

Mr. David D. Lykken  
Pipeline Safety Director  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. S.W  
P.O box 47250  
Olympia, WA 98504

RECEIVED

JUN 21 2012

WASH. UT. & TP. COMM

Dear Mr. David D. Lykken,

We want to request for an extension in complying with Probable Violation # 5 to August 21, 2012. The reading on Cell 1 of Tank 115 rectifier was  $-0.692$  which is less than the minimum voltage necessary for cathodically protecting the tank bottom of  $-0.850$ . However, using engineering practice, adequate Cathodic protection can also be indicated by a polarization shift of at least 100 mv. This is one of the Cathodic Protection Acceptance criteria indicated in our Breakout Tank Manual, on Chapter 5, section f, page 10. The most recent annual 2011 annual survey by Norton Corrosion Limited and the Native and polarization Decay Data recorded in 2009 meet the minimum criterion.

This is our plan in approaching and bringing the probable violation # 5 into full compliance.

1. Rectifiers were interrupted last week to obtain an instant OFF.
2. Readings were recorded from the Under Tank Reference cell and tank perimeter utilizing portable reference cell.
3. Rectifiers were de-energized and locked-out and tagged out last week.
4. Approximately 0.5 hour was exhausted measuring for stray current.
5. To establish stable native reading Under Tank Reference Cell will be monitored on a weekly basis.
6. When a stable reading is established, additional field testing will be completed and rectifiers will be re-energized.
7. All recorded data after 45 to 60 days will be included on a written report with analysis and recommendation.

Sincerely,  
*for D. Williams*  
Dean Williams

General Manager

Cc: Dennis Ritter: Pipeline Safety Program Engineer, Dan Liss: Corrosion Engr/ Asset Integrity Manager

| Location                                     | Date→ | Potentials - millivolts |                |                     |                       | IF<br>% effective   |
|--|-------|-------------------------|----------------|---------------------|-----------------------|---------------------|
|  |       | On                      | Instant<br>Off | Native<br>by others | Polarization<br>Decay |                     |
| <b>Tank 113 - buried piping</b>              |       |                         |                |                     |                       |                     |
| <b>In-use fuel piping</b>                    |       |                         |                |                     |                       |                     |
| 24" Riser w/IF SW side - W                   |       | 2564                    | 882            | 280                 | 602                   |                     |
| E  |       | 2060                    | 817            | 239                 | 578                   |                     |
| 24" Riser TS                                 |       | 2280                    | 821            | 276                 | 545                   |                     |
| anode disc.                                  |       |                         |                | 1530 anode          | 9.8 mA collection     |                     |
| 12" Riser capped SE                          |       | 2395                    | 854            | 289                 | 565                   |                     |
| 8" Riser w/IF S side                         |       | 2758                    | 851            | 281                 | 570                   |                     |
| 8" Riser TS                                  |       | 2751                    | 828            | 279                 | 549                   |                     |
| anode disc.                                  |       |                         |                | 1624 anode          | 12 mA collection      |                     |
| 12" Riser NE side - W                        |       | 1990                    | 736            | 256                 | 480                   |                     |
| E  |       | 2153                    | 757            | 264                 | 493                   |                     |
| 2"/4" Riser w/ IU S side                     |       | 3793                    | 1236           | 346                 | 890                   |                     |
| <b>Miscellaneous structures</b>              |       |                         |                |                     |                       |                     |
| 2 - 4" Risers Foam Line - NW                 |       | 608                     | 331            | 344                 | -13                   |                     |
| 2 - 4" Risers Foam Line - SE                 |       | 375                     | 529            | 550                 | -21                   | same ref location   |
| tank   |       | 1878                    | 627            |                     |                       | same ref location   |
| 3 Risers Foam Line - SE                      |       | 683                     | 675            | 533                 | 142                   |                     |
| <b>Tank 114 (120') - tank fuel level 36'</b> |       |                         |                |                     |                       |                     |
| N  |       | 1427                    | 856            | 258                 | 598                   |                     |
| E  |       | 2649                    | 1353           | 132                 | 1221                  |                     |
| S  |       | 3490                    | 2007           | 258                 | 1749                  |                     |
| W side Jbox, Perm. Ref 1 (red) - 40'         |       | 1927                    | 197            | 97                  | 100                   |                     |
| Perm. Ref 2 (blk) - 80'                      |       | 1611                    | 450            | 27                  | 423                   |                     |
| W  |       | 2593                    | 1072           | 159                 | 913                   |                     |
| <b>Tank 114 - buried piping</b>              |       |                         |                |                     |                       |                     |
| <b>In-use fuel piping</b>                    |       |                         |                |                     |                       |                     |
| 24" Riser NE side - W                        |       | 1204                    | 985            | 698                 | 287                   |                     |
| E  |       | 1426                    | 884            | 601                 | 283                   |                     |
| 4" Riser NE                                  |       | 1411                    | 948            | 694                 | 254                   |                     |
| 2"/4" Riser w/ IU S side                     |       | 3080                    | 1457           | 569                 | 888                   |                     |
| <b>Miscellaneous structures</b>              |       |                         |                |                     |                       |                     |
| 2 - 4" Risers Foam Line - NW                 |       | 123                     | 325            | 649                 | -324                  | same ref location 1 |
| tank   |       | 2468                    | 808            |                     |                       | same ref location 1 |
| 2 - 4" Risers Foam Line - SE                 |       | 420                     | 602            | 701                 | -99                   | same ref location 2 |
| tank   |       | 3053                    | 1505           |                     |                       | same ref location 2 |
| <b>Tank 115 (120') - tank fuel level 30'</b> |       |                         |                |                     |                       |                     |
| N  |       | 1834                    | 503            | 105                 | 398                   |                     |
| E  |       | 2054                    | 630            | 150                 | 480                   |                     |
| S  |       | 1664                    | 476            | 246                 | 230                   |                     |
| W side Jbox, Perm. Ref 1 (red) - 40'         |       | 856                     | 359            | 67                  | 292                   |                     |
| Perm. Ref 2 (blk) - 80'                      |       | 1041                    | 379            | -49                 | 428                   |                     |