

NOTICE OF AMENDMENT

ELECTRONIC MAIL - RETURN RECEIPT REQUESTED

March 2, 2021

Alan Armstrong
President & Chief Executive Officer
Williams Olefins Feedstock Pipelines, LLC
P.O. Box 645
Tulsa, Oklahoma 74172

CPF 4-2021-004 NOA

Dear Mr. Armstrong:

From February 24, 2020 through September 9, 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 Williams Olefins Feedstock Pipeline, LLC's (Williams) Bayou Ethane Pipeline operations and maintenance procedures in Houston, Texas.

During the inspection, PHMSA identified the apparent inadequacies found within Williams' plans or procedures, as described below:

1. **§ 195.402 - Procedural manual for operations, maintenance, and emergencies.**

(a) *General.* Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

(c) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1) . . .

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

§ 195.426 - Scraper and sphere facilities.

No operator may use a launcher or receiver that is not equipped with a relief device capable of safely relieving pressure in the barrel before insertion or removal of scrapers or spheres. The operator must use a suitable device to indicate that pressure has been relieved in the barrel or must provide a means to prevent insertion or removal of scrapers or spheres if pressure has not been relieved in the barrel.

Williams' procedure for scraper and sphere facilities is inadequate. *Williams Project Standards - LF16 NGL Pipeline Facilities Design Guide - 33 51 12E*, which was last revised on April 21, 2017, does not include a procedure for safely relieving pressure in the barrel of a launcher or the receiver before the insertion or removal of scrapers or spheres as required under § 195.426. Williams was unable to provide a procedure that provided guidance for safely relieving pressure in the barrel or receiver of a launcher or receiver for review during the inspection.

2. *Williams Project Standards - LF16 NGL Pipeline Facilities Design Guide* and/or its associated procedures must be amended to provide guidance for safely relieving pressure in the barrel or the receiver of a launcher or receiver.

§ 195.402 - Procedural manual for operations, maintenance, and emergencies.

(a) . . .

(c) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1) . . .

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

§ 195.428 - Overpressure safety devices and overfill protection systems.

(a) Except as provided in paragraph (b) of this section, each *operator* shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

Williams' procedure for inspection and testing of regulators is inadequate to address the requirements of § 195.428. *Williams Operating Standards - Midstream Tests and Inspections of Overpressure Protection and Pressure Limiting Devices - 07.05.70.12*, last revised on April 1, 2020, does not include inspection and testing procedures for regulators, high or low pressure shutdowns, high/high or low/low pressure shutdowns, and automatic

shutoff devices for the devices in the O&M manual. While the procedure does guide the testing and inspection of the other mentioned devices, it lacks procedures for the testing of the devices mentioned above.

Williams Operating Standards - Midstream Tests and Inspections of Overpressure Protection and Pressure Limiting Devices must be amended to provide guidance for conducting the inspection and testing of regulators, high or low pressure shutdowns, high/high or low/low pressure shutdowns, and automatic shutoff devices.

3. **§ 195.402 - Procedural manual for operations, maintenance, and emergencies.**

(a) . . .

(c) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1) . . .

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

§ 195.422 - Pipeline Repairs.

(a) Each *operator* shall, in repairing its *pipeline systems*, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons or property.

Williams Operating Requirements - Gas Pipes Installation and Removal of Stopples - 07.55.50.08, dated December 14, 2017, is inadequate as it only applied to its gas assets and not the hazardous liquids assets. Williams personnel stated that a similar procedure was in development for use on its liquid assets. The procedure under development is required as part of the pipeline safety regulation in §195.422 to insure that repairs on the pipeline are done in a safe manner and to prevent damage to persons and property.

Williams must complete its procedures for the installations and removal of stopples during hot tapping for its liquid pipelines.

4. **§ 195.402 - Procedural manual for operations, maintenance, and emergencies.**

(a) . . .

(c) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1) . . .

(13) Periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

Williams Operating Requirements - WIMS Reviews – 12.02.00.03, dated July 1, 2019, does not meet the requirement of § 195.402(c)(13). Specifically, the WIMS procedure on page one and subsequently in Section 2.4 requires that the “Periodic Operations and Maintenance Procedure Reviews” (PPR) be carried out every five years. Section 2.5 of the procedure also includes appropriate methods for carrying out the review, which includes “Performance on the Job” and “Review of Completed Work.” Reviewing the work completed by employees once every five years is inadequate and does not meet the regulatory requirement of § 195.402(c)(13). The review required under § 195.402(c)(13) is intended to allow an operator to take corrective actions where deficiencies are found. Section 195.402(c) references the manual of written procedures in § 195.402(a), which requires an annual review that is not to exceed 15 months.

Therefore, the requirements of § 195.402(c), including § 195.402(c)(13), are supposed to be reviewed within a timeframe of a calendar year and not to exceed 15 months. Reviewing the work done by operator personnel is an activity that needs to be carried out each calendar year, not exceed 15 months. Procedures that require a review of the work done by operator personnel on a five-year interval does not meet the intent of the regulation.

Williams must revise its procedure to ensure that the review of work done by operator personnel meets the requirement of § 195.402(c)(13).

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 Olefins Feedstock Pipeline, L.L.C. maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Mary L. McDaniel, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2021-004 NOA**, and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Mary L. McDaniel, P.E.
Director, Southwest, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: Tyson Green, Manager Pipeline Safety, Williams, tyson.green@williams.com