



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 AMENDMENT

OVERNIGHT EXPRESS MAIL

June 11, 2012

Mr. Randy Barnard
Vice President, Operations
Williams Gas Pipeline-Transco
2800 Post Oak Blvd.
Houston, TX 77056

CPF 1-2012-3003M

Dear Mr. Barnard:

During the week of December 6, 2010, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Williams Gas Pipeline's (Williams) operating and maintenance procedures for its liquefied natural gas plant in Carlstadt, New Jersey.

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

1. 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 LNG Plant did not have specific procedures for testing control devices. Williams presented Procedure "B-7: Control and Safety Device Test and Inspection", dated June 2010, which fails to provide sufficient detail to guide technicians in performing the tests and inspections on control equipment.

During the inspection Williams stated that it utilizes the Williams Policy 30.02.00.05-Remote Control Shutdown Devices, Inspection and Testing (Policy) which references 4 procedures dealing with Shutdown systems, digital input/output devices, Analog Input/Output devices, Pneumatic control Devices. This Policy provides the detail needed for proper testing and inspection of control devices. However, this Policy states that the procedures are applicable to compressor stations, not LNG plants. There is no linkage between the Procedure B-7 and the Policy stating that these procedures would be used in an LNG plant. Procedure B-7 needs to be linked to Williams Policy for LNG plant usage.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. 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). 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.

If, after opportunity for a hearing, 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. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within thirty (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 Gas Pipeline-Transco maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to, as well as any correspondence relating to this Notice to: Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628. Please refer to **CPF 1-2012-3003M** on each document you submit, and please provide a (signed) copy in electronic format whenever possible. Smaller files may be emailed to Byron.Coy@dot.gov. Larger files should be sent on a CD accompanied by the original (signed) paper copy to the Eastern Region Office.

Sincerely,

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

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