



Prepared for Washington State Citizens Committee on Pipeline Safety

Submitted by Department of Ecology Spill Prevention, Preparedness and Response Program – Pipeline Oil Spill Contingency Plan, Drill, and GRP Updates

12/02/2020

Ecology's Spills Program is a comprehensive program for preventing, preparing and responding to oil spills in Washington State for vessels, facilities, rail, and pipelines.

Contingency Plan Review: Ecology is responsible for review and approval of pipeline oil spill contingency plans through an interagency agreement with the Utilities and Transportation Commission. Contingency plans are approved for five years.

Drills/Readiness Exercises: Ecology evaluates oil spill drills for pipelines here in Washington State. In each of the three years drill cycle, plan holders are required to have one tabletop exercise and two deployment exercises. In one of the three years each plan holder is required to hold a worst case tabletop drill. Integrated contingency plans covering multiple facilities typically have alternative drill programs. The Northwest Area Committee Exercise Schedule can be found [here](#).

Geographic Response Planning: Geographic Response Plans (GRP) are pre-identified response strategies to protect sensitive, cultural and economic resources. Ecology develops GRPs for the water bodies that pipelines cross. These plans are referenced in the plan holder's contingency plan.

Pipeline Oil Spill Contingency Plan and Drill Updates

Phillips 66 Integrated Contingency Plan Washington State

The Phillips 66 Washington State ICP includes four terminals and the portion of Yellowstone Pipeline from the Idaho border to Moses Lake. The plan received a 5-year approval on September 17, 2018. The most recent update included changes to facility diagrams, changes to the worst case planning distance, worst case and medium case discharge scenarios, and vulnerability analysis for the Moses Lake and Spokane Terminals. These changes were brought about by a review of the Facility Response Plan by US EPA, and are presently under review to determine if they affect any of Ecology's requirements.

2020 Drills:

- 6/23/2020: Equipment Deployment - Renton (Self-certified)
- 9/15,16/2020: Equipment Deployment/Table Top – Tacoma (evaluated virtually)
- 11/4/2020: Equipment Deployment – Moses Lake (Self-certified)
- 11/5/2020: Equipment Deployment - Spokane (Self-certified)

Spills: None

Tidewater Transportation & Terminals, Washington Pipeline

The Tidewater Transportation & Terminals contingency plan includes a 4.2 mile 4 inch diameter pipeline connecting their Snake River Terminal and Burlington Northern Railroad's refueling depot, and three 4903-foot 6 inch diameter pipelines connecting to the Andeavor Pasco Terminal. Their plan received 5-year approval on October 30, 2019. The most recent plan update was an annual update which included changes in QI's, change in the status of one of their terminals, and changes in their Primary Response Contractor. This update was approved on November 6, 2020.

2020 Drills:

- 08/07/2020: Tabletop and Deployment Drill, Pasco (Self-certified)
- 09/30/2020: Tabletop and Deployment Drill, Vancouver (Self-certified)

Spills: None

SeaPort Sound Terminal, LLC

SeaPort Sound Terminal is located on the Hylebos Waterway in Tacoma. The facility includes a three mile long pipeline that connects to the Olympic Pipeline at the Tacoma Station. Their plan received 5-year approval on November 24, 2015. The most recent update was an annual update which was approved on January 31, 2020. The 5-year approval has been extended until March 23, 2021, to allow time to complete updates for the first phase-in date of the new rule, along with updates for a new 5-year approval.

2020 Drills:

- 4/30/2020: Tabletop Drill, Tacoma (evaluated virtually)
- 10/6/2020: Equipment Deployment, Tacoma (evaluated virtually)
- 12/3/2020: Equipment Deployment, Tacoma

Spills: None

Andeavor Logistics Northwest Products System

The Northwest Products System contingency plan covers their pipeline from the Oregon border near Pasco to Spokane. A new plan was submitted on August 29, 2019 which changed the plan ownership and name from TLNP to Andeavor Logistics LP Northwest Products System. The plan was reviewed, made available for a 30-day public comment period, and granted a 5-year approval on February 3, 2020. There have been no changes to the plan since then.

2020 Drills:

- 05/01/2020: Incident credit in place of Tabletop Drill

- 09/23/2020: Deployment Drill, Snake River GRP (evaluated virtually)
- 09/24/2020: Deployment Drill, Walla Walla River GRP (evaluated virtually)

Spills: None

BP Pipelines (North America) Northwest Pipelines District

The BP Pipelines plan covers the 392-mile long Olympic Pipeline and the 5-mile long Cherry Point Crude Line. Their plan received 5-year approval on June 10, 2016. The most recent plan update, which was an annual update, was approved on July 23, 2020. This included updated forms, updated Field Document, changes in personnel, and a new Binding Agreement signed by a new District Operations Manager. Changes required for the first phase-in date of the new rule will be due in April, 2021 at the same time the plan must be submitted for 5-year approval. A pre-review of the plan has been completed.

