



Certified Mail 7018 0680 0002 3320 0732

November 6, 2020

Mr. Sean C. Mayo
Pipeline Safety Director
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

**RE: Inspection Response Letter
2020 Hazardous Liquid Integrity Management Program Inspection – Tidewater Terminal
Company – (Insp. No. 8077)**

Dear Mr. Mayo,

The Washington Utilities and Transportation Commission (UTC) conducted a Hazardous Liquid Integrity Management Program Inspection of the Snake River Terminal and associated pipelines from August 3, 2020 to August 6, 2020. The inspection included a records review, procedure review, and physical inspection of the pipeline and breakout tank facilities.

Tidewater reviewed the inspection report dated October 8, 2020 and implemented corrective actions for each probable violation. Corrective action information and completion dates for each are described in the included spreadsheet.

Tidewater appreciates UTC's assistance relative to pipeline compliance. Please contact the undersigned at bill.collins@tidewater.com or 360-693-1491 if you have any questions concerning the attached spreadsheet or if you require additional information.

Sincerely,

A handwritten signature in black ink that reads 'William H. Collins'.

William H. Collins
Director, EHS&S

Cc: Snake River Terminal Files

Issue	Proposed Corrective Action	Due Date
<p>Tidewater's Integrity Management Plan (Plan) does not incorporate the breakout tanks at Snake River Terminal (SRT) into their risk assessment. This same process was missing during the previous commission Integrity Management inspection (ID 7232). The Plan should describe specifically how risk assessment for breakout tanks will be conducted.</p>	<p>A quantitative indexing risk model has been developed to include the breakout tanks at SRT and the IMP will be updated to include how the risk analysis is conducted for breakout tanks.</p>	<p>11/6/2020</p>
<p>Tidewater's Plan does not include a process to perform continual assessment and evaluation of the breakout tanks at the SRT.</p>	<p>Section 7.0, Continuing Evaluation and Assessment, of the IMP has been updated to describe the procedure for evaluation on the breakout tanks at SRT in accordance with 49 CFR 195.452(f)(5).</p>	<p>11/5/2020</p>
<p>Tidewater's Plan does not include a process to identify preventive measures to protect high consequence areas from the risks associated with the breakout tanks at SRT.</p>	<p>Section 6.0, Preventive and Mitigative Measures, of the IMP has been updated to include the breakout tanks at SRT in the Preventive and Mitigative Measures evaluation in accordance with 49 CFR 195.452(f)(6).</p>	<p>11/5/2020</p>
<p>Tidewater's Plan does not include a process to identify mitigative measures to protect high consequence areas from the risks associated with the breakout tanks at SRT.</p>	<p>Section 6.0, Preventive and Mitigative Measures, of the IMP has been updated to include the breakout tanks at SRT in the Preventive and Mitigative Measures evaluation in accordance with 49 CFR 195.452(f)(6).</p>	<p>11/5/2020</p>
<p>Records were insufficient to indicate that program effectiveness is being evaluated. Section 4.1 of the Plan has a list of measures to assess effectiveness, but it is unclear if Tidewater is collecting all of this data and how they use the data to evaluate effectiveness of the Integrity Management Program.</p>	<p>Performance measures are listed in Section 8.1, Performance Measures. This section has been updated with details on where the collected data is stored and how it is evaluated.</p>	<p>11/5/2020</p>
<p>Tidewater had no records to indicate that risk analysis has been completed for the breakout tanks at SRT. Tidewater regularly conducts a risk analysis for the pipelines, but no records were available for breakout tank risk analysis.</p>	<p>A quantitative indexing risk model has been developed to include the breakout tanks at SRT and the IMP will be updated to include how the risk analysis is conducted for breakout tanks.</p> <p>A new section in Section 8.0, Program Evaluation, has been added which will cover where records will be stored and maintained.</p>	<p>11/5/2020</p>