

## NOTICE OF AMENDMENT

### OVERNIGHT EXPRESS DELIVERY

February 13, 2018

Mr. Mark Cluff  
VP Safety & Operational Discipline  
Transcontinental Gas Pipe Line Company  
One Williams Center  
Tulsa, OK 74172

**CPF 1-2018-1006M**

Dear Mr. Cluff:

From June 13-15, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Transcontinental Gas Pipe Line Company's (a subsidiary of Williams Pipeline L.P., 'Williams') Mainline A&C Station 160 to Station 180 (Virginia) – GAP Pipe Replacement in Appomattox, Virginia.

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

**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.**

Williams' construction standards were inadequate for controlling corrosion in accordance with the requirements of subpart I of 49 CFR Part 192. Specifically, Williams' Project Standard, *Below-Ground Protective Coatings – Field Applied*, Revision 01.00-Publication Date: 12/14/2016 (Standard), contained conflicting information regarding coating thickness.

During the inspection, the PHMSA inspector reviewed Williams' Standard for below-ground protective coating application. Williams' Standard, Section 2.08 New Coating Application, includes the following excerpts:

A. *General*

1. *Apply according to manufacturer's instruction.*

...

B. *Fusion-Bonded Epoxy (FBE) Powder...*

6. *Machine Application...*

e) *Apply the approved powdered coating as rapidly as possible to prevent premature cool down of the heated zone and to achieve at least 20 mils and a maximum of 35 mils DFT.*

...

C. *Liquid-Epoxy Coatings...*

2. *Single-layer, two-layer, or both ARO should achieve at least 20 mils and a maximum of 35 mils DFT.*

The Standard did not provide clear written coating specifications on coating thickness, as manufacturer's instructions typically contain a recommended coating thickness application range. The Standard fails to address circumstances where a conflict occurs between this thickness range and the coating thicknesses ranges specified in Sections B and C, which could lead to confusion for a coating crew on what thickness range is acceptable.

Therefore, Williams' construction standards were inadequate per the requirements of §192.303.

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. 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 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 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.

It is requested (not mandated) that Transcontinental Gas Pipe Line Company 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, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. Please refer to **CPF 1-2018-1006M** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to [robert.burrough@dot.gov](mailto: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  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration

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