reinforcement rods.
- Based on the location of the welds, it can be assumed that bolts 3 & 4 on the coupler body represent the top of fitting. Using this assumption, the welds of each leg on each weld are located in the top (or upper) position.



Figure 7- Lug A1

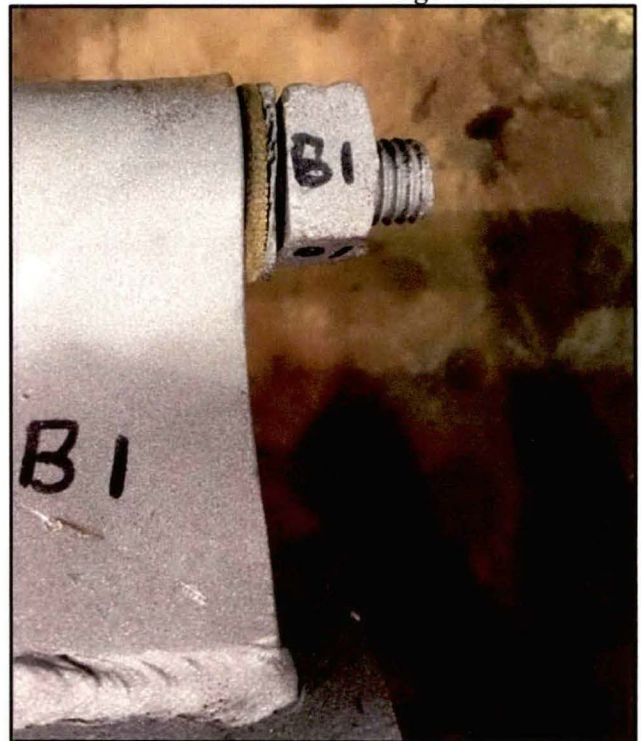


Figure 8- Lug B1

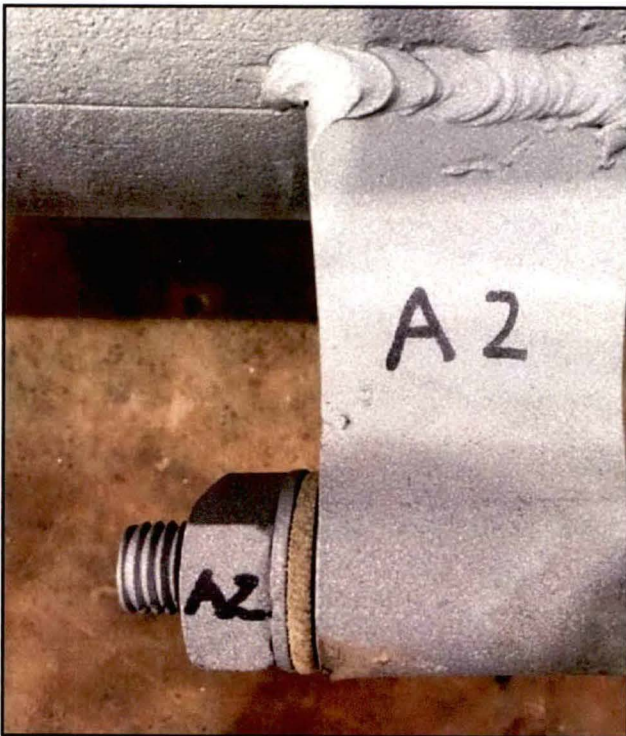


Figure 9- Lug A2

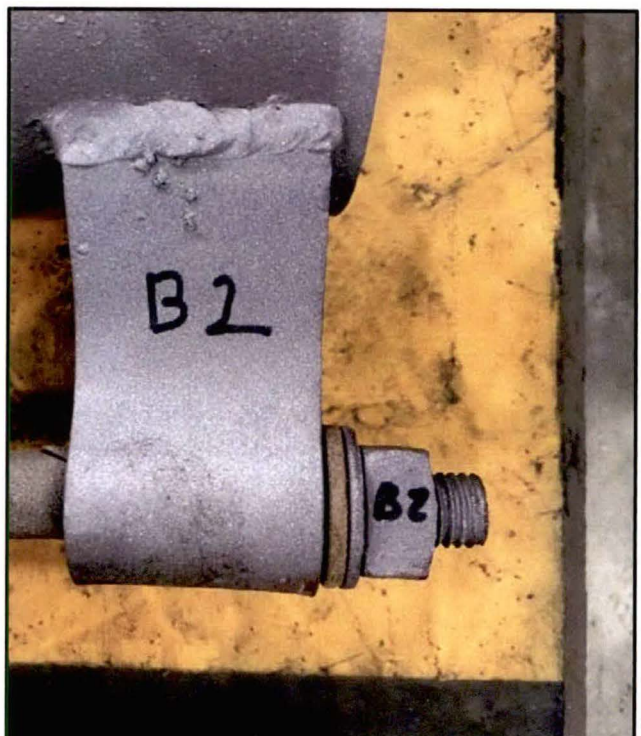


Figure 10- Lug B2



Figure 11- Lug A1 Welds

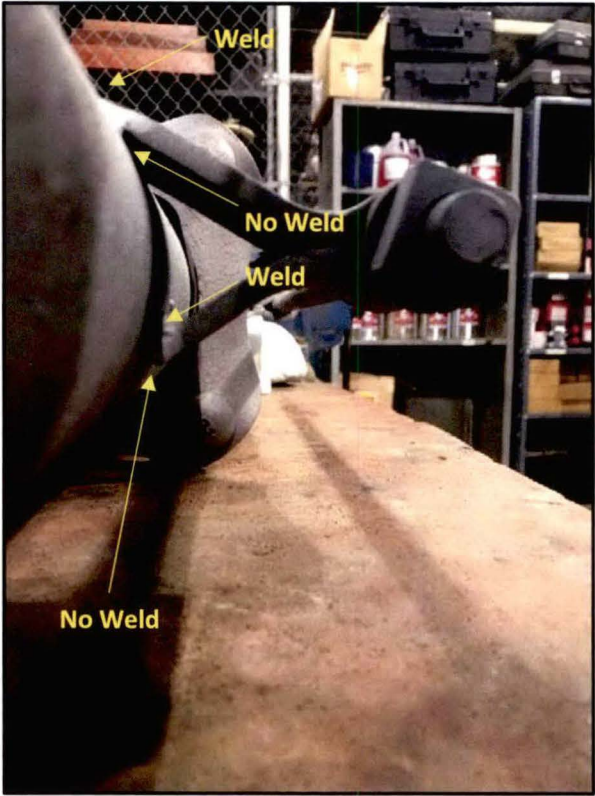


Figure 12- Lug A2 Welds

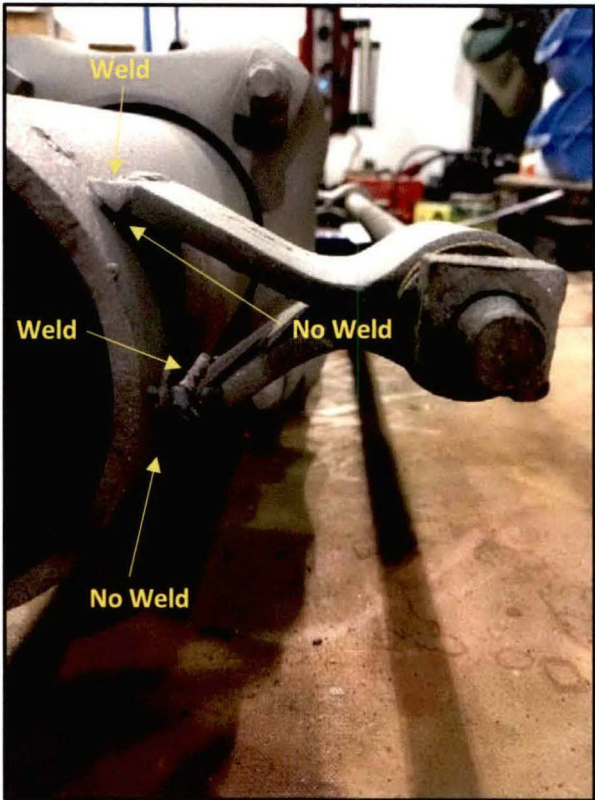


Figure 13- Lug B1 Welds

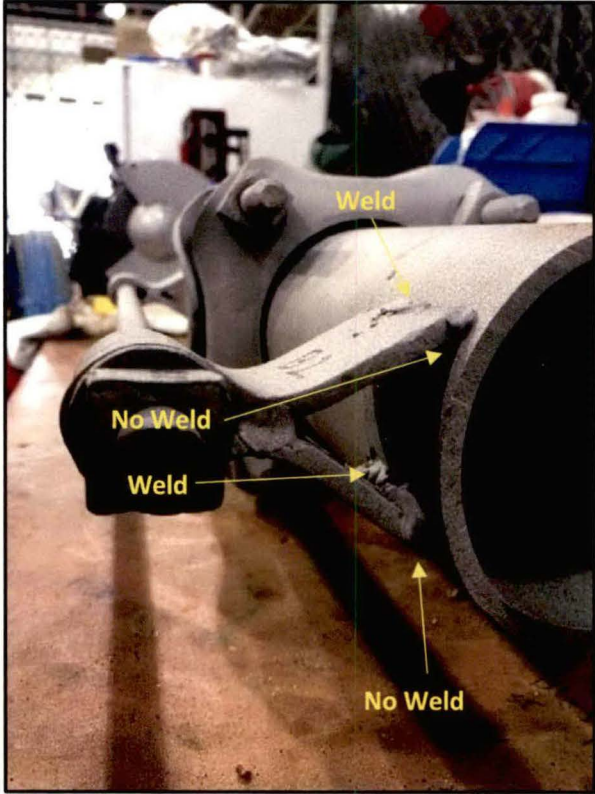


Figure 14- Lug B2 Welds



**Part D- Analysis of Coupling**

This section is reserved for the lab report.

**LG&E - Kentucky Utilities**  
**6900 Enterprise Drive**  
**Louisville, KY 40214**

**August 17, 2018**

Attention: Chad Augustine

## **Report No. 201801864**

### **Metallurgical Evaluation of Coupling and Associated Hardware**

**Location: Kramers & Beech St.**

#### **DESCRIPTION AND PURPOSE**

A natural gas pipe section including a coupling was submitted for metallurgical evaluation. The section was a 4" pipe with a Dresser Style 39 Insulating Coupling. Two joint harnesses were also affixed to the pipe section. Copies of the installation information for the coupling and harnesses were previously provided for this investigation. It was reported that the coupling had been installed in the field at Kramers & Beech Streets. The pipe section was subsequently excavated after substantial service duration without failure. It was requested that the general dimensions, weld quality, corrosion condition and mechanical properties of the coupling components be determined as directed.

#### **RESULTS**

The submitted pipe section with the coupling is shown in Figures 1 and 2. Four A-frame lugs of the joint harnesses had been fillet welded to the pipe segments. Two rods and associated nuts with deflection rings had been affixed through the welded lugs to apply compression to the coupled joint. The coupling consisted of two followers, a middle ring and associated nonmetallic gaskets and sleeves. Four equally spaced bolts with associated nuts secured the coupling components together and against the pipe segments. The general orientation of the coupling was consistent with the supplied information for the specified Dresser Style 39. Prior to receipt, the ends of the pipe segment were labelled as Ends A and B, as shown in Figures 1 and 2. The top of the pipe was selected as the surface with the generally better weld appearance. Lugs A1 and A2 were welded to Pipe A, and Lugs B1 and B2 were welded to Pipe B. The rod between Lugs A1 and B1 was arbitrarily identified as Rod 1, whereas the opposite was Rod 2. The four coupling bolts were arbitrarily numbered as Bolts 1 through 4 around the circumference.

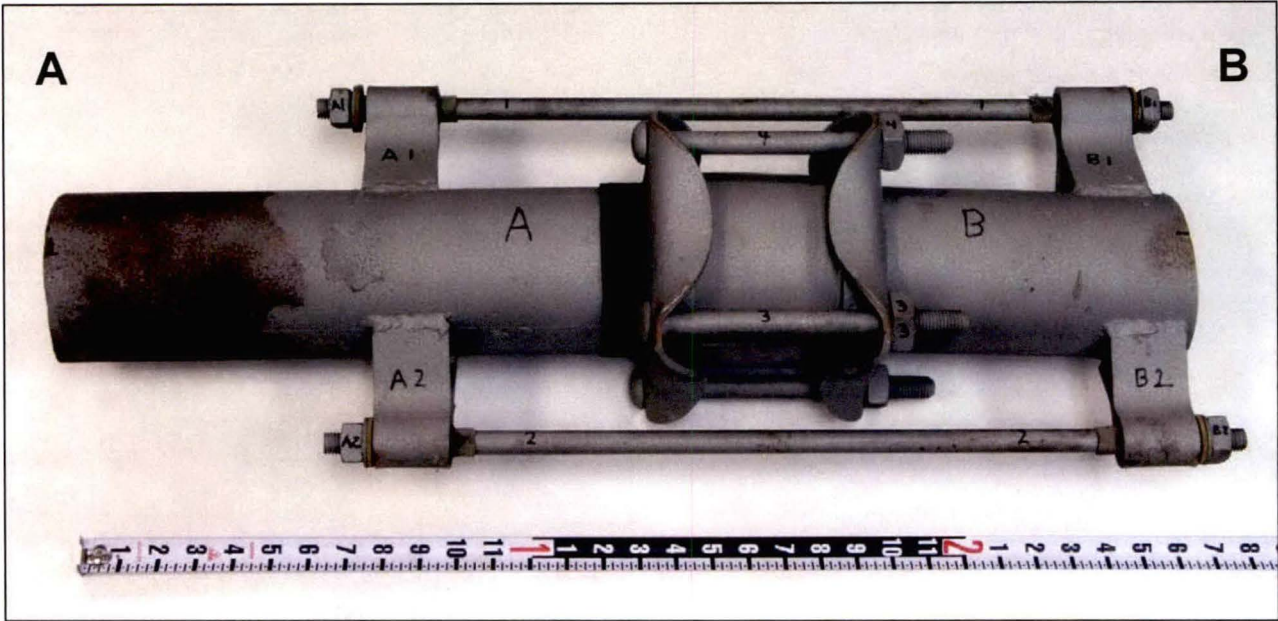


Figure 1. Photograph of the top of the submitted coupling sample. The bolt heads were all at End A, while the nuts were toward End B.

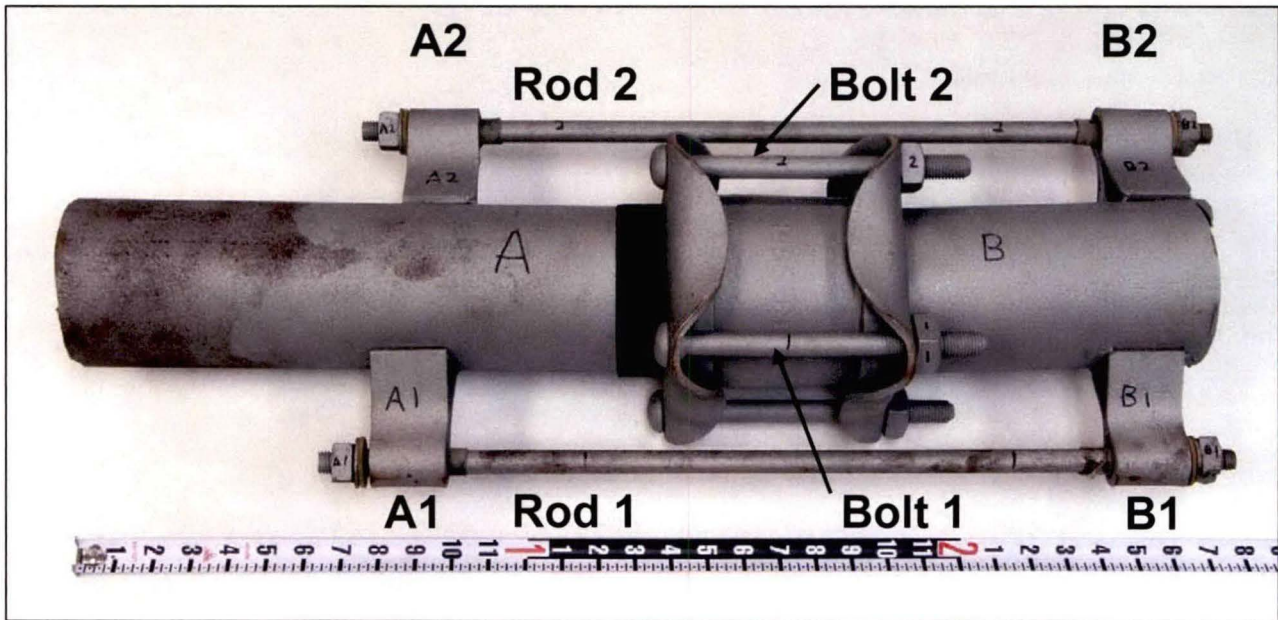


Figure 2. Photograph of the bottom of the submitted sample. Lug, rod and bolt identifications are shown.

**SECTION 1- DIMENSIONAL MEASUREMENT**

The two sets of harness lugs were positioned on opposite sides of the pipe. The relative orientation of the harness lugs was measured by photographing the assembly from the ends and applying

a protractor overlay for angle measurement. The obtained measurements are shown in Figures 3 and 4 with the data summarized in Table 1. Both harness lugs were straight and not bent. The depth of insertion of each pipe into the coupling was also measured, both before and verified after disassembly. The dimensions are provided in Table 2. No requirements were provided for these characteristics.

**TABLE 1 – LUG SPACING DIMENSIONAL MEASUREMENTS**

<b>Compound</b>	<b>Angle</b>	<b>Deviation from 180°</b>	<b>Image</b>
Rod A1 / Rod A2	172°	8°	Figure 3
Rod B1 / Rod B2	169°	11°	Figure 4

**TABLE 2 – PIPE COUPLING DIMENSIONAL MEASUREMENTS**

<b>Component</b>	<b>Depth of Pipe into Coupling</b>	<b>Gap Between Pipes in Coupling</b>
Pipe A	2"	~ 1/2" (Original sample length – 30 1/2")
Pipe B	2 1/4"	

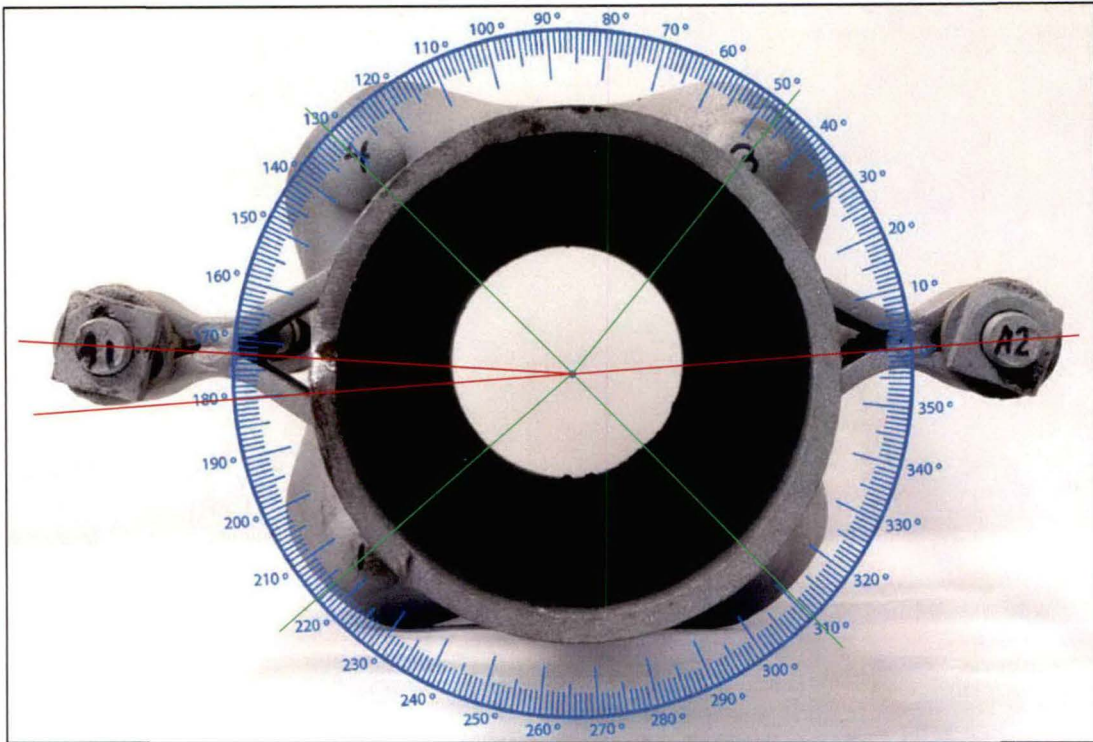


Figure 3. End facing image of the sample at End A. A superimposed protractor shows that the centers of Lugs A1 and A2 were approximately 8° from square.

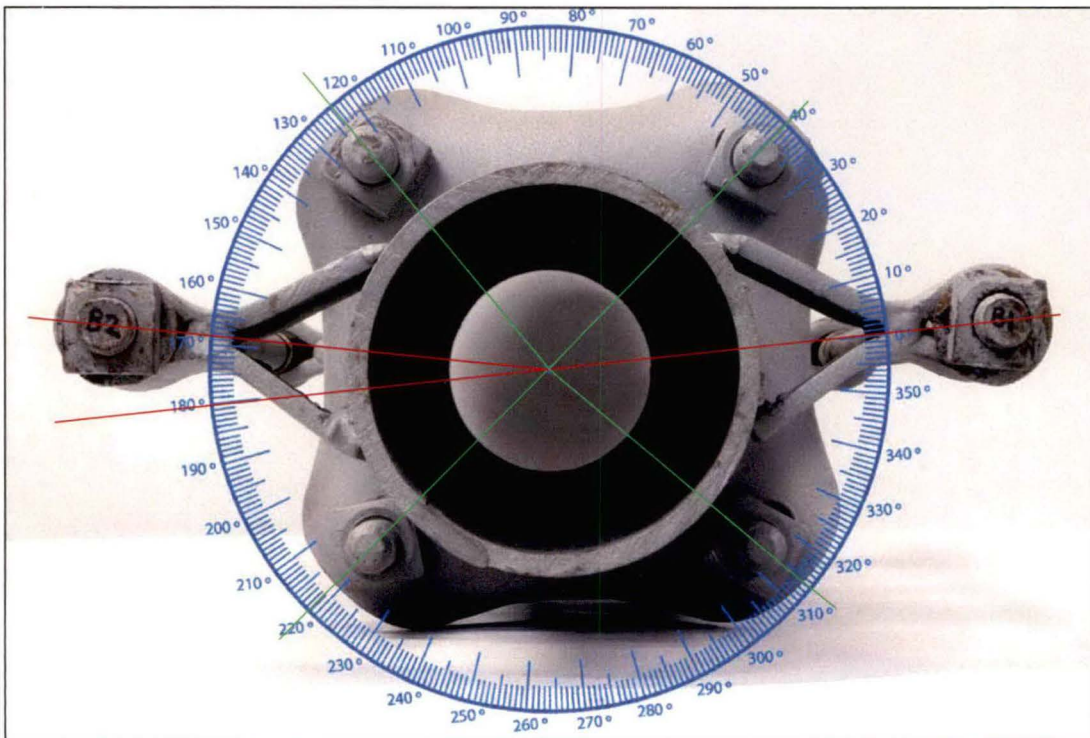


Figure 4. End facing image of the sample at End B. A superimposed protractor shows that the centers of Lugs B1 and B2 were approximately 11° from square.

**SECTION 2- VISUAL OBSERVATIONS**

The lug attachment welds were regions of interest on the pipe coupling sample. Each A-frame lug contained four fillet weld locations; exterior top, exterior bottom, interior top, and interior bottom. Each weld was inspected visually using a flashlight and magnifying lens. No welding code or quality criteria were provided for weld acceptance or for the severity of corrosion alteration. For comparison purposes, the welds were rated as substantial fusion, partial fusion, and minimal fusion. The summarized weld fusion and corrosion observations are provided in Table 3. Representative weld regions are shown in Figures 5 through 13. It was further noted that the welds also contained localized weld discontinuities including undercut, overlap, and spatter in addition to the incomplete fusion. Welding was only performed on the exterior top and interior bottom of each lug, consistent with the ease of welding in the field. No cracking in the welds or base metal heat affected zones (HAZ) was identified. Some superficial pitting corrosion was observed, but no significant material loss had occurred.

