



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

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

WARNING LETTER

EXPRESS OVERNIGHT MAIL

August 20, 2013

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

CPF 1-2013-3002W

Dear Mr. Neave:

During the week of October 15, 2012, 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 (Transco) records for operations in Carlstadt, NJ.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

- 1. §193.2521 Operating records.**
Each operator shall maintain a record of results of each inspection, test and investigation required by this subpart. For each LNG facility that is designed and constructed after March 31, 2000 the operator shall also maintain related inspection, testing, and investigation records that NFPA 59A (incorporated by reference, see § 193.2013) requires. Such records, whether required by this part or NFPA 59A, must be kept for a period of not less than five years.

Transco failed to maintain a complete record of results of each inspection, test and investigation required by this subpart.

1-2013-3002W

Specifically, Transco's Fire Water Inspection Report Form WGP 0073 was incomplete in that items in the "Hoses" section of form were identified as "tested" but the details in the Hoses section of the form were not completed.

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. Also, for LNG facilities, an additional penalty of not more than \$50,000 for each violation may be imposed. 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 item(s) identified in this letter. Failure to do so will result in Transco 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 1-2013-3002W**. 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,

Byron Coy, PE
Director, PHMSA ER
Pipeline and Hazardous Materials Safety Administration