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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

May 2, 2012

Washington Utilities and Transportation Commission
Attn: Mr. David D. Larkin, Pipeline Safety Director
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250, Olympia, WA 98594-7250
(360) 664- 1160

Regarding: 2012 Standard Liquid Safety Inspection- SeaTac Fuel Facilities, LLC.
Swissport Fueling corrective action timeline.

On March 19th to 21st, 2012, the Washington Utilities and Transportation Commission (WUTC) conducted a safety inspection that reported six (6) probably violations and four (4) areas of concern as stated in the April 4, 2012 letter.

Swissport Fueling as operator of the Seattle-Tacoma International Airport Fuel Facilities, LLC has received and reviewed the report and offer that the corrective actions to the following Findings and Area of Concern will be submitted on or before October 5, 2012 to WUTC for review. Swissport also includes the planned corrective actions and the progress status of the actions as of the day of this letter.

Probable Violations

1. 49CFR 195.402 Procedural manual for operations, maintenance and emergencies.
Finding(s):
 - a. 49 U.S.C 60132, subsection ABD-08-07- requires submission of hazardous liquid facility maps to the National Pipeline Mapping System (NPMS).
Planned corrective action / (status)- Swissport plans to submit the appropriate facility data into the NPMS to comply with the regulation.
(In progress)
 - b. 49 CFR 195.529 (c) requires a written procedure to calculate the volume of product released during an accident as defined in 195.50.
Planned corrective action / (status)- Swissport plans to revise the Spill Control Plan to include calculated volumes in the event of fuel a release to comply with the regulation.
(In progress)

2. 49CFR 195.402 Procedural manual for operations, maintenance and emergencies.
Finding(s):
Records of hydro test could not be furnished during the inspection as Swissport did not obtain them from the previous operator Olympic Pipeline when they took over operation in 2002.
Planned corrective action / (status)- Swissport plans to request hydro test data from Olympic Pipeline and maintain records on site to comply with regulation.
(Completed)

3. 49CFR 195.402 Procedural manual for operations, maintenance and emergencies.
Finding(s):
49 CFR 195.404 (part of subpart F) requires minimum information to be available for operations and maintenance procedures. The Manual Section XVIII does not have all the required information listed, specifically Pipe Type. Additionally, Records could not be furnished during the inspection as Swissport did not obtain them from the previous operator Olympic Pipeline when they took over operation in 2002.
Planned corrective action / (status)- Swissport plans to request pipe type data from Olympic Pipeline and maintain records on site to comply with the regulation.
(Completed)

4. 49CFR 195.402 Procedural manual for operations, maintenance and emergencies.
Finding(s):
Tank 115 (and the entire facility) is located down in large hollow. Runoff from tank in some areas accumulates near the base. Port of Seattle attempted to minimize water flow under the tank base by installing raised curbing. It does not work. This ponding could lead to corrosion under tank bottom. This condition needs to be rectified or explained why this condition will not affect the integrity of the tank.
Planned corrective action / (status)- Swissport plans to seek civil contractor to re-design base curbing to allow for water runoff and prevent ponding and comply with regulation.
(In progress)

5. 49CFR 195.573 What must I do to monitor external corrosion control?
Finding(s):
Tank 115 cell #1 rectifier was reading -0.692 which is less than the minimum voltage necessary for cathodically protecting the tank bottom of -0.85.
Planned corrective action / (status)- Swissport has consulted with Asset Integrity Manager who is NACE certified and plans to increase settings or make other necessary corrections to comply with regulation.
(In progress)

6. 49CFR 195.405 protection against ignitions and safe access/egress involving floating roofs.

Finding(s):

49 CFR 195.405 requires specific procedures for protection against certain ignition sources as well as safe access/egress to floating roof. The Manual does not indicate whether this section applies to Tank 115 or how Swissport complies with this regulation.

Planned corrective action / (status)- Swissport plans to write procedures for protecting against ignition sources and access/egress to floating roof tanks.

(In progress)

Areas of Concern

1. 49 CFR 195.2. Definitions

Finding(s):

Pipeline schematic appears to indicate that Swissport has the ability to pump back into Olympic's line from Tank 115 (which is the only tank currently regulated). This situation needs to be clarified and/or confirmed.

Planned corrective action / (status)- Swissport plans to make modifications to eliminate the ability to pump back to Olympic Pipeline and comply with regulation.

(In progress)

2. 49CFR 195.402 Procedural manual for operations, maintenance and emergencies.

Finding(s):

Swissport does not have the construction records showing actual pipeline material specifications used for the pipelines they operate. The records could not be furnished during the inspection as Swissport did not obtain them from the previous operator Olympic Pipeline when they took over operation in 2002.

Planned corrective action / (status)- Swissport plans to request actual pipeline materials data from Olympic Pipeline and comply with regulation.

(Completed)

3. 49CFR 195.428 Overpressure safety devices and overflow protection systems.

Finding(s):

49 CFR 195.428 applies if Tank 115 is significantly altered or repaired. Swissport should have a procedure in place to ensure the regulation is met in the event a repair is necessary.

Planned corrective action / (status)- Swissport plans to write procedure for tank 115 if it is significantly altered and comply with regulation.

(Completed)

4. 49CFR 195.402 Procedural manual for operations, maintenance and emergencies.

Finding(s):

During the safety inspection it became apparent that clear, concise diagrams showing the following information would be very helpful for regulatory, routine and emergency operations:

- a. An elevation drawing of Tank 1125 showing fill levels, alarms, capacity elevation and vent (overflow) elevation.

Planned corrective action / (status)- Swissport plans to make diagrams showing fill levels, alarms, capacity elevation and vent (overflow) elevation to comply with regulation.

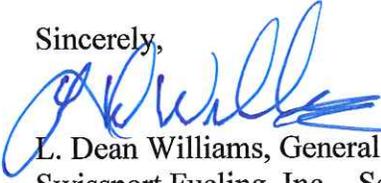
(In progress)

- b. An overall system map showing all regulated facilities relative to Olympic's Facilities should be included in the O&M Manual.

Planned corrective action / (status)- Swissport plans to prepare map showing the facility relative to Olympic Pipeline's facility to comply with regulation.

(In progress)

Sincerely,



L. Dean Williams, General Manager
Swissport Fueling, Inc. - Seattle, WA

cc: Jay Long SeaTac Fuel Facilities, LLC Consortium Chairman
Mark Norris, Swissport Fueling VP of Consortiums