The harness rods and coupling bolts were also inspected for corrosion alteration. The observations are provided in Table 4. None of the fasteners, or the surrounding lugs, coupling components and pipe surfaces exhibited significant corrosion. The fasteners and the lugs were not necked down / stretched and no cracks were present. The coupling bolt heads were not marked. The coupling was disassembled during inspection and additional images of the observed features are included as Figures 14 through 18. The interior surfaces were not significantly degraded or corroded.

The elastomeric components of the coupling consisted of a pipe separator, insulating sleeve, and two gaskets. Inspection revealed that they appeared to be intact and not degraded.

**TABLE 3 – LUG WELD VISUAL EXAMINATION RESULTS**

Component	Location	Weld	Observations
Lug A1	Exterior	Top	Substantial fusion
		Bottom	No weld
	Interior	Top	No weld
		Bottom	Partial weld
Lug A2	Exterior	Top	Substantial fusion
		Bottom	No weld
	Interior	Top	No weld
		Bottom	Substantial fusion
Lug B1	Exterior	Top	Substantial fusion
		Bottom	No weld
	Interior	Top	No weld
		Bottom	Substantial fusion
Lug B2	Exterior	Top	Substantial fusion
		Bottom	No weld
	Interior	Top	No weld
		Bottom	Substantial fusion

**TABLE 4 – FASTENER VISUAL EXAMINATION RESULTS**

Component	Observations
Rod 1	Not bent or stretched, no gross corrosion, rotated freely
Rod 2	Not bent or stretched, no gross corrosion
Bolt 1	Not bent or stretched, no gross corrosion
Bolt 2	Not bent or stretched, no gross corrosion
Bolt 3	Not bent or stretched, no gross corrosion
Bolt 4	Not bent or stretched, no gross corrosion

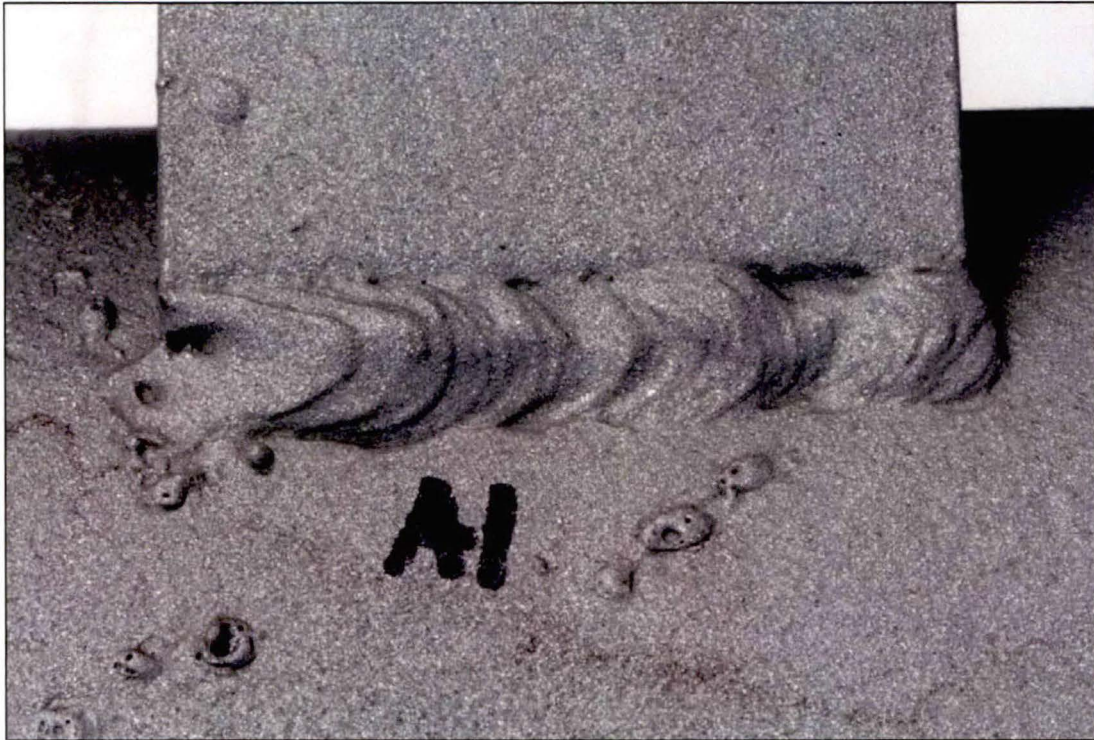


Figure 5. Image of the Lug A1 exterior top weld which exhibited substantial fusion except for some overlap, spatter and underfill.



Figure 6. Image of the Lug B1 exterior top weld which exhibited minimal porosity.



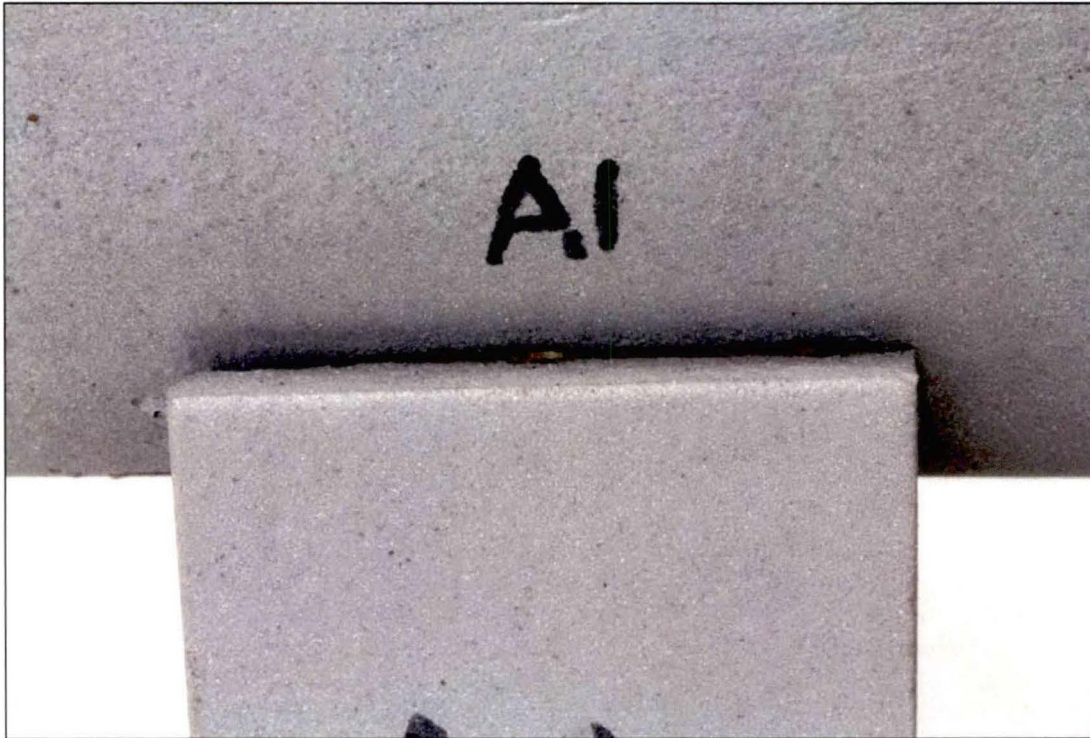


Figure 7. Image of the Lug A1 exterior bottom joint region which was not welded.

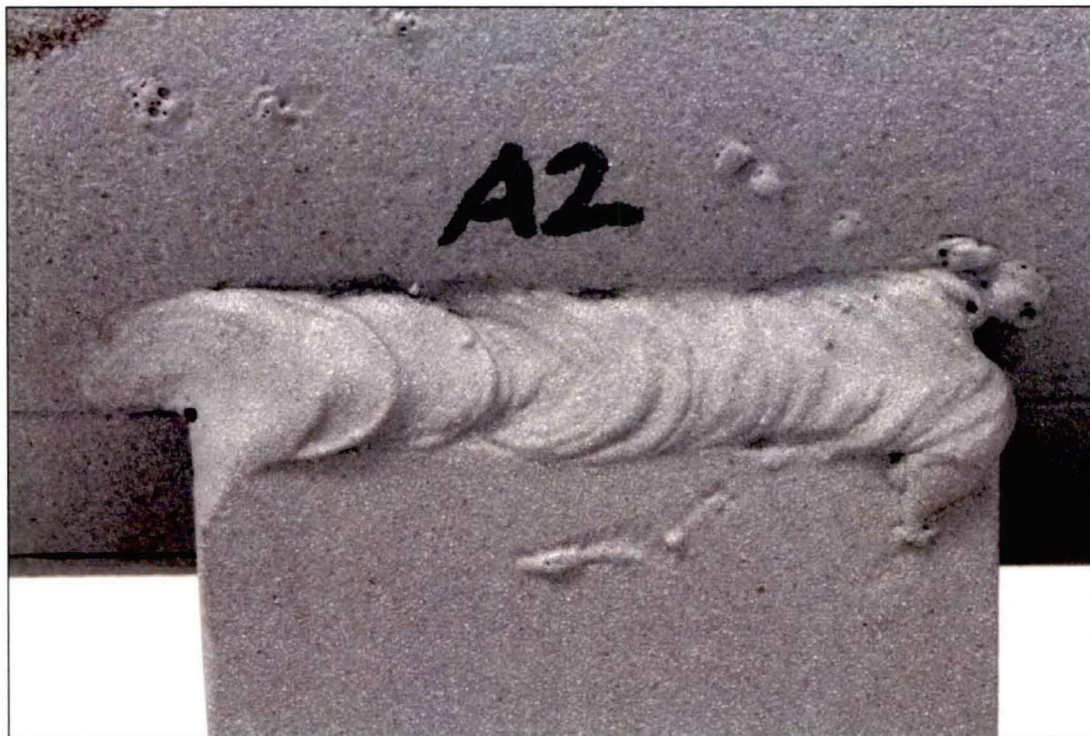


Figure 8. Image of the Lug A1 exterior top weld.



Figure 9. Image of the Lug B2 exterior top weld which exhibited substantial fusion except for some overlap and spatter.

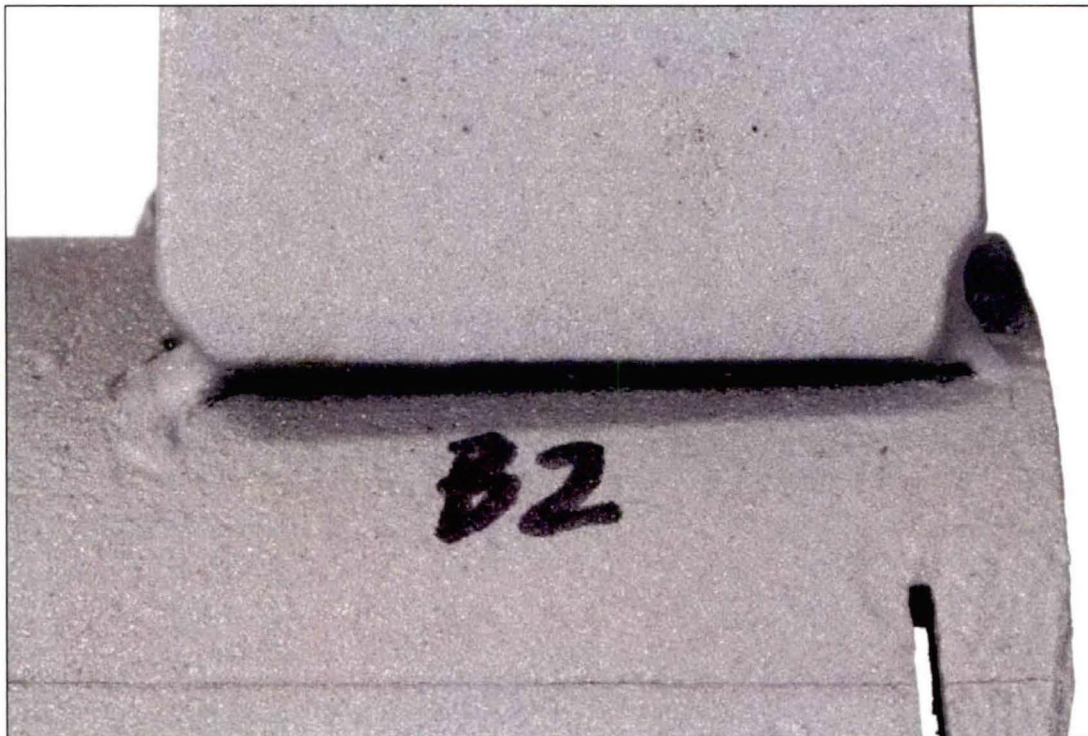


Figure 10. Image of the Lug B2 exterior bottom weld. Joining at the ends of the lug was from welding from the interior surface.



Figure 11. Image of the Lug A2 interior bottom weld which exhibited substantial fusion except for some overlap and spatter.



Figure 12. Image of the Lug B1 interior bottom weld which exhibited some fusion.

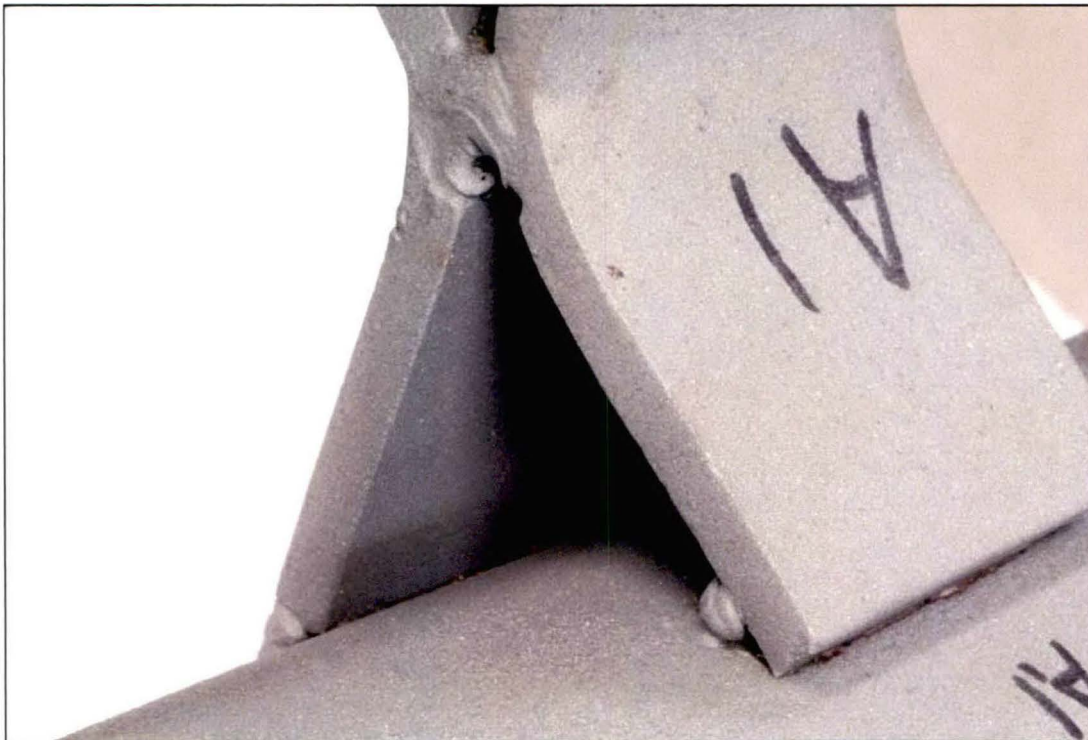


Figure 13. Image of the Lug A1 interior top weld (left) and the exterior bottom weld (right).

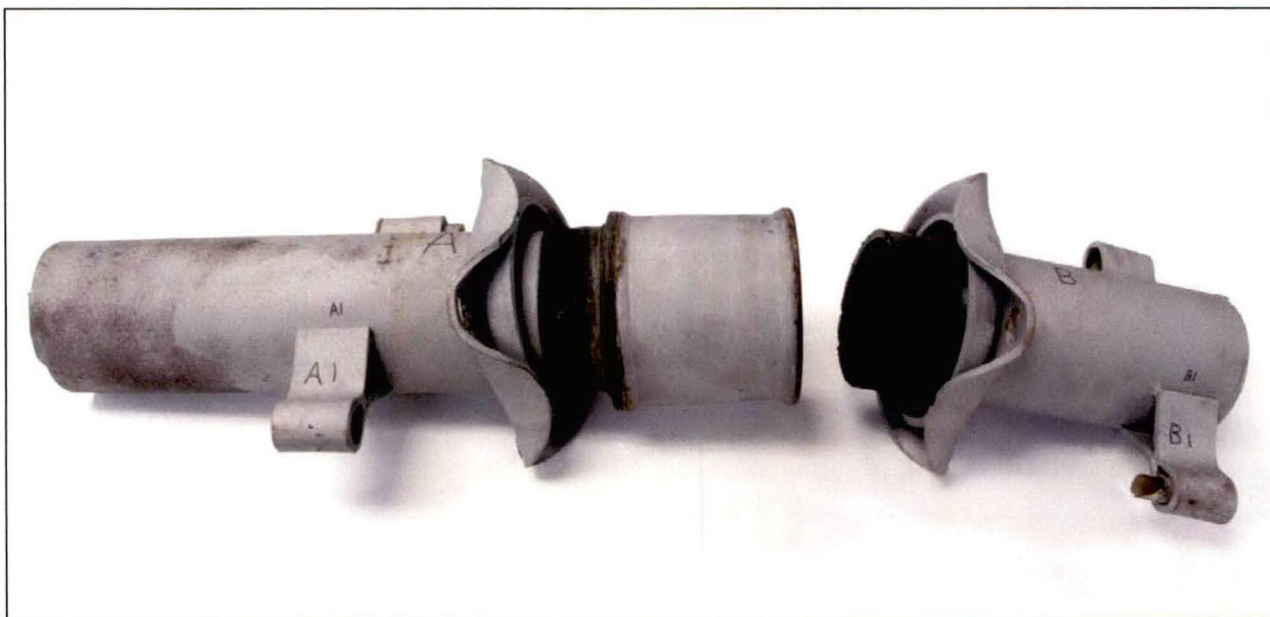


Figure 14. Photograph of the pipe sample after disassembly.

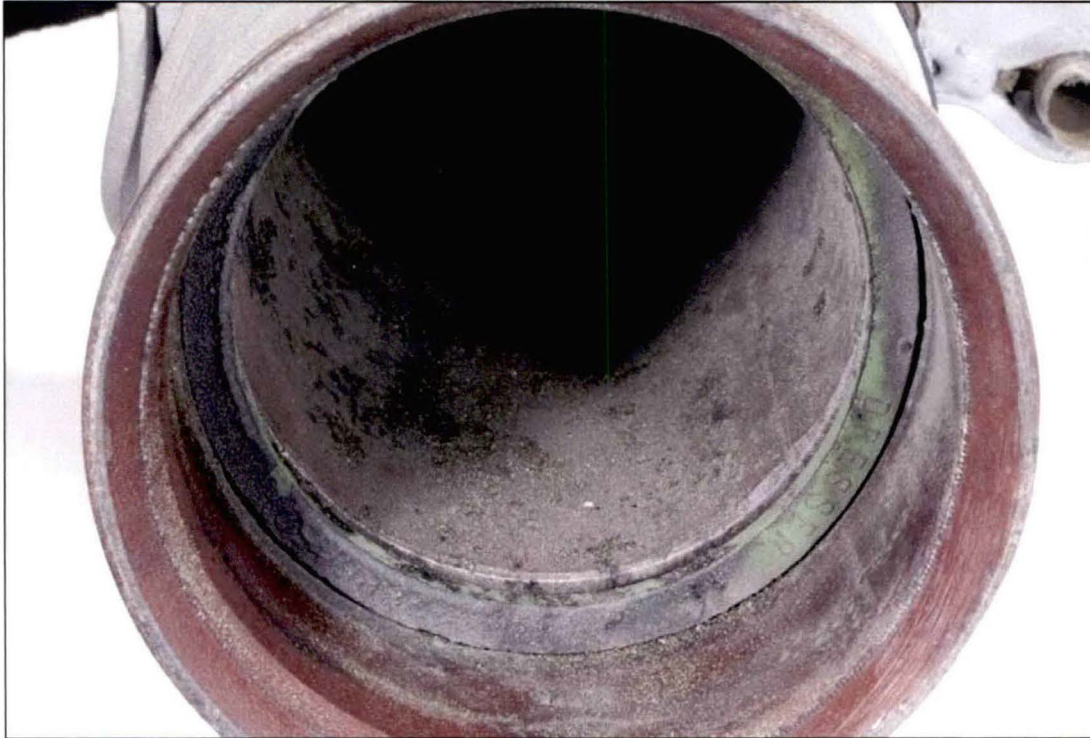


Figure 15. Photograph into the End A pipe section with the coupling attached. The green pipe separator ring was evident.



Figure 16. Photograph of the end of the End B pipe section.



Figure 17. This is an image of the black polymeric sleeve.

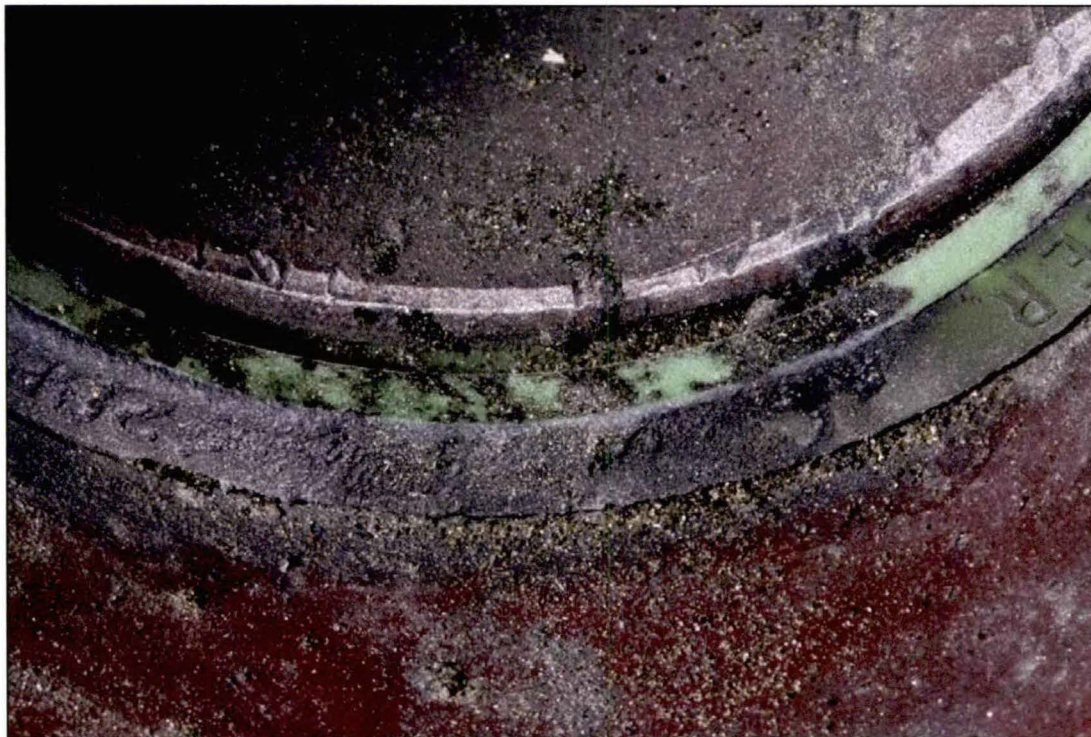


Figure 18. Photograph of the green pipe separator.

**SECTION 3- TORQUE TESTING- FOR INFORMATION ONLY**

Torque testing was performed on the nuts of the rods and studs on the pipe coupling sample. A calibrated torque wrench was used to determine breakaway torque on each fastener. Prior to testing it was apparent that the Rod 1 nut was loose, suggesting no clamping force on the lugs. The breakaway torque measurements are summarized in Table 5. The rods did not have a specified torque requirement. The four coupling bolts exhibited torque values ranging from 70 to 90 ft.-lbs. Two bolt torque values were below the Dresser Style 39 coupling installation torque recommendation of 75 ft.-lbs. minimum for 5/8” fasteners.

