



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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*Sent via email*

June 11, 2021

Joe Richardson  
District Manager  
Sunshine Propane  
10853 Rhody Drive  
Port Hadlock WA 98339

**RE: 2021 Liquefied Petroleum Gas Standard Inspection – Sunshine Propane Silverwater Café Meter System – (Insp. No. 8314)**

Dear Mr. Richardson:

Staff from the Washington Utilities and Transportation Commission (staff) conducted an LPG Standard inspection of Sunshine Propane (Sunshine) Silverwater Café Meter System on May 26, 2021. This inspection included a plans and records review and an inspection of the pipeline facilities.

Our inspection indicates [7] probable violation(s) 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 July 13, 2021. The response should include how and when you plan to bring the probable violations into full compliance.

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

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under [RCW 81.04.405](#); or
- Issue a complaint under [RCW 81.88.040](#), seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter

81.88 RCW is subject to a civil penalty not to exceed \$218,647 for each violation for each day that the violation persists. The maximum civil penalty for a related series of violations is \$2,186,465; or

- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a penalty or complaint in this matter. Should the commission decide to assess a penalty or initiate a complaint, your company will have an opportunity to respond and formally present its position.

If you have any questions or if we may be of any assistance, please contact Anthony Dorrrough at (360) 481-4035.

Sincerely,

Sean C. Mayo  
Pipeline Safety Director

cc: Joe Applewhite, Service Technician, Sunshine Propane

**UTILITIES AND TRANSPORTATION COMMISSION**  
**2021 Liquefied Petroleum Gas Pipeline Safety Inspection**  
**Sunshine Propane – Silverwater Café Meter System**

The following probable violation(s) and areas of concern of Title 49 CFR Part 192-605, 615 and WAC 480-93-015, 188 were noted as a result of the 2021 inspection of the Sunshine Propane – Silverwater Café Meter System (SP). The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

**PROBABLE VIOLATIONS**

1. **49 CFR §192.605(a) Procedural manual for operations, maintenance, and emergencies.**

*(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.*

**Finding(s):**

SP failed to provide documentation to show their manual was reviewed and updated at intervals not exceeding 15 months, but at least once each calendar year.

2. **49 CFR §192.615(b)(1) Emergency plans**

*(b) Each operator shall:*

*(1) Furnish its supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures established under paragraph (a) of this section as necessary for compliance with those procedures.*

**Finding(s):**

SP failed to provide documentation to show supervisors responsible for emergency action are furnished with any emergency procedures.

3. **49 CFR §192.615(b)(2) Emergency plans**

*(b) Each operator shall:*

*(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.*

**Finding(s):**

SP failed to provide documentation that appropriate operating personnel were trained on emergency procedures.

4. **49 CFR §192.615(b)(3) Emergency plans**

*(b) Each operator shall:*

(3) Review employee activities to determine whether the procedures were effectively followed in each emergency.

**Finding(s):**

SP failed to provide documentation that there is a process to review employee activities following an emergency.

5. **49 CFR §192.615(c) Emergency plans**

*(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:*

*(1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;*

*(2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;*

*(3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and*

*(4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.*

**Finding(s):**

SP failed to provide documentation that there is any liaison established with appropriate fire, police, and other public officials.

6. **WAC 480-93-015(4) Odorization of gas**

*(4) Each gas pipeline company must follow the odorant testing instrument manufacturer's recommendations for maintaining, testing for accuracy, calibrating and operating such instruments. When the manufacturer does not provide a recommendation, each gas pipeline company must conduct accuracy checks and calibrate such instruments at least once annually, if the instrument is outside specified tolerances.*

**Finding(s):**

SP failed to provide documentation to show that they followed odorant testing instrument manufacturer's recommendations for maintaining, testing for accuracy, calibrating and operating such instruments or any other kind of accuracy checks or calibration for 2019 & 2020.

7. **WAC 480-93-188(2) Gas leak surveys**

*(4) Each gas pipeline company must maintain, test for accuracy, calibrate and operate gas detection instruments in accordance with the manufacturer's recommendations. If there are no written manufacturer's recommendations or schedules, then the gas pipeline*

*company must test such instruments for accuracy at least monthly, but not to exceed forty-five days between testing, and at least twelve times per year. The gas pipeline company must recalibrate or remove from service any such instrument that does not meet applicable tolerances. Records of accuracy checks, calibration and other maintenance performed must be maintained for five years.*

**Finding(s):**

SP failed to provide records of accuracy checks, calibration and any other maintenance performed which must be maintained for five years.