



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

03/10/2021

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. Plan holders are required to have one tabletop exercise and two deployment exercises per year within a three-year drill cycle. In one of the years, in this cycle, 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 geographic response 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 was done in response to a review of the plan by US EPA, and was approved on December 8, 2020. Plan updates have been received to comply with the 12-month phase-in of the Oil Spill Contingency Plan rule update. The plan is presently posted for public review and will be reviewed by Ecology to determine if the changes meet the new requirements.

2021 Drills:

- 05/10/2021: Equipment Deployment – Moses Lake
- 05/12/2021: Table Top – Spokane
- 05/13/2021: Equipment Deployment – Spokane
- 06/15/2021: Equipment Deployment - Renton
- 06/16/2021: Table Top – Renton
- 06/17/2021: Equipment Deployment – Tacoma

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. Plan updates have been received to comply with the 12-month phase-in of the Oil Spill Contingency Plan rule update. The plan is presently posted for public review and will be reviewed by Ecology to determine if the changes meet the new requirements.

2021 Drills:

- 08/25/2021: Equipment Deployment, Vancouver
- 09/22/2021: Equipment Deployment, Pasco
- 10/27/2021: Worst Case Tabletop, Vancouver

Spills: None

SeaPort Sound Terminal, LLC

SeaPort Sound Terminal is located on the Hylebos Waterway in Tacoma. The facility includes a 3-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. The revised plan is presently posted for public review and will be reviewed by Ecology to determine if the changes meet the new requirements. A SEPA process is presently underway for storage expansion and upgraded wastewater systems; information is available here:

<https://apps.ecology.wa.gov/separ/Main/SEPA/Record.aspx?SEPANumber=202100560>

2021 Drills:

- 05/06/2021: Tabletop, Tacoma
- //2021: Equipment Deployment, Tacoma
- //2021: 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 Tesoro Logistics Northwest Products System to Andeavor Logistics LP Northwest Products System. The plan received a 5-year approval on February 3, 2020. Plan updates have been received to comply with the 12-month phase-in of the Oil Spill Contingency Plan rule update and annual update requirements. The plan is presently posted for public review and will be reviewed by Ecology to determine if the changes meet the new requirements.

2021 Drills:

- //2021: Tabletop
- //2021: Equipment Deployment
- //2021: Equipment Deployment

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.

2021 Drills:

- //2021: Equipment Deployment –
- //2021: Equipment Deployment –
- 10/06/2021: Worst Case Tabletop – Virtual exercise

Spills: None

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. Plan updates have been received to comply with the 12-month phase-in of the Oil Spill

Contingency Plan rule update and annual update requirements. The plan is presently posted for public review and will be reviewed by Ecology to determine if the changes meet the new requirements.

2021 Drills:

- //2021: Deployment Drill
- //2021: Deployment Drill
- 09/21/2021: Worst Case Tabletop – TBD

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 April 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. A pre-review of the plan, in preparation for the 5-year approval, was completed on October 7, 2020. The revised plan containing updates to comply with the phase-in of the new rule was submitted for 5-year review on February 16, 2021, and is presently posted for public review.

2021 Drills:

- //2021: Equipment Deployment, Tacoma
- 09/23/2021: Equipment Deployment, Tacoma
- 09/23/2021: Tabletop, Tacoma

Spills: None

Worst-Case Tabletop Drills in 2021:

- Trans Mountain Pipeline, 09/21/21
- BP Pipelines NW Pipelines District, 10/06/21
- Tidewater Transportation and Terminals, 10/27/21

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 occurred 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.

Ecology has completed 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 rule adoption occurred on February 2, 2021 with an effective date of March 5, 2021. This rule 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 undergoing full updates or have recently been completed and will affect pipeline contingency plans.

- North Puget Sound (Published November 2020)
- Central Puget Sound (Published February 2021)
- WRIA 7 (target completion June 2021)
- Clark, Cowlitz, SW Lewis (target completion June 2021)

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

This concludes Ecology's update.