

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

October 30, 2017

Mr. Mark Cluff
VP Safety & Operational Discipline
Williams Field Services
One Williams Center
Tulsa, OK 74172

CPF 1-2017-5030M

Dear Mr. Cluff:

From March 6 – 10, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Williams Field Services' (Williams) procedures for operations and maintenance in Moundsville, West Virginia.

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

1. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

Williams' written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies for each pipeline system were inadequate. Specifically, Williams' procedures failed to include sufficient guidance for emergency response supervisors to be knowledgeable of emergency response procedures for which they are

responsible, per the requirements of § 195.403(c).

Section 195.403(c) states:

“Each operator shall require and verify that its supervisors maintain a thorough knowledge of that portion of the emergency response procedures established under §195.402 for which they are responsible to ensure compliance.”

During the inspection, the PHMSA inspector reviewed Williams’ *SIP-ADM-12.01 Emergency Response and Planning – Emergency Management*, dated 11/17/16 (Procedure). The Procedure did not include adequate details on the following:

- Defining Emergency response supervisor role
- Emergency response supervisor training
- Emergency response supervisor knowledge verification
- Training requirements
- Training documentation

During the inspection, the PHMSA inspector asked Williams where the applicable information was documented and Williams was not able to provide a response.

Therefore, Williams failed to include guidance in its procedures for emergency response supervisors, per the requirements of § 195.403(c).

2. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

Williams’ procedures for operating, maintaining and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part are inadequate for overpressure safety devices. Specifically, Williams’ procedure failed to provide sufficient guidance on how to conduct and document relief valve inspections, per § 195.428(a).

Section 195.428(a) states in part:

“...inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.”

During the inspection, the PHMSA inspector reviewed Williams’ *9.01-ADM-018 Tests and Inspections of Overpressure Protection and Pressure Limiting Devices - Operations*, dated 10/21/11, (Procedure) and Form WES-57 – Regulator, Overpressure Protection Device and Control Valve Inspection (Record), Rev #2, dated 1/1/07.

Williams' Procedure did not provide sufficient guidance on conducting and documenting a relief valve inspection.

Williams' Procedure did not include any definitions, requirements or guidance on the related Record for, but not limited to, the following Record fields:

- Controlled Pressure Found
- Controlled Pressure Left
- Reset Pressure Found
- Reset Pressure Left
- Required Set Pressure
- Capacity Mcf/Hr at Set Point

Therefore, Williams failed to provide sufficient guidance on how to conduct and document relief valve inspections, per the requirements of § 195.428(a).

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. Failure to respond within 30 days of receipt of this Notice 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 an Order Directing Amendment. If 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. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 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.

It is requested (not mandated) that Williams maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Acting Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. In correspondence concerning this matter, please refer to **CPF 1-2017-5030M** and, whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,

Robert Burrough
Acting Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*