



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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*Sent Via Email and Electronic Return Receipt Mail*

August 27, 2018

Bruce Reed  
VP of Operations  
Tidewater Terminal Company  
PO Box 1210  
6305 NW Old Lower River Rd  
Vancouver, WA 98660

**RE: 2018 Hazardous Liquid Public Awareness Program Inspection – Tidewater Terminal Company (Insp. No. 7564)**

Dear Mr. Reed:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Public Awareness Program inspection of Tidewater Terminal Company (Tidewater) from Jul. 30-Aug. 2. This inspection included a records review and inspection of pipeline facilities.

Our inspection indicates **one** area of concern as noted in the enclosed report, 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 Sept. 28. The response should include how and when you plan to bring the area of concern into full compliance.

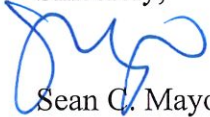
**What happens after you respond to this letter?**

The attached report presents staff's decision on the area of concern and does not constitute a finding of probable violation by the staff at this time if the issue is resolved within 90 days of discovery. If this issue is not resolved within 90 days, this matter may result in the issuance of a notice of probable violation.

If you have any questions or if we may be of any assistance, please contact Dennis Ritter at (360) 664-1159. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

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Sincerely,



Sean C. Mayo  
Pipeline Safety Director

Enclosure

cc: Bill Collins, Director EHS&S, Tidewater [bill.collins@tidewater.com](mailto:bill.collins@tidewater.com)  
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**UTILITIES AND TRANSPORTATION COMMISSION**  
**2018 Hazardous Liquid Pipeline Safety Inspection**  
**Tidewater Terminal Company**

The following area of concern of Title 49 CFR Part 195 was noted as a result of the 2018 inspection of the Tidewater Terminal Company's Public Awareness Program. The inspection included a random selection of records and field inspection of the pipeline facilities.

**AREA OF CONCERN**

**1. Title 49 CFR 195.440 Public awareness.**

*(a) Each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference)*

*(e) The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.*

*(f) The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports hazardous liquid or carbon dioxide.*

**IA Question: Question 9 Public Awareness and Damage Prevention:** Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility location? PD.PA.LOCATIONMESSAGE.R-195.440(e)(195.440(f))

**Finding:**

Tidewater does have a Public Awareness Plan (PAP) that follows the guidance of *American Petroleum Institute's (API) Recommended Practice (RP) 1162*. However, Tidewater's plan does not state what happens when required mailings to constituent groups are returned to sender. Tidewater does not know if they get returned mailings nor do they have a process to evaluate why the mailings didn't reach the intended customer. Tidewater should update their procedure to account for this condition.