



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

March 26, 2018

Mr. Mark Cluff
VP Safety & Operational Discipline
Transcontinental Gas Pipe Line Company
One Williams Center
Tulsa, OK 74172

CPF 1-2018-3001M

Dear Mr. Cluff:

From August 15 to 17, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Transcontinental Gas Pipe Line Company's (Williams) procedures for Station 240, Carlstadt LNG Facility in Carlstadt, NJ.

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

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 plant.

Williams' manual of written procedures was inadequate with regard to uncontrollable emergencies. Specifically, the manuals failed to include prescriptive procedures for 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 plant.

During the inspection, the PHMSA inspector reviewed the following Williams documents:

- Simulated Emergency Action, Station 240-LNG Plant (Plan),
- Procedure Manual, Sections 23 and 28, dated June 2015 (Manual),
- Operations and Maintenance Procedure (Procedure), Section A-8 Emergency Plans and Preparedness, dated October 2014.

The Plan, Manual, and Procedure failed to differentiate between a controllable and an uncontrollable emergency, while providing only cursory reference to notification of appropriate local officials and evacuation needs.

Therefore, Williams' Plan, Manual, and Procedure were inadequate, as they failed to include prescriptive procedures for recognizing an uncontrollable emergency and taking action as required by § 193.2509(b)(2).

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; and

Williams' manual of written procedures was inadequate in that it failed to include details of the inspections or tests under paragraph (a) of § 193.2605 and the frequency of performance. Specifically, Williams' Operations and Maintenance Procedure (Procedure), Section B-3: Support Systems, dated May 2014 failed to: define criteria to evaluate the integrity of the support systems; provide a rationale for the 5-year interval between inspections; and provide guidelines for the annual monitoring.

During the inspection, the PHMSA inspector reviewed Williams' Procedure, which stated in part:

Once every 5 years, a visual inspection will be made of all structural supports and foundations, including the LNG tank pile caps, at the LNG Plant.

...

Support systems shall be monitored annually for changes. If changes are found, Operations Technical Support (OTS) shall be notified for further review.

The Procedure failed to define criteria on the elements of its support systems. This included, but was not limited to, defining degrees of deterioration, impact on the integrity of the support system, and assigning a timeframe to address each concern.

The Procedure failed to provide a rationale for the 5-year interval between visual inspections of all structural supports and foundations. Per § 193.2605(a), periodic inspections are to be consistent with generally accepted engineering practice.

The Procedure failed to provide guidelines for the annual monitoring of the support systems, including prescriptive details for performing the activity.

Therefore, Williams' Procedure failed to include details of the inspections or tests under paragraph (a) of § 193.2605 and the frequency of performance.

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 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).

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 **Williams** 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, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. Please refer to **CPF 1-2018-3001M** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Burrough", written over a light blue horizontal line.

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

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