

To: State of Washington  
Utilities and Transportation Commission  
621 Woodland Square Loop S.E.  
Lacey, WA 98503

From: Sunshine Propane  
c/o: Joe Richardson  
10853 Rhody Dr  
Port Hadlock, WA 98339

Date: 6/29/21

**Subject: Response to Silverwater Café Meter System Inspection No. 8314**

The following document addresses our response and proposed plans to correct the probable violations that were identified during the inspection (Insp. No. 8314) of the Silverwater Café Meter System and corresponding records on May 26<sup>th</sup> by Anthony Dorrough of the UTC.

The probable violations from the inspection are listed below. Our action plans for addressing each probable violation is highlighted in **bold** immediately following each of the findings.

#### **PROBABLE VIOLATIONS**

**1. 49 CFR §192.605(a) 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.*

**Finding(s):**

SP failed to provide documentation to show their manual was reviewed and updated at intervals not exceeding 15 months, but at least once each calendar year.

#### **Sunshine Propane's Recommended Action**

**Sunshine Propane has created an annual review certification document that will be included in a tabbed section of the pipeline operation manual. The District Manager will conduct a thorough annual review of the operations manual every twelve months. This review and certification will be completed by 7/31/2021 and will be reviewed every 12 – 15 months in subsequent years.**

**2. 49 CFR §192.615(b)(1) Emergency plans**

*(b) Each operator shall:*

*(1) Furnish its supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures established under paragraph (a) of this section as necessary for compliance with those procedures.*

**Finding(s):**

SP failed to provide documentation to show supervisors responsible for emergency action are furnished with any emergency procedures.

**Sunshine Propane's Recommended Action**

**The emergency response plan that is included in the current meter operations manual was found to be lacking in detail in regard to furnishing the appropriate trained meter personnel and supervisors with concise instructions for initiating emergency response actions depending on the level of emergency identified or reported. In response to these finding Sunshine Propane sought the expertise of Mike Sims, the creator of our existing operations manual, to modify and enhance the procedures it contains. Our first draft of this improved response document is currently under review and will be edited and adopted by Sunshine Propane for inclusion in our operations manual no later than 8/31/2021.**

**It will include specific response protocols for varying levels of emergencies that will clearly define our response procedures.**

**3. 49 CFR §192.615(b)(2) Emergency plans**

*(b) Each operator shall:*

*(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.*

**Finding(s):**

SP failed to provide documentation that appropriate operating personnel were trained on emergency procedures.

**Sunshine Propane's Recommended Action**

**Sunshine Propane currently holds a weekly safety meeting covering a variety of propane industry topics. However, this training does not have an annual Emergency Response Plan training and review component. This training was completed in 2019 but we were deficient in providing and conducting this specific training in 2020.**

**Sunshine Propane will conduct this training in concert with the development of our enhanced Emergency Response Plan that will be adopted by 8/31/2021. The ERP training will be conducted no later than 8/31/2021 and will be included as an annual event to coincide with the annual review of the meter operations manual.**

**4. 49 CFR §192.615(b)(3) Emergency plans**

*(b) Each operator shall:*

*(3) Review employee activities to determine whether the procedures were effectively followed in each emergency.*

**Finding(s):**

SP failed to provide documentation that there is a process to review employee activities following an emergency.

**Sunshine Propane's Recommended Action**

**Sunshine has a process in place per the operations manual to document all emergencies. This consists of the following:**

- 1) Leak Investigation report detailing the location, time, severity of the leak and actions taken to bring leak under control**
- 2) Service Work Order: Complete with pictures of damage and repairs, list of parts and description of materials used to make system safe as well as a documented leak check**

**There was no provision in the existing operations manual for a formal review process after the emergency response process was completed.**

**Going forward Sunshine Propane will conduct a formal review with all involved parties to assess and review the activities of all employees. We will document the findings in an Emergency Response Review Report that will be stored in the Silverwater Café system binder**

**5. 49 CFR §192.615(c) Emergency plans**

*(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:*

*(1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;*

*(2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;*  
*(3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and*  
*(4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.*

**Finding(s):**

SP failed to provide documentation that there is any liaison established with appropriate fire, police, and other public officials.

