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Transcontinental Gas Pipeline Company
2800 Post Oak Blvd
Houston, TX 77056
(405) 626-1785

April 25, 2018

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Material Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

Re: CPF 1-2018-3001M

Mr. Burrough;

On March 26, 2018, the Pipeline Safety and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Amendment (Notice) to Williams - Transcontinental Gas Pipeline Company (Transco). The Notice identified certain alleged inadequacies in the plans and/or procedures for Station 240, Carlstadt LNG Facility in Carlstadt, NJ. PHMSA identified the alleged inadequacies during an inspection of the above mentioned facility between August 15th and 17th, 2017.

Williams is fully committed to maintaining the safety of its LNG facilities and appreciates the opportunity to respond to the Notice. Williams has reviewed the alleged inadequacies and begun the process of addressing the items identified in the Notice as detailed in the below responses. Pursuant to the Notice, Williams is not contesting the alleged findings. Williams has a strict management of change process for the comprehensive gathering of input and approvals for new procedures and modification of existing procedures. Williams will provide your office with updated copies of the procedure modifications as addressed below once complete.

1. **§ 193.2509 Emergency Procedures.**
(b) To adequately handle each type of emergency identified under paragraph (a) of this section and each fire emergency, each operator must follow one or more manuals of written procedures. The procedures must provide for the following:

(2) Recognizing an uncontrollable emergency and taking action to minimize harm to the public and personnel, including prompt notification of appropriate local officials of the emergency and possible need for evacuation of the public in the vicinity of the LNG plan.

PHMSA alleges that Williams does not specifically address "uncontrollable emergencies" and prescriptive procedures for recognizing the emergency and taking action to minimize harm to the public and personnel including prompt notification of appropriate local officials of the emergency and possible need for evacuation of the public in the vicinity of the LNG plant within its procedures.

Williams will update the required plan, manual, and procedure to address these concerns.

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.

PHMSA alleges that Williams's procedures fail to define criteria on the elements of it support systems, including but not limited to, defining degrees of deterioration, impact on the integrity of the support system, and assigning a timeframe to address each concern.

Williams believes these concerns are addressed in the procedure, however additional clarity and specificity would be beneficial. Williams will update the required procedure to address these concerns.

Williams looks forward to working with PHMSA in the future. Please feel free to contact me at 405-626-1785 if you have any questions or concerns about the provided solutions to the PHMSA concerns in this letter.

Respectfully,

Clint Ratke
Manager – Pipeline Safety
Williams
Transcontinental Gas Pipeline Company
Clint.Ratke@Williams.com

cc: Al Taylor, Vice President Operations – Eastern Interstates
Mark Cluff, Vice President – Safety & Operational Discipline
Amy Shank, Director – Pipeline Safety & Asset Integrity
Eric Raymond, Director Operations – Princeton Division
John Casto, Sr Manager Operations – New Jersey North