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Transcontinental Gas Pipeline Company
2800 Post Oak Blvd
Houston, TX 77056
(405) 626-1785

May 1, 2018

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Material Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

Re: CPF 1-2018-3002

Mr. Burrough;

On March 28, 2018, the Pipeline Safety and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Probable Violation (NOPV) and Proposed Civil Penalty (PCP) to Williams - Transcontinental Gas Pipeline Company (Transco), and received on April 2, 2018, for an alleged violation of the Pipeline Safety Regulations that was identified during the inspection of the Station 240, Carlstadt LNG Facility located in Carlstadt, NJ that occurred between August 15th and 17th, 2017.

Williams is fully committed to maintaining the safety of its LNG facilities and appreciates the opportunity to respond to the Notice. Williams has reviewed the alleged violation and begun the process of addressing the findings identified in the Notice and as detailed in the response below. Pursuant to the Notice – Response Options, Williams is not contesting the alleged violation or civil penalty. Please be advised that Williams has submitted payment for the Civil Penalty assessed in the Notice.

1. § 193.2719 Training: records.

(a) Each Operator shall maintain a system of records which -

(2) Provide evidence that personnel have undergone and satisfactorily completed the required training programs.

PHMSA alleges that Williams failed to maintain records which evidenced that personnel had undergone and satisfactorily completed the required training programs. Specifically, Williams failed to present evidence that it had provided continuing instruction to its LNG plant operations and maintenance personnel at intervals of not more than 2 years to keep all personnel current on knowledge and skills they gained in the program of initial instructions, as required per §193.2713(b).

Williams will refresh personnel on the requirements of training record keeping and work with our Training staff to research more efficient and permanent ways of maintaining training records.

Williams looks forward to working with PHMSA in the future. Please feel free to contact me at 405-626-1785 if you have any questions or concerns about the provided solutions to the PHMSA concerns in this letter.

Respectfully,



Clint Ratke
Manager – Pipeline Safety
Williams
Transcontinental Gas Pipeline Company
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cc: Al Taylor, Vice President Operations – Eastern Interstates
Mark Cluff, Vice President – Safety & Operational Discipline
Amy Shank, Director – Pipeline Safety & Asset Integrity
Eric Raymond, Director Operations – Princeton Division
John Casto, Sr Manager Operations – New Jersey North