



U S Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

409 3rd Street, SW Suite 300
Washington, DC 20024

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 3, 2007

Mr Randall Barnard
Vice President of Operations
Williams Gas Pipeline-Transco
2800 South Post Oak Road
Houston, TX 77251

CPF 1-2007-1005M

Dear Mr Bernard

On December 13 and 14, 2006, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code investigated the incident that took place on December 12, 2006 at Williams Gas Pipeline – Transco (Williams) Compressor Station Building at the Ellicott City, MD Station 190

On the basis of the investigation, PHMSA has identified apparent inadequacies found within Williams' plans or procedures, as described below

1. §192.605 Procedural manual for operations, maintenance, and emergencies.

(a) *General.* Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

Williams responded to PHMSA's request for specific information (letter dated April 5, 2007) by letter dated May 17, 2007 which discussed Williams' post incident root cause analysis. Based on the investigation of the incident and information provided by Williams, changes need to be incorporated in Williams' operating and maintenance procedures that address the following

- 1 Activities involving the use of welding and torch cutting should be avoided inside the compressor building
- 2 The need for the lead person responsible for specific maintenance activities to insure that necessary detailed steps to isolate the main compressor units are communicated to maintenance personnel including welders
- 3 Training of employees and any other personnel responsible for completing the hot work permit for compressor station maintenance activities

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 120 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.

In correspondence concerning this matter, please refer to **CPF 1-2007-1005M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Byron Coy". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

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

Enclosure *Response Options for Pipeline Operators in Compliance Proceedings*