**TABLE 5 – FASTENER TORQUE MEASUREMENT**

Component	Breakaway Torque	Observations
Rod 1	< 10 ft.-lbs.	Nut spun by hand – no clamping force
Rod 2	15 ft.-lbs.	Less than the 75 ft.-lbs. recommended for 5/8” fasteners
Bolt 1	70 ft.-lbs.	Less than the 75 ft.-lbs. recommended for 5/8” fasteners
Bolt 2	70 ft.-lbs.	Less than the 75 ft.-lbs. recommended for 5/8” fasteners
Bolt 3	90 ft.-lbs.	Satisfied the 75 ft.-lbs. recommended for 5/8” fasteners
Bolt 4	75 ft.-lbs.	Less than the 75 ft.-lbs. recommended for 5/8” fasteners

**SECTION 4- TENSILE TESTING, ASTM A370-17A**

Tensile testing was performed on round specimens that were removed from the two harness rods and the four coupling bolts. The tensile mechanical properties of the fasteners were measured and the results are summarized in Table 6. No mechanical property requirements were indicated for the fasteners on the provided Dresser harness or coupling information.

**TABLE 6 – FASTENER TENSION TEST RESULTS**

Component	Ultimate Tensile Strength, ksi	0.2% Offset Yield Strength, ksi	Elongation, %	Reduction in Area, %
Rod 1	89.0	52.0	30	51
Rod 2	98.5	55.5	17	35
Bolt 1	69.0	52.0	32	67
Bolt 2	68.0	48.9	34	67
Bolt 3	68.0	49.8	35	67
Bolt 4	68.5	50.5	33	65

Specimen Dimensions; Diameter 0.35”, with gage length of 1”  
Percent elongation was measured using elongation-after-fracture measurements

**SECTION 5- ROCKWELL AND SUPERFICIAL HARDNESS, ASTM E18-17**

Small sections of the four lugs were excised for hardness testing. Rockwell hardness testing was performed on the lugs after removal of surface roughness by sanding. The obtained results are provided in Table 7 and are suggestive of a moderate strength level. No requirements were provided for comparison.

**TABLE 7 – LUG HARDNESS TEST RESULTS – ROCKWELL B - HRBW**

<b>Results</b>	<b>Reading 1</b>	<b>Reading 2</b>	<b>Reading 3</b>	<b>Reading 4</b>	<b>Average</b>
Lug A1	87	90	89	89	89
Lug A2	87	88	87	87	87
Lug B1	88	88	88	89	88
Lug B2	87	87	87	87	87

**SECTION 6- LIQUID DYE PENETRANT EXAMINATION**

The two separated ends of the disassembled coupling were sent to a third party NDE laboratory for inspection. The primary inspector recommended dye penetrant examination rather than the magnetic particle inspection technique. Inspection was performed in accordance with the acceptance criteria of API 1104 "Welding of Pipelines and Related Facilities". The inspection results are provided as an appendix. Two representative welds are shown in Figures 19 and 20 with the dye penetrant test media remaining.



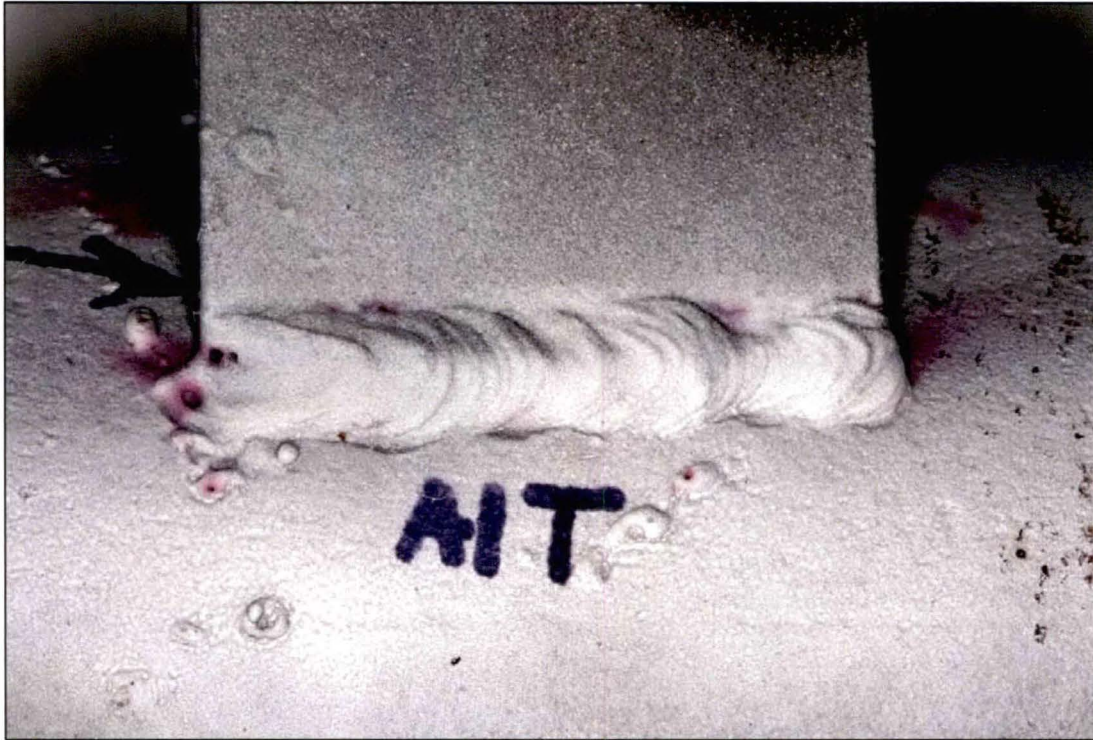


Figure 19. Image of the Lug A1 exterior top weld after dye penetrant media had been used during inspection.



Figure 20. Image of the Lug B1 interior bottom weld after dye penetrant media had been used during inspection.



Respectfully submitted

Handwritten signature of Brett A. Miller in black ink.

Brett A. Miller, P.E., FASM, CWI  
Technical Director

Concurrence

Handwritten signature of Remmel O. Taylor in black ink.

Remmel O. Taylor  
Senior Metallurgist / Failure Analyst

All procedures were performed in accordance with the IMR Quality Manual, current revision, and related procedures; and the PWA MCL Manual F 23 and related procedures. The information contained in this test report represents only the material tested and may not be reproduced, except in full, without the written approval of IMR Test Labs ("IMR"). IMR maintains a quality system in compliance with the ISO/IEC 17025 and is accredited by the American Association for Laboratory Accreditation (A2LA), certificates #1140.03 and #1140.04. IMR will perform all testing in good faith using the proper procedures, trained personnel, and equipment to accomplish the testing required. IMR's liability to the customer or any third party is limited at all times to the amount charged for the services provided. All samples will be retained for a minimum of 6 months and may be destroyed thereafter unless otherwise specified by the customer. The recording of false, fictitious, or fraudulent statements or entries on this document may be punished as a felony under federal statutes. IMR Test Labs is a GEAE S-400 approved lab (Supplier Code T9334).

APPENDIX – NONDESTRUCTIVE INSPECTION RECORD



HAYES TESTING LABORATORY, INC.  
Phone 502-266-9729  
2521 Holloway Rd.  
Louisville, Kentucky 40299

NDE PENETRANT REPORT

Client: IMR Project: 201801864A/B  
 Item Description: 4' support clips Part No: SEE below  
 Drawing No: \_\_\_\_\_ Spec. 1104  
 Acceptance Class API Procedure HTL-PT

WELD	OTHER TEST ITEMS
Weld Joint _____	Material _____
Weld Process _____	Processing _____
Base Material _____	Material _____
Material Thickness <u>N/A</u>	Dimensions <u>N/A</u>
Weld Length/OD _____	Additional Info _____
Surface Condition _____	Surface Condition _____

PRECLEAN: Method Spray/wipe Material SKG-S AEROSOL  
 Batch No. 15M15K Drying Time 10 minutes  
 PENETRANT: Material SKL-WP2 Batch No. 17H13K  
 Application brush Dwell Time 25 minutes  
 EMULSIFICATION: Material \_\_\_\_\_ Batch No. \_\_\_\_\_  
 Application N/A Emulsification Time \_\_\_\_\_  
 EXCESS PENETRANT REMOVAL: Material towel/wipe Batch No. \_\_\_\_\_  
 Method \_\_\_\_\_ Drying Time \_\_\_\_\_  
 DEVELOPER: Material SKD-S2 Batch No. 14F04K  
 Method Spray Drying Time 10 minutes Developing Time 10 mins  
 POSTCLEAN: Material SKG-S AEROSOL Batch No. 15M15K  
 Method Spray/wipe

No. of Parts Accepted 4 Serial No.'s \_\_\_\_\_  
 No. of Parts Rejected 6 Serial No.'s \_\_\_\_\_

OTHER INFORMATION:  
 A1B - No weld  
 A1B1 - Rejected porosity/crack  
 A1T - Accepted  
 A1T1 - Rejected  
 A2T - Accepted  
 A2T1 - No weld  
 A2B1 - Rejected  
 B1T - Accepted  
 B1T1 - Rejected CRACK  
 B1B1 - Rejected Lack of fusion  
 B1B - No weld  
 B2T - Accepted  
 B2T1 - No weld  
 B2B1 - Rejected Lack of fusion

INSPECTED BY: [Signature] DATE: 8/10/18

Legend

A1B- Lug **A1**, **B**ottom **W**eld

A1BI- Lug **A1**, **B**ottom **I**nside **W**eld

A1T- Lug **A1**, **T**op **W**eld

A1TI- Lug **A1**, **T**op **I**nside **W**eld

A2T- Lug **A2**, **T**op **W**eld

A2TI- Lug **A2**, **T**op **I**nside **W**eld

A2BI- Lug **A2**, **B**ottom **I**nside **W**eld

B1T- Lug **B1**, **T**op **W**eld

B1TI- Lug **B1**, **T**op **I**nside **W**eld

B1BI- Lug **B1**, **B**ottom **I**nside **W**eld

B1B- Lug **B1**, **B**ottom **W**eld

B2T- Lug **B2**, **T**op **W**eld

B2TI- Lug **B2**, **T**op **I**nside **W**eld

B2BI- Lug **B2**, **B**ottom **I**nside **W**eld

## Bolt-Style Coupling (pressures > 3 psig)

This form will be completed when LG&E or LG&E contractors expose a bolt-style coupling in a system where the pressure is > 3 psig (medium and high pressure distribution and transmission) and the coupling will be backfilled. The purpose of the form is to provide Operations, Engineering and Gas Regulatory personnel with information about the bolt style coupling installation.

### Part A- Discovery of Coupling

#### Precautions:

1. Stop excavation upon discovering the bolt-style coupling in the excavation
2. Set-up a perimeter around the excavation to keep the public away from the excavation

#### General Information:

1. Contact Employee for the bolt style coupling found:
2. Date of exposure: 04/06/2018
3. Location: 5252 Cane Run Rd (Cane Run Generating Station)
4. Size of coupling (based on pipe size if not exposed enough to determine):
5. Type of soil (circle one): Sandy Clay Gravel Topsoil Other (take picture and describe)
6. Soil Density test:  Type A  Type B  Type C (Note: data not collected, this field was added after coupler was removed)
7. Status:  Removed  Abandoned in place  Backfilled- left in service

#### Pictures:

1. Take at least two pictures of the coupling. The pictures should be from different angles (additional pictures can be taken).
2. Email pictures to supervisor. Ensure pictures are attached to this form:

**Sketch:** Provide a sketch showing the coupling orientation (vertical/horizontal), nearby branches, pipe, valves and fittings, other utilities or structures, etc.

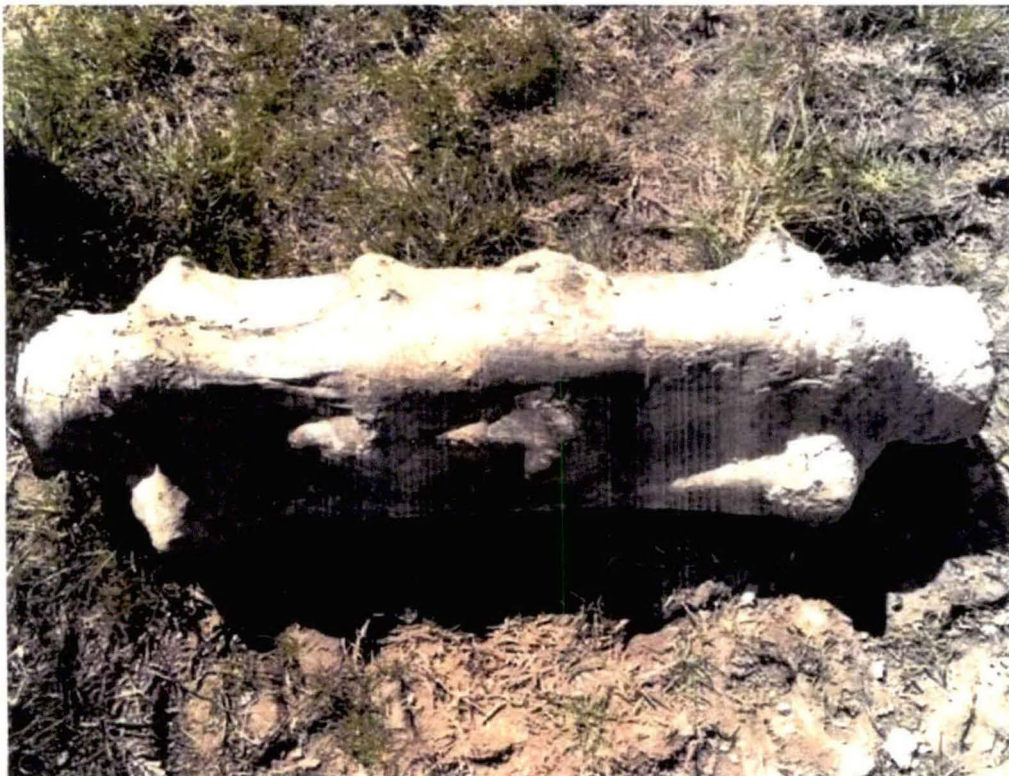
#### Leak Survey:

1. Use an instrument designed to detect natural gas to check for the presence of natural gas after backfilling the excavation. Include readings in the above sketch in relation to the coupling. If the contact employee is not leak survey qualified they should contact:
  - a. Their supervisor to call Gas Regulatory to complete the survey after the excavation is backfilled. Call [REDACTED]
  - b. If Gas Regulatory is not available contact Gas Dispatch to have the survey assigned to a Gas Trouble Technician.

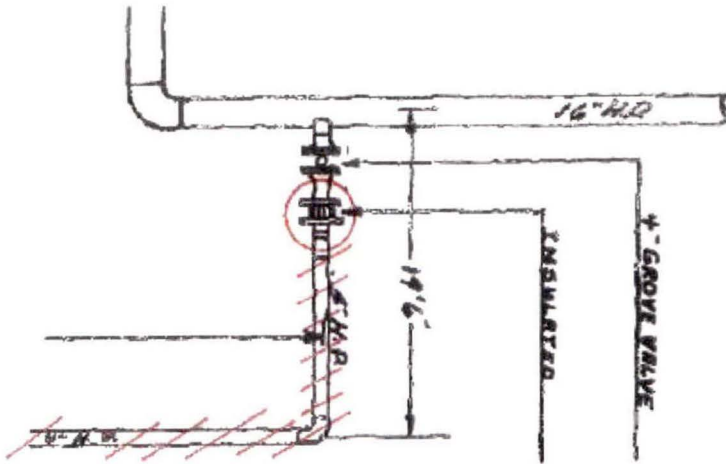
Leak Survey completed at time of backfill (circle one) yes no

Include completed form in the main report and email a scanned copy of the completed form (back and front) to the Distribution Integrity Management (DIM) group.

Field Pictures



Sketch



**Part B- Coupling Information**

General Information		Tracking #: 2018-005	
Date 7/3/2018	Expense Org 004385	Project 134829	Task LAB
Address/Location 5252 Can Run Rd (Cane Run Power Plant)			
Size 4-inch	Material Steel	Coating Wax Tape	MAOP 305
Main/Service Number 160878	Soil Type (from Part A) Unavailable	Manufacturer Dresser	Model 4-inch Style 39
Pipe Connection:	Steel to Steel	Steel to Plastic	Plastic to Plastic

Historical Information	
Installation Date 4/8/1959	Document Source Main Report
Installation Company Mims Pipeline	Document Source Main Report
Foreman R.E. Mingus	Document Source Main Report
Welder Unknown	Document Source Main Report

GIS Information
Sys Id (of Coupler) 11926543
Screen Capture



Pictures



Figure 1- Top View



Figure 2- Front View



Figure 3- Back View



Figure 4- Bottom View

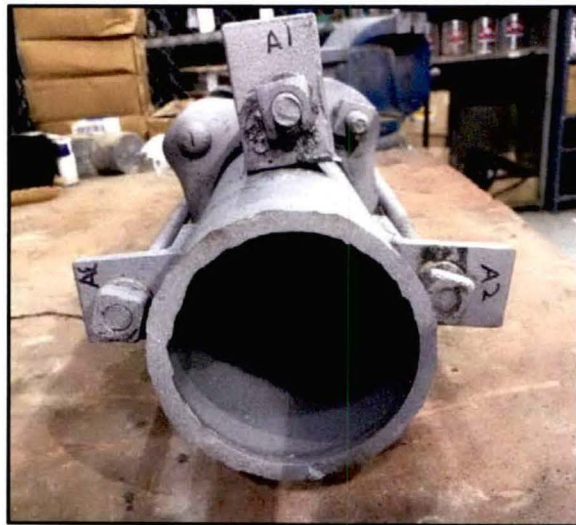


Figure 5- Left Side



Figure 6- Right Side

**Part C- Inspection of Coupling**

Visual Inspection Performed by: Chad Augustine [REDACTED] & Elliott Bauer [REDACTED]

Component Quantities	
Number of Bolts on Coupler Body	4
Number of Reinforcement Rods	3
Number of Lugs	6 (2 each)

Corrosion						
	Pipe A	Pipe B	Coupler Body	Bolts	Rods	Lugs
General External Corrosion Present?	No	No	No	No	No	No
Localized Corrosion Present?	No	No	No	No	Possible <sup>1,2</sup>	No
Pit Depths	N/A	N/A	N/A	N/A	>.03 mm <sup>2</sup>	N/A
Internal Corrosion?	No	No				

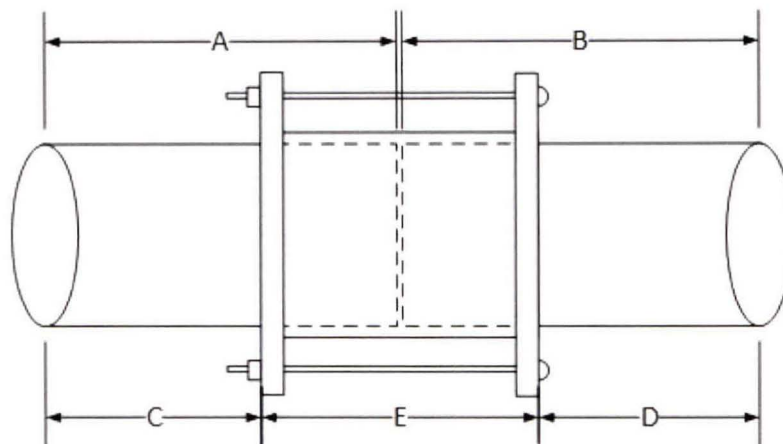
Coupler Body				
Length of Coupler (in.):		6.5625 in		
Bolt	Washer Present?	Nut present?		
1	No, no washer either side	Yes		
2	No, no washer either side	Yes		
3	No, no washer either side	Yes		
4	No, no washer either side	Yes		

Reinforcement Rods						
Rod	Length (in.)	Diameter (in.)	Washer present at head of bolt?	Washer present at end of bolt?	Nut Present? Type?	Type of rod?
1	24"	.629"	Yes	Yes	Yes <sup>3</sup> Square	All Thread? (no head)
2	24"	.631"	Yes	Yes	Yes Square	All Thread? (no head)
3	24"	.645"	Yes	Yes	Yes Square	All Thread? (no head)

Lugs (Measurements)				
Pipe Side	Lug Number	Thickness (in.)	Circumference (in)	
			Distance to next lug, clockwise	Distance to next lug, counter-clockwise
A	1	.485"	To A2: 3.1875"	To A3: 4.375"
A	2	.481"	To A1: 3.1875"	To A3: 6.375"
A	3	.481"	To A1: 4.375"	To A2: 6.375"
B	1	.478	To B2: 3.4375"	To B3: 4.250"
B	2	.477"	To B1: 3.4375"	To B3: 6.6875"
B	3	.477"	To B1: 4.250"	To B2: 6.6875"

Lugs (Observations)				
Lug	Lug	Assembly sets aligned?	Deformed?	Deflected? (angle of)
A1	B1	Yes	Yes. The rods are bowed over the coupler body. See Figures 1, 2, 3, & 4.	0°
A2	B2	Yes	Yes. The rods are bowed over the coupler body. See Figures 1, 2, 3, & 4.	0°
A3	B3	Yes	Yes. The rods are bowed over the coupler body. See Figures 1, 2, 3, & 4.	0°

Lugs (Weld Quality)						
Pipe Side	Lug Number	Any part detached from pipe?	Welded on all three sides of exterior? If no, describe	Are welds on exterior continuous? If no, describe	Welded on all three sides of interior? If no, describe	Are welds on interior continuous? If no, describe
A	1	Yes	No, all have one weld. <sup>4</sup>	Yes	Not Applicable <sup>5</sup>	Not Applicable <sup>5</sup>
A	2	Yes	No, all have one weld. <sup>4</sup>	Yes	Not Applicable <sup>5</sup>	Not Applicable <sup>5</sup>
A	3	Yes	No, all have one weld. <sup>4</sup>	Yes	Not Applicable <sup>5</sup>	Not Applicable <sup>5</sup>
B	1	Yes	No, all have one weld. <sup>4</sup>	Yes	Not Applicable <sup>5</sup>	Not Applicable <sup>5</sup>
B	2	Yes	No, all have one weld. <sup>4</sup>	Yes	Not Applicable <sup>5</sup>	Not Applicable <sup>5</sup>
B	3	Yes	No, all have one weld. <sup>4</sup>	Yes	Not Applicable <sup>5</sup>	Not Applicable <sup>5</sup>



Stab Depth					
	A	B	C	D	Stab Depth (A-C) or (B-D)
Pipe Side A	13.5"		10.5625"		2.9375"
Pipe Side B		17.9375"		14.5"	3.4375"
	Sum of stab depths (should be closely equal to measurement E)				6.375"
	Coupler Length (E)				6.5625"
	Difference				0.1875"

Additional Comments and General Observations

- <sup>1</sup> Possible corrosion on rod 1. The rod is in contact with the coupler brackets. It is unknown if the indications on the rod and bracket are corrosion or metal loss due to rod and bracket rubbing against each other. See Figure 7.
- <sup>2</sup> Severe corrosion on nut A1. It is greater than .03. The pit gage would not lay flat against the nut in order to get an accurate measurement. See Figure 8.
- <sup>3</sup> Does not have an insulating washer.
- <sup>4</sup> The lugs do not conform to the curvature of the pipe and cannot make complete contact. See Figures 9 & 10.
- <sup>5</sup> The lugs are solid flat surfaces with no interior. See Figure 11.



