



P.O. Box 3000
Honolulu, Hawaii 96802-3000

March 9, 2009

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MR CHRIS HOIDAL
DIRECTOR, WESTERN REGION
U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
12300 W. DAKOTA AVENUE, SUITE 110
LAKEWOOD, CO 80228

Dear Mr. Hoidal,

Subject: CPF 5-2009-0004M

This is in response to the subject Notice of Amendment. Please find attached the following:

1. D-383 Welding Procedures
2. D-381 Inspection and Testing of Welds

In accordance with the Notice of Amendment, we have revised our O&M procedures to address the inadequacies noted by Mr. Hossein Manfared. Standard D-383 has been revised to specify the qualification of our welding procedures. In section III.B.1., ***“Each pipeline welding procedure shall be qualified in accordance with API 1104 Section 5, or ASME Section IX Article II.”***

Standard D-381 has been revised to specify the inspection of welds. In section IV.A., ***“The acceptability of a weld that is nondestructively tested or visually inspected shall be determined according to the standards in Section 9 of API Standard 1104.”***

If there are any questions, or if additional information is desired, please contact me at 808-594-5661, or by e-mail at esawa@hawaiigas.com.

Your attention to this matter is very much appreciated.

Very truly yours,

A handwritten signature in black ink, appearing to read "Edwin Sawa", written over a faint circular stamp.

The Gas Company LLC
Edwin Sawa
Compliance Engineer

Attachments: D-383
D-381



THE GAS COMPANY

DISTRIBUTION STANDARDS

PREPARED BY	C. Calvet	DATE	02/18/09	NUMBER	D-383
APPROVED BY	R. Yoshimoto	SUPERSEDES		SHEET	1 OF 3
REVISED BY		Operations & Maintenance Procedures Manual-Transmission, Tab F			
TITLE					
WELDING PROCEDURES					

Reference: 49 CFR 192.225

I. PURPOSE

The attached Welding Procedure Selection Guide lists qualified welding procedures for welding on the Company's DOT jurisdictional gas pipeline facilities. All work will be done in conformance with 49 CFR Part 192, API Standard 1104 or ASME Section IX.

II. REFERENCES

A. The following documents form a part of this specification to the extent indicated herein;

1. ASME Boiler and Pressure Vessel Code:

Section IX Qualification Standard for Welding and Brazing Procedures, Welders, Brazers, and Welding and Brazing Operators, (2001 edition with July 2003 Addenda).

3. American Petroleum Institute, (API):

1104 Welding of Pipelines and Related Facilities, (19th edition, 1999 and Oct 2001 Errata)

III. WELDING PROCEDURES

A. Procedures

1. Before welding is started, a detailed procedure specification shall be established and qualified to demonstrate that welds with suitable mechanical properties and soundness can be made by the procedure.
2. The purpose of this procedure is to provide direction to the welder for making welds in accordance with Code requirements.

B. Procedure Qualification

1. Each pipeline welding procedure shall be qualified in accordance with API 1104 section 5 or ASME Section IX Article II.



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TITLE	WELDING PROCEDURES				

2. Only destructive testing performed in accordance with the applicable welding standard may be used to qualify the test welds for the proposed welding procedure.
3. Any change of an essential variable as detailed in the governing welding code will require a new procedure qualification.

IV. DOCUMENTATION

- A. The Engineering Department will maintain welding procedure qualification records for welding procedures.

VI. RESPONSIBILITIES

The Engineering Manager is responsible for ensuring that Company welding procedures are qualified per applicable codes.



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DISTRIBUTION STANDARDS

PREPARED BY C. Calvet	DATE 02/18/09	NUMBER D-383
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TITLE	WELDING PROCEDURES	

WELDING PROCEDURES MASTER LIST

Welding Code	Material	Welding Process	Electrode Type	Welding Direction	API Material Grade/Group	Joint Design	Nom. Wall Thickness	Pipe Diameter in inches	Proc. No. WPS-xx
ASME	Carbon Steel	SMAW	E6010 & E7010	Down	P1 Group 1	Groove & Fillet	0.100 - 1.750"	All	WPS-01
API 1104	Carbon Steel	SMAW	E7018	Up	> X-42 & < X-65	Butt w/backing	0.188 - 0.750"	All	WPS-05
API 1104	Carbon Steel	SMAW	E7018	Up	> X-42 & < X-65	Fillet	0.188 - 0.750"	All	WPS-07



THE GAS COMPANY

DISTRIBUTION STANDARDS

PREPARED BY	UniField	DATE	03/06/09	NUMBER	D-381
APPROVED BY	R. Yoshimoto	SUPERSEDES	D-381, 10/11/06	SHEET	1 OF 3
REVISED BY	C. Calvet	Operations & Maintenance Procedures Manual-Transmission, Tab F			
TITLE	INSPECTION AND TESTING OF WELDS				

Reference: 49 CFR 192.241, 192.243 and 192.245

I. PURPOSE

This standard establishes procedures to be followed in the inspection and nondestructive testing (NDT) of all welds on The Gas Company (TGC) pipeline facilities.

