



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

820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628
609.989.2171

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

OVERNIGHT EXPRESS DELIVERY

March 6, 2014

Mr. Joe R. Neave
VP, Safety and Regulatory Compliance
Transcontinental Gas Pipe Line Company
2800 Post Oak Blvd
Houston, TX 77056

CPF 1-2014-1002

Dear Mr. Neave:

On May 31, 2013, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code investigated an incident that occurred at the Transcontinental Gas Pipeline's (TRANSCO), Neshanic Station 505 facility, located in located in Neshanic Station, New Jersey.

The incident occurred on May 30, 2013, during maintenance work to install a new valve and tee section of piping at the station as part of the Northeast Supply Link Modification project

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

1. §192.751(b) Prevention of accidental ignition.

Each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including the following:

(b) Gas or electric welding or cutting may not be performed on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work.

TRANSCO failed to take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion.

Specifically, TRANSCO failed to adequately monitor for a combustible atmosphere in the area of work during the pre-heat phase of welding a 30-inch diameter cap onto a section of pipe. Monitoring was being performed at educer locations which were remote from where the pre-heat was being performed, but there was no monitoring being performed at the location where the pre-heat operation was being conducted. As a result, a combustible mixture of vapor accumulated inside the pipe and an ignition occurred.

The contractor crew was in the pre-heat phase of welding a 30-inch diameter cap onto a section of pipe when the incident occurred. The cause of the incident was an accumulation of a combustible mixture inside the pipe that was ignited by the heat from a propane torch being used to preheat the pipe prior to welding. The resulting ignition blew the 30-inch diameter cap from the external welding clamps securing it to the pipe.

Based on the investigation completed by TRANSCO:

1. The incident was caused by “incorrect operation” and “reducing air movement at the time of the preheat operation and not fully removing liquids inside the pipe may have contributed to the accumulation of vapors inside the pipe.”
2. “this line has several valves tied to it with high pressure gas on the other side of the valve. We have determined that at least one of those valves was leaking and when the cap was being prepared to be welded on to the pipe the educer that was running all day, to keep the gas away from the work area, was turned down and I believe the gas migrated toward the work area and was ignited when the torch was applied to pre-heat the cap.”

The source of the accumulating vapors inside the pipe was not determined.

Proposed Civil Penalty

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a 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 \$167,000 as follows:

<u>Item number</u>	<u>PENALTY</u>
1	\$167,000

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. All material submit in response to this enforcement action may be 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.

Please submit all correspondence in this matter to Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628. Please refer to **CPF 120141002** on each document you submit and please, whenever possible, provide a signed PDF copy in electronic format. Smaller files may be emailed to Byron.Coy@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,

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

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