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Larry Legendre
Manager Pipeline Safety
Williams Atlantic Gulf

March 14, 2018

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

Re: CPF 1-2018-1006M – Notice of Amendment

Dear Mr. Burrough,

On February 14, 2018 Williams Transcontinental Gas Pipeline Company (Transco), received the subject Notice of Amendment (NOA) from the Pipeline and Hazardous Materials Safety Administration (PHMSA). The letter serves as the submittal of Williams' amended procedures with changes highlighted in yellow, and that procedural guidance which goes unchanged highlighted in green. All revisions took effect on February 21, 2018.

Should you have any questions or need additional information, please do not hesitate to call.

Sincerely,

Larry Legendre
Manager, S & OD, Pipeline Safety, Atlantic Gulf
(713)215-2733

Enclosures:
NOA Item 1: WIMS 09 96 29C Below-Ground Protective Coatings – Field Applied

2.08 NEW COATING APPLICATION

A. General

1. Apply according to manufacturer's instruction.
2. Perform substrate surface preparation. Refer to Section **Error! Reference source not found.**.
3. Use only Company-approved products for coating, repair and recoating.
4. Do not use coating materials after manufacturers' expiration dates.
5. Do not allow dirt, dust or deleterious material to contaminate the powder-coated area during the application and curing stages.
6. At the end of each day, clean any equipment surface in contact with coating materials during application.

B. Fusion-Bonded Epoxy (FBE) Powder

1. Bare surface power brushing of FBE is prohibited.
2. Flocking of FBE is prohibited.
3. Do not allow recycling of FBE unless automatic recycling equipment is employed.
4. Do not overcoat cured FBE with FBE.
5. Preheat.
   a) Heat the weld zone according to the manufacturer's recommendations, but do not exceed a temperature of 475 degrees F, using a high-frequency induction-heating coil of sufficient size, width, and power to provide the required heat in the weld zone and 2 inches of the fusion-bonded pipe coating.
   b) Calibrate the induction coil to ± 10 degrees, and certify it according to the manufacturer of the induction coil.
   c) Gradually apply the heat at a rate to prevent blistering, disbondment, or other anomalies to the existing plant-applied pipe coating.
   d) Measure the temperature with a calibrated pyrometer.
   e) Monitor the pipe joint temperature immediately prior to coating every 10 minutes.
   f) The temperature of the pipe at time of application of the coating material must be within the minimum and maximum limits recommended by the coating material supplier.
6. Machine Application
   a) Install the powder application machine around the heated weld joint immediately after the heater is removed.
   b) Center the machine on the weld joint.
   c) To prevent differential curing of the resin powder, the total thickness of coating required shall be applied by the coating machine in the least number of passes possible. At least two passes are required.
   d) Apply the coating in a uniform manner.
   e) Apply the approved powdered coating as rapidly as possible to prevent premature cool down of the heated zone and to achieve a minimum of 20 mils and a maximum not to exceed powder product manufacturer's requirements.
7. Manual Application
   a) Manual Application is prohibited

C. Liquid-Epoxy Coatings

1. No solvents are to be added to the epoxy system.
2. Single-layer, two-layer, or both ARO Dry Film Thickness (DFT) shall be greater than 25 mils and less than maximum specified on current product manufacturers Product Data Sheets (PDS). Within limits indicated on manufacturers PDS, applied DFT should generally match or exceed DFT of adjacent factory-applied coating system.
3. The coating may be brush-grade or spray-grade as follows:
    a) Brush-grade: The coating is a two component system (activator and base) and shall be mixed and applied in accordance with manufacturer's recommended practice.
    b) Spray-grade: The coating is a two component system (activator and base) and shall be spray-applied in multiple passes to build the required thickness in accordance with the manufacturer's recommended practice.
    c) During the coating application, the WFT of the applied coating shall be measured using a wet-film gauge and the wet-film gauge marks shall be brushed out. Wet-film measurements shall be made on every joint, elbow, tee, etc., being coated. If low areas are detected, additional coating shall be applied before a tack-free condition occurs.
    d) Coat the roughened existing coating at the overlap.
    e) The finished coating shall be generally smooth and free of application defects such as pinholes, fish eyes, sags, drips, icicles, etc.
    f) After the coating has cured to a resilient condition, measure the DFT of each joint using a magnetic gauge per SSPC-PA2.

D. Bonded Tape Coatings
1. Apply the coating using the manufacturer recommended equipment, whether hand-powered, air-powered, engine-driven, or other in accordance with NACE SP0109.
2. Apply the tape with sufficient tension to bond and conform to the surface being coated.
3. Hot-Applied Tape.
    a) Proper application is obtained by use of a propane torch with a wide-mouth burner head.
    b) The torch is used to heat the proper tape surface to soften the coal-tar or bitumen tape, giving the tape a smooth, glossy finish. Heat enough tape such that it remains in this semiliquefied state during application.
    c) Alternatively, the pipe shall be heated and wrapped until the surface to be coated is completed.
4. Cold-Applied Single Coat Tape.
    a) Spiral wrap.
        1) Apply in a spiral manner with a continuous overlap.
        2) When the tape is supplied with a release liner, the release liner shall be removed as wrapping progresses in a spiral manner with a continuous overlap.
    b) Circumferential wrap ("cigarette wrap").
        1) Precut strips of tape to a length equal to the circumference of the pipe plus a minimum of 4 inches.
        2) When the tape is supplied with a release liner, remove the release liner as the wrapping progresses.