Figure 7- Rod 1 Metal Loss

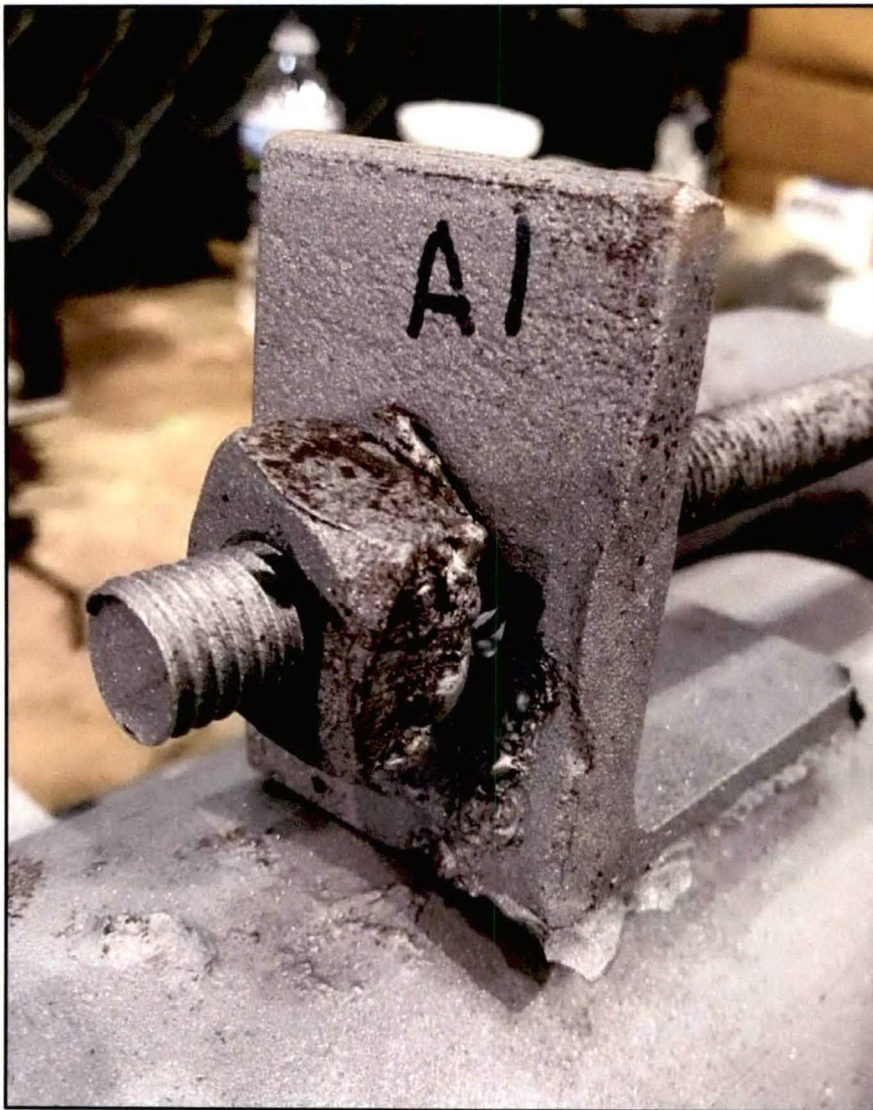


Figure 8- Nut A1 & Lug A1 Metal Loss



Figure 9- Side View of Lug

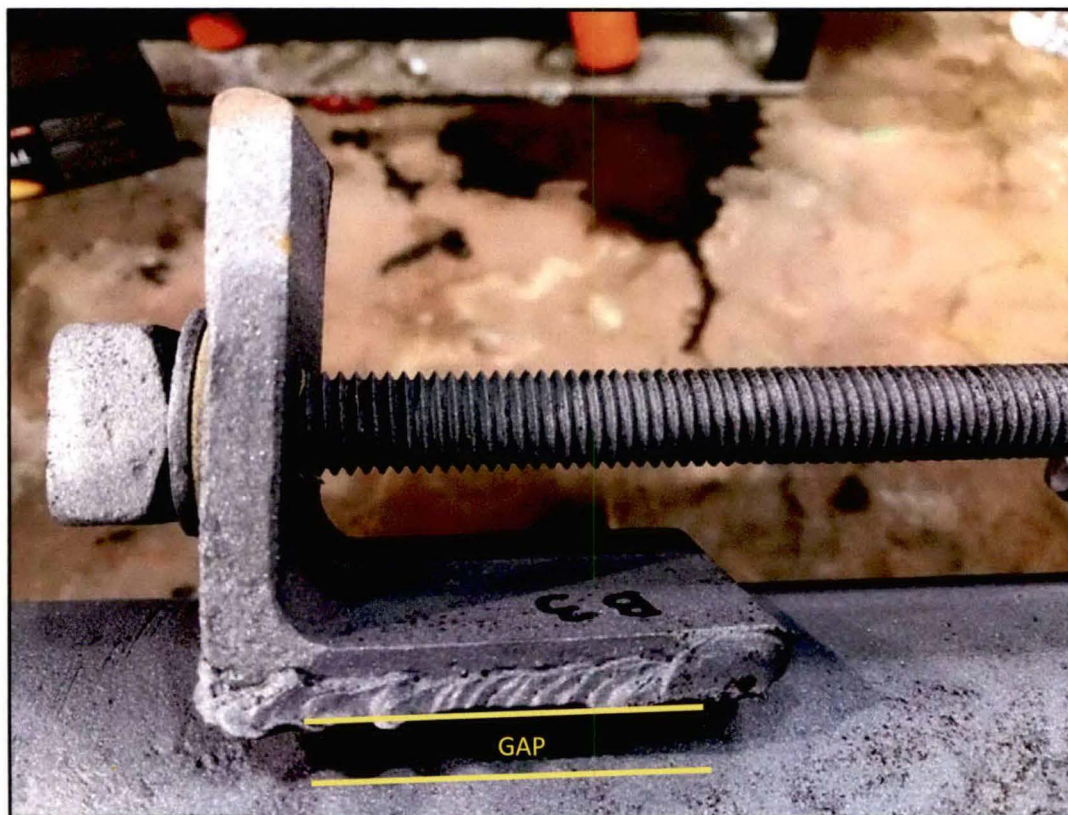


Figure 10- Front View of Lug



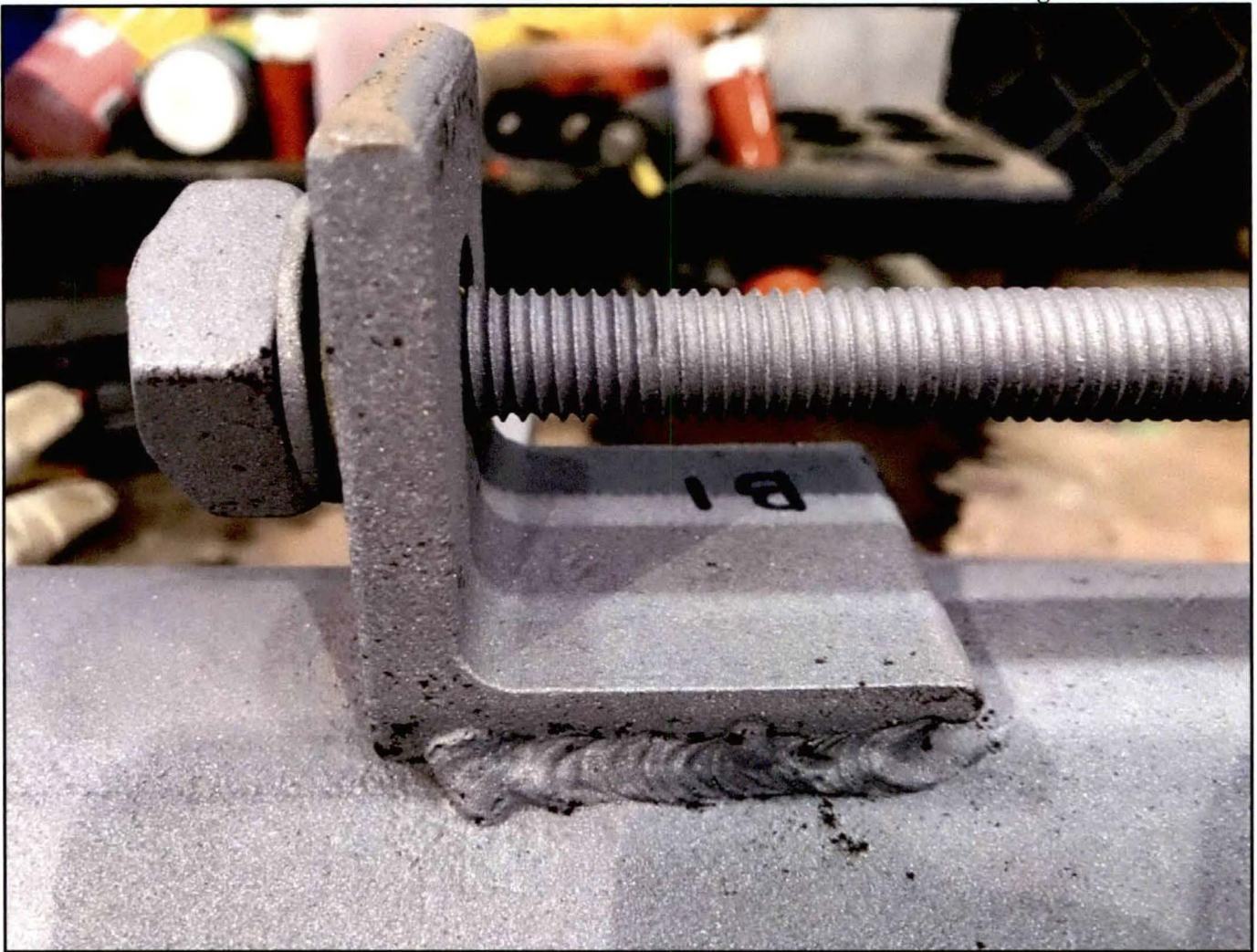


Figure 11- Front View of Lug

**Part D- Analysis of Coupling**

This section is reserved for the lab report.

**LG&E - Kentucky Utilities**  
**6900 Enterprise Drive**  
**Louisville, KY 40214**

**August 17, 2018**

Attention: Chad Augustine

## **Report No. 201801863**

### **Metallurgical Evaluation of Coupling and Associated Hardware**

#### **Location: 5252 Cane Run Road**

#### **DESCRIPTION AND PURPOSE**

A natural gas pipe section including a coupling was submitted for metallurgical evaluation. The section was a 4" pipe with a Dresser Style 39 Insulating Coupling. Three joint harnesses were also affixed to the pipe section using angle iron lugs. Copies of the installation information for the coupling and harnesses were provided for a prior investigation. It was reported that the coupling had been installed in the field at 5252 Cane Run Road. The coupled pipe section was subsequently excavated after a substantial service duration without failure. It was requested that the general dimensions, weld quality, corrosion condition and mechanical properties of the coupling components be determined as directed.

#### **RESULTS**

The submitted pipe section with the coupling is shown in Figures 1 and 2. Six cut angle iron lugs of the joint harnesses had been fillet welded to the pipe segments. Three threaded rods and associated nuts with deflection rings had been affixed through the welded lugs to apply compression to the coupled joint. The coupling consisted of two followers, a middle ring and associated nonmetallic gaskets and sleeves. Four equally spaced bolts with associated nuts secured the coupling components together and against the pipe segments. The general orientation of the coupling was consistent with the supplied information for the specified Dresser Style 39. Prior to receipt, the ends of the pipe segment were labelled as Ends A and B, as shown in Figures 1 and 2. The top of the pipe was selected as the surface with the middle harness and generally better weld appearance. Lugs A1, A2 and A3 were welded to Pipe A, and Lugs B1, B2 and B3 were welded to Pipe B. The rod between lugs A1 and B1 was Rod 1, between A2 and B2 was Rod 2 and the between Lugs A3 and B3 was Rod 3. The four coupling bolts were arbitrarily numbered as Bolts 1 through 4 around the circumference.



Figure 1. Photograph of the top of the submitted coupling sample. Three attachment rods were affixed with angle iron lugs. Lugs A1 and B1 are identified.

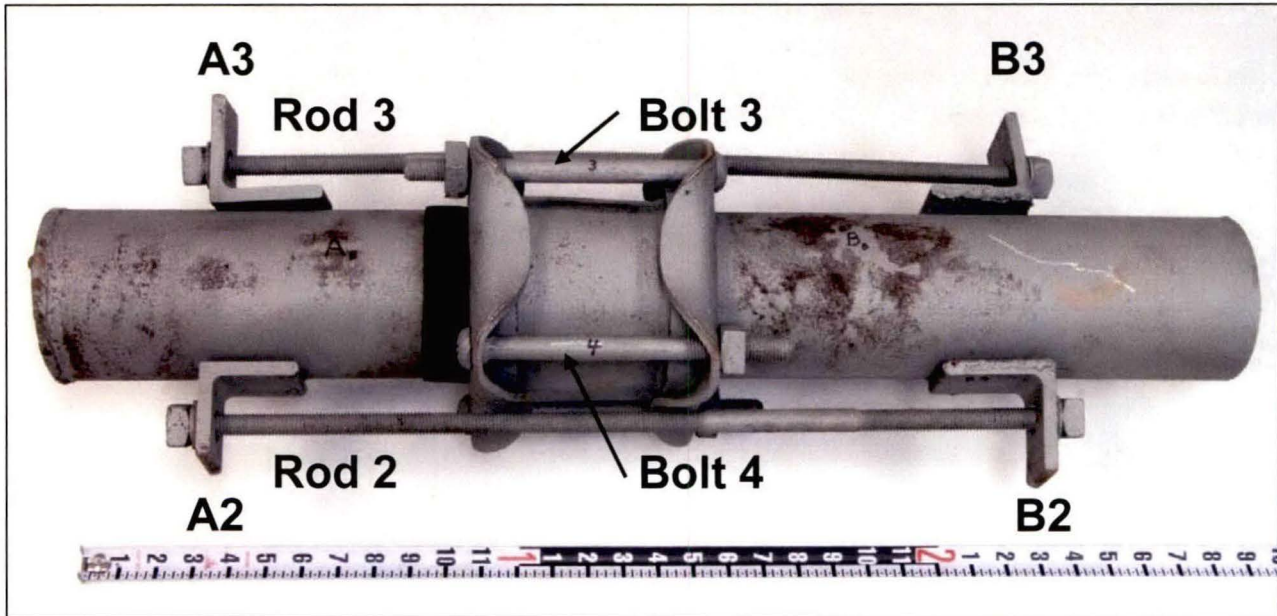


Figure 2. Photograph of the bottom of the submitted sample. Lug, rod and bolt identifications are shown.

**SECTION 1- DIMENSIONAL MEASUREMENT**

The three sets of harness lugs were positioned on opposite sides of the pipe. The relative orientations of the harness lugs were measured by photographing the assembly from the ends and applying a protractor overlay for angle measurement. The obtained measurements are shown in Figures 3 and 4 with the data summarized in Table 1. The harness lugs were straight and not bent. The depth of insertion of each pipe into the coupling was also measured, both before and verified after disassembly. The dimensions are provided in Table 2. No requirements were provided for these characteristics.

**TABLE 1 – LUG SPACING DIMENSIONAL MEASUREMENTS**

<b>Compound</b>	<b>Angle</b>	<b>Image</b>
Rod A1 / Rod A2	96°	Figure 3
Rod A1 / Rod A3	100°	Figure 3
Rod A2 / Rod A3	196°	Figure 3
Rod B1 / Rod B2	84°	Figure 4
Rod B1 / Rod B3	102°	Figure 4
Rod B2 / Rod B3	186°	Figure 4

**TABLE 2 – PIPE COUPLING DIMENSIONAL MEASUREMENTS**

<b>Component</b>	<b>Depth of Pipe into Coupling</b>	<b>Gap Between Pipes in Coupling</b>
Pipe A	2 1/2"	~ 1/2" (Total sample length = 31 3/4")
Pipe B	2"	

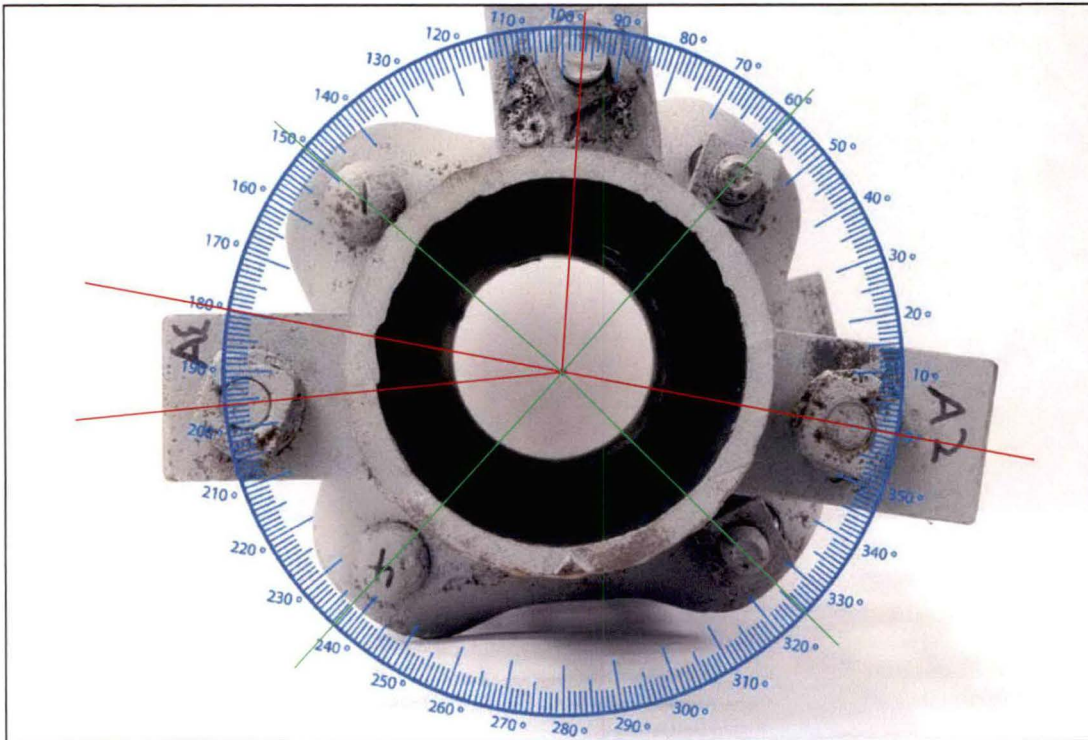


Figure 3. End facing image of the sample at End A. A superimposed protractor shows the angles between the centers of Lugs A1, A2 and A3.

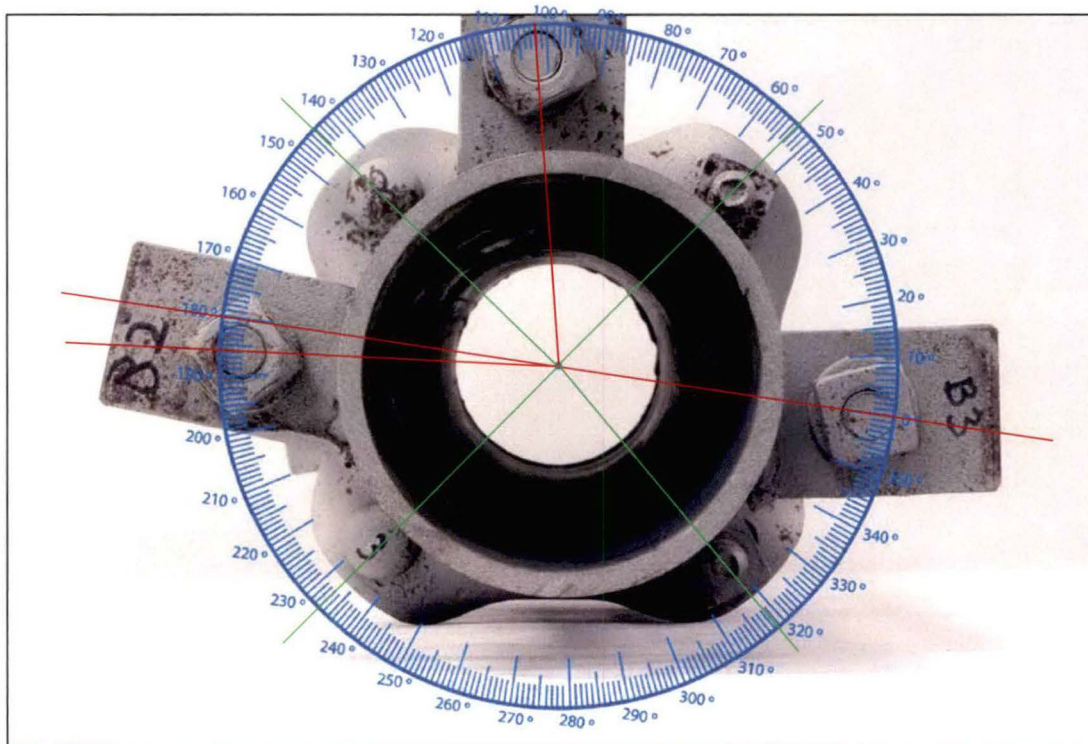


Figure 4. End facing image of the sample at End B. A superimposed protractor shows the angles between the centers of Lugs B1, B2 and B3.

**SECTION 2- VISUAL OBSERVATIONS**

The lug attachment welds were another region of interest on the coupling sample. Each of the six lugs contained two fillet weld locations. Lugs A1 and B1 had welds on the left and right whereas Lugs A2, B2, A3 and B3 had top and bottom weld joints. Each weld was inspected visually using a flashlight and magnifying lens. For comparison purposes, the welds were rated as substantial fusion, partial fusion, and minimal fusion. The summarized weld fusion and corrosion observations are provided in Table 3. Representative weld regions are shown in Figures 5 through 13. The bases of the lugs were flat so they did not conform to the curvature of the pipe surface. As a result, only one side of each lug could be welded. The non-welded sides of some lugs contained welding evidence but no fusion. It was noted that the completed welds contained localized weld discontinuities including undercut, overlap, and spatter in addition to the incomplete fusion. No cracking in the welds or base metal heat affected zones (HAZ) was visually identified. Some superficial pitting corrosion was observed, but no significant material loss had occurred.

The harness rods and coupling bolts were also inspected for corrosion alteration. The observations are provided in Table 4. None of the fasteners, or the surrounding lugs, coupling components and pipe surfaces exhibited significant corrosion. The fasteners and the lugs were not necked down / stretched and no cracks were present. The coupling was disassembled during inspection and additional images of the observed features are included as Figures 14 through 18. The interior surfaces were not significantly degraded or corroded.

The elastomeric components of the coupling consisted of a pipe separator, insulating sleeve, and gaskets. Inspection revealed that they appeared to be intact and not degraded. Some debris was evident within the assembled components but corrosion was minimal.

**TABLE 3 – LUG WELD VISUAL EXAMINATION RESULTS**

Component	Location	Weld	Observations
Lug A1	Exterior	Right	No fusion
		Left	Substantial fusion
Lug A2	Exterior	Top	Substantial fusion
		Bottom	No weld
Lug A3	Exterior	Top	Substantial fusion
		Bottom	No weld
Lug B1	Exterior	Right	No weld
		Left	Substantial fusion
Lug B2	Exterior	Top	Substantial fusion
		Bottom	No fusion
Lug B3	Exterior	Top	Substantial fusion
		Bottom	No fusion

**TABLE 4 – FASTENER VISUAL EXAMINATION RESULTS**

Component	Observations
Rod 1	Not bent or stretched, no gross corrosion, nut rotated freely
Rod 2	Not bent or stretched, no gross corrosion
Rod 3	Not bent or stretched, no gross corrosion
Bolt 1	Not bent or stretched, no gross corrosion
Bolt 2	Not bent or stretched, no gross corrosion
Bolt 3	Not bent or stretched, no gross corrosion
Bolt 4	Not bent or stretched, no gross corrosion





Figure 5. Image of the Lug A1 left weld which exhibited substantial fusion. Some porosity was apparent.



Figure 6. Image of the Lug B1 left weld which exhibited substantial fusion.

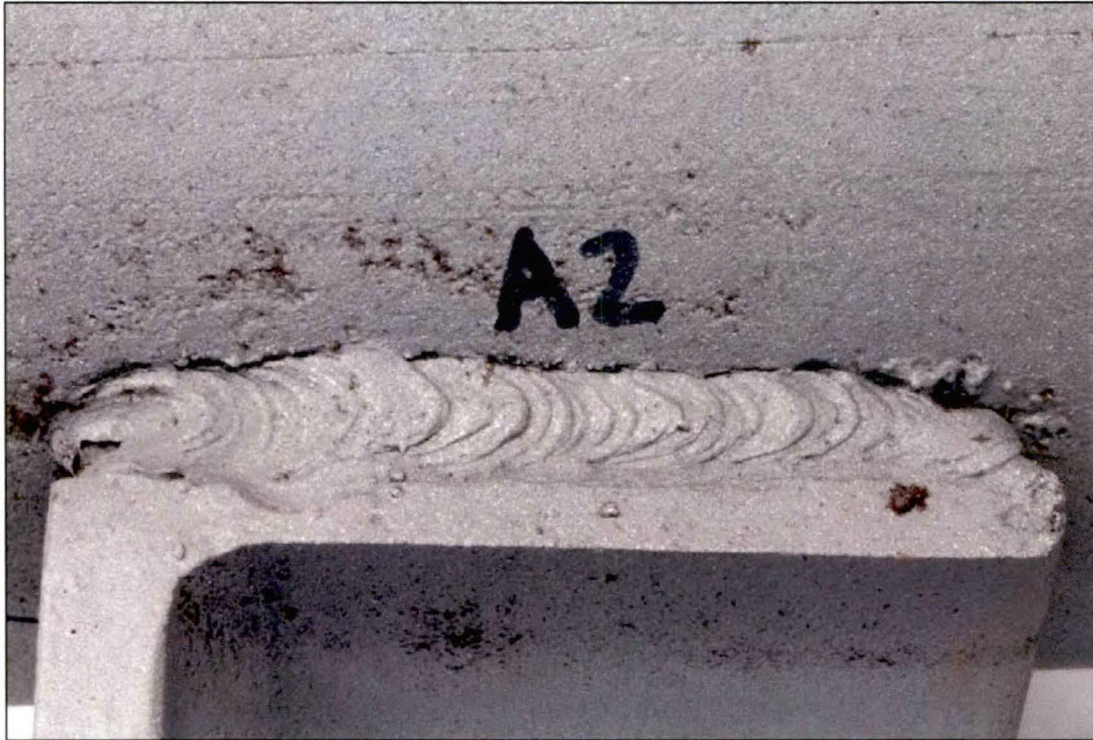


Figure 7. Image of the Lug A2 top weld. This weld exhibited some incomplete fusion.

