



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: Mark.Cluff@williams.com

April 14, 2021

Mr. Mark Cluff
VP Safety & Operational Discipline
Transcontinental Gas Pipeline Company
One Williams Center
P.O. Box 645
Tulsa, OK 74172

CPF 1-2021-014-NOA

Dear Mr. Cluff:

From October 19, 2020 - November 4, 2020, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Transcontinental Gas Pipeline Company's (Transco) procedures for its Station 240 LNG plant in Carlstadt, New Jersey.

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

1. § 193.2717 Training, fire protection.

(a) ...

(b) A written plan of continuing instruction, including plant fire drills, must be conducted at intervals of not more than 2 years to keep personnel current on the knowledge and skills they gained in the instruction under paragraph (a) of this section.

Transco's procedures for training were inadequate. Specifically, Transco's *53.00.04.2-Emergency Plans and Preparedness Manual Review & Training* and *53.00.04.1-Conduct Fire Drill* (Fire Protection Procedures) failed to include details on fire protection training for operation, maintenance, and supervisory personnel.

During the inspection, the PHMSA inspector requested Transco's procedures regarding refresher

fire protection training for operation, maintenance, and supervisory personnel. Transco provided its Fire Protection Procedures which discuss emergency plans and fire drills. However, the written procedures did not include provisions requiring operations, maintenance and supervisory personnel to receive refresher fire protection training addressing the knowledge and skills requirements in § 193.2717(a). The written procedures also failed to include provisions requiring plant fire drills.

When the PHMSA inspector requested if there were additional procedures or guidance related to the fire drill training requirement, Transco stated there was no such requirement in the Fire Protection Procedures.

Therefore, Transco failed to include details on fire protection training for operation, maintenance, and supervisory personnel in accordance with § 193.2717(b). Transco must revise its procedures to include requirements for these personnel to participate in refresher fire protection training, including fire drills.

2. § 193.2605 Maintenance procedures.

(a) ...

(b) Each operator shall follow one or more manuals of written procedures for the maintenance of each component, including any required corrosion control...

Transco's maintenance procedures were inadequate. Specifically, Transco's *53.00.18- LNG Tank Inspections* (Tank Inspection Procedure) failed to provide details for inspecting or testing liquefied natural gas storage tanks in accordance with § 193.2623(b).

During the inspection, the PHMSA inspector requested Transco's procedures regarding inspecting liquefied natural gas storage tanks, and Transco provided its Tank Inspection Procedure. Section C of the Tank Inspection Procedure discussed frequencies and limited details for performing certain inspection or testing activities relative to foundation and tank movement, inner tank leakage and effectiveness of insulation. However, it lacked detailed procedures addressing how these liquefied natural gas storage tank inspections or tests are actually performed, particularly regarding inner tank leakage, frost heave, and effectiveness of insulation.

When the PHMSA inspector requested if there were additional procedures or guidance related to liquefied natural gas storage tank inspection or tests, Transco was not able to provide any additional information.

Therefore, Transco failed to include details in its maintenance procedures of its process to inspect or test liquefied natural gas storage tanks in accordance with § 193.2623¹, as required by

¹ § 193.2623 Inspecting LNG storage tanks.

Each LNG storage tank must be inspected or tested to verify that each of the following conditions does not impair the structural integrity or safety of the tank:

- (a) Foundation and tank movement during normal operation and after a major meteorological or geophysical disturbance.
- (b) Inner tank leakage.
- (c) Effectiveness of insulation.

§ 193.2605(b). Transco must revise its Procedure to include details on its required inspections and tests.

3. § 193.2605 Maintenance procedures.

(a) ...

(b) Each operator shall follow one or more manuals of written procedures for the maintenance of each component, including any required corrosion control...

Transco's maintenance procedures were inadequate. Specifically, Transco's *07.47.501.OG Atmospheric Special Consideration Plan, dated 10/24/19* (SC AC Plan) failed to state the required inspection frequencies for atmospheric corrosion inspections, in accordance with § 193.2635(d)².

Section 193.2635(d) states that "Each component that is protected from atmospheric corrosion must be inspected at intervals not exceeding 3 years."

During the inspection, the PHMSA inspector requested Transco's procedure regarding inspecting for atmospheric corrosion. Transco provided the following procedures:

- *07.47.501.OG Atmospheric Special Consideration Plan, dated 10/24/19*
- *07.47.007-OG Onshore Atmospheric Corrosion Inspection, dated 01/02/20* (OG AC Procedure)
- *53.00.21- Corrosion – Atmospheric Inspection*
- *07.47.50.28 Gas Pipes Atmospheric and Offshore Splash Zone Corrosion Inspections, dated 12/13/18*

Transco's procedures were contradictory to one another in that they required different inspection frequencies for the inspection of atmospheric corrosion. Specifically, the SC AC Plan discussed a 9-year frequency for inspecting certain piping, while the OG AC Procedure specified a 3-year interval for onshore LNG facilities. Additionally, the 9-year inspection frequency of Transco's special consideration piping failed to meet the 3-year inspection interval requirement for components protected from atmospheric corrosion.

When the PHMSA inspector asked Transco about the 9-year inspection interval for special consideration piping, Transco re-iterated that this piping was inspected per its procedure, at the required 9-year frequency.

Therefore, Transco failed to state in its maintenance procedures the required inspection frequencies for inspection of atmospheric corrosion in accordance with § 193.2635(d), as required by § 193.2605(b). Transco must revise its maintenance procedures to require consistent frequencies for atmospheric corrosion inspections at intervals complying with § 193.2635(d).

(d) Frost heave.

² § 193.2635 Monitoring corrosion control.

(a) ...

(d) Each component that is protected from atmospheric corrosion must be inspected at intervals not exceeding 3 years.

4. **§ 193.2503 Operating procedures.**

Each operator shall follow one or more manuals of written procedures to provide safety in normal operation and in responding to an abnormal operation that would affect safety. The procedures must include provisions for:

(a) ...

(c) Recognizing abnormal operating conditions.

Transco's operating procedures were inadequate. Specifically, Transco's *53.00.03-Monitoring for Hazardous Conditions* and *LNG Plant Procedures Manual Station 240*, dated 11/27/18, (collectively, Procedures) failed to include details for recognizing abnormal operating conditions.

During the inspection, the PHMSA inspector requested Transco's procedures regarding abnormal operating conditions. Transco provided its Procedures which mention abnormal operation conditions. The Procedures discussed tank and vaporizer abnormal operating conditions. However, the Procedures did not provide guidance on how Transco personnel recognize abnormal operating conditions, nor do they define or list abnormal operating conditions that may exist at other portions of the LNG plant.

When the PHMSA inspector requested if there were additional procedures or guidance related to abnormal operating conditions, Transco was not able to provide any additional information.

Therefore, Transco failed to include details in its operating procedures for recognizing abnormal operating conditions in accordance with § 193.2503(c). Transco must amend its Procedures to include these details.

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 Enforcement 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 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 Transcontinental Gas Pipeline 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, Eastern Region, Pipeline and Hazardous Materials Safety Administration, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. In correspondence concerning this matter, please refer to **CPF 1-2021-014-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on USB flash drive accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

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

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