



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY 1-800-833-6384 or 711

Sent via email

June 23, 2022

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

RE: 2022 Liquefied Petroleum Gas Standard Inspection – Sunshine Propane Port Ludlow Meter System – (Insp. No. 8445)

Dear Mr. Richardson:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Liquefied Petroleum Gas (LPG) standard inspection of Sunshine Propane Port Ludlow Meter System (Sunshine) on April 13, 2022. This inspection included a records review and inspection of the pipeline facilities and meter locations.

Our inspection indicates 4 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 25, 2022. 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 \$225,134 for each violation for each day that the violation persists. The maximum civil penalty for a related series of violations is \$2,251,334; 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. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Sean C. Mayo
Pipeline Safety Director

cc: Joe Applewhite/Service Technician/Sunshine Propane

UTILITIES AND TRANSPORTATION COMMISSION
2022 Liquefied Petroleum Gas Pipeline Safety Inspection
Sunshine Propane Port Ludlow Meter System

The following probable violation(s) of Title 49 CFR Part 192.491; 192.615, and WAC 480-93-100; 480-93-188 were noted as a result of the 2022 inspection of the Sunshine Propane Port Ludlow Meter System (Sunshine). The inspection included a complete review of all operation and maintenance (O&M), emergency response, inventory records and field inspection of the pipeline facilities and meter locations.

PROBABLE VIOLATIONS

1. **49 CFR §192.491(c) Corrosion control records.**

(c) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosion control condition does not exist. These records must be retained for at least 5 years, except that records related to 192.465 (a) and (e) and 192.475 (b) must be retained for as long as the pipeline remains in service.

Finding(s):

Sunshine failed to provide records of cathodic protection surveys for all four underground containers for the year 2020.

2. **49 CFR §192.615(c) Emergency Plans.**

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

Finding(s):

Sunshine failed to provide records of meetings with police and other public officials.

3. **WAC 480-93-100(3) Valves**

(3) All service valves selected for inspection in the program required in subsection (2) of this section must be operated and maintained at least once annually, but not to exceed fifteen months between operation and maintenance.

Finding(s):

Sunshine failed to provide records of operation and maintenance (O&M) for meter service valves as required by O&M procedures for the years 2020/2021.

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

(2) 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):

Records provided indicated intervals exceeding forty-five days on [2] separate occasions since the last inspection.