This procedure will be strictly adhered to by all qualified personnel who perform the testing and examination of welds on any The Gas Company (TGC) pipeline facilities. Personnel qualified under this procedure may include TGC employees and contract personnel.

II. REFERENCES

A. The following documents form a part of this specification to the extent indicated herein:

1. API Standard:

1104 Welding of Pipelines and Related Facilities, (19th edition, 1999 and 10/31/01 errata).

III. NDT PERSONNEL: QUALIFICATION AND CERTIFICATION

A. Welding Inspection Personnel:

1. Welding Inspection personnel shall be qualified in accordance with API 1104 Section 8.3.
2. Shall be qualified by experience and training for the visual inspection of pipeline welds.
3. Minimum qualifications are one or more of the following:
 - a. 5 years work experience as a welder.
 - b. Engineering degree with 5 years work experience related to pipeline welding.
 - c. High School degree with 10 years work experience related to pipeline welding.
 - d. ASNT Level II or III certification.
4. Records of qualification for TGC and contract employees shall be maintained and available for inspection in the Engineering Dept. These records will be kept a minimum of 5 years after the project is complete.

B. Non Destructive Testing Personnel

1. NDT personnel shall be certified in accordance with API 1104 Section 8.4.



THE GAS COMPANY

DISTRIBUTION STANDARDS

PREPARED BY	UniField	DATE	03/06/09	NUMBER	D-381
APPROVED BY	R. Yoshimoto	SUPERSEDES	D-381, 10/11/06	SHEET	2 OF 3
REVISED BY	C. Calvet	Operations & Maintenance Procedures Manual-Transmission, Tab F			
TITLE	INSPECTION AND TESTING OF WELDS				

2. NDT personnel shall be certified to Level I, II or III in accordance with the recommendations of ASNT, No. SNT-TC-1A, ACCP.
3. Only Level II or III shall interpret results.
4. Records shall include the results of tests, agency and person granting certification and date. These records will be kept for a minimum of 5 years after the project is complete.
5. Recertification requirements:
 - i. NDT Level I and II shall be recertified at least every 3 years.
 - ii. NDT Level III shall be recertified at least every 5 years.
 - iii. Or if the competency of the NDT individual is in question.

IV. **NONDESTRUCTIVE TESTING (GENERAL)**

- A. The acceptability of a weld that is nondestructively tested or visually inspected shall be determined according to the standards in Section 9 of API Standard 1104.
- B. Testing by nondestructive methods will be performed by qualified individuals in accordance with procedures established herein.
- C. Weld inspection requirements:
 1. At a minimum, all welds will be examined for acceptability using visual inspection.
 2. 100% of welds on pipelines operating at a pressure that results in a hoop stress of 20% or more of the Specified Minimum Yield Strength (SMYS), will be nondestructively tested.
 3. If 100% is impracticable, at least 90 percent will be tested. NDT testing must be impracticable for each girth weld not tested.
 4. Pipeline tie ins, including tie ins of replacement sections, 100%.
 5. All methods of NDT, except trepanning, are acceptable methods of examining a weld, providing that they clearly indicate all defects that could possibly affect the integrity of the weld.
 6. Each weld will be tested over the entire circumference.



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TITLE	INSPECTION AND TESTING OF WELDS				

V. NONDESTRUCTIVE TESTING PROCEDURES

- A. Procedures for NDT testing shall be in accordance with API 1104 Section 11.

VI. ACCEPTANCE CRITERIA FOR NDT TESTING OF WELDS

- A. The acceptance of welds nondestructively tested or visually inspected shall be determined in accordance with API 1104 Section 9.

VII. REPAIR OR REMOVAL OF DEFECTS

- A. Repair or removal of defects shall be in accordance with API 1104 Section 10.
1. Each weld that is unacceptable must be removed or repaired.
 2. Each weld with a crack that is more than 8% of the weld length must be removed.
 3. Each weld that is repaired must have the defect removed to sound metal.
 4. All repairs will be made in accordance with the welding procedures that were initially used to make the weld.

VIII. RECORDS

- A. When NDT is performed, the operator will retain for the life of the pipeline a record of each weld made, each test performed, each weld proving acceptability and the disposition of those welds failing testing. This record will be organized by suitable sections such as; mileposts, compressor stations, etc.

IX. RESPONSIBILITIES

- A. The AMNSI Construction Supervisor, or designated alternate, will be responsible for ensuring that weld testing is performed completely and accurately by qualified individuals acting within their level of expertise and ensuring that personnel who will perform the inspection and testing of welds have been thoroughly trained and qualified for the testing procedures that they will utilize.