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

12300 W. Dakota Ave., Suite 340
Lakewood, CO 80228

WARNING LETTER

VIA ELECTRONIC MAIL TO: chad.zamarin@williams.com

December 3, 2025

Mr. Chad Zamarin
President/CEO
Mid-Continent Fractionation & Storage, LLC
One Williams Center
Tulsa, OK 74172

CPF 5-2025-018-WL

Dear Mr. Zamarin:

From July 15 through 19, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected the Williams Mid-Continent Fractionation and Storage (MCFS) Control Room Management and Procedures in McPherson, Kansas.

As a result of the inspection, it is alleged that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

1. § 195.446 Control room management.

> **(a) General**
> **(e) *Alarm management.* Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:**
> **(1) …**
> **(2) Identify at least once each calendar month points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false**

alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities;

MCFS failed to identify at least once each calendar month points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities, as required by § 195.446(e)(2).

Specifically, records for the monthly alarm reviews conducted in June 2021, January 2022, September 2023, and February 2024 failed to comprehensively identify and assess all elements mandated by the applicable regulation. MCFS focused exclusively on safety-related alarms (SRA) during these reviews, neglecting to evaluate the full spectrum of alarms. Furthermore, controllers demonstrated insufficient understanding of false alarms, resulting in their exclusion from the monthly alarm review process[1]. In addition, inhibited alarms were neither appropriately defined within the Alarm Management Plan (AMP) nor incorporated into the monthly review procedures.

2. § 195.446 Control room management.

(a) General
(e) *Alarm management.* Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:
(1) …
(3) Verify the correct safety-related alarm set-point values and alarm descriptions when associated field instruments are calibrated or changed and at least once each calendar year, but at intervals not to exceed 15 months;

MCFS failed to verify the correct safety-related alarm set-point values and alarm descriptions when associated field instruments are calibrated or changed and at least once each calendar year, but at intervals not to exceed 15 months, as required by § 195.446(e)(3).

Specifically, records dated October 21, 2021, documented various incorrect setpoint values associated with safety-related alarms (SRAs), wherein the recorded points reflected the existing setpoints rather than the correct, intended values[2]. Furthermore, records dated November 22, 2022, pertaining to Management of Change (MOC) UMC 2222289, revealed errors in both setpoint values and alarm descriptions. Similarly, records dated October 24, 2023, identified discrepancies in setpoint values and alarm descriptions. In addition, records from December 5, 2023 contained multiple comments regarding whether certain alarms should be classified as SRAs, with recommendations to re-rationalize these alarms. MCFS confirmed that, as of July 17, 2024—the time of the inspection the re-rationalization process had not been completed, despite the lapse of over six months since these issues were initially identified.

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[1] Control Room Management FAQ E.02 and E.03

[2] Control Room Management FAQ E.04 and E.05

3. § 195.446 Control room management.

(a) General
(e) *Alarm management.* Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:
(1) …
(5) Monitor the content and volume of general activity being directed to and required of each controller at least once each calendar year, but at intervals not exceeding 15 months, that will assure controllers have sufficient time to analyze and react to incoming alarms;

MCFS failed to monitor the content and volume of general activity being directed to and required of each controller at least once each calendar year, but at intervals not exceeding 15 months, that will assure controllers have sufficient time to analyze and react to incoming alarms, as required by § 195.446(e)(5).

Specifically, workload study records dated December 21, 2021 and December 14, 2022 failed to specify the time frames during which data was collected, as well as the number of shifts monitored. Consequently, these records do not adequately demonstrate that the content and volume of general activities directed to, and required of, each controller were appropriately assessed.

4. § 195.446 Control room management.

(a) General
(e) *Alarm management.* Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:
(1) …
(6) Address deficiencies identified through the implementation of paragraphs (e)(1) through (e)(5) of this section.

MCFS failed to address deficiencies identified through the implementation of paragraphs (e)(1) through (e)(5) of this section, as required by § 195.446(e)(6).

Specifically, deficiencies identified in the monthly alarm reviews, as well as those noted during the 2023 review of correct safety-related alarm setpoints and alarm descriptions, were not remediated in a timely manner. It is imperative that such deficiencies be addressed promptly to ensure ongoing compliance and operational safety.[3]

5. § 195.446 Control room management.

[3] Control Room Management FAQ E.16

(a) General
(f) *Change management.* Each operator must assure that changes that could affect control room operations are coordinated with the control room personnel by performing each of the following:
(1) …
(2) Require its field personnel to contact the control room when emergency conditions exist and when making field changes that affect control room operations.

MCFS failed to require its field personnel to contact the control room when emergency conditions exist and when making field changes that affect control room operations, as required by § 195.446(f)(2).

Specifically, the documentation associated with the Mitchell Critical DOT Valve Inspection, conducted on May 7, 2024 lacks evidence that field personnel established communication with the control room prior to and subsequent to the inspection. In addition, a review of the controller logs from the same date revealed no record of such communications being initiated or received.[4]

6. § 195.446 Control room management.

(a) General
(j) *Compliance and deviations.* An operator must maintain for review during inspection:
(1) …
(2) Documentation to demonstrate that any deviation from the procedures required by this section was necessary for the safe operation of the pipeline facility.

MCFS failed to maintain for review during inspection documentation to demonstrate that any deviation from the procedures required by this section was necessary for the safe operation of the pipeline facility, as required by § 195.446(j)(2).

Specifically, records documenting hours of service (HOS) deviations for December 10, 2021, and January 18, 2022, were not provided. On these dates, controllers exceeded the maximum allowable hours of service as stipulated in Section 700.502 – Shift Lengths and Rotations, which limits controllers to 63 hours within any sliding seven-day period. The operator has incorrectly applied a 35-hour reset provision, which is permissible only following a sequence of two or more day shifts.[5] Though the operator contends that the FAQs are not enforceable, their control room manual and procedures incorporated language derived from these FAQs, which they subsequently failed to adhere to. This improper application of the 35-hour reset resulted in undocumented HOS deviations.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed $272,926 per violation per day the violation persists, up to a maximum of $2,729,245 for a

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[4] Control Room Management FAQ F.01 and F.02

[5] Control Room Management FAQ D.07.

related series of violations. For violation occurring on or after December 28, 2023 and before December 30, 2024, the maximum penalty may not exceed $266,015 per violation per day the violation persists, up to a maximum of $2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023, the maximum penalty may not exceed $257,664 per violation per day the violation persists, up to a maximum of $2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023, the maximum penalty may not exceed $239,142 per violation per day the violation persists, up to a maximum of $2,391,142 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not exceed $225,134 per violation per day the violation persists, up to a maximum of $2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed $222,504 per violation per day the violation persists, up to a maximum of $2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed $218,647 per violation per day the violation persists, up to a maximum of $2,186,465 for a related series of violations.

We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in Williams Mid-Continent Fractionation and Storage, LLC being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 5-2025-018-WL.** 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).

Sincerely,

DUSTIN B HUBBARD Digitally signed by DUSTIN B HUBBARD
Date: 2025.12.03 09:35:03 -07'00'

Dustin Hubbard
Director, Western Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 D. Fehling (24-296573)
Lyndon Hoel, Manager Pipeline Safety, Mid-Continent Fractionation & Storage, LLC, lyndon.hoel@williams.com