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By DRW UTC Pipeline Safety Program at 2:09 pm, Jun 26, 2018

June 25, 2018

RE: 2018 Hazardous Liquid Public Awareness – Swissport Fueling, Inc, - (Insp. No. 7583)

Dear Mr. Mayo,

**Finding: Swissport's Public Awareness plan states, in section 7.0 Program Evaluation, that Swissport will contract third party, Burns and McDonnell , to conduct effectiveness evaluations every 4 years. Swissport could not provide records that this evaluation had occurred since the implementation of the plan in 2013.**

As a means of explanation for this violation, we simply were not aware of this requirement. Swissport Fueling in Seattle had a change in General Manager in 2014 and had our long-time operations manager retire last year. I know that does not excuse us from this finding in any way. I just wanted to offer that up to illustrate that this was a mere oversight and not a blatant disregard for our obligation to perform this task.

Swissport Fueling has been working with a number of internal and external entities to address the finding noted in the WUTC inspection. After exploring our options, we have secured the services of EnerTech out of Wichita, KS to assess our public awareness program effectiveness. As you may know, EnerTech is the organization that Olympic Pipeline uses to assess their public awareness program. We will have them in to perform their assessment and report their results by July 31, 2018. Once complete, we will present EnerTech's report to the WUTC inspector and if necessary, alter our program based on their recommendation. Going forward, we hope to partner with Olympic Pipeline to coordinate our public awareness assessments in an effort to take advantage of the overlap in scope between our facility and the pipeline.

Please let me know if I may provide any additional information regarding this violation or our plans to bring our program into compliance.

Sincerely,

Jay Long  
General Manager  
Swissport Fueling – SEA  
Mobile: 206-227-0337