

PI-81-0110

July 17, 1981

Mr. Edilberto C. Gamboa
Senior Vice President - Operations
First Philippine Industrial Corporation
P.O. Box MCC 967
Makati Commercial Center
Philippines 3116

Dear Mr. Gamboa:

This is in response to your letter dated June 24, 1981, concerning testing liquid pipelines.

Our regulations require only an initial hydrostatic test to 125 percent of maximum operating pressure (MOP) for 4 hours and an additional 4 hours at 110 percent of MOP if the pipeline cannot be visually inspected for leakage. The development of this regulation is contained in the enclosed notice of proposed rulemaking and final rule.

Your letter mentioned transporting highly volatile liquids (HVL) . One requirement a we have in the past imposed under §195.6 on operators transporting anhydrous ammonia that the water content be monitored and water added, if necessary, to bring the water content to 0.2 percent by weight. We believe this will combat potential for stress corrosion cracking in anhydrous ammonia pipelines.

Sincerely,
Melvin A. Judah
Acting Associate Director
for Pipeline Safety Regulation
Materials Transportation Bureau

First Philippine Industrial Corporation
P.O. Box MCC 967
Makati Commercial Center
Philippines 3116

June 24, 1981

Materials Transportation Bureau
Department of Transportation
Washington, D.C. 20590
U.S.A.

Attention: Mr. Melvin A. Judah
Acting Associate Director
Pipeline Safety Regulation

Subject: PIPELINES – FIRST PHILIPPINE
INDUSTRIAL CORPORATION

Dear Mr. Judah:

We have thoroughly studied the literatures you sent us. We found them very valuable indeed.

It is now clear to us that we have to test our pipeline to 125% of Maximum Operating Pressure (MOP). From our experience, the MOP increases as the volume of product to be shipped increase. We reckon forecast volumes on a yearly basis. We believe it would be wise for us to factor in the continuing metal loss from the pipeline as a result of corrosion, and the possible thinning effect of any pipeline stretching due to earthquake. The foremost question in our mind is: 'How often do we have to subject the pipeline to 125% of MOP?'

We shall appreciate very much your advice on this matter. Any useful literature or other information on this question, we shall likewise greatly appreciate.

For a recap of our company, FPIC owns and operates two pipelines. A 16-inch black oil line with a design pressure of 1440 psig, and a 14-inch white oil line with the same rating. Since 1974, the white line has been handling LPG. Hence, its category had graduated to an HVL (Highly Volative Liquid) pipeline.

Trusting we shall be favored with your reply at your earliest convenience, we remain

Very truly yours,
Edilberto C. Gamboa
Senior Vice President - Operations