2020 Drills:

- 09/02/2020: Tabletop Drill – Renton (evaluated virtually)
- 02/23/2020: Potential Incident credit
- 10/02/2020: Deployment Drill – North Puget Sound GRP

Spills: 2/23/20, gasoline spills in two locations in Woodinville and Bothell. Maintenance was being done on the Olympic pipeline causing leaks from recently installed threaded valves at both locations. The spill volume is under investigation.

Trans Mountain Pipeline (Puget Sound)

The Trans Mountain Pipeline contingency plan covers the Puget Sound portion of the Trans Mountain Pipeline from the Canadian border near Sumas to the four northern refineries. Their plan received 5-year approval on December 26, 2018. The most recent plan update, which was an annual update that included changes to their personnel and internal notification system, was approved on December 31, 2019. There have been no changes to the plan since then.

2020 Drills:

- 12/09/2020: Deployment Drill
- 12/10/2020: Deployment Drill
- 12/08/2020: Tabletop Drill – Bellingham (WC postponed till 2021, will hold small TTX)

Spills: None

U.S. Oil & Refining Company/McChord Pipeline

US Oil/McChord Pipeline's contingency plan covers the US Oil Refinery and the McChord pipeline, which runs from the Tacoma refinery to Joint Base Lewis McChord. The plan received a 5-year approval on January 15, 2016. The approval has been extended until March 24, 2021, to allow time to complete updates for the first rule phase-in date. The most recent plan update was approved on April 17, 2020. There have been no changes to the plan since then. A pre-review of the plan, in preparation for the 5-year approval, was completed on October 7, 2020.

2020 Drills:

- 07/30/2020: Deployment Drill, Tacoma (Self-certified)
- 09/23/2020: Deployment Drill, Tacoma (evaluated virtually)
- 09/23/2020: Tabletop Drill, Tacoma (evaluated virtually)

Spills: 3/18/20, asphalt spill at the US Oil rail loading yard in Tacoma. Not pipeline related. A rail tank car was overfilled with asphalt and an estimate of 250 barrels spilled to the ground. No water impacts.

Worst-Case Tabletop Drills in 2020:

- Trans Mountain Pipeline, 9/15/20: Postponed till next year due to COVID-19
- BP Pipelines NW Pipelines District, 10/7/20: Postponed till next year due to COVID-19

Rule Updates

Oil Spill Contingency Plan rule updates: 173-182 WAC (facilities, pipelines, and vessels) and 173-186 (Railroad) have been updated. Both rules became effective January 18, 2020 and require changes to contingency plans over the next 24 months. The first phase-in date occurs on January 18, 2021. The rule update effecting pipelines, 173-182 WAC, will:

- Establish requirements for review and approval of Spill Management Teams including entities providing wildlife rehabilitation and recovery services.
- Enhance requirements for readiness for spills of oils that, depending on their chemical properties, environmental factors (weathering), and method of discharge, may submerge or sink.
- Update drill requirements to reflect legislative direction.
- Update planning standards to align vessel and facility requirements and ensure best achievable protection is maintained in contingency plans.
- Enhance planning standards for oiled wildlife response.
- Make other edits to address inconsistent or unclear direction in the rule, or other administrative edits.

Ecology is in the rulemaking process to amend [Chapter 173-185 WAC, Oil Movement by Rail and Pipeline Notification](#). This chapter establishes reporting standards for facilities that receive crude oil by rail and pipelines that transport crude oil through the state. The rule also describes reporting standards for Ecology to share information with tribes, emergency responders, local

governments, and the public. The rulemaking will implement Engrossed Substitute House Bill ([ESHB\) 1578](#) and Engrossed Substitute Senate Bill (ESSB) 5579, both passed in 2019 and codified in RCW 90.56.565 and 90.56.580.

This rulemaking will:

- Expand advance notice reporting requirements for facilities that receive crude oil by rail to include type and vapor pressure of crude oil
- Expand biannual notice requirements for pipelines that transport crude oil through the state to include gravity and type of crude oil
- Describe how required information will be provided to the Utilities and Transportation Commission (UTC)
- Make other changes to clarify language and make any corrections needed

Geographic Response Plan Updates

Part of the recent updates to the Oil Spill Contingency Plan rule (WAC 173-182) will require all GRPs be updated with details about benthic and seafloor resources at risk from non-floating oil spills. Ecology will be updating all the GRPs where non-floating oils are a risk by July 2021. We are also reaching out to all plan holders to share information about the update process and next steps.

The following GRP's are presently being updated and will affect pipeline contingency plans.

- North Puget Sound (target completion 2020)
- North Central Puget Sound (target completion 2020)
- Central Puget Sound (target completion 2020)
- WRIA 7 (target completion 2020)
- Clark, Cowlitz, SW Lewis (target completion in 2021)
- Spokane River (target completion 2020)

Comments on any GRP's can be submitted to: GRPs@ecy.wa.gov

This concludes Ecology's update.