# PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

## PART A – INSPECTION IDENTIFICATION

| | | |
|---|---|---|
| **CPF #: click here to enter** | **[ ] Gas**<br>**XX LNG**<br>**[ ] Hazardous Liquid** | **Date of Inspection:**<br>10/20/2008 -<br>10/23/2008 |
| **PHMSA/State Inspector name and organization:**<br>Scott Rukke, Washington State Utilities and Transportation Commission | | |

## PART B – OPERATOR INFORMATION

| | | | |
|---|---|---|---|
| **Pipeline operator/owner:**<br>Williams Gas Pipeline -West | **OPID:**<br>13845 | **Inspection location:**<br>Plymouth, WA | **Inspection Unit #:**<br>1155 |
| **Company Official name, title, telephone, FAX#:**<br>Randy Barnard, VP Operations, (713) 215-2375<br>Fax: (713) 215-4269 | | **Mailing address of Company Official:**<br>2800 Post Oak Blvd.<br>Houston, TX 77056 | |
| **Nature and size of operator's system (miles, products, environmental conditions, employees):**<br>Liquefied natural gas plant consisting of two storage tanks commissioned in 1975 and 1979 with a capacity of approximately 14,616,000 gallons each. Two liquefaction processors consist of an integrated cascade loop system with a capacity of 6 MMCFD, each. Four vaporizers have a capacity of 75 MMCFD, each. The boil-off gas vapors are collected from the storage tanks and injected into the transmission pipeline. | | | |
| **Portion of system inspected (locations and facilities):**<br>The Plant's Operations and Maintenance Manual was included in the Joint Team Review complete in June 2005. Maintenance records were reviewed. The following areas were inspected: the LNG #2 - tank foundation ring walls, tank shell, supports for aboveground LNG piping, ventilation systems, auxiliary power supply, fighting equipment, fire and gas detection systems were field tested and all fire and gas detectors operated as designed. The ventilation fans and ESD system were activated for LNG 2. The LNG Plant's cathodic protection system uses the negative 850 mv DC criteria. All CP values exceeded the minimum criteria. Field emphasis was on LNG #2. | | | |

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## PART C – VIOLATION and CIVIL PENALTY INFORMATION

Note: Information shown in Part C of this Pipeline Safety Violation Report relates to probable violations, proposed compliance orders, and proposed civil penalties

### VIOLATION NUMBER 1

**Identify the regulation violated with the part, section, and most specific paragraph of Title 49, such as 192.309(b)(3)(ii):**

193.2619(c)(2)

*(c)(2) Control systems that are intended for fire protection must be inspected and tested at regular intervals not to exceed 6 months.*

**How did the operator violate the regulation?:**

The operator exceeded 6 months when inspecting and testing their fire detectors.

**Provide additional detail regarding the violation, including the duration and extent of the violation:**

Part 193.2619(c)(2) requires that control systems intended for fire protection be inspected and tested at a frequency not to exceed 6 months. Fire eye detectors are a component of control systems intended for fire protection. The 6-month timeframe was exceeded by 16 days.

**Provide a description of the evidence:**

Williams fire detector maintenance records, Form WGP 0023, indicate that fire detectors were inspected and tested on 6/25/2007 and again on 1/10/2008. This exceeds the maximum 6-month timeframe.

**How might this violation have impacted public safety?:**

Testing and maintenance of fire control systems is an important function in ensuring the protection of an LNG facility in the event of fire. Since this violation only lasted 16 days, the impact to public safety would be minimal.

**How might this violation have impacted the environment?:**

Testing and maintenance of fire control systems is an important function in ensuring the protection of an LNG facility in the event of fire. Since this violation only lasted 16 days the impact to the environment would be minimal.

**Person(s) interviewed [include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation]:**

Von Studer, General Manager, is responsible for ensuring operations and maintenance activities are performed as required.

Lauri Duncombe, Compliance Engineer, is responsible for conducting compliance audits and ensuring that Williams standards and procedures meet federal requirements.

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**Comments of person(s) interviewed regarding the violation:**

Von Studor and Lauri Duncombe were surprised that there was no grace period in the code. They agree that the 6-month timeframe can't be exceeded in 193.2619(c)(2) but were not fully sure that fire eyes were included in 193.2619(c)(2). I emailed Dave Lykken who conferred with PHMSA to be sure that fire eye detectors were in fact considered a component of the fire protection system. PHMSA confirmed that they were.

**For IM Inspections only, enter the Area Finding & Risk Category data (from Table 1A or 1B of the *Enforcement Guidance for Liquid and Gas Transmission IM*)**

- Area Finding: click here to enter
- Risk Category (A-E) click here to enter

| | | | | |
|---|---|---|---|---|
| **Proposed action:** (check one) | [ ] | **NOPV w/ civil penalty** | [ ] | **NOPV w/ civil penalty & compliance order** |
| | [ ] | **NOPV w/ compliance order** | X | **Other:** Warning letter |

## Civil Penalty Assessment Considerations For This Violation:

<Complete sections C1, C2 and C3 only if a civil penalty is proposed for this violation>

**C1 — Degree of the operator's culpability:**
click here to enter

**C2 — Good faith in attempting to achieve compliance:**
click here to enter

**C3 — Additional comments applicable to civil penalty:**
click here to enter

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## PART D – History of Prior Offenses

Note: Complete Part D only if at least one of the probable violations has a proposed civil penalty

| PRIOR OFFENSES (for the 5 year period prior to the approx. date of this inspection's NOPV letter) | | | |
|---|---|---|---|
| **Date of Final Order** | **CPF #** | **What type of enforcement action(s) (CO, CP, ODA ) are in the Final Order?** | **Identify the regulation(s) violated (Part, Section, and Paragraph)** |
| [click ] | [click ] | [click here to enter] | [click here to enter] |
| [click ] | [click ] | [click here to enter] | [click here to enter] |

**Inspector's signature & organization** **Date:**

**PHMSA Region Director's signature** **Date:**

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## Evidence Exhibit A

**Name of Operator:** **[click here to enter]**

| Violation number(s) supported by the evidence | Evidence (attached) | Obtained from | Identifying Witness |
|---|---|---|---|
| 1 | Williams form WGP 0023, dated 6/20/2007 | Lauri Duncombe | Scott Rukke, Lauri Duncombe |
| 1 | Williams form WGP 0023, dated 1/10/2008 | Lauri Duncombe | Scott Rukke, Lauri Duncombe |

Press TAB in above cell for more rows