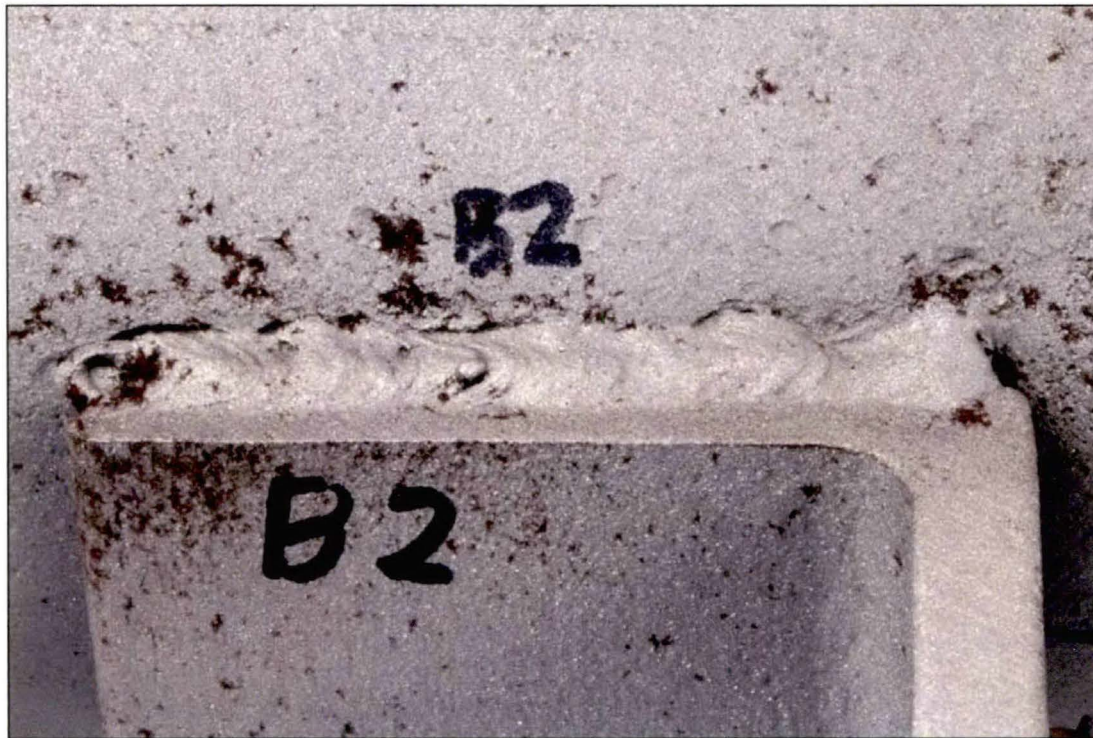


Figure 8. Image of the Lug B2 top weld region. This weld exhibited substantial fusion.

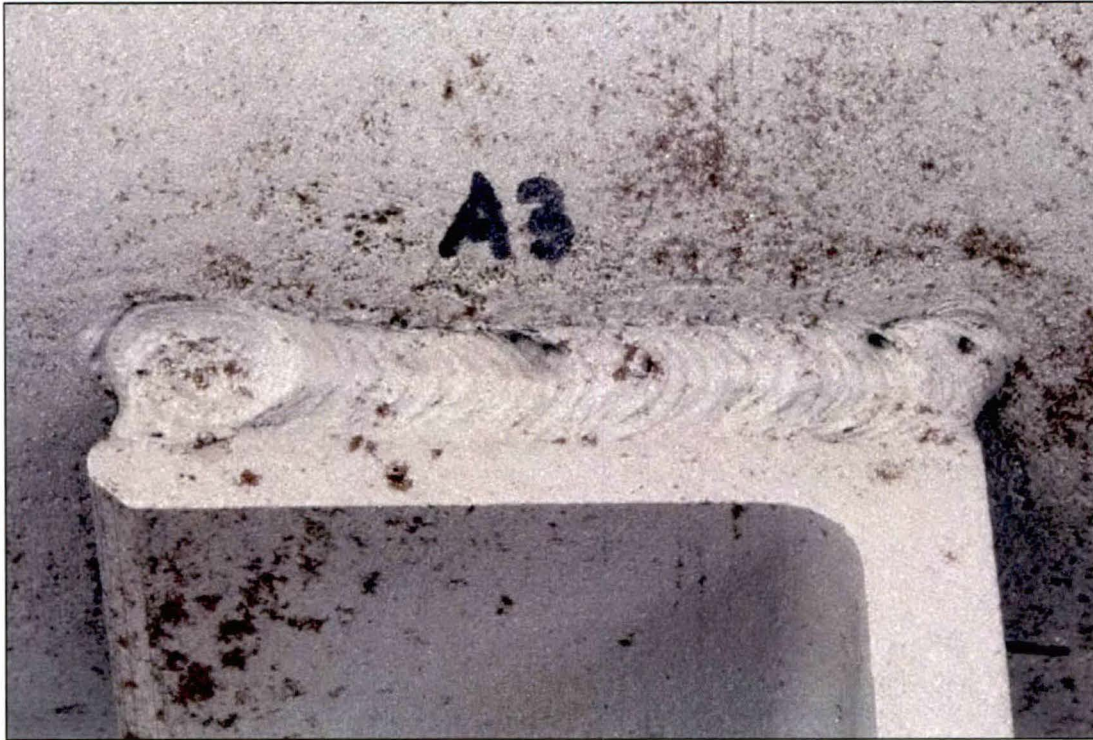


Figure 9. Image of the Lug A3 top weld with some porosity.

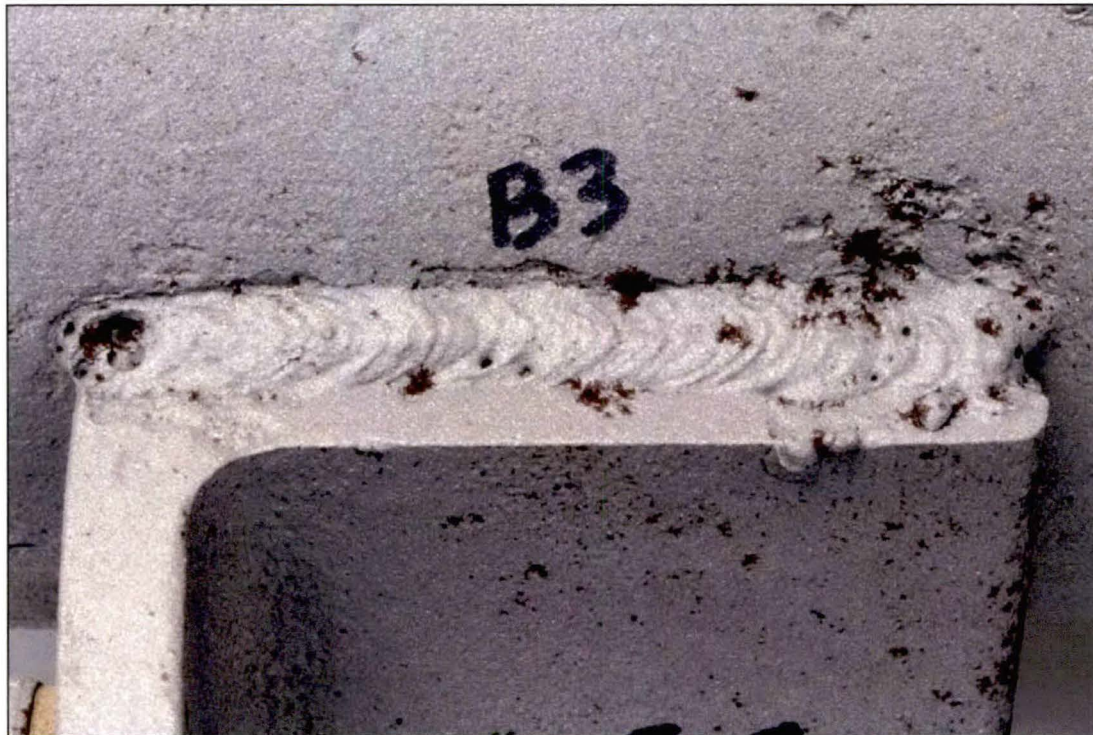


Figure 10. Image of the Lug B3 top weld showing spatter and porosity.

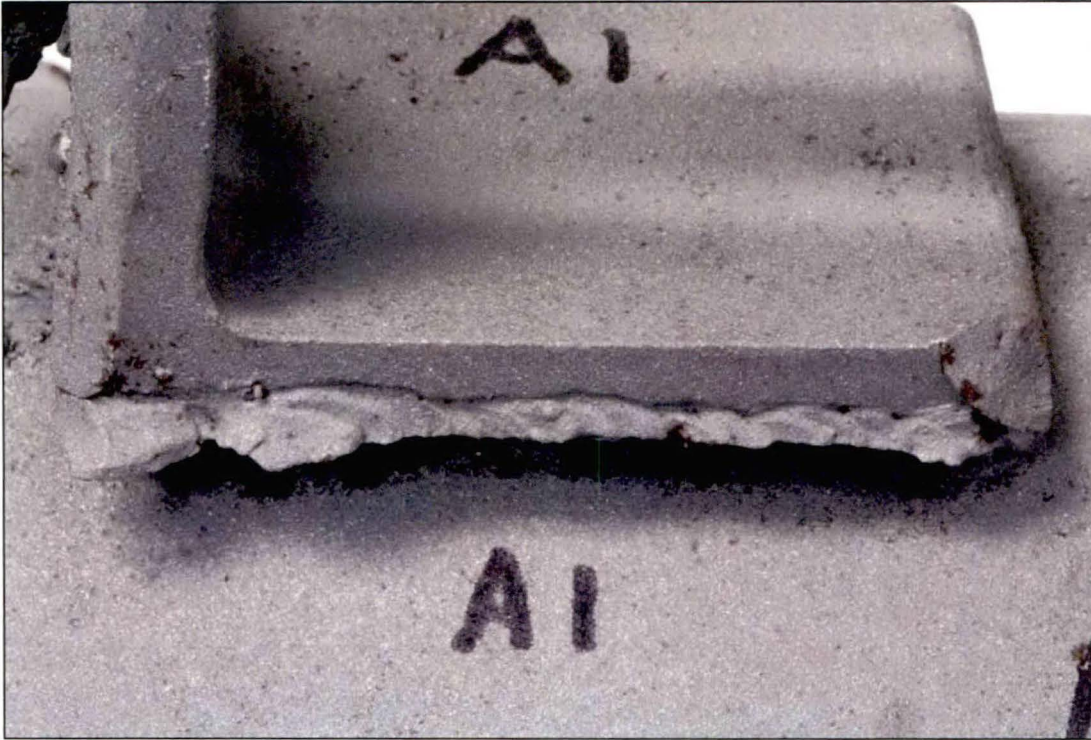


Figure 11. Image of the Lug A1 right side weld which was not fused. Due to the flat lug base configuration, one side of each lug was not properly welded.

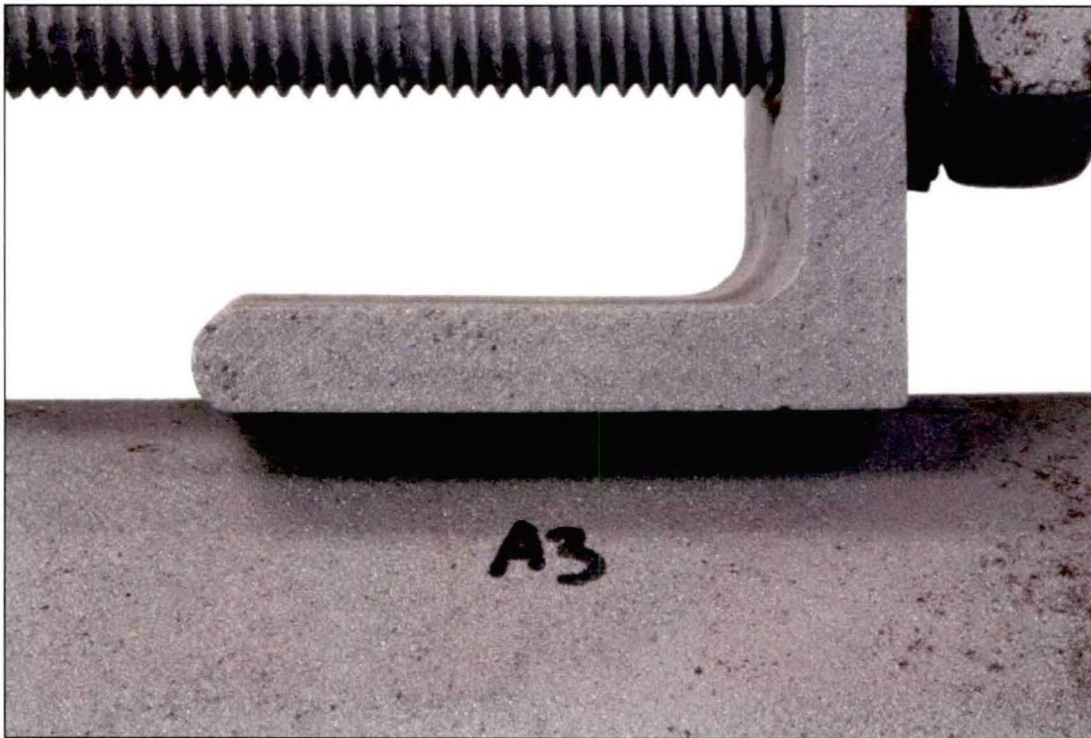


Figure 12. Image of the Lug A3 bottom weld.

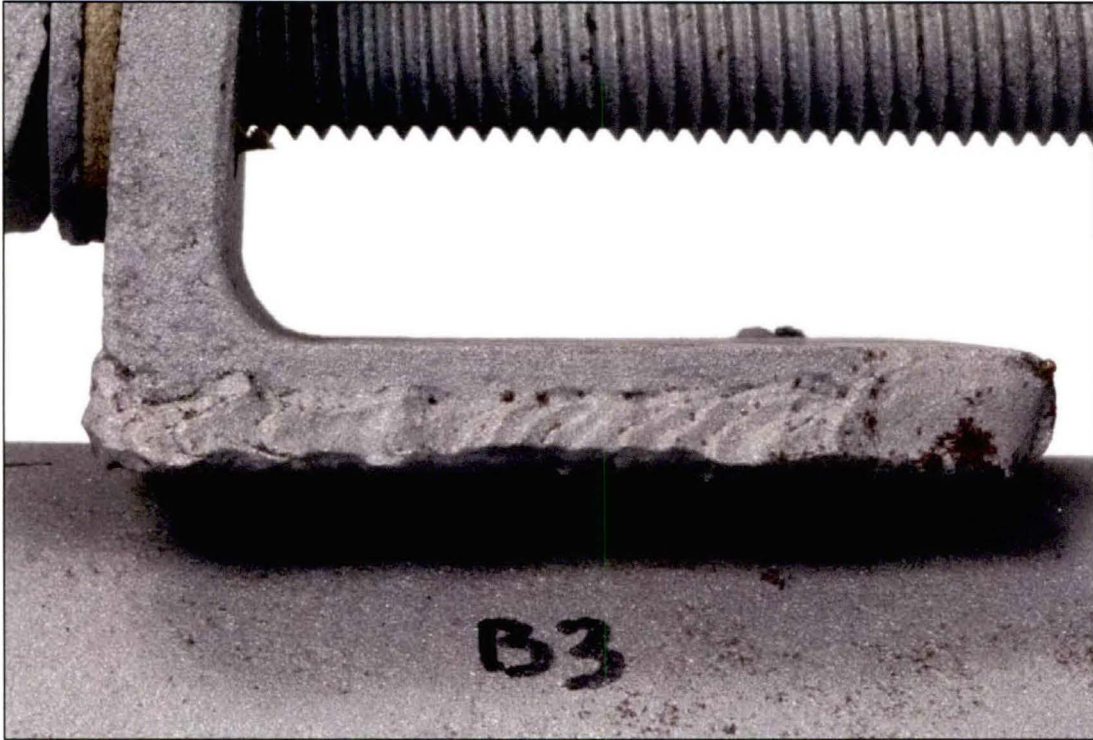


Figure 13. Image of the Lug B3 bottom weld with no fusion.



Figure 14. Photograph showing some superficial rust on the coupling surface where a rod had been in close proximity.

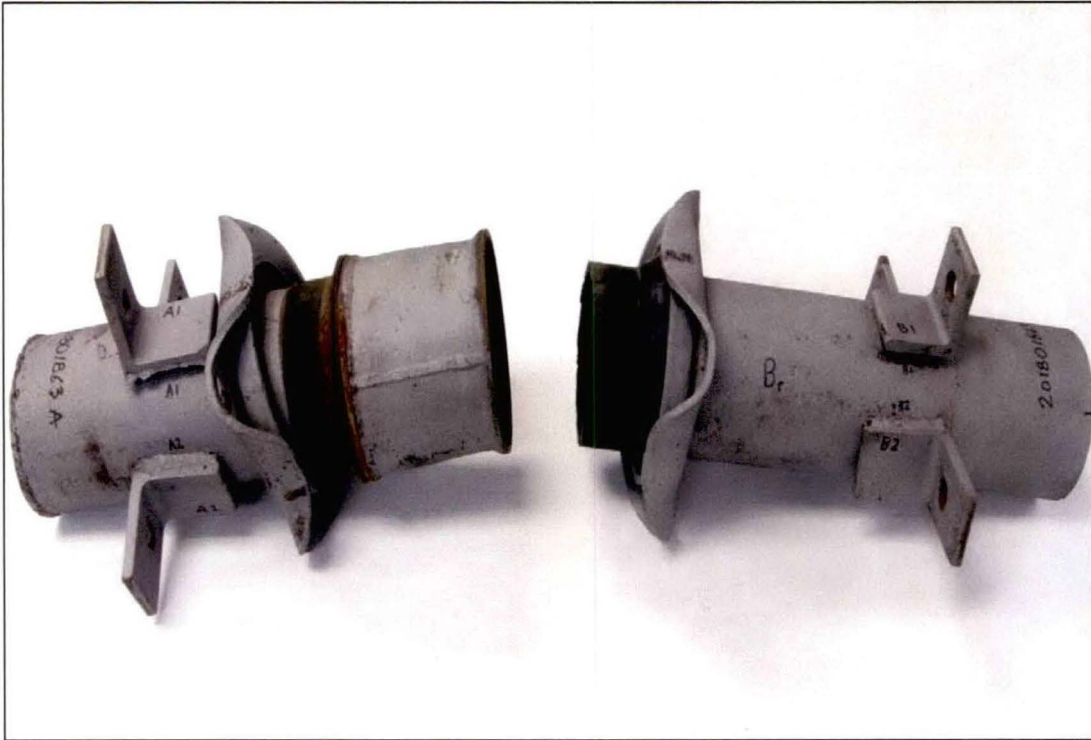


Figure 15. Photograph of the A (left) and B (right) sides of the coupled pipe after disassembly.

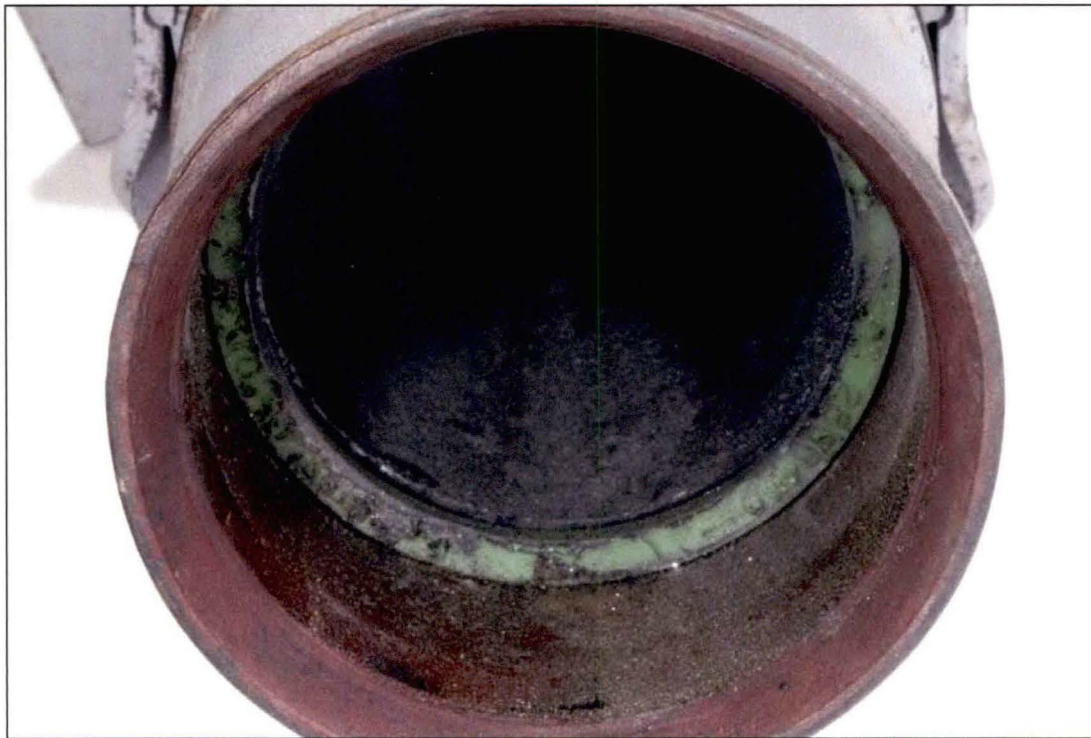


Figure 16. The interior of the coupling region contained a green colored pipe separator.

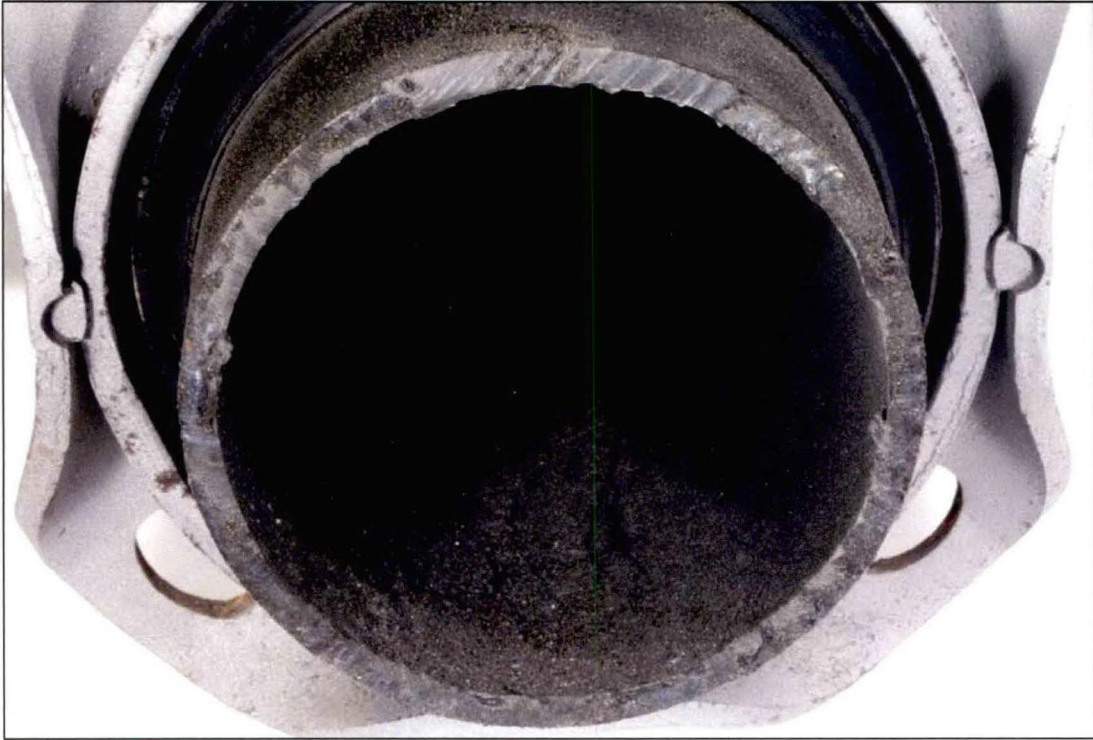


Figure 17. The bore of pipe end B is shown.



