

October 30, 2018

Mr. Sean C. Mayo  
Pipeline Safety Director  
Utilities and Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
Olympia, WA 98504

**RECEIVED**  
State of Washington  
**OCT 31 2018**  
UTC  
Pipeline Safety Program

**RE: Targa Sound Terminal LLC  
2018 Standard Hazardous Liquid Records and Field Inspection  
Inspection No. 7581  
Notice of Violation Response**

Dear Mr. Mayo:

Targa Sound Terminal LLC (Targa) received your letter dated October 12, 2018, regarding the Standard Hazardous Liquid Records and Field Inspection that was conducted by the UTC between September 24<sup>th</sup> and 26<sup>th</sup>. Targa Sound Terminal prepared this response to address the probable violations listed in your letter detailing the September inspection. Targa's response to the findings stated in your October 12, 2018 letter are as follows:

- 1. UTC Observation: 49 CFR 195.428 – Overpressure safety devices and overfill protection systems.**  
After staff reviewed the records for valve inspection, staff found that Targa has not been testing the thermal relief valves on the launcher/receiver, boost station pump, and the thermal relief attached to the surge line that enters tank 205.

**Targa Response:** The Sound Terminal operated with the belief that the line was properly protected and showed compliance for this rule through the annual certification of the pipeline's overpressure safety device. The pressure relief device is bench tested by a qualified third party company. As noted in the inspection, thermal relief devices attached to the line had not been tested to the same scheduled rigor as the pressure relief valve. For continued compliance with this regulation, the Sound Terminal has changed the inspection practices for the thermal relief devices to match that of the pressure relief valve. Targa has purchased an identical set of thermal relief devices. Annually, all overpressure safety devices, including thermal reliefs, will be replaced with a certified valve. The replaced valve will then be bench tested and stored until it is returned to service in the following year.

- 2. UTC Observation: 49 CFR 195.583 – Atmospheric Corrosion Control.**  
Staff found that Targa could not provide inspection documentation stating they had performed an atmospheric corrosion inspection for 2015. Targa was able to provide an atmospheric corrosion inspection document for 2018.

**Targa Response:** Targa routinely inspects the regulatory pipeline. In 2015, an *In-Line Inspection* of the pipeline was performed. The line should have been inspected for atmospheric corrosion at that time, however documentation completed during the inspection did not indicate if that task was completed. The Sound Terminal utilizes a third party compliance software task management system and this requirement has since been added to the program. Adherence to the software program will ensure continued compliance with this requirement.

Each item identified in this inspection has been addressed by the Sound Terminal in a manner consistent with expected regulatory compliant operation for a jurisdictional pipeline facility. Through equipment purchases, changes in procedures, and the use of software management programs, the Targa Sound Terminal will continue to operate at the level of expectation set forth by the rules, regulations, and obligations required of a responsible

operator. Our focus continues to be on operating the pipeline in compliance to all applicable rules and regulations. We appreciate the opportunity to work with the UTC to identify these areas and to strengthen our operations. Targa is confident that this issue has been addressed satisfactorily and requests that no further action be needed to rectify this issue.

If you have any questions regarding this information, please contact Matthew Kolata at 253-579-1947.

Sincerely,



Vincent J. Di Cosimo  
Senior Vice President

gd

cc  
Matthew Kolata  
Tim Huffer  
Troy Goodman