

**Washington Utilities and Transportation Commission
Hazardous Liquid Pipeline Operator
Jurisdictional Evaluation Report**

Company Name: Swissport Fueling, Inc.

Company Official: George Mencarelli

Address: 42025 Aviation Drive

City/State/Zip: Dulles, Virginia 20166

Telephone: 702-261-5483

District or Division Office Inspected

Name: Swissport Fueling (SeaTac)

Address: 2350 S 190th St

City/State/Zip: Seattle, Washington 98188

Telephone: 206-246-0407 FAX: _____

Operator Representative

Name and Title: Jamil Simpson

Operations Manager

WUTC Representative

Name and Title: Derek Norwood

Energy/Utilities Engineer

Inspection Dates: 01/08/2020, 06/30/2020 and 9/14/2020

Date of Last Inspection: September 12, 2017

Inspecting Agency: Washington Utilities and Transportation Commission

1. Describe the pipeline system and location.
The Swissport facility is operated in SeaTac, WA and the purpose of the facility is to receive, perform quality control checks, remove impurities, and distribute all the Jet-A fuel required to Sea-Tac International Airport. Swissport receives product from Olympic Pipeline and temporarily stores product in above ground tanks for supply to SeaTac Airport.

2. Is this pipeline facility used to transport carbon dioxide or hazardous liquids, as defined in 49 CFR, part 195.2?
Yes - may be jurisdictional to the hazardous liquid pipeline safety regulations.
No - not jurisdictional under Federal Law.
No, Swissport owned pipelines and facilities are not used to transport hazardous liquid as defined in 49 CFR 195.2.

3. Which hazardous liquid(s) is being transported?
All of these liquids, except Liquified Petroleum Gas and Anhydrous Ammonia, are classified as hazardous liquids under Part 195. Liquified Petroleum Gas and Anhydrous Ammonia are classified as highly volatile liquids

Crude Oil	<input type="checkbox"/>	Gasoline	<input type="checkbox"/>
Diesel Fuel	<input type="checkbox"/>	Jet Fuel	<input checked="" type="checkbox"/>
Liquified Petroleum Gas	<input type="checkbox"/>	Carbon Dioxide	<input type="checkbox"/>
Anhydrous Ammonia	<input type="checkbox"/>	Other	<input type="checkbox"/>
4. Does this pipeline transport hazardous liquids across state boundaries?
Yes - indicative of an interstate pipeline system.
No - may be an intrastate pipeline system.
No. Swissport receives product from Olympic Pipeline and delivers to SeaTac Airport. All piping is within Swissport and SeaTac property.

5. Does this pipeline transfer hazardous liquids to an interstate hazardous liquid pipeline?
Yes - may be an interstate pipeline; check for FERC tariff.
No - may be an intrastate pipeline system.
No. Swissport receives product from Olympic Pipeline and delivers to SeaTac Airport. All piping is within Swissport and SeaTac property.

6. Are storage tanks used to relieve surges in the pipeline system or to receive and store hazardous liquid transported by pipeline for re-injection and continued transportation by pipeline?
Yes - the tanks are classified as breakout tanks and subject to federal regulations.
No - the tanks are not subject to federal or Commission regulations.
No. The tanks at the Swissport facility are used for storage and delivery to SeaTac Airport. Tank 115 has a rupture pin for protection of Swissport piping but based on records review and interviews with Olympic Pipeline and Swissport, the tank does not act

as surge protection for Olympic Pipeline which is a regulated facility under 49 CFR Part 195. The MOP of Olympic's system is 1330 psig and the rupture pin on Tank 115 is set to activate at 150 psig. Swissport piping uses ANSI 150 and ANSI 300 fittings which have pressure ratings of 285 psig and 740 psig, respectively. These pressures are well below the MOP of Olympic facilities.

7. Does the pipeline facility contain "in-plant piping" (Piping that is located on the grounds of the plant and used to transfer hazardous liquid or carbon dioxide between plant facilities or between plant facilities and a pipeline or other mode of transportation, but not including any device and associated piping that are necessary to control pressure in the pipeline under 195.406(b).)?

Yes - in-plant piping is exempt from the hazardous liquid pipeline safety regulations as outlined in federal regulations. The key components that typify 'in-plant piping' are: located solely upon the company's private property, used to transfer liquid from one company facility to another, used to transfer liquid within the company's facility, and has minimal egress, if any, across public rights-of-way.

No - the entire pipeline system may be jurisdictional under federal regulations.

Yes, all Swissport piping is "in-plant piping". Swissport does not operate any piping outside of their own property.

8. Does the pipeline operate in its entirety at a stress level of 20 percent or less of the specified minimum yield strength of the line pipe?

Yes - may be classified as low-stress pipeline.

No - not a low-stress pipeline; subject to the jurisdiction of Part 195.

Yes

9. Does the pipeline operate in or traverse any incorporated or unincorporated city, town, village, or any other designated residential or commercial area such as a subdivision, a business or shopping center, or a community development?

Yes - the pipeline traverses a 'populated area'; must comply with Part 195.

No - the pipeline may not be in a 'populated area'; may be exempt from Part 195.

No, all Swissport piping is "in-plant piping". Swissport does not operate any piping outside of their own property.

10. Is the pipeline less than one mile in length? ***

Yes - the pipeline, at this time, may be exempt from jurisdiction under 49 CFR Part 195 not 2000 Washington State Law.

No - the pipeline may be jurisdictional under federal regulations.

Yes

11. Does the pipeline cross offshore or any waterway currently used for commercial navigation? ***

Yes - the pipeline may be jurisdictional under federal regulations.

No - the pipeline may be exempt from jurisdiction under 49 CFR Part 195 but covered under State Pipeline Safety Law.

No

12. Is the pipeline regulated by the Coast Guard? ***

Yes - the pipeline may not be under the jurisdiction under federal regulations.

No - the pipeline may be jurisdictional to under Federal Law.

No

13. Request from the operator a copy of maps and diagrams that identify the location of all intrastate pipelines and pipeline facilities.

See attached documents

*** *These are new questions that were added after the Federal Office of Pipeline Safety stayed the enforcement of two categories of low-stress pipelines on May 14, 1996. The two categories are: (1) low-stress pipelines regulated by the U.S. Coast Guard; and (2) low-stress pipelines that are less than one mile in length (measured outside plant or terminal grounds), except if the pipeline crosses offshore or any other waterway currently used for commercial navigation. As of July 12, 1996, amendment number 53 to 49 CFR Part 195 will extend the regulations (49 CFR Part 195) to three groups of low-stress pipelines: pipelines that transport highly volatile liquids, pipelines or pipeline segments in populated areas, and pipelines or pipeline segments in navigable waterways.*