



U S Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

409 3rd Street, SW, Suite 300
Washington, DC 20024

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 22, 2007

Mr Randy Barnard
Vice President
Operations and Gas Control
Williams Gas Pipeline
2800 Post Oak Boulevard,
Houston, TX 77056

CPF 1-2007-3007M

Dear Mr Barnard

From July 17 to 19, 2007, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Williams Gas Pipeline (Williams) Station 240 LNG plant for certain operating and maintenance procedures in Carlstadt, New Jersey

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Williams' plans or procedures, as described below

1. §192.2503 Operating procedures.

Each operator shall follow one or more manuals of written procedures to provide safety in normal operation and in responding to an abnormal operation that would affect safety. The procedures must include provisions for:

- (c) Recognizing abnormal operating conditions.**

Williams' operating procedures provide a list of abnormal operating conditions for the liquefaction process. Williams could provide no other plant functions for which abnormal operating conditions were identified.

2. § 193.2605 Maintenance procedures.

(b) Each operator shall follow one or more manuals of written procedures for the maintenance of each component, including any required corrosion control. The procedure must include:

- (1) The details of the inspections or tests determined under paragraph (a) of this section and their frequency of performance; and**
- (2) A description of other actions necessary to maintain the LNG plant according to the requirements of this subpart.**

2a Williams' written procedures (B-3) describe the procedures to identify changes in the condition of structural supports and foundations of LNG related facilities (§ 193.2609 Support systems). The procedures fail to (1) identify each structural component that is to be inspected, (2) provide an evaluation methodology for the changes identified in the condition of structural supports and foundations, (3) justify the five year inspection interval which is a wide span between inspections. If adverse changes in conditions are observed, procedures only require that technical services should be notified. There is no description of prescribed action or a response interval to monitor or remediate identified detrimental changes that could impair support.

2b Williams employs a consultant to test and treat water on 5 engines, 2 compressors, and 4 vaporizers at least every two years (§ 193.2635e). There are no written procedures to specify the test methods or test intervals to monitor the effects of internal corrosion.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C F R § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In correspondence concerning this matter, please refer to **CPF 1-2007-3007M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Byron Coy". The signature is fluid and cursive, with a large initial "B" and "C".

Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure *Response Options for Pipeline Operators in Compliance Proceedings*