

## WARNING LETTER

### OVERNIGHT EXPRESS DELIVERY

November 2, 2016

Ms. Stephanie Timmermeyer  
VP, Safety and Regulatory Compliance  
Transcontinental Gas Pipe Line Company  
525 Central Park Drive  
Oklahoma City, OK 73105

**CPF 1-2016-1008W**

Dear Ms. Timmermeyer:

From September 15 through 19, 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Williams's Transcontinental Gas Pipe Line Company's (Transco) replacement of sections of mainlines A, B, and C within Unit #2881 - Elliott City in Owings Mills, MD.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation is:

**1. §192.303 Compliance with specifications or standards.**

**Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.**

Transco failed to construct each transmission line or main in accordance with comprehensive written specifications or standards that are consistent with this part.

Specifically, Transco failed to follow its construction procedures. During the inspection, the PHMSA inspector reviewed Transco's construction specifications and records related to the replacement of a section of transmission line C in Owings Mills, MD.

Transco's construction procedure, titled "Volume 890 – Construction Specification for Online Pipeline Inspection, revised 7/28/14, paragraph 1.1.9," states in part ". . . poly tanks, made of non-conducting material, will not be used for venting, catching, or storing pipeline liquids."

During a field inspection on 9/16/2014, the PHMSA inspector observed a poly tank connected to the pipeline at MP 1631.94. Transco's Construction Daily Progress Report #20 stated, "Manifolds were welded onto both ends of old ML 'C' and a cleaning pig was run to check for fluids - no liquids found."

PHMSA informed Transco's Chief Inspector of the failure to follow Transco's construction specifications. Transco informed PHMSA that the operation did not result in the disposition of any

condensate or liquid from mainline C into the poly tank, and that a decision had been made not to utilize the poly tank for liquid/condensate removal operations, which were pending for the replacement sections on Line A and Line B.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$205,638 per violation per day the violation persists up to a maximum of \$2,056,380 for a related series of violations. For violation occurring between January 4, 2012 to August 1, 2016, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in Transco being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2016-1008W**. 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).

Sincerely,

Byron Coy, P.E.  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration