



STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
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CERTIFIED MAIL

July 10, 2014

Mark Norris
Vice President for Consortium
SeaTac Fuel Facilities, LLC
42025 Aviation Dr.
Suite 350
Dulles, VA 20166

Dear Mr. Norris:

RE: 2014 Standard Hazardous Liquid Safety Inspection – SeaTac Fuel Facilities LLC

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection from June 3 - 4, 2014, of Swissport Fueling Inc. SeaTac Fuel Facilities LLC. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates one area of concern, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing by August 8, 2014. The response should include how and when you plan to address the area of concern.

We would like to thank Swissport's personnel for their professionalism and cooperation during this inspection.

If you have any questions or if we may be of any assistance, please contact Dave Cullom at (360) 664-1141. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

David D. Lykken
Pipeline Safety Director

Enclosure

cc: L. Dean Williams, General Manager, Swissport Fueling, Inc.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2014 Hazardous Liquid Pipeline Safety Inspection
Swissport Fueling Inc - SeaTac Fuel Facilities LLC

The following areas of concern of Title 49 CFR Part 195 were noted as a result of the 2014 inspection of the Swissport Fueling Inc - SeaTac Fuel Facilities LLC. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

AREA OF CONCERN

1. **49 CFR §195.432 Inspection of in-service breakout tanks**
 - (b) *Each operator must inspect the physical integrity of in-service atmospheric and low-pressure steel aboveground breakout tanks according to API Standard 653 (incorporated by reference, see § 195.3). However, if structural conditions prevent access to the tank bottom, the bottom integrity may be assessed according to a plan included in the operations and maintenance manual under § 195.402(c)(3).*

Finding(s):

In the last two 5 years in-service API inspections, API 653 inspectors, Matthew Orr on 5/27/2008 and Byron Johnson on 4/8/2013, noted that there should be a moisture barrier caulking applied between the foundation and the tank shell. The operator should address these findings by the API inspectors and either comply with the recommendation or justify why they did not follow the API inspectors' recommendation.