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RETURN RECEIPT REQUESTED

December 16, 2016

Mr. Chris Hoidal
Director, Western Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 110
Lakewood, CO 80228

Reference: CPF 5-2016-0025M (Notice of Amendment)

Dear Mr. Hoidal:

This letter is in response to the referenced Notice of Amendment dated November 15, 2016. It is Hawaii Gas' position that it has been meeting the minimum requirements of the Integrity Management Program's (IMP) regulation regarding developing and following a written integrity management program. Although Hawaii Gas' IM Procedures may have lacked sufficient detail in certain sections, the basic elements of the program were developed and the required practice was being performed.

Hawaii Gas performed an IMP review and revised relevant IM procedures on December 7, 2016 based on comments provided in the Notice of Amendment. Hawaii Gas believes that the items listed in the Notice of Amendment are adequately addressed by our revised procedures.

A summary of the Notice of Amendment items and the proposed revisions by Hawaii Gas to address these issues are described below:

1. 49 CFR §192.907 – Develop and Follow a Written Integrity Management Program.
Regarding IM Procedures to select and implement additional preventative and mitigative measures (P&MM), Hawaii Gas is submitting an updated version of IM-007 "Preventive and Mitigative Measures" (Attachment I) and its P&MM tracking form (Attachment II) to reflect its process for selection, implementation, and tracking of additional P&MM. Regarding IM Procedures to implement data integration & perform risk assessment, Hawaii Gas is submitting a small sample of its Transmission Line Risk Database to demonstrate it developed and maintains a centralized database used in risk management (Attachment III).
 - **Attachment I – IM-007 "Preventive and Mitigative Measures"**
 - **Attachment II – P&MM Tracking Form**
 - **Attachment III – Hawaii Gas Transmission Line Risk Database**

2. 49 CFR §192.605 – Retention Period for Program Documentation.

Regarding retention period for odorizing program documentation, Hawaii Gas is submitting its amended standard D-960 “Odorizing Program” to reflect the retention period as specified in 49 CFR §192.709 (c).

- **Attachment IV – Hawaii Gas Standard D-960 “Odorizing Program”.**

Hawaii Gas believes that the above revisions and submitted documentation satisfy all the issues cited in the Notice of Amendment. Hawaii Gas is committed to operating a safe and reliable pipeline system, and protecting the public and environment from any potential product release.

Should there be any questions regarding Hawaii Gas’ proposed revisions in accordance with the Notice of Amendment, please contact Ed Sawa, Manager, Pipeline Operations, by phone at (808) 594-5661, or by email at esawa@hawaiigas.com.

Sincerely,



Mustafa Demirbag
Executive Director of Operations

Enclosures:

Attachment I – IM-007 “Preventive and Mitigative Measures”

Attachment II – P&MM Tracking Form

Attachment III – Hawaii Gas Transmission Line Risk Database

Attachment IV – Hawaii Gas Standard D-960 “Odorizing Program”