



U.S. Department
of Transportation
**Pipeline and
Hazardous Materials
Safety Administration**

820 Bear Tavern Road, Suite 306
West Trenton, NJ 08628

**NOTICE OF PROBABLE VIOLATION
and
PROPOSED CIVIL PENALTY**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 06, 2009

Mr. Randall Barnard
Senior Vice President
Williams Gas Pipeline - Transco
P.O. Box 1396
Houston, TX 77251

CPF 1-2009-1007

Dear Mr. Barnard:

On September 14, 2008, a failure occurred on the Williams Transco 30-inch Line B near Appomattox, Virginia resulting in the release of natural gas which ignited. Pursuant to 49 U.S.C. § 60117, the Pipeline and Hazardous Materials Safety Administration (PHMSA) initiated an investigation of the incident.

As a result of this pipeline failure and the ensuing explosion and fire, several homes were damaged or destroyed. Five people were sent to the hospital with first and second degree burns. Twenty-three families living in the vicinity of the failure site were evacuated and dozens of fire-fighters and police officers responded to the scene. On September 25, 2008, PHMSA issued a Corrective Action Order (CAO No. 1-2008-1004H) to Williams Gas Pipeline requiring the company to take immediate action to protect public safety.

As a result of the ongoing investigation of the Appomattox incident, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items investigated and the probable violation(s) are:

1. §192.457 External corrosion control: Buried or submerged pipelines installed before August 1, 1971.

(a) Except for buried piping at compressor, regulator, and measuring stations, each buried or submerged transmission line installed before August 1, 1971, that has an effective external coating must be cathodically protected along the entire area that is effectively coated, in accordance with this subpart....

Williams did not maintain cathodic protection sufficient to control corrosion along the entire coated pipeline as evidenced by its corrosion records showing low pipe-to-soil readings for Line B in the vicinity of the rupture site. Line B is a transmission pipeline installed in 1955 with an external coating that required cathodic protection.

During the investigation, PHMSA reviewed the company's corrosion control records for the pipe in the vicinity of the rupture site including records of the results of Close-Interval Surveys (CIS) performed in 2003 and 2006. These records graphically depict a dip in the pipe-to-soil readings in the vicinity of the rupture site that were well below the -0.85 volt criteria of 49 CFR Part 192 Appendix D (Criteria for Cathodic Protection and Determination of Measurements). The CIS readings for Line B in the vicinity of the rupture site taken in 2003 and 2006 were as follows:

<u>Station</u>	<u>2003</u>	<u>2006</u>
3848 + 50	-0.530	-0.542
3849 + 00	-0.690	-0.399

The pipe section that ruptured on September 14, 2008 was sent to a third-party metallurgical lab and the results of the testing confirmed that external corrosion was the cause of the rupture.

2. §192.465 External corrosion control: Monitoring

(d) Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.

The actions initiated by Williams to address the low readings at the failure site identified by the 2003 CIS, did not actually correct the deficiencies. The remote ground bed installed near this location in 2004 was ineffective in correcting the low readings at the failure site. The readings remained low as evidenced by the 2006 CIS results. The pipe-to-soil readings taken in the 2006 CIS at the failure site were in the range of -0.542 to -0.399 volts demonstrating that Williams had not corrected the deficiencies dating back to 2003. The readings taken in the 2003 CIS were in the range of -0.50 to -0.60 volts at the rupture site. Close-Interval Surveys were not conducted in

the area in 2004 or 2005. The 2006 CIS indicated that the readings at the failure site remained low and not in compliance.

Williams later installed a linear anode in the area in June of 2007. Although the annual readings in 2007, taken a short distance south of the failure site at the Highway 26 driveway, met the -0.85 volt criteria, follow-up CIS readings were not taken in 2007 or 2008 at the failure site itself.

Proposed Civil Penalty

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation(s) and has recommended that you be preliminarily assessed a civil penalty of \$952,500 as follows:

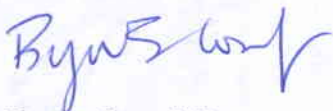
<u>Item number</u>	<u>PENALTY</u>
1	\$570,000
2	\$382,500

Response to this Notice

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). 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 a Final Order.

In your correspondence on this matter, please refer to **CPF 1-2009-1007** and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



Byron Coy, P.E.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

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