Figure 18. Image of the sleeve on the exterior of the pipe. Some debris was also present.

**SECTION 3- TORQUE TESTING- FOR INFORMATION ONLY**

Torque testing was performed on the nuts on the rods, and the studs on the pipe samples. A calibrated torque wrench was used to determine breakaway torque on each fastener. Prior to testing it was apparent that one harness rod was loose, suggesting no clamping force on the lugs. The breakaway torque measurements are summarized in Table 5. The rods did not have a specified torque requirement. The four coupling bolts exhibited torque values ranging from 65 to 100 ft.-lbs. One value was below the Dresser Style 39 coupling installation torque recommendation of 75 ft.-lbs. minimum for 5/8" fasteners.

**TABLE 5 – FASTENER TORQUE MEASUREMENT**

<b>Component</b>	<b>Breakaway Torque</b>	<b>Observations</b>
Rod 1	< 10 ft.-lbs.	Nut spun by hand – no clamping force
Rod 2	20 ft.-lbs.	Less than the 75 ft.-lbs. recommended for 5/8" fasteners
Rod 3	20 ft.-lbs.	Less than the 75 ft.-lbs. recommended for 5/8" fasteners
Bolt 1	90 ft.-lbs.	Satisfied the 75 ft.-lbs. recommended for 5/8" fasteners
Bolt 2	90 ft.-lbs.	Satisfied the 75 ft.-lbs. recommended for 5/8" fasteners
Bolt 3	100 ft.-lbs.	Satisfied the 75 ft.-lbs. recommended for 5/8" fasteners
Bolt 4	65 ft.-lbs.	Less than the 75 ft.-lbs. recommended for 5/8" fasteners

**SECTION 4- TENSILE TESTING, ASTM A370-17A**

Tensile testing was performed on round specimens that were removed from the three harness rods and the four coupling bolts. The tensile mechanical properties of the fasteners were measured and the results are summarized in Table 6. No mechanical property requirements were indicated for the fasteners on the provided Dresser harness or coupling information.



**TABLE 6 – FASTENER TENSION TEST RESULTS**

Component	Ultimate Tensile Strength, ksi	0.2% Offset Yield Strength, ksi	Elongation, %	Reduction in Area, %
Rod 1	138	123	21	65
Rod 2	131	116	22	86
Rod 3	129	113	23	67
Bolt 1	67.5	39.6	34	56
Bolt 2	66.0	40.2	36	62
Bolt 3	63.5	33.9	36	62
Bolt 4	64.5	33.6	36	60

Specimen Dimensions; Diameter 0.35”, with gage lengths of 1”  
Percent elongation was measured using elongation-after-fracture measurements

**SECTION 5- ROCKWELL AND SUPERFICIAL HARDNESS, ASTM E18-17**

Small sections of the six lugs were excised for hardness testing. Rockwell hardness testing was performed on the angle iron lugs after removal of surface roughness by sanding. The obtained results are provided in Table 7 and are suggestive of a moderate strength level. No requirements were provided for comparison.

**TABLE 7 – LUG HARDNESS TEST RESULTS – ROCKWELL B - HRBW**

Results	Reading 1	Reading 2	Reading 3	Reading 4	Average
Lug A1	76	77	75	77	76
Lug A2	72	71	72	73	72
Lug A3	72	71	73	70	72
Lug B1	73	73	76	72	74
Lug B2	72	73	71	71	72
Lug B3	71	71	70	71	71

**SECTION 6- LIQUID DYE PENETRANT EXAMINATION**

The two separated ends of the disassembled coupling were sent to a third party NDE laboratory for inspection. The primary inspector recommended dye penetrant examination rather than the magnetic particle inspection technique. Inspection was performed in accordance with the acceptance criteria of API 1104 “Welding of Pipelines and Related Facilities”. The inspection results are provided as an

appendix. Two representative welds are shown in Figures 19 and 20 with the dye penetrant test media remaining.

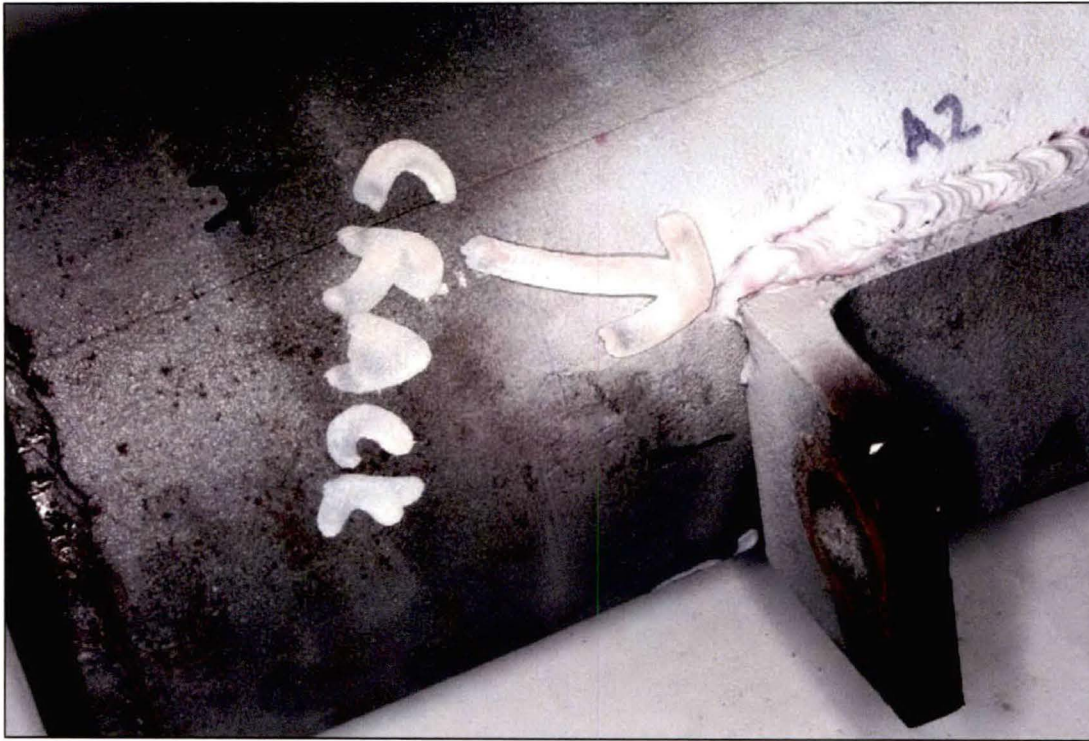


Figure 19. Image of the Lug A2 top weld which exhibited a crack that was detected during dye penetrant inspection.



Figure 20. Image of the Lug B2 top weld which exhibited numerous pores.



Respectfully submitted

*Brett A. Miller*

Brett A. Miller, P.E., FASM, CWI  
Technical Director


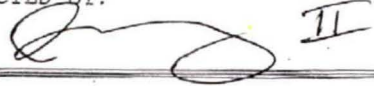
Concurrence

*Rommel O. Taylor*

Rommel O. Taylor  
Senior Metallurgist / Failure Analyst

All procedures were performed in accordance with the IMR Quality Manual, current revision, and related procedures; and the PWA MCL Manual F 23 and related procedures. The information contained in this test report represents only the material tested and may not be reproduced, except in full, without the written approval of IMR Test Labs ("IMR"). IMR maintains a quality system in compliance with the ISO/IEC 17025 and is accredited by the American Association for Laboratory Accreditation (A2LA), certificates #1140.03 and #1140.04. IMR will perform all testing in good faith using the proper procedures, trained personnel, and equipment to accomplish the testing required. IMR's liability to the customer or any third party is limited at all times to the amount charged for the services provided. All samples will be retained for a minimum of 6 months and may be destroyed thereafter unless otherwise specified by the customer. The recording of false, fictitious, or fraudulent statements or entries on this document may be punished as a felony under federal statutes. IMR Test Labs is a GEAE S-400 approved lab (Supplier Code T9334).

APPENDIX – NONDESTRUCTIVE TESTING RECORD

		HAYES TESTING LABORATORY, INC. Phone 502-266-9729 2521 Holloway Rd. Louisville, Kentucky 40299	
<b>NDE PENETRANT REPORT</b>			
Client: <u>IME</u>		Project: <u>201801863A/B</u>	
Item Description: <u>Support clips</u>		Part No: <u>See below</u>	
Drawing No: _____		Spec. <u>1104</u>	
Acceptance Class <u>API</u>		Procedure <u>HTL-PT</u>	
WELD		OTHER TEST ITEMS	
Weld Joint _____		Material _____	
Weld Process _____		Processing _____	
Base Material _____		Material _____	
Material Thickness <u>N/A</u>		Dimensions <u>N/A</u>	
Weld Length/OD _____		Additional Info _____	
Surface Condition _____		Surface Condition _____	
PRECLEAN: Method <u>Spray/wipe</u> Batch No. <u>15M15K</u>		Material <u>SKC-5 Aerosol</u> Drying Time <u>10 minutes</u>	
PENETRANT: Material <u>SKL-WD2</u> Application <u>brush</u>		Batch No. <u>17H13K</u> Dwell Time <u>25 minutes</u>	
EMULSIFICATION: Material _____ Application <u>N/A</u>		Batch No. _____ Emulsification Time _____	
EXCESS PENETRANT REMOVAL: Material <u>towel/wipe</u> Method _____		Batch No. _____ Drying Time _____	
DEVELOPER: Material <u>SKD-S2</u> Method <u>Spray</u>		Batch No. <u>14E04K</u> Drying Time <u>10 minutes</u> Developing Time <u>10 mins.</u>	
POSTCLEAN: Material <u>SKC-5 Aerosol</u> Method <u>Spray/wipe</u>		Batch No. <u>15M15K</u>	
No. of Parts Accepted <u>1</u>		Serial No.'s _____	
No. of Parts Rejected <u>5</u>		Serial No.'s _____	
OTHER INFORMATION:			
A1L - Rejected porosity A1R - No weld A2 - Rejected crack A3 - Rejected porosity A3 - No weld		B1R - No weld B1L - Accepted B2 - Rejected porosity B2 - No weld B3 - Rejected porosity B3 - No weld	
INSPECTED BY: 		DATE: <u>8/10/18</u>	

Legend

A1L- Lug **A1**, Left Weld

A1R- Lug **A1**, Right Weld

A2- Lug **A2**

A3- Lug **A3**

B1R- Lug **B1**, Right Weld

B1L- Lug **B1**, Left Weld

B2- Lug **B2**

B3- Lug **B3**

## Bolt-Style Coupling (pressures > 3 psig)

This form will be completed when LG&E or LG&E contractors expose a bolt-style coupling in a system where the pressure is > 3 psig (medium and high pressure distribution and transmission) and the coupling will be backfilled. The purpose of the form is to provide Operations, Engineering and Gas Regulatory personnel with information about the bolt style coupling installation.

### Part A- Discovery of Coupling

#### Precautions:

1. Stop excavation upon discovering the bolt-style coupling in the excavation
2. Set-up a perimeter around the excavation to keep the public away from the excavation

#### General Information:

1. Contact Employee for the bolt style coupling found: Found via records research in TIMP
2. Date of exposure: 1/3/2019
3. Location: Dixie Beach Regulator Station
4. Size of coupling (based on pipe size if not exposed enough to determine): 2 inch
5. Type of soil (circle one): Sandy Clay Gravel Topsoil Other (take picture and describe)
6. Soil Density test:  Type A  Type B  Type C
7. Status:  Removed  Abandoned in place  Backfilled- left in service
8. Discovered How?:  Leak on Coupler  Other Maintenance Excavation  Facility Replacement  
 Facility Retirement  Other Records

#### Pictures:

1. Take at least two pictures of the coupling. The pictures should be from different angles (additional pictures can be taken).
2. Email pictures to supervisor. Ensure pictures are attached to this form:

**Sketch:** Provide a sketch showing the coupling orientation (vertical/horizontal), nearby branches, pipe, valves and fittings, other utilities or structures, etc.

#### Leak Survey:

1. Use an instrument designed to detect natural gas to check for the presence of natural gas after backfilling the excavation. Include readings in the above sketch in relation to the coupling. If the contact employee is not leak survey qualified they should contact:
  - a. Their supervisor to call Gas Regulatory to complete the survey after the excavation is backfilled. Call [REDACTED]
  - b. If Gas Regulatory is not available contact Gas Dispatch to have the survey assigned to a Gas Trouble Technician.

Leak Survey completed at time of backfill (circle one)    yes    no    not applicable

Include completed form in the main report and email a scanned copy of the completed form (back and front) to the Distribution Integrity Management (DIM) group.

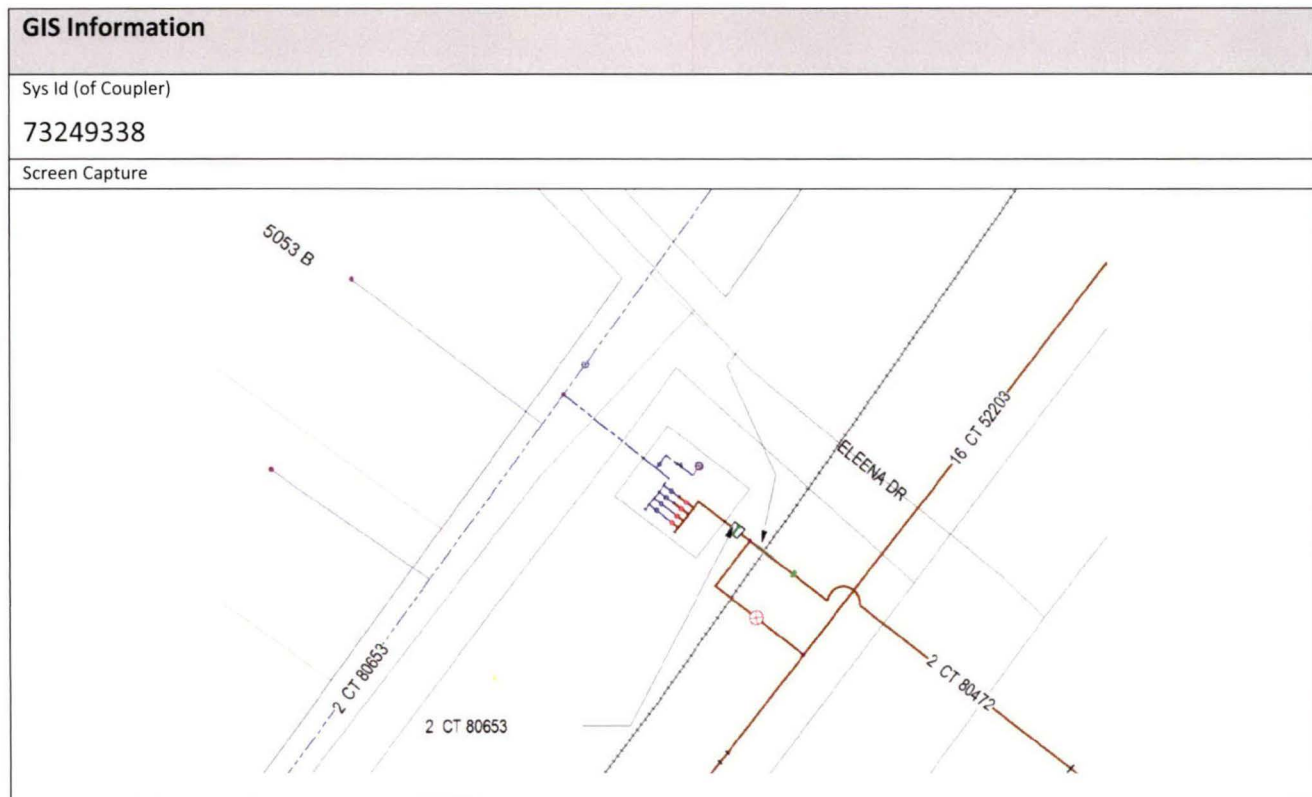
Field Pictures



**Part B- Coupling Information**

General Information		Tracking #: 2019-001	
PO Number 1019768	Expense Org 4385	Project 134829	Task LAB
Address/Location 16402 Dixie Beach Rd			
Size 2 inch	Material Steel	Coating Grease Wrap	MAOP 305 psig
Main/Service Number 80472	Soil Type (from Part A) Clay	Manufacturer Dresser	Model Style 90
Pipe Connection:	Steel to Steel	Steel to Plastic	Plastic to Plastic

Historical Information	
Installation Date 8/7/1959	Document Source Main Report
Installation Company Unknown	Document Source Main Report
Foreman Unknown	Document Source Main Report
Welder Unknown	Document Source Main Report





Pictures

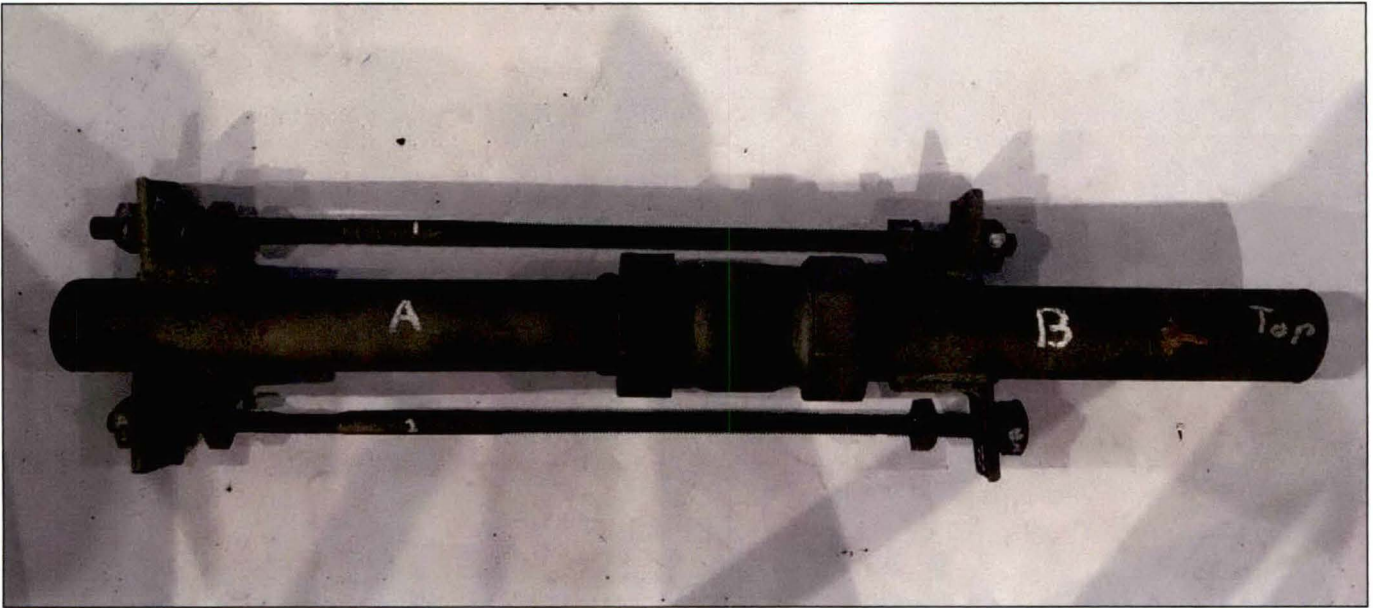


Figure 1- Top View

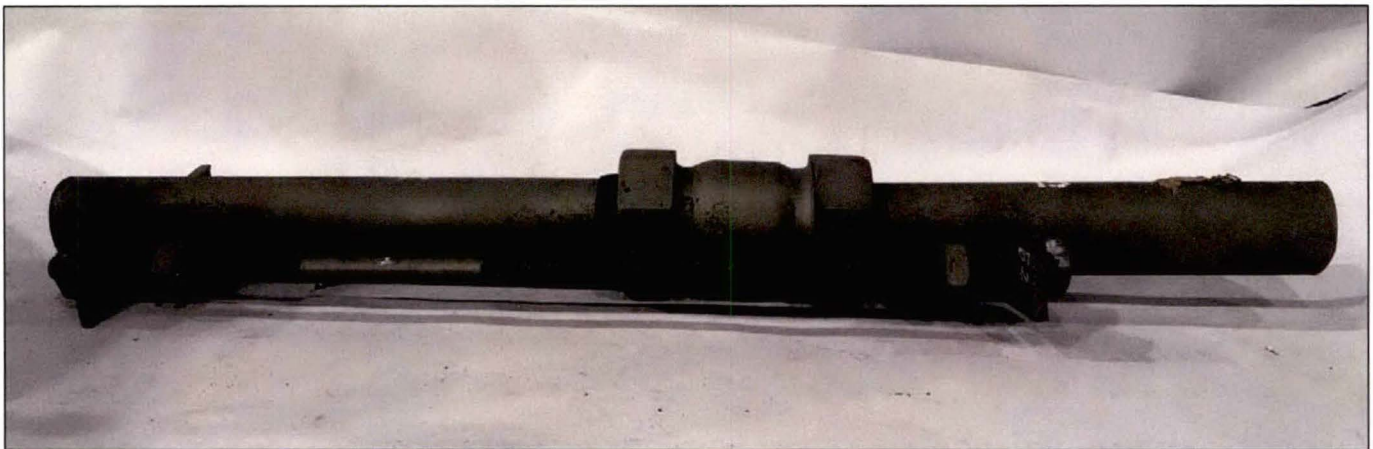


Figure 2- Front View

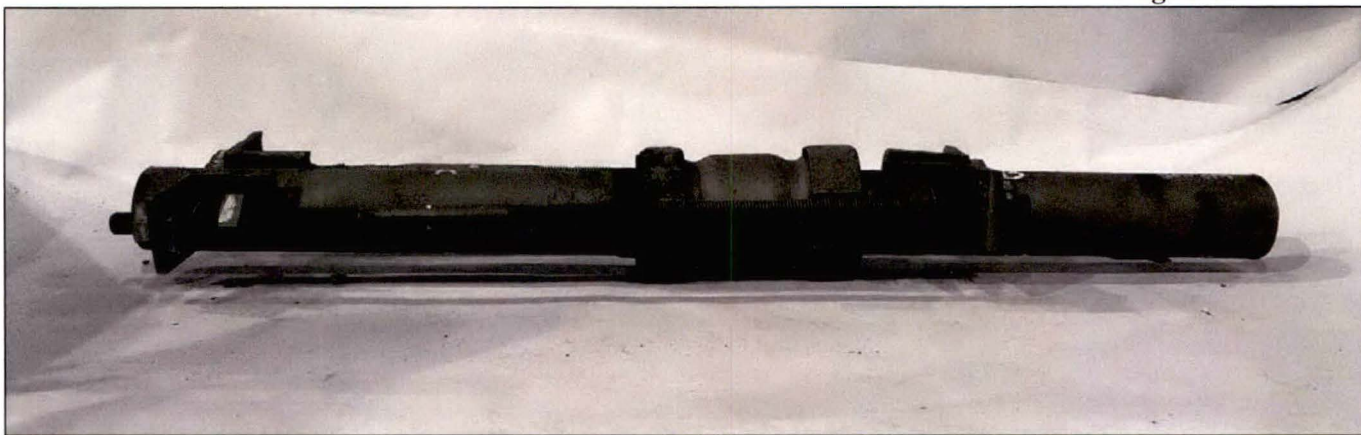


Figure 3- Back View



Figure 4- Bottom View



Figure 5- Left Side View



Figure 6- Right Side View

**Part C- Visual Inspection of Coupling**

Visual Inspection Performed by: Chad Augustine [REDACTED]

Date: 1/4/2019

**Table 1- Component Quantities**

Number of Bolts on Coupler Body	0 <sup>1</sup>
Number of Reinforcement Rods	2
Number of Lugs	4 (2 each rod)

<sup>1</sup> This is not a bolted style coupling, it is a compression nut follower style. See figure(s) 1-6.

