

December 20, 2018

Mr. Alan S. Armstrong
President and Chief Executive Officer
Williams Partners, LP
One Williams Center
Tulsa, OK 74172

Re: CPF No. 1-2018-1007

Dear Mr. Armstrong:

Enclosed please find the Final Order issued in the above-referenced case to your subsidiary, Transcontinental Gas Pipe Line Company, LLC. It makes one finding of violation and assesses a civil penalty of \$33,700. This is to acknowledge receipt of payment of the full penalty amount by wire transfer, dated June 15, 2018. This enforcement action is now closed. Service of the Final Order by certified mail is effective as provided under 49 C.F.R. § 190.5.

Thank you for your cooperation in this matter.

Sincerely,

Alan K. Mayberry
Associate Administrator
for Pipeline Safety

Enclosure

cc: Mr. Robert Burrough, Director, Eastern Region, Office of Pipeline Safety, PHMSA
Mr. Clint Ratke, Manager, Pipeline Safety, Williams, Transcontinental Gas Pipe Line
Company, LLC, 2800 Post Oak Blvd, Houston, TX 77056

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, D.C. 20590**

In the Matter of)) Transcontinental Gas Pipe Line Company, LLC,) a subsidiary of Williams Partners, LP,) Respondent.)	CPF No. 1-2018-1007
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FINAL ORDER

From February 9 through 13, 2015, pursuant to 49 U.S.C. § 60117, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), conducted an on-site pipeline safety inspection of the facilities and records of Transcontinental Gas Pipe Line Company, LLC (Transco or Respondent), in South Boston, Virginia. Transco, a subsidiary of Williams Partners, LP, operates a 10,200-mile interstate transmission pipeline system extending from South Texas to New York City.¹

As a result of the inspection, the Director, Eastern Region, OPS (Director), issued to Respondent, by letter dated April 2, 2018, a Notice of Probable Violation and Proposed Civil Penalty (Notice). In accordance with 49 C.F.R. § 190.207, the Notice proposed finding that Transco had violated 49 C.F.R. § 192.243, and proposed assessing a civil penalty of \$33,700 for the alleged violation.

Transco responded to the Notice by letter dated June 7, 2018 (Response). The company did not contest the allegation of violation and paid the proposed civil penalty of \$33,700 by wire transfer, dated June 15, 2018. In accordance with 49 C.F.R. § 190.208(a)(1), such payment authorizes the Associate Administrator to make a finding of violation and to issue this Final Order without further proceedings.

FINDING OF VIOLATION

In its Response, Respondent did not contest the allegation in the Notice that it violated 49 C.F.R. Part 192, as follows:

¹ The Williams Companies website, *available at* <https://co.williams.com/operations-2/atlantic-gulf-operating-area/transco/> (last accessed Nov. 6, 2018).

Item 1: The Notice alleged that Respondent violated 49 C.F.R. § 192.243(b), which states:

§ 192.243 Nondestructive testing.

(a) Nondestructive testing of welds must be performed by any process, other than trepanning, that will clearly indicate defects that may affect the integrity of the weld. . . .

(b) Nondestructive testing of welds must be performed:

(1) In accordance with written procedures: . . .

The Notice alleged that Respondent violated 49 C.F.R. § 192.243(b) by failing to perform nondestructive testing of welds in accordance with written procedures. Specifically, the Notice alleged that Respondent failed to follow its own written procedure regarding the nondestructive testing of four welds made during construction of Transco's Virginia Southside Lateral Expansion Project. When performing radiographic nondestructive testing, Transco's procedure required its personnel to identify station markers no greater than 12 inches apart for welds made on pipe greater than or equal to 10 inches in diameter. Radiographic inspection reports reviewed by PHMSA during the inspection indicated station markers that exceeded the 12-inch minimum interval on four separate welds made during the construction project.

Respondent did not contest this allegation of violation. Accordingly, based upon a review of all of the evidence, I find that Respondent violated 49 C.F.R. § 192.243(b) by failing to perform nondestructive testing of welds in accordance with written procedures.

This finding of violation will be considered a prior offense in any subsequent enforcement action taken against Respondent.

ASSESSMENT OF PENALTY

Under 49 U.S.C. § 60122, Respondent is subject to an administrative civil penalty not to exceed \$200,000 per violation for each day of the violation, up to a maximum of \$2,000,000 for any related series of violations.² In determining the amount of a civil penalty under 49 U.S.C. § 60122 and 49 C.F.R. § 190.225, I must consider the following criteria: the nature, circumstances, and gravity of the violation, including adverse impact on the environment; the degree of Respondent's culpability; the history of Respondent's prior offenses; any effect that the penalty may have on its ability to continue doing business; and the good faith of Respondent in attempting to comply with the pipeline safety regulations. In addition, I may consider the economic benefit gained from the violation without any reduction because of subsequent damages, and such other matters as justice may require. The Notice proposed a total civil penalty of \$33,700 for the violation cited above.

Item 1: The Notice proposed a civil penalty of \$33,700 for Respondent's violation of 49 C.F.R. § 192.243(b), for failing to perform nondestructive testing of welds in accordance with written

² These amounts are adjusted annually for inflation. *See, e.g.*, Pipeline Safety: Inflation Adjustment of Maximum Civil Penalties, 82 Fed. Reg. 19325 (April 27, 2017).

procedures. Transco neither contested the allegation nor presented any evidence or argument justifying a reduction in the proposed penalty. Accordingly, having reviewed the record and considered the assessment criteria, I assess Respondent a civil penalty of **\$33,700**, which amount was paid in full by Respondent on June 15, 2018.

This enforcement action is now closed. The terms and conditions of this Final Order are effective upon service in accordance with 49 C.F.R. § 190.5.

December 20, 2018

Alan K. Mayberry
Associate Administrator
for Pipeline Safety

Date Issued