



## 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*

*12/15/2021*

### Background

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 the 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. Plan updates have been received to comply with the 12-month and 18-month phase-in of the Oil Spill Contingency Plan rule update. The plan was posted for public review for 60 days and reviewed by Ecology. It was determined that additional information was needed, so the plan was granted conditional approval on April 23. Additional updates to meet the rule requirements were submitted in July and September. The process of review and amendment continues as we work towards completing all required changes.

#### **2021 Drills:**

- 05/10/2021: Equipment Deployment – GRP deployment, Moses Lake
- 05/12, 13/2021: Equipment Deployment and Tabletop – Spokane
- 06/17/2021: Equipment Deployment and Tabletop – Renton
- 08/11/2021: Equipment Deployment, MSRC deployment
- 08/23, 24/2021: Equipment Deployment, Large scale equipment deployment, Port Angeles

*Spills: None*

### **Tidewater Transportation & Terminals, Washington Pipeline**

The Tidewater Transportation & Terminals contingency plan includes a 4.2-mile long, 4-inch diameter pipeline connecting their Snake River Terminal and Burlington Northern Railroad's refueling depot, and three 4903-foot long, 6-inch diameter pipelines connecting to the Andeavor Pasco Terminal. Their plan received 5-year approval on October 30, 2019. Plan updates have been received to comply with the 12-month and 18-month phase-in of the Oil Spill Contingency Plan rule update. The plan was posted for public review for 60 days and reviewed by Ecology. It was determined that additional information was needed, so the plan was granted conditional approval on April 23, allowing for additional time to complete the required changes. Additional updates to meet the rule requirements were submitted in July, September, and October. The plan underwent a final public comment period in November. The plan remains in conditional approval while the final review of updates is being completed. Tidewater recently completed their tri-annual Worst Case Drill, which may require additional plan updates based on lessons learned from the drill.

#### **2021 Drills:**

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

*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 5-year approval has been extended, to allow time to complete updates for the first phase-in date of the Oil Spill Contingency Plan rule, along with updates for a new 5-year approval. Plan updates have been received to comply with the 12-month phase-in of the new rule. The plan was posted for public review for 60 days and reviewed by Ecology. It was determined that additional information was needed, so the plan was granted conditional approval on April 23, allowing for additional time to complete the required changes. Plan updates were submitted in June, but the second public comment period in August identified that another update was needed to the plan. That final update is pending; in the meantime, the plan remains in Conditional Approval status.

#### **2021 Drills:**

- 04/30/2021: Equipment Deployment, Government Initiated Unannounced Exercise
- 05/06/2021: Tabletop, Tacoma

- 08/11/2021: Equipment Deployment, MSRC deployment
- 08/23, 24/2021: Equipment Deployment, Large scale equipment deployment, Port Angeles

**Spills:** None

### **Andeavor Logistics Northwest Products System**

The Northwest Products System contingency plan covers the Andeavor Logistics pipeline from the Oregon border near Pasco to Spokane. The plan received a 5-year approval on February 3, 2020. The plan was updated with information required to comply with the 12-month and 18-month phase-in of the Oil Spill Contingency Plan rule and annual update requirements. After being posted for public review twice and completing the review process the updated plan was approved on September 3, 2021.

#### **2021 Drills:**

- 07/28/2021: Tabletop, Spokane
- 07/28/2021: Equipment Deployment, GRP deployment, Spokane
- 09/08/2021: Equipment Deployment, Pasco

**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 Pipeline. Their plan received 5-year approval on June 10, 2016. A revised plan was received on April 6, 2021 and put up for a 60-day public review on April 15<sup>th</sup>. This plan included changes required for the first and second phase-in dates of the new rule as well as updates necessary for the 5-year approval. It was determined that additional information was needed, so the plan was granted conditional approval on June 9<sup>th</sup>, allowing for additional time to complete the required changes. Plan updates were received on August 9<sup>th</sup> and October 20<sup>th</sup> and were reviewed and deemed complete. The plan is presently posted for the final public review period which ends on December 17<sup>th</sup>.

#### **2021 Drills:**

- 04/30/2021: Equipment Deployment – Unannounced notification drill
- 08/11/2021: Equipment Deployment, MSRC deployment
- 08/23, 24/2021: Equipment Deployment, Large scale equipment deployment, Port Angeles
- 09/14/2021: Equipment Deployment – GRP deployment, Kent
- 10/06/2021: Worst Case Tabletop – Virtual exercise

**Spills:** 11/16/21, 3-gallon gasoline spill to containment. The spill occurred due to a gasket failure at the Olympic Pipeline facility within the Phillips 66 Ferndale Refinery.

*The investigation and enforcement action is pending for the two spills which occurred in February 2020.*

### **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 three of the four northern refineries. Their plan received 5-year approval on December 26, 2018. The plan was updated with information required to comply with the 12-month and 18-month phase-in of the Oil Spill Contingency Plan rule and annual update requirements. After being posted for public review twice and completing the review process the updated plan was approved on October 26, 2021.

#### **2021 Drills:**

- 08/23, 24/2021: Deployment Drill, Large scale equipment deployment, Port Angeles
- 11/02/2021: Deployment Drill, GRP Deployment, Bellingham
- 09/22/2021: Worst Case Tabletop – Virtual exercise

**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 connects the Tacoma refinery to Joint Base Lewis McChord. The plan was updated with information required to comply with the 12-month and 18-month phase-in of the Oil Spill Contingency Plan rule and updates for a new 5-year approval. After being posted for public review twice and completing the review process the updated plan was approved on October 4, 2021.

#### **2021 Drills:**

- 08/11/2021: Equipment Deployment, MSRC deployment
- 08/23, 24/2021: Equipment Deployment, Large scale equipment deployment, Port Angeles
- 09/23/2021: Equipment Deployment, Tacoma
- 09/23/2021: Tabletop, Tacoma

**Spills:** None

#### **Worst-Case Tabletop Drills in 2021:**

- Trans Mountain Pipeline, 09/22/21
- BP Pipelines NW Pipelines District, 10/06/21
- Tidewater Transportation and Terminals, 10/27/21

### **Rule Updates**

Oil Spill Contingency Plan rule updates: WAC 173-182 (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 and second phase-in dates occurred on January 18 and July 18, 2021. The final plan update is due on January 18, 2022. The rule update effecting pipelines, WAC 173-182, 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.

## Geographic Response Plan Updates

Part of the recent updates to the Oil Spill Contingency Plan rule (WAC 173-182) required all GRPs to be updated with details about benthic and seafloor resources at risk from non-floating oil spills. These updates were completed in July. All plan holders are now aware of the updates and are incorporating the updates into their contingency plans.

The following GRP's are presently undergoing full updates, and will affect pipeline contingency plans:

- Lake Washington
- Lower Columbia River
- WRIA 7
- Clark, Cowlitz, SW Lewis

Comments on any GRP's can be submitted to [GRPs@ecy.wa.gov](mailto:GRPs@ecy.wa.gov)

**This concludes Ecology's update.**