SeaPort
SOUND TERMINAL, LLC

4130 E 11th Street, Tacoma, WA 98421
(253) 272-9348

Sent via email

October 30, 2023

Scott Rukke
Pipeline Safety Director
Washington UTC

RE: 2023 Hazardous Liquid Control Management Plan Inspection – SeaPort Sound Terminal, LLC – (Insp. No. 8632)

Dear Mr. Rukke,

We have received the CRM Inspection reply letter referenced above that listed two probable violations. Please review the following information that will list the modifications we have made to bring our CRM manual and required documentation into full compliance with required regulations.

Probable Violation, 49 CFR 195.446(h)(6) – SeaPort does not have a process to include team training and exercises as part of the controller training program.

Effective immediately, SeaPort Sound has added the following verbiage to the CRM manual, Section #14- Training and will submit the amended manual to Washington UTC for review.

Team Training

195.446 (h) (6) Control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with Controllers (control room personnel) during normal, abnormal or emergency situations. Operators must comply with the team training requirements under this paragraph no later than January 23, 2018.

Method:

The Pipeline Supervisor performs Team Training with Controllers once per calendar year not to exceed 15 months (See Pipeline Control Room Training Checklist). The following training is designed to address new and current Controllers' roles and responsibilities defined by the operator.

SeaPort Sound performs training with pipeline field personnel. The training checklist is used as a guide for the training and discussion along with the terminal OQ Covered Task list. Additional training topics include generating proper paperwork, equipment inspections, alarm checks, and recognizing AOC's. Further discussion also includes monitoring receipts, responding to alarms, interaction with Controllers, and reviewing Controller's role.

Examples of training for all reasonably expected operations personnel may include the Facility Response Plan (FRP), Spill Prevention, Control and Countermeasures Plan (SPCC), participation in field spill or emergency response exercises, and lessons learned (See 195.446 (g)).
SeaPort Sound also conducts Annual Spill Drills with extended participation by Oil Spill Response Organizations, Spill Management Team Members, regulatory responders, contractors, local managers, and pipeline personnel.

Documentation for these events are located at the SeaPort Sound Terminal office.

Probable Violation, 49 CFR 195.446(a) – Annual training program review had insufficient documentation for the following items.

   a. *Documentation of the training topics covered in the training sessions to ensure all required Roles and Responsibilities have been addressed and covered.*
   d. *Interviews of controllers for their suggestions to improve the training program.*

While SeaPort Sound is confident that the training reviewed for this audit covered all the required subject materials as well as discussions with controllers about improvements, there exists insufficient documentation to support the annual review.

To provide for better documentation of training topics, operator understanding of the training materials, and any suggestions operators may have to improve the training program, SeaPort Sound has modified the Pipeline Control Room Training checklist (separate attachment). The checklist will verify all required topics are listed and provide an additional section for Training Program Improvement Suggestions.

This new checklist is being used immediately with the 2023 operator training refresher that had not been completed at the time of our CRM audit (August 28th – 30th),

A separate memo to the file will be completed noting review of all required items and if there were identified improvements from discussions and reviews with controllers.
Potential improvements will follow the process outlined in section #14 of the CRM manual.

SeaPort Sound Terminal is committed to operating our Terminal and Pipeline safely and in compliance with all applicable regulations. Please let me know if there are any questions or if additional information is needed.

Sincerely,

Ted Lilyeblade

Compliance Manager

cc: Derek Norwood, WaUTC
    Edward Luebke, Senior Vice President, Operations
    Doug Hall, Director Environmental
    Rob Cohee, Pipeline Supervisor, SeaPort