



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. Docket PL-090042

CERTIFIED MAIL

November 13, 2009

Frank J. Grolimund
Vice President, Operations
Swissport Fueling, Inc.
42025 Aviation Dr
Dulles, VA 20166

Dear Mr. Grolimund:

Re: 2009 Hazardous Liquid Standard Inspection-Sea Tac Washington Terminal Response to July 7, 2009 Letter

We have completed our review of the submissions provided as part of your July 7, 2009 response letter to the April 2009 standard inspection of Swissport Fueling, Inc. (Swissport) SeaTac Terminal. The submission included revised copies of company Operations and Maintenance Procedures, Weld Procedures, Drug and Alcohol misuse testing programs, Operator Qualifications program and Public Awareness Program. Based on this review the following issues still need to be resolved:

Operations and Maintenance Procedures

1. 49 CFR §195.422(b) requires that no pipe, valve, or fitting for replacement in repairing the pipeline may be used unless it is designed and constructed as required in 49 CFR §195. This issue is addressed on page 27, section XXI of the Breakout Tank Manual. We suggest changing the words "this part" with "49 CFR 195" since this part only applies with respect to the rule not your Manual.

Drug and Alcohol Misuse Testing Program

We accept the revisions made to the Drug and Alcohol testing program.

Weld Procedures

- Procedures do not have ranges for diameter and wall thickness. This is not required but you will not be able to use this procedure if the wall thickness or diameter of the welded pipe deviates from the procedure. Note that ranges must be consistent with API 1104.



- There is no sketch of joint design for a butt weld. The sketch needs to show bevel angle, root face size, root opening, space between abutting members.
- Which procedure is associated with the sketch on procedure 2B-T? This is a fillet weld sketch but appears to be associated with the butt weld procedure. Please clarify which sketch belongs to which procedure.
- There is no sketch for procedure 3C-WOL.
- Electrode size, Filler group classification, minimum number of beads, sequence of beads, amperage and voltage ranges need to be specified for the butt weld.
- The procedure needs to state whether the pipe is fixed or rolled.
- The procedure needs to state the time of completion between completion of the root bead and between the second and subsequent beads for the fillet weld procedure.
- Post weld treatment is not addressed in procedure 2C-M.
- Range of speed only specified for procedure 2B-T.
- Qualification tests are not found for procedure 2C-M and 3C-WOL.
- Weld procedure 2B qualification test does not state the process, material type and grade, pipe size, wall thickness, position, welding time between passes, amperage, voltage, electrode polarity, electrode, shielding flux (if used) sizes of electrodes, shielding gas and flow rate (if used) speed of travel, preheat and/or post heat (if used), joint design, pass numbers, uphill/downhill used for the qualification test.

Operator Qualification Program

- The list of covered tasks does not appear to be complete. Tasks such as Overfill protection alarm testing, inspection and calibration, coating inspection of aboveground pipe, cathodic protection rectifier inspection are some of the tasks which do not appear to be identified as covered tasks,
- The re-evaluation frequency for each covered task does not appear to be specified.
- Contractor qualifications do not appear to be addressed in the program.
- The program does not address management of other entities performing covered tasks.
- Details of training programs are not specified for each covered task.
- Detailed qualifications and evaluation method for each covered task are not specified.
- Was the four part test applied developing the covered task list? This was not clear.
- Evaluation methods for each task were not defined.
- There should be a procedure for managing qualifications of individuals performing covered tasks during program integration following a merger or acquisition.
- There should be detailed qualification records for each operator. Passing criteria should be clearly established.
- There should be discussion of provisions to have non-qualified personnel performing covered tasks while being observed by qualified personnel.
- Abnormal operating conditions need to be identified and incorporated into qualification process.
- Specific re-evaluation intervals must be established and located in the manual. Intervals must be justified depending on the specific task.

- A detailed management of change process must be developed and incorporated into company procedures.
- Details of how significant program changes will be handled need to be defined and provided.

Public Awareness Program

- There must be evidence of management commitment to the public awareness program. This must include a statement with name title of the person authorized to fund the program. The statement must include the signature of the appropriate person who authorizes funding.
- The message content for those who reside along the pipeline must include pipeline purpose and reliability, hazards and prevention measures taken, leak recognition and response, damage prevention awareness, how and where to get more information, one call requirements and emergency communications.
- The message content for emergency officials must include pipeline purpose and reliability, hazards and Prevention measures undertaken, leak recognition and response, emergency preparedness and response, how and where to get more information, emergency communications and one call requirements.
- The message content for local officials must include pipeline purpose and reliability, hazard and prevention measures undertaken, leak recognition and response, damage prevention awareness, pipeline location information, how and where to get more information, one call requirements and emergency communications.
- The priority message should be written in the plan. The message for emergency and public officials should state that people are to be protected first then property.
- The method of message delivery must be specified in the plan.
- Message delivery frequency must be established in the plan. This frequency must comply with 49 CFR §195.
- Swissport will be required to verify that the public awareness program has been carried out.
- There must be procedures carry out an annual audit to ensure that the public awareness plan meets the minimum requirements of the regulation.
- The annual audit must ensure that actions called out in the plan have been carried out.
- Records confirming the annual audit has been performed must be maintained.
- The results of the review must be shared with upper management and internal feedback sought.
- The program must be modified based on the evaluation, the changes must be documented and implemented.
- Pre testing must be conducted and pretesting material must be developed to assess program performance.
- An effectiveness assessment must be conducted in accordance with section 8 of API 1162.

Swissport Fueling, Inc.

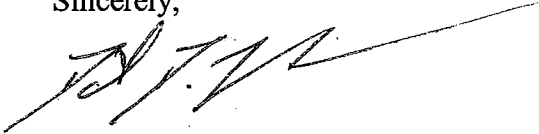
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Please respond to this letter by December 15, 2009 noting the timeframe for submitting revisions to these remaining issues. We appreciate the spirit of cooperation displayed by Swissport and its representatives. Should you have questions or comments, please contact Joe Subsits at (360) 664-1322.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Lykken', with a long horizontal line extending to the right.

David D. Lykken

Acting Pipeline Safety Director

cc: Harry Edward Grant, Riddell Williams P.S.
Michael Hagen Swissport Fueling Inc