**Table 2- Corrosion**

	Pipe A	Pipe B	Coupler Body	Bolts	Rods	Lugs	Nuts
General External Corrosion Present?	Yes, minor	Yes, minor	Yes, minor	Not Applicable	Yes, minor	Yes, minor	Yes, minor
Localized Corrosion Present?	No	No	No	Not Applicable	No	No	No
Pit Depths	0.040"	0.040"	Note <sup>3</sup>	Not Applicable	0.080"	Note <sup>3</sup>	Note <sup>3</sup>
Internal Corrosion?							

<sup>3</sup> Could not measure with a pit gage card because there was not enough clearance for the card.

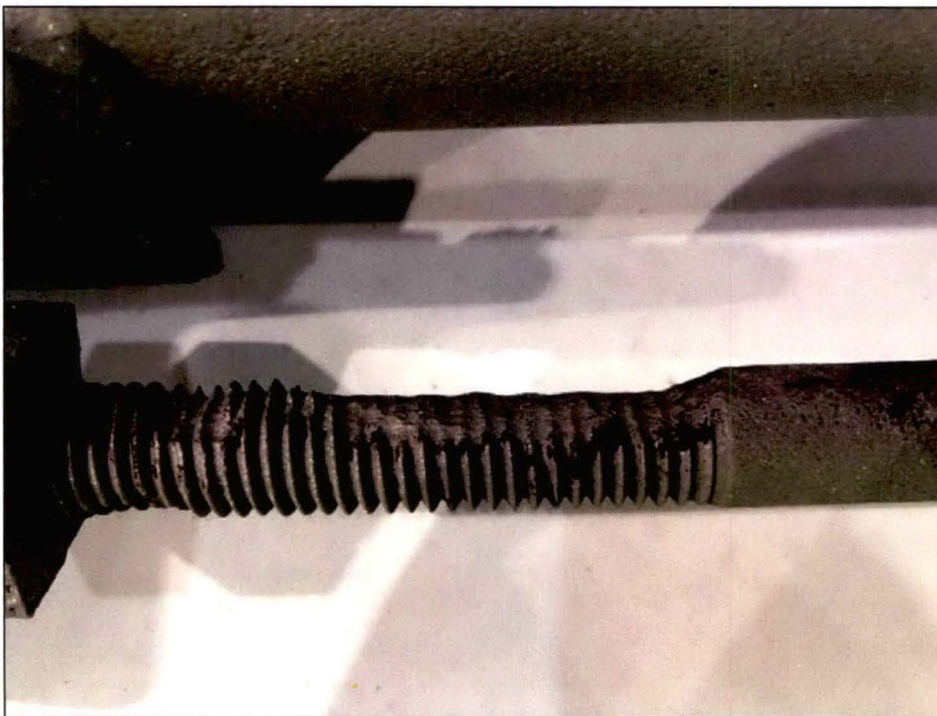


Figure 7- Corrosion Rod 2



Figure 8- Corrosion Pipe A



Figure 9- Corrosion Coupling Body  
version 5.1 (12/06/2018)

Table 3- Coupler Body

Bolt	Washer Present	Nut present?
1		
2		
3		
4		
5		
6		

Not Applicable.  
This coupling is not a bolted style.

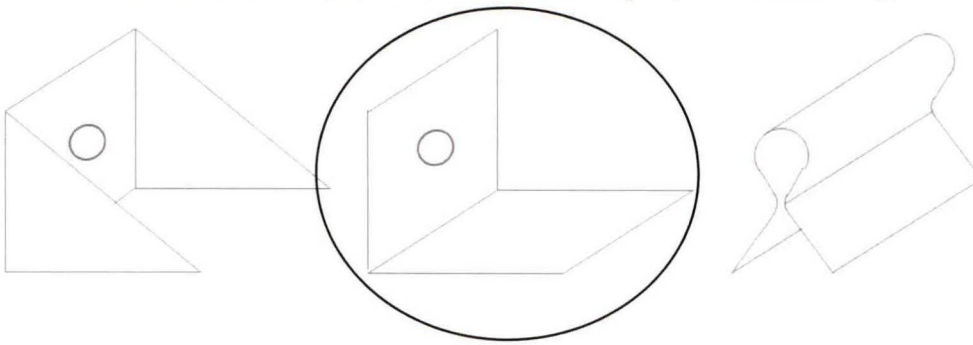
Table 4- Reinforcement Rods

Rod	Length (in.)	Diameter (in.)	Washer present at head of bolt?	Washer present at end of bolt?	Nut Present? Type?	Type of rod?
1	24.25	0.6230	Yes <sup>4</sup>	Yes	Yes, square	Appears to be kit provided
2	24.00	0.6230	Yes <sup>4</sup>	Yes	Yes, square	Appears to be kit provided

<sup>4</sup> There is no head for the bolt. A nut is serving as the head.

**Type of Lug**

(Please indicate the shape of the lug by circling one below. If the lug shape is different than any preset shape below, sketch the shape.)



**Table 5- Lugs (Measurements)**

Pipe Side	Lug Number	Thickness (in.)	Circumference (in)	
			Distance to next lug, clockwise	Distance to next lug, counter-clockwise
A	1	0.3740	Top: 2.500 <sup>5</sup>	Bottom: 7.000 <sup>5</sup>
A	2	0.3580	Top: 2.500 <sup>5</sup>	Bottom: 7.000 <sup>5</sup>
B	1	0.3540	Top: 2.750 <sup>5</sup>	Bottom: 6.750 <sup>5</sup>
B	2	0.3745	Top: 2.750 <sup>5</sup>	Bottom: 6.750 <sup>5</sup>

<sup>5</sup> Since the lugs are not flush along the curvature of the pipe, only one side of the lug was welded to the pipe. There is no other point of reference to measure from lug to lug so the weld were used.

**Table 6- Lugs (Observations)**

Lug	Lug	Assembly sets aligned?	Deformed?	Deflected? (angle of)
A1	B1	Yes	No	2°
A2	B2	Yes	No	1°

Table 7- Lugs (Weld Quality)

Pipe Side	Lug Number	Any part detached from pipe?	Welded on all sides of exterior? If no, describe	Are welds on exterior continuous? If no, describe	Welded on all sides of interior? If no, describe	Are welds on interior continuous? If no, describe
A	1	Yes <sup>6</sup>	No <sup>6</sup>	Yes	Not Applicable	Not Applicable
A	2	Yes <sup>6</sup>	No <sup>6</sup>	Yes <sup>7</sup>	Not Applicable	Not Applicable
B	1	Yes <sup>6</sup>	No <sup>6</sup>	Yes	Not Applicable	Not Applicable
B	2	Yes <sup>6</sup>	No <sup>6</sup>	Yes	Not Applicable	Not Applicable

<sup>6</sup> The lugs are not flush along the curvature of the pipe, so only one side of the lug was welded to the pipe. See Figures 10 & 11.

<sup>7</sup> Major porosity. See figure 12.



Figure 10- Lugs





Figure 11- Lug

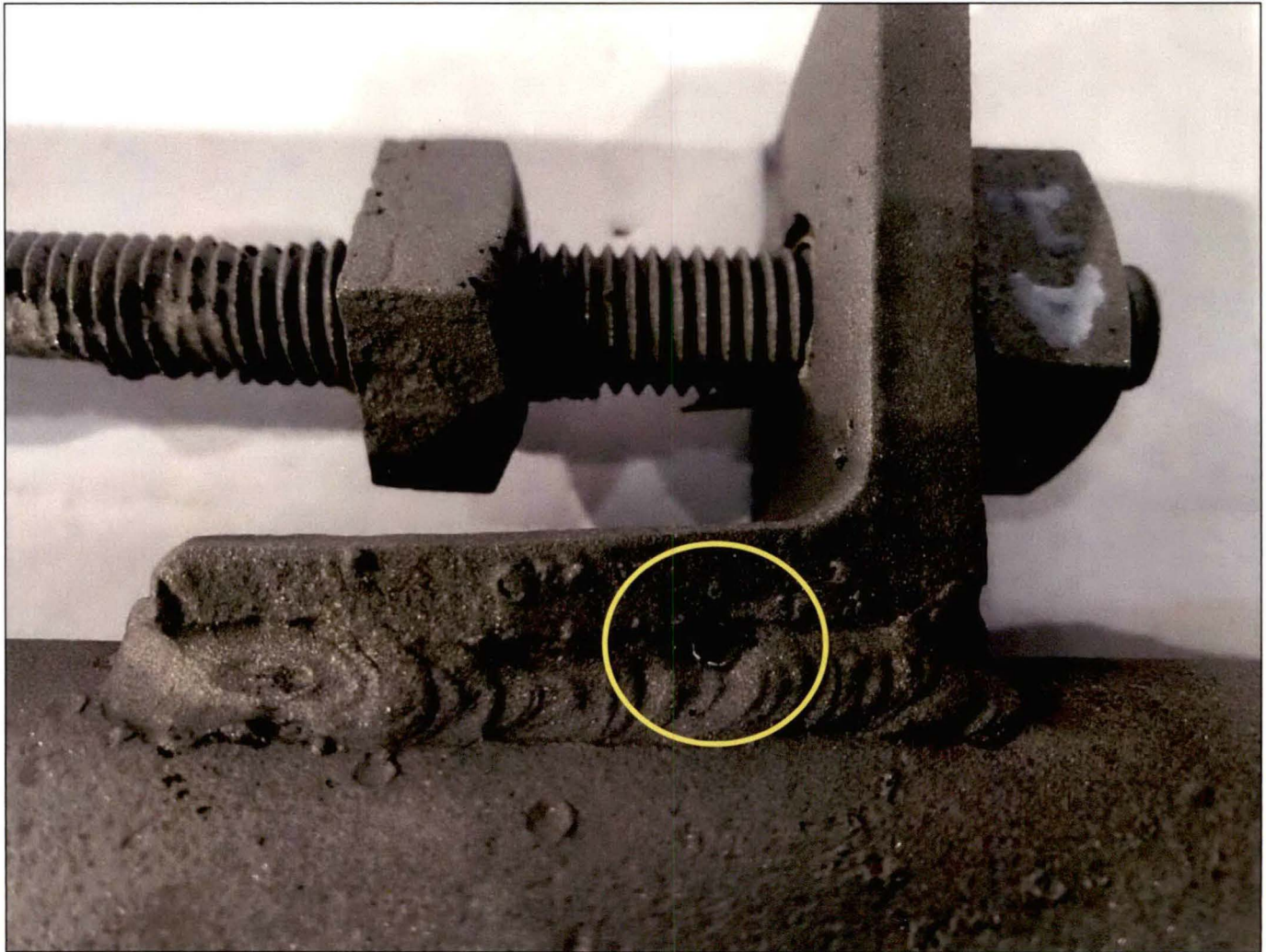


Figure 12- Porosity in weld

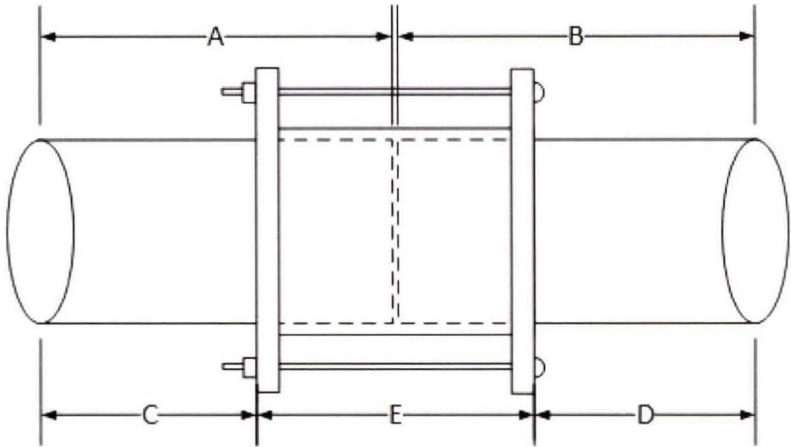


Table 8- Stab Depth

	A	B	C	D	Stab Depth (A-C) or (B-D)
Pipe Side A	16.6875		13.9375		2.7500
Pipe Side B		14.8125		11.4375	3.3750
	Sum of stab depths (should be closely equal to measurement E)				6.1250
	Coupler Length (E)				6.3125
	Difference				-0.1875

Additional Comments and General Observations

Pictures indicate manufacturer and style of coupling.



Figure 13- Manufacturer



Figure 14- Style

**Part D- Analysis of Coupling**

This section is reserved for the lab report.

**LG&E - Kentucky Utilities**  
**6900 Enterprise Drive**  
**Louisville, KY 40214**

**January 14, 2019**

Attention: Chad Augustine

## **Report No. 201900016**

### **Metallurgical Evaluation of Coupling and Associated Hardware**

**Location: 16402 Dixie Beach Road**

#### **DESCRIPTION AND PURPOSE**

A natural gas pipe section including a coupling was submitted for metallurgical evaluation. The section was a 2" pipe with an integral coupling without attachment bolts. Two joint harnesses were also affixed to the pipe section. It was reported that the coupling had been installed in the field at 16402 Dixie Beach Road. The pipe section was subsequently excavated after substantial service duration without failure. It was requested that the general dimensions, weld quality, corrosion condition and mechanical properties of the coupling components be determined as directed

#### **RESULTS**

The submitted pipe section with the coupling is shown in Figures 1 and 2. Four lugs of the joint harnesses had been fillet welded to the pipe segments. Two rods and associated nuts had been affixed through the welded lugs to apply compression to the coupled joint. The coupling consisted of a steel coupling with an interior nonmetallic gasket / sleeve. Prior to receipt, the ends of the pipe segment were labelled as Ends A and B, as shown in Figures 1 and 2. The top and bottom of the coupling section were marked. Lugs A1 and A2 were welded to Pipe A, and Lugs B1 and B2 were welded to Pipe B. The rod between Lugs A1 and B1 was identified as Rod 1, whereas the opposite was Rod 2.

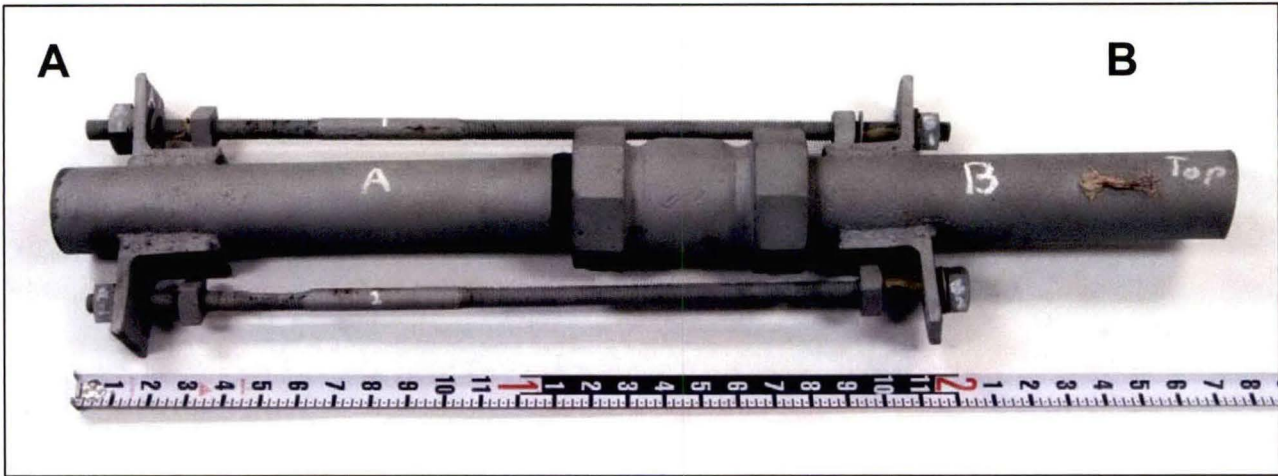


Figure 1. Photograph of the top of the submitted coupling sample.

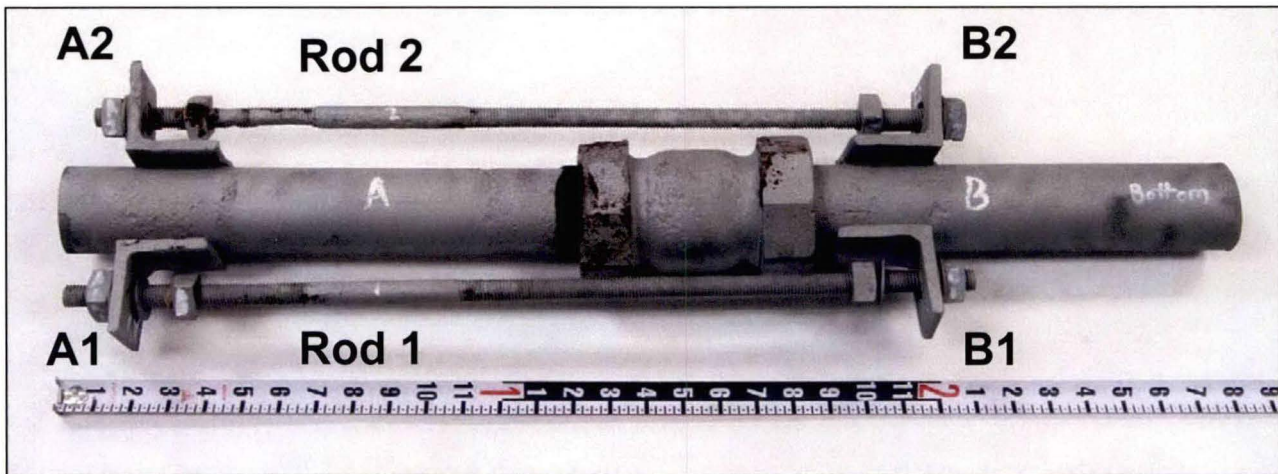


Figure 2. Photograph of the bottom of the submitted sample. Lug and rod identifications are shown.

**SECTION 1- DIMENSIONAL MEASUREMENT**

The two sets of harness lugs were positioned on opposite sides of the pipe. The relative orientations of the harness lugs were measured by photographing the assembly from the ends and applying a protractor overlay for angle measurement. The obtained measurements are shown in Figures 3 and 4 with the data summarized in Table 1. Both harness lugs were straight and not bent. The depth of insertion of the pipe segments into the coupling was also measured and the dimensions are provided in Table 2. No requirements were provided for these characteristics.

**TABLE 1 – LUG SPACING DIMENSIONAL MEASUREMENTS**

Component	Angle	Deviation from 180°	Image
Rod A1 / Rod A2	199°	19°	Figure 3
Rod B1 / Rod B2	210°	30°	Figure 4

**TABLE 2 – PIPE COUPLING DIMENSIONAL MEASUREMENTS**

Component	Depth of Pipe into Coupling	Gap Between Pipes in Coupling
Pipe A	2 3/4	~ 3/8" (Original sample length – 36")
Pipe B	3 3/8"	

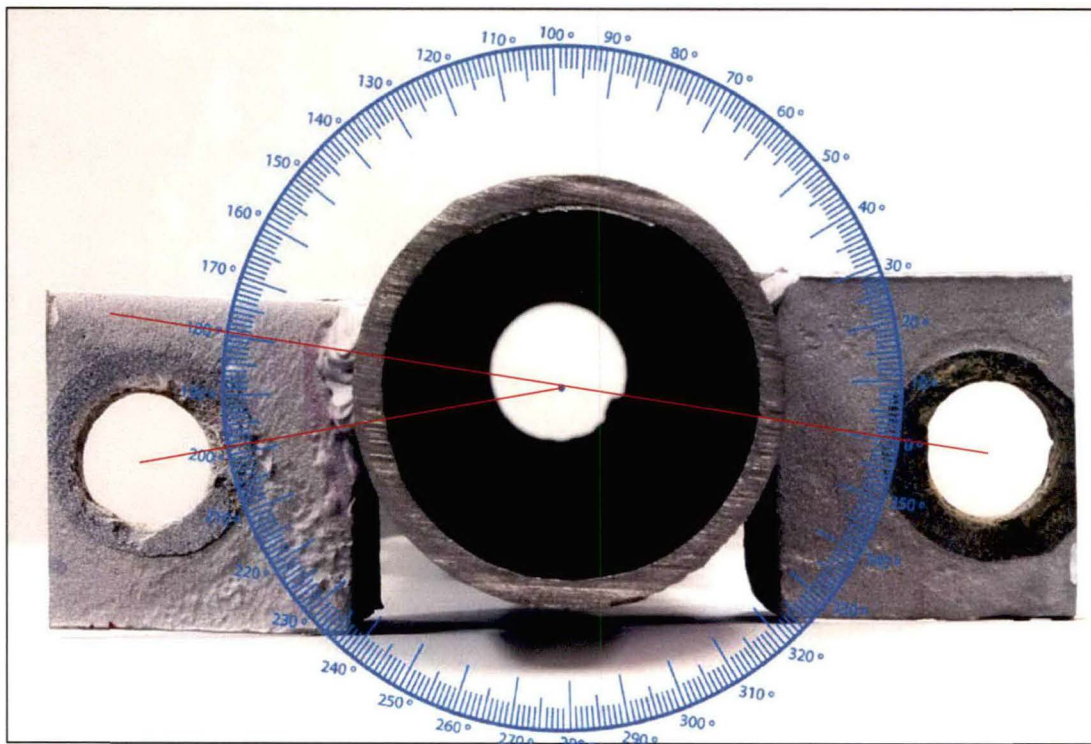


Figure 3. End facing image of the sample at End B. A superimposed protractor shows that the centers of Lugs A1 and A2 were approximately 19° from square.

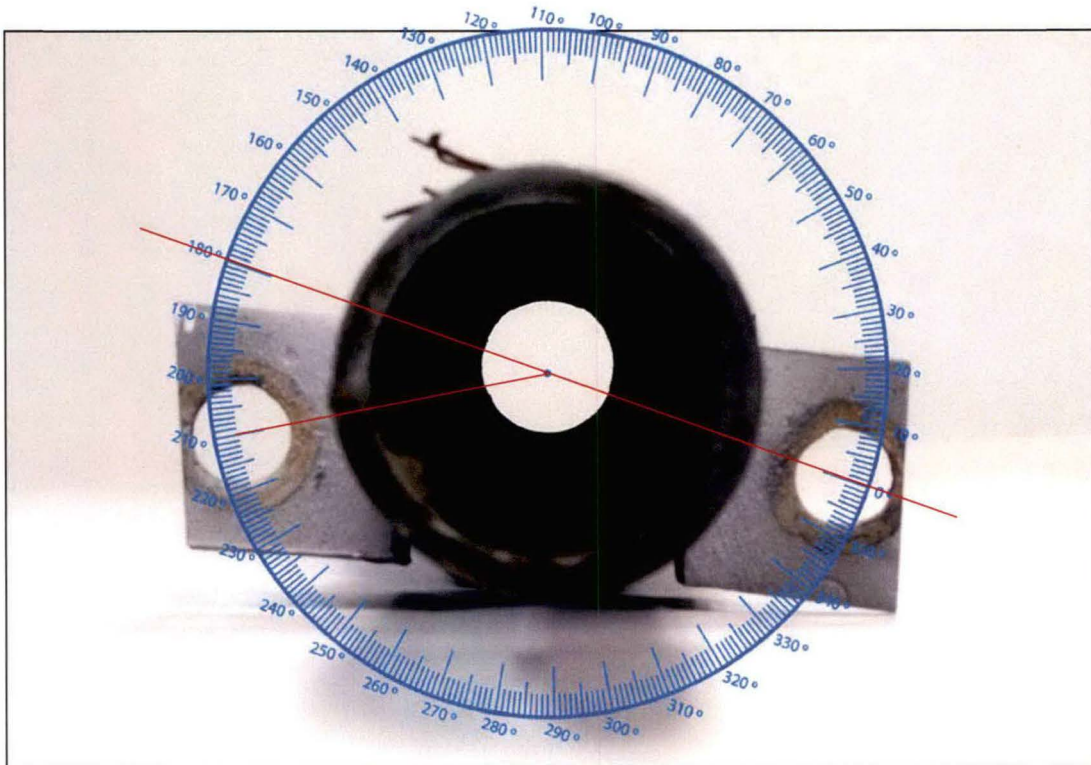


Figure 4. End facing image of the sample at End B. A superimposed protractor shows that the centers of Lugs B1 and B2 were approximately  $30^\circ$  from square.