**Sunshine Propane's Recommended Action**

**District Manager contacted East Jefferson County Fire and EMT as well as the sheriff's department to request an initial meeting to share operating, testing and emergency response procedures and best practices. We will also familiarize them with the physical location of our meter systems. Initial meeting with the East Jefferson County Chief is scheduled for the week of 7/19/21.**

**I am awaiting confirmation from the sheriff's department to determine an initial meeting date.**

**The initial meeting will include action items for further communication and training as well as the frequency and scope of future collaboration.**

**6. WAC 480-93-015(4) Odorization of gas**

*(4) Each gas pipeline company must follow the odorant testing instrument manufacturer's recommendations for maintaining, testing for accuracy, calibrating and operating such instruments. When the manufacturer does not provide a recommendation, each gas pipeline company must conduct accuracy checks and calibrate such instruments at least once annually, if the instrument is outside specified tolerances.*

**Finding(s):**

SP failed to provide documentation to show that they followed odorant testing instrument manufacturer's recommendations for maintaining, testing for accuracy, calibrating and operating such instruments or any other kind of accuracy checks or calibration for 2019 & 2020.

**Sunshine Propane's Recommended Action**

**Upon review of our odorizer binder following the inspection, we located the annual calibration documents for 2019 and 2020. This demonstrates compliance to this requirement. The certified documents from our vendor, Heath Consultants, are below:**



ODORATOR 2  
CALIBRATION CERTIFICATE  
0.44 % Propane

Serial # 2101929001  
Wo # 10909  
Tech: S,BAZURTO  
Date: 7/29/2019

Firmware version: 1.35

Calibration date: 7/29/2019

Blower speed: 6500

Klcd: 0.90490

Pcal: 101679

Tcal: 297.6

Zero: 0.0000

Span %: 0.44

Self-test %: 0.55

ODORATOR 2 reading "0.22" (10 %LEL), REF reading % LEL: 0.28

ODORATOR 2 reading "0.09" (4.1 %LEL), REF reading % LEL: 0.17

Next Day: Zero: 0.0000 Span %: 0.44

This Odorator 2 has been calibrated in conformance with Heath Calibration Procedure.  
The Gas mixture used for calibration is verified by direct comparison to calibration standards traceable to NIST ASTM Class 1 weights and /or NIST gas mixture reference materials.

Technician Name S,BAZURTO

Signature: Smedal Bazurto



ODORATOR 2  
CALIBRATION CERTIFICATE  
0.44 % Propane

Serial # 2101929001  
Wo # 31860  
Tech: S,BAZURTO  
Date: 7/27/2020

Firmware version: 1.35

Calibration date: 7/27/2020

Blower speed: 6600

Klcd: 0.89830

Pcal: 101583

Tcal: 298.6

Zero: 0.0000

Span %: 0.44

Self-test %: 0.54

ODORATOR 2 reading "0.22" (10 %LEL), REF reading % LEL: 0.22

ODORATOR 2 reading "0.09" (4.1 %LEL), REF reading % LEL: 0.12

Next Day: Zero: 0.0000 Span %: 0.44

This Odorator 2 has been calibrated in conformance with Heath Calibration Procedure.  
The Gas mixture used for calibration is verified by direct comparison to calibration standards traceable to NIST ASTM Class 1 weights and /or NIST gas mixture reference materials.

Technician Name S,BAZURTO

Signature:

**7. WAC 480-93-188(2) Gas leak surveys**

*(4) Each gas pipeline company must maintain, test for accuracy, calibrate and operate gas detection instruments in accordance with the manufacturer's recommendations. If there are no written manufacturer's recommendations or schedules, then the gas pipeline company must test such instruments for accuracy at least monthly, but not to exceed forty-five days between testing, and at least twelve times per year. The gas pipeline company must recalibrate or remove from service any such instrument that does not meet applicable tolerances. Records of accuracy checks, calibration and other maintenance performed must be maintained for five years.*

***Finding(s):***

*SP failed to provide records of accuracy checks, calibration and any other maintenance performed which must be maintained for five years.*

**Sunshine Propane's Recommended Action**

**Sunshine Propane utilizes a Sensit CGI as our device for leak surveys. The manual requires monthly meter calibrations. Inspection of our CGI Maintenance manual did show intermittent gaps in documentation for some months. As a result, we have implemented a process ensuring mutual responsibility that monthly calibrations are completed and documented.**

Respectfully Submitted by,

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