Memorandum

To: VaNessa Duplessie, Chair, Washington State Citizen's Committee on Pipeline Safety (CCOPS)

From: Bill Rickard, member, CCOPS

Date: 6/17/2010

Re: Pipeline Safety Awareness and the SEPA process

Kelli Gustaf (Ecology) and I updated the proposed language for promoting the awareness of pipelines in the guidance documents for the SEPA checklist[1] to include the comments from the meeting on June 10th. These new changes:

- Accepts all previous proposed language
- Change hazardous material pipelines to hazardous liquid and natural gas transmission pipelines.
- Add a footnote with the consultation zone guidance (footnote, page3).
- Add mitigation guidance. This was already in the guidance, so the existing language is now included it in the memo for the committee to review.

Please forward this proposal to the CCOPS for approval or comments. The entire original document (SEPA Guide for Project Applicants) is located at the following: http://www.ecy.wa.gov/programs/sea/sepa/apguide/apguide1.htm, web version or http://www.ecy.wa.gov/pubs/0206018.pdf, pdf version.

The following is the current guidance language in the *SEPA Guide for Project Applicants* for Section 7. Environmental Health Section a:

Environmental Health

Environmental health hazards: Describe any existing or suspected contamination at the site. Indicators of possible site contamination include some types of past uses: such as auto repair or wrecking facilities, gasoline dispensing facilities, dry cleaning, municipal dump site, radioactive waste, industrial site, log yard, agricultural uses (fertilizers and/or pesticides), etc.

Contact the Dept of Ecology's Toxic Cleanup Program staff in the local regional office or headquarters for additional information or assistance in identifying potential or verified contaminated sites, and the type of contamination likely at a site.

[1] (http://www.ecy.wa.gov/programs/sea/sepa/e-review.html

Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development and/or construction, or at any time during the operating life of the project. For example, an auto body shop is likely to use solvents and paints and produce, or generate, used cleaning solvents or paint wastes.

The use, storage, and/or transport of minor quantities of cleaning supplies, such as to maintain an office building or for residential needs may be listed as a class rather than individual products. Substances used in large quantities, such as in industrial or agricultural processes, should be identified by name.

Emergency services: Emergency services include police, fire, spill response, ambulance or aid car, etc. Include the need for specialized services and response. For example, certain types of facilities are required to acquaint fire departments with the toxic materials stored or processed on-site and the special fire-fighting needs of the site.

Mitigation: Identify mitigation for existing contamination, if any, and for possible impacts during construction and operation of the project.

For possibly contaminated sites, state whether an environmental site assessment has or will be prepared for the site (e.g. Phase I or II site investigation, remedial investigation/feasibility study, etc.). Briefly summarize any actions being taken for additional study or for development of a cleanup plan for contamination or hazardous waste. Contact Ecology's Toxic Cleanup Program and/or an environmental cleanup contractor for information on appropriate cleanup and/or containment methods. List any remedial investigation/feasibility study, federal record of decision or state cleanup action plan. For the project, list any Spill Prevention, Containment and Control Plan (SPCC) or similar environmental, health, and safety plans.

Summarize any plans to contain or address environmental impacts and potential releases in the event of an upset, scheduled or unscheduled shut down, accident or contingency occurring, or if project construction or operations are temporarily or permanently suspended. Also, for these circumstances explain any plans to bypass normal processes or controls.

Describe any measures during construction and operations to reduce or eliminate the use or production of hazardous substances.

The following is proposed guidance language *SEPA Guide for Project Applicants* for Section 7. Environmental Health section a (CCOPS suggested additions <u>underlined</u>, Ecology suggested additions <u>*underlined and in italics*</u>):

Environmental Health

Environmental health hazards: Describe any existing or suspected contamination or potential health hazard at the site, either from present or past use.

Indicators of possible site contamination include some types of past uses: such as auto repair or wrecking facilities, gasoline dispensing facilities, dry cleaning, municipal dump site, radioactive waste, industrial site, log yard, agricultural uses (fertilizers and/or pesticides), etc.

Contact the Dept of Ecology's Toxic Cleanup Program staff in the local regional office or headquarters for additional information or assistance in identifying potential or verified contaminated sites, and the type of contamination likely at a site.

Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and natural gas transmission pipelines located within the project area and within the 660 feet consultation zone[2] of the project and easements associated with the pipeline. For example, the location of a hazardous liquid or natural gas transmission pipeline(s) within 660 feet of the project site poses a potential hazard during planning, development and the operating life of a project.

Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development and/or construction, or at any time during the operating life of the project. For example, an auto body shop is likely to use solvents and paints and produce, or generate, used cleaning solvents or paint wastes.

The use, storage, and/or transport of minor quantities of cleaning supplies, such as to maintain an office building or for residential needs may be listed as a class rather than individual products. Substances used in large quantities, such as in industrial or agricultural processes, should be identified by name.

Emergency services: Emergency services include police, fire, spill response, ambulance or aid car, etc. Include the need for specialized services and response. For example, certain types of facilities are required to acquaint fire departments with the toxic materials stored or processed on-site and the special fire-fighting needs of the site.

Mitigation: Identify mitigation for existing contamination, if any, and for possible impacts during construction and operation of the project.

For possibly contaminated sites, state whether an environmental site assessment has or will be prepared for the site (e.g. Phase I or II site investigation, remedial investigation/feasibility study, etc.). Briefly summarize any actions being taken for additional study or for development of a cleanup plan for contamination or hazardous waste. Contact Ecology's Toxic Cleanup Program and/or an environmental cleanup contractor for information on appropriate cleanup and/or containment methods. List any remedial investigation/feasibility

[2] The consultation zone is 660 feet on each side of the centerline of a hazardous liquid and natural gas transmission pipeline. The zone is identified as baseline recommended practice BL-05 as developed by Pipeline Informed Planning Alliance (PIPA), under the auspices of the U.S. Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA)

study, federal record of decision or state cleanup action plan. For the project, list any Spill Prevention, Containment and Control Plan (SPCC) or similar environmental, health, and safety plans.

Summarize any plans to contain or address environmental impacts and potential releases in the event of an upset, scheduled or unscheduled shut down, accident or contingency occurring, or if project construction or operations are temporarily or permanently suspended. Also, for these circumstances explain any plans to bypass normal processes or controls.

Describe any measures during construction and operations to reduce or eliminate the use or production of hazardous substances.

In the section at the end of the guidance document is a list of contacts and phone numbers. Two entries to add (in the appropriate locations) to this section are;

Additional Resources:
National Pipeline Mapping System-Public Map Viewer
[https://www.npms.phmsa.dot.gov/]

Washington Utilities and Transportation Commission (WUTC) – Pipeline Safety Program, 360-664-1160 [http://www.wutc.wa.gov/publicsafety]