## **SECTION 2- VISUAL OBSERVATIONS**

The lug attachment welds were regions of interest on the pipe coupling sample. Each lug contained four fillet weld locations; exterior top, exterior bottom, interior top, and interior bottom. Each weld that was present was inspected visually using a flashlight and magnifying lens. It was indicated that welding was performed in accordance with API 1104. General weld inspection was performed initially, followed by visual inspection by an outside NDE company. For comparison purposes, the welds were rated as substantial fusion, partial fusion, and minimal fusion. The summarized weld fusion and corrosion observations are provided in Table 3. Representative weld regions are shown in Figures 5 through 10. No welding had been performed on the bottom exterior, bottom interior, or top interior locations of the lug joints. The lugs were not contoured to the diameter of the pipe so only one tangential location could be welded. It was further noted that the welds contained localized weld discontinuities including undercut, overlap, and spatter in addition to incomplete fusion. No cracking in the welds or base metal heat affected zones (HAZ) was visually identified. Some superficial pitting corrosion of the welds was observed, but no significant material loss had occurred.

The coupling and harness rods were also inspected for corrosion alteration. Figure 11 shows the rusting damage to the coupling after the prior sandblasting. The observations for the rods are provided



in Table 4. The rods exhibited substantial corrosion and the worst region is shown in Figure 12. No corrosion cracking was evident. The rods were not necked down or stretched.

**TABLE 3 – LUG WELD VISUAL EXAMINATION RESULTS**

Component	Location	Weld	Observations
Lug A1	Exterior	Top	Substantial fusion
		Bottom	No weld
	Interior	Top	No weld
		Bottom	No weld
Lug A2	Exterior	Top	Substantial fusion
		Bottom	No weld
	Interior	Top	No weld
		Bottom	No weld
Lug B1	Exterior	Top	Substantial fusion
		Bottom	No weld
	Interior	Top	No weld
		Bottom	No weld
Lug B2	Exterior	Top	Substantial fusion
		Bottom	No weld
	Interior	Top	No weld
		Bottom	No weld

**TABLE 4 – FASTENER VISUAL EXAMINATION RESULTS**

Component	Observations
Rod 1	Not bent or stretched, substantial corrosion pitting
Rod 2	Not bent or stretched, substantial corrosion pitting



Figure 5. Image of the Lug A1 exterior top weld which exhibited substantial fusion except for some underfill, and undercut.



Figure 6. Image of the Lug A2 exterior top weld which exhibited substantial fusion except for some underfill, undercut and spatter.



Figure 7. Image of the Lug B1 exterior top weld which exhibited substantial fusion except for some underfill, undercut and spatter.



Figure 8. Image of the Lug B2 exterior top weld which exhibited substantial fusion except for some underfill, undercut and spatter.



Figure 9. Image of the underside of Lugs A1 and A2 showing that no welding had been performed.

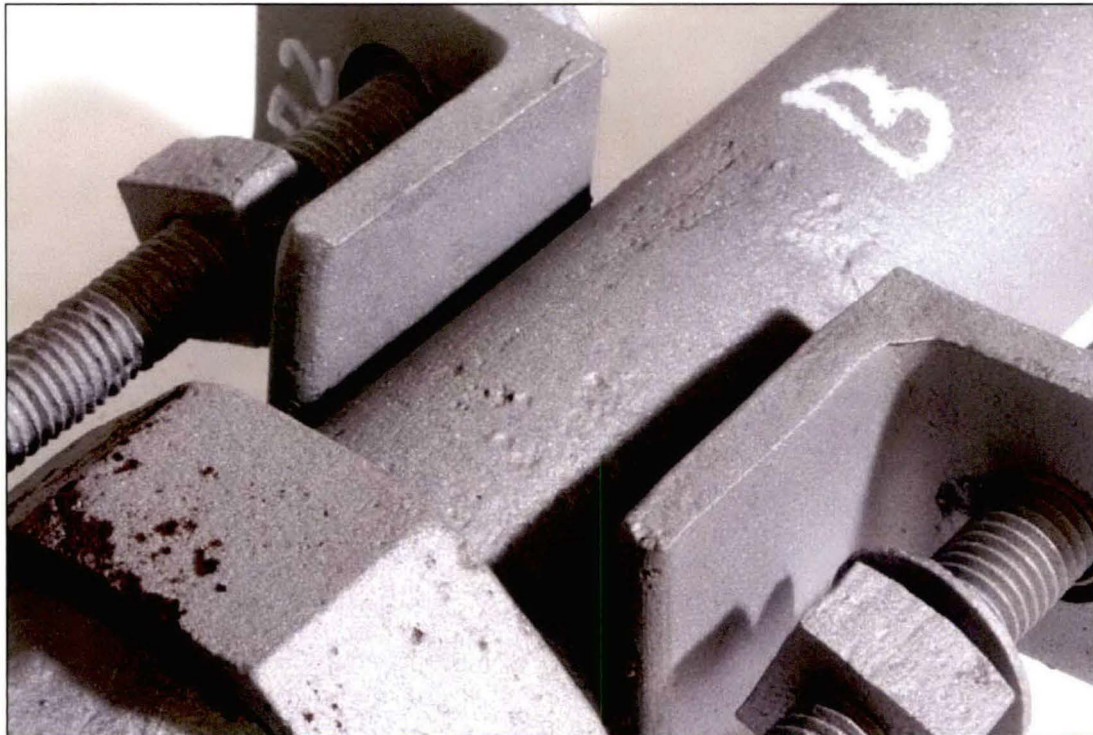


Figure 10. Image of the underside of Lugs B1 and B2 showing that no welding had been performed.

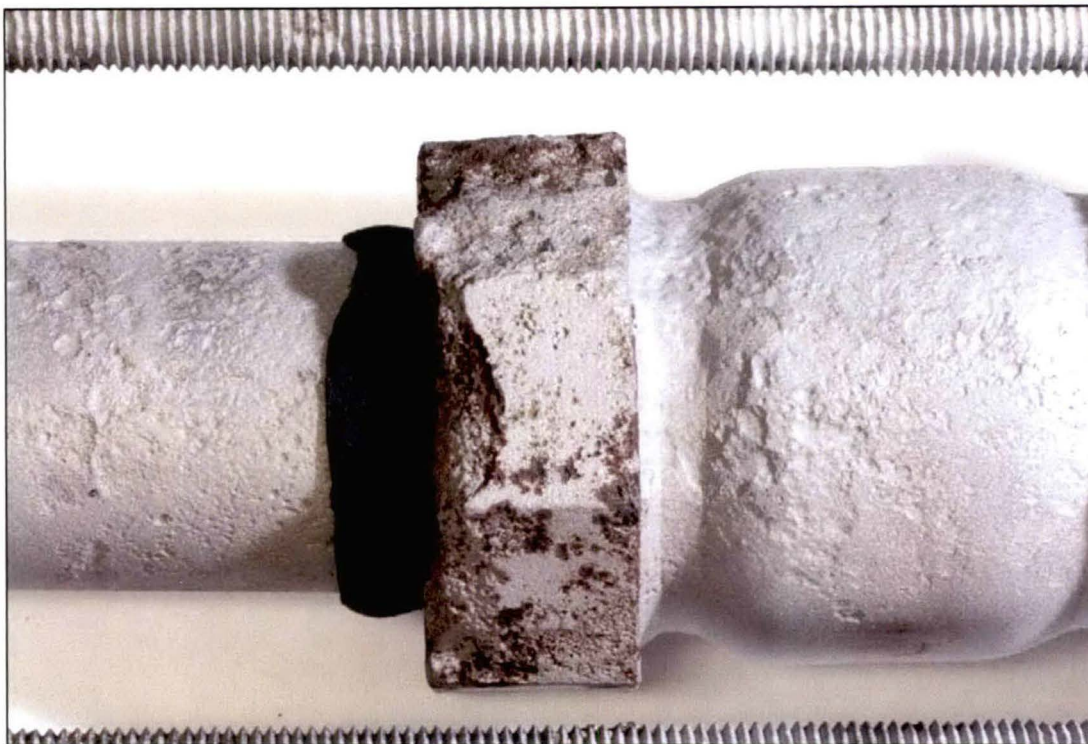


Figure 11. Photograph of a corroded region on the bottom of the coupling.

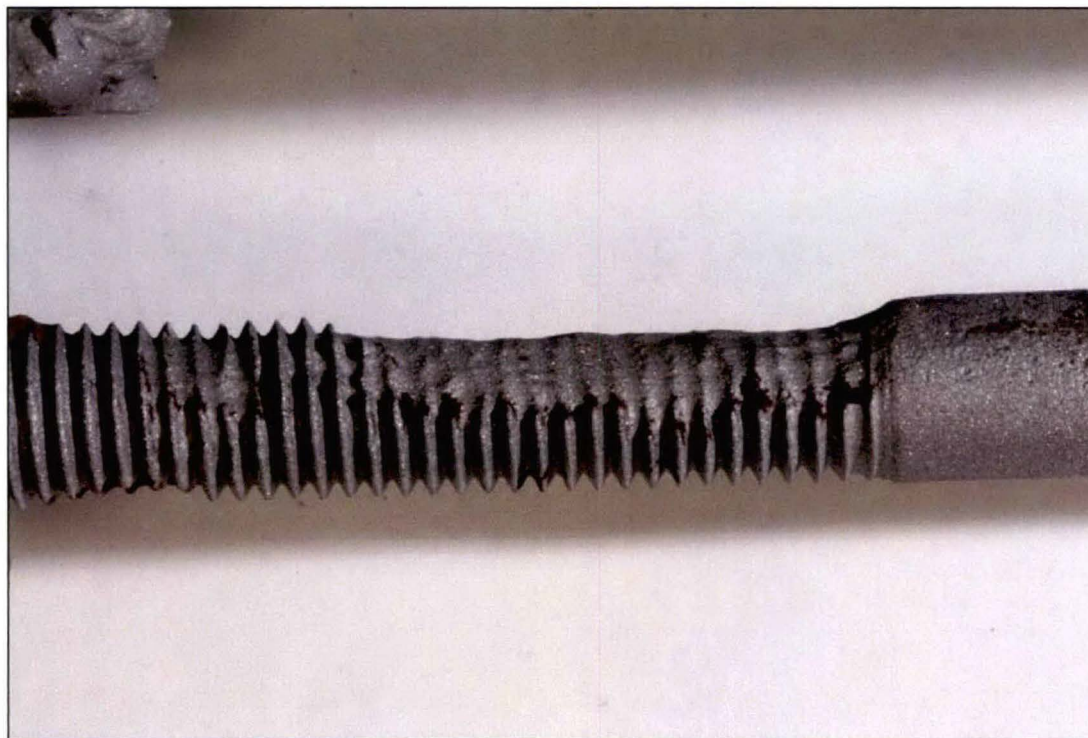


Figure 12. Photograph of the worst corrosion on one of the rods.

**SECTION 3- TORQUE TESTING- FOR INFORMATION ONLY**

Torque testing was performed on the nuts of the rods on the pipe coupling sample. A calibrated torque wrench was used to determine breakaway torque on each fastener. The breakaway torque measurements are summarized in Table 5. The rod fasteners did not have a specified torque requirement.

**TABLE 5 – FASTENER TORQUE MEASUREMENT**

Component	Breakaway Torque	Observations
Rod 1	40 ft.-lbs.	No requirement provided
Rod 2	55 ft.-lbs.	No requirement provided

**SECTION 4- TENSILE TESTING, ASTM A370-17A**

Tensile testing was performed on round specimens that were removed from the two harness rods and the four coupling bolts. The tensile mechanical properties of the fasteners were measured and the results are summarized in Table 6. No mechanical property requirements were provided for the fasteners.

**TABLE 6 – FASTENER TENSION TEST RESULTS**

Component	Ultimate Tensile Strength, ksi	0.2% Offset Yield Strength, ksi	Elongation, %	Reduction in Area, %
Rod 1	114	66.0	22	51
Rod 2	106	62.0	26	56

Specimen Dimensions; Diameter 0.35" with gage length of 1.4"

Percent elongation was measured using elongation-after-fracture measurements

**SECTION 5- ROCKWELL HARDNESS, ASTM E18-17**

Small sections of the four lugs were excised for hardness testing. Rockwell hardness testing was performed on sectioned segments of the lugs after the removal of surface roughness by sanding. The obtained results are provided in Table 7 and are suggestive of a moderate strength level. No requirements were provided for comparison.

**TABLE 7 – LUG HARDNESS TEST RESULTS – ROCKWELL B - HRBW**

Results	Reading 1	Reading 2	Reading 3	Reading 4	Average
Lug A1	75	75	76	76	76
Lug A2	73	73	74	74	74
Lug B1	73	73	74	76	74
Lug B2	74	76	76	75	75

**SECTION 6- NONDESTRUCTIVE EXAMINATION**

The two separated ends of the disassembled coupling were sent to a third party NDE laboratory for inspection. Visual and liquid dye penetrant inspection were performed on the lug attachment welds. Inspection was performed in accordance with the acceptance criteria of API 1104 “Welding of Pipelines and Related Facilities”. The inspection results are provided as Appendices A and B. Two representative welds are shown in Figures 13 and 14 with the dye penetrant test media remaining.

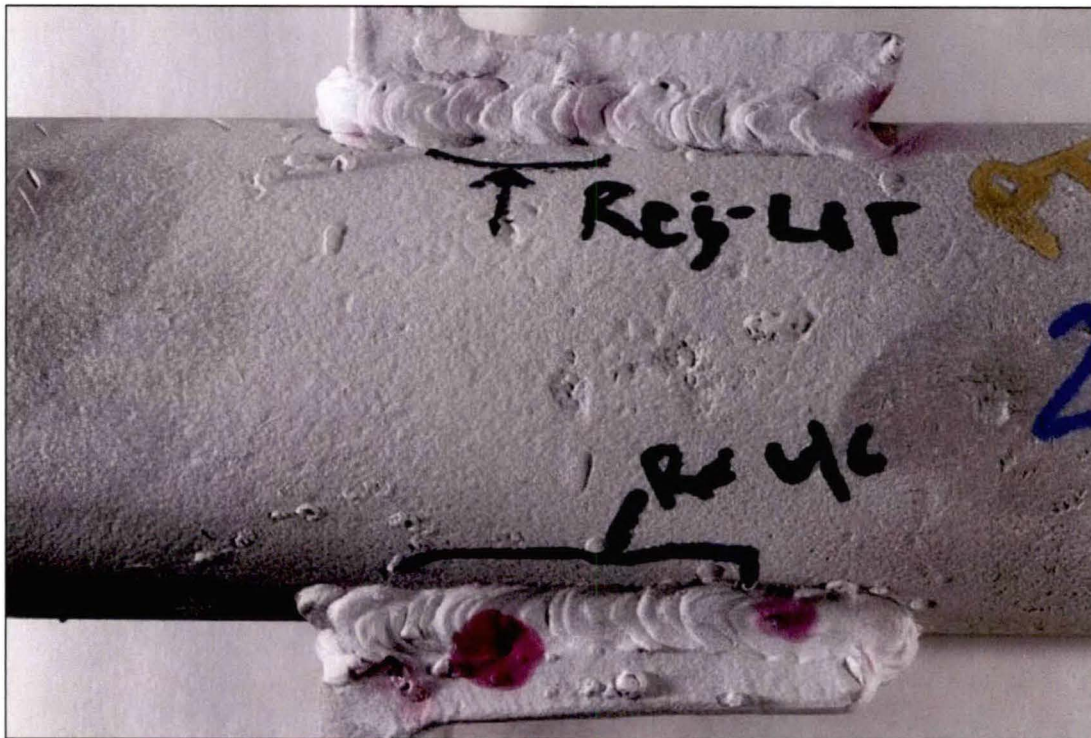


Figure 13. Image of the Lug A1 and A2 exterior top welds after dye penetrant media had been used during inspection.

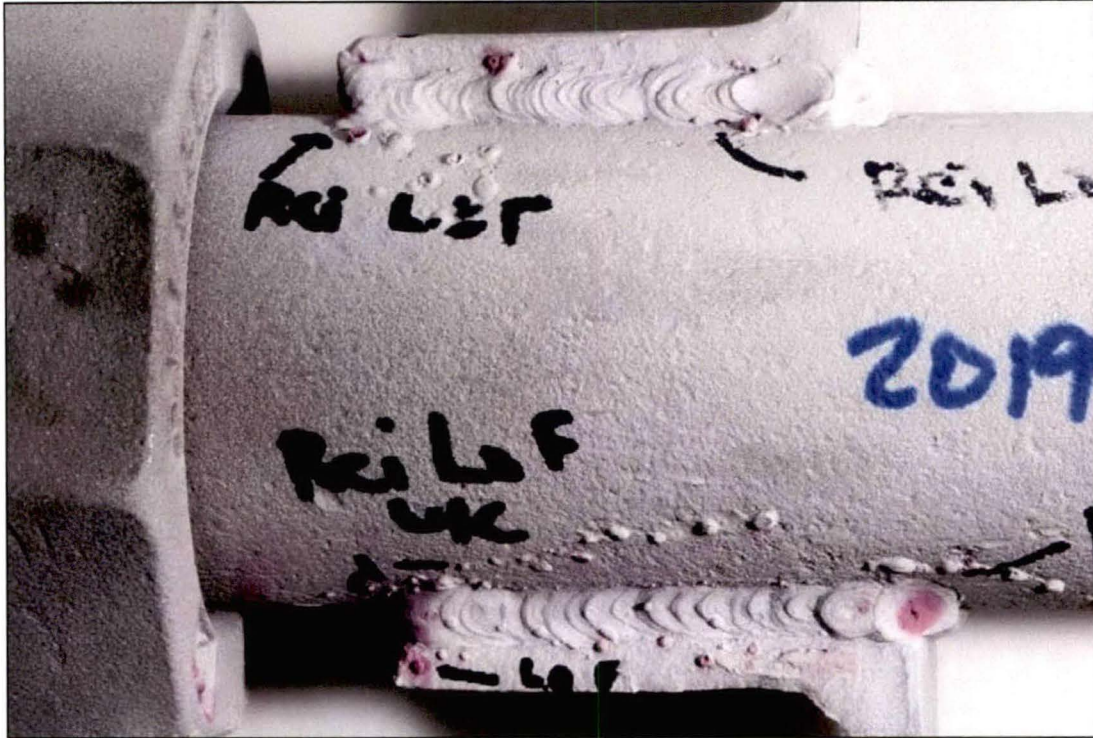


Figure 14. Image of the Lug B1 and B2 exterior top welds after dye penetrant media had been used during inspection.



Respectfully submitted

Brett A. Miller, P.E., FASM  
Technical Director

Concurrence

Phillip Swartzentruber, Ph.D., E.I.T.  
Failure Analyst

All procedures were performed in accordance with the IMR Quality Manual, current revision, and related procedures; and the PWA MCL Manual F-23 and related procedures. The information contained in this test report represents only the material tested and may not be reproduced, except in full, without the written approval of IMR Test Labs ("IMR"). IMR maintains a quality system in compliance with the ISO/IEC 17025 and is accredited by A2LA, certificates #1140.03 and #1140.04. IMR will perform all testing in good faith using the proper procedures, trained personnel, and equipment to accomplish the testing required. Conformance will be based on results without measurement uncertainty applied, unless otherwise requested by the customer. IMR's liability to the customer or any third party is limited at all times to the amount charged for the services provided. All test samples will be retained for a minimum of 3 months and may be destroyed thereafter, unless otherwise specified by the customer. The recording of false, fictitious, or fraudulent statements or entries on this document may be punished as a felony under federal statutes. IMR Test Labs is a GEAE S-400 approved lab (Supplier Code T9334).



APPENDIX A – VISUAL INSPECTION RECORD



HAYES TESTING LABORATORY, INC.  
Phone 502-266-9729  
2521 Holloway Rd.  
Louisville, Kentucky 40299

**VISUAL INSPECTION REPORT**

Customer: IMR-Test Labs Date: 1-9-19  
Location of Work: Louisville, Ky Purchase Order #: S579T

\*\*\*\*\*


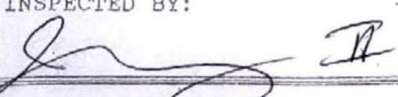
On 1-9-19 personnel of Hayes Testing conducted a visual and dye penetrant inspection for IMR on job # 201900016.  
Inspection was performed on steel gas coupling where lugs are welded to API-1104. Results are listed below.  
Section 201900016-A Rejected for undercut, porosity, Lack of Fusion Visually  
Section 201900016-B Rejected for Lack of fusion, porosity, and undercut.  
please see attached for penetrant results.  
If you have any questions regarding this report please feel free to contact me at anytime.  
Respectfully Submitted,  
*[Signature]*

Results interpreted to CODE: API-1104

INSPECTOR: *[Signature]* Level or CWP #: IF

Your Independent Laboratory For Complete Non-Destructive Testing

APPENDIX C – PENETRANT INSPECTION RECORD

		HAYES TESTING LABORATORY, INC. Phone 502-266-9729 2521 Holloway Rd. Louisville, Kentucky 40299	
NDE PENETRANT REPORT			
Client: <u>IMR</u>		Project: <u>201900016</u>	
Item Description: <u>2" Coupling</u>		Part No: <u>See below</u>	
Drawing No: _____		Spec. <u>1104</u>	
Acceptance Class <u>API</u>		Procedure <u>HTL-PT</u>	
WELD		OTHER TEST ITEMS	
Weld Joint _____		Material _____	
Weld Process _____		Processing _____	
Base Material _____		Material _____	
Material Thickness <u>N/A</u>		Dimensions <u>N/A</u>	
Weld Length/OD _____		Additional Info _____	
Surface Condition _____		Surface Condition _____	
PRECLEAN: Method <u>Spray/Wipe</u> Batch No. <u>15M15K</u>		Material <u>SKC-S Aerosol</u> Drying Time <u>10 minutes</u>	
PENETRANT: Material <u>SKL-WP2</u> Application <u>brush</u>		Batch No. <u>17H13K</u> Dwell Time <u>25 minutes</u>	
EMULSIFICATION: Material _____ Application <u>N/A</u>		Batch No. _____ Emulsification Time _____	
EXCESS PENETRANT REMOVAL: Material <u>towel/wipe</u> Method _____		Batch No. _____ Drying Time _____	
DEVELOPER: Material <u>SKD-S2</u> Method <u>Spray</u>		Batch No. <u>14F04K</u> Drying Time <u>10 minutes</u> Developing Time <u>10 mins</u>	
POSTCLEAN: Material <u>SKC-S Aerosol</u> Method <u>Spray/Wipe</u>		Batch No. <u>15M15K</u>	
No. of Parts Accepted <u>1</u>		Serial No.'s _____	
No. of Parts Rejected <u>3</u>		Serial No.'s _____	
OTHER INFORMATION:			
201900016 A- PT 1 Rejected surface porosity PT2 Acceptable 201900016 B- PT 3,4 Rejected porosity, Lack of Fusion			
INSPECTED BY:		DATE:	
		<u>1/9/19</u>	



a PPL company

Gwen R. Pinson  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

January 31, 2019

**RE: *Louisville Gas and Electric Company Alleged Failure to Comply with  
KRS 278.495, 807 KAR 5:022, and 49 C.F.R. Part 192  
Case No. 2017-00119***

Dear Ms. Pinson:

In accordance with the Kentucky Public Service Commission's Order of March 16, 2018, Ordering Paragraph No. 3 in Case No. 2017-00119, Louisville Gas and Electric Company ("LGE") hereby notifies the Commission that the removal of all remaining mechanical couplings on the LG&E transmission system is now complete.

The following three couplings were removed from LG&E's transmission system:

- 1) A bolted-style mechanical coupling installed in 1959 was removed from service on March 23, 2018. The lab report analysis is attached as Exhibit A.
- 2) A bolted-style mechanical coupling installed in 1962 was removed from service on April 6, 2018. The lab report analysis is attached as Exhibit B.
- 3) A nut follower-style mechanical coupling installed in 1959 was removed from service on January 3, 2019. The lab report analysis is attached as Exhibit C. The work required to remove this last coupling was delayed due to the time it took to obtain the required permits to work in the vicinity of a railroad.

Enclosed, please find the full reports on the removal effort in the above referenced matter.

Should you require anything further, please contact me at your convenience.

**Louisville Gas and Electric  
Company**

State Regulation and Rates  
220 West Main Street  
PO Box 32010  
Louisville, Kentucky 40232  
www.lge-ku.com

Rick E. Lovekamp  
Manager Regulatory  
Strategy/Policy  
T 502-627-3780  
rick.lovekamp@lge-ku.com

Gwen R. Pinson  
January 31, 2019

Sincerely,

A handwritten signature in blue ink, appearing to read "Rick E. Lovekamp". The signature is fluid and cursive, with the first name "Rick" being the most prominent.

Rick E. Lovekamp

Enclosure