



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

03/16/2022

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, 18, and 24-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, 2021. Additional updates to meet the rule requirements were submitted in July and September, 2021 and February, 2022. The process of review and amendment continues as we work towards completing all required changes.

2022 Drills:

- 07/14/2022: Equipment Deployment, Tacoma
- 07/20/2022: Equipment Deployment and Tabletop, Renton
- 07/21/2022: Equipment Deployment, Tacoma
- 08/04/2022: Worst Case Tabletop, Spokane

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, 2021 allowing for additional time to complete the required changes. Additional plan changes to meet the rule requirements were submitted in July, September, and October, 2021. The plan underwent a final public comment period in November. Tidewater completed their tri-annual Worst Case Drill in October, which required additional plan updates based on lessons learned from the drill, followed by additional updates to reflect staff turnover. The plan remains in conditional approval while the final review of updates is being completed.

2022 Drills:

- 08/25/2022: Equipment Deployment, Vancouver
- 09/22/2022: Equipment Deployment, Pasco
- //2022: Tabletop Drill

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 a new 5-year approval on February 14, 2022, after being in Conditional Approval since April 23, 2021. In the interim, SeaPort updated their plan to comply with the 12, 18, and 24 month phase-in requirements, as well as clarifying the shared staffing agreement between the Tacoma terminal and other TLP terminals in Seattle and Portland.

2022 Drills:

- 04/06/2022: Equipment Deployment, Tacoma
- 06/16/2022: Worst Case Tabletop, Tacoma
- //2022: Equipment Deployment

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 has been updated with information required to comply with the 12, 18, and 24-month phase-in of the Oil Spill Contingency Plan rule and annual update requirements. The 12 and 18-month updates were approved on September 3, 2021 and the 24-month update/annual update was approved February 3, 2022.

2022 Drills:

- //2022: Equipment Deployment
- //2022: Equipment Deployment
- 10/27/2022: Worst Case Tabletop Drill, 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. The last 5-year approval expired on June 10, 2021. A revised plan was received on April 6, 2021 and put up for a 60-day public review on April 15th. This plan included changes required for the 12 and 18-month phase-in dates of the new rule as well as updates necessary for the 5-year approval. Additional information was needed, so the plan was granted conditional approval on June 9th, allowing for additional time to complete the required changes. Plan updates were received on August 9th, October 20th, and January 27th, and were reviewed and deemed complete. The plan was posted for a final public comment period in November and granted final approval for all rule updates and a new 5-year approval on February 14, 2022.

2022 Drills:

- 06/07/2022: Equipment Deployment
- 06/22/2022: Equipment Deployment, Large scale
- 07/27/2022: Tabletop, Renton

Spills: *The investigation and enforcement action for the two gasoline spills which occurred in February 2020 is complete. The two incidents were the result of maintenance operations in which BP inadequately tightened fittings and failed to perform a leak check post-installation at normal operating pressure. After the leaks were discovered, BP did not complete a site safety assessment before entry, as detailed in its oil spill contingency plan. BP also failed to provide timely notification of the spill to water. A total of approximately 67.4 gallons of gasoline impacted waters of the state.*

Based on the findings, The Washington Department of Ecology is penalizing British Petroleum (BP) \$100,000 for one of the spills, which impacted waters of the state. The other spill did not reach waters of the state. BP has accepted and paid the penalty.

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 has been updated with information required to comply with the 12, 18, and 24-month phase-in of the Oil Spill Contingency Plan rule and annual update requirements. The 12 and 18-month updates were approved on October 26, 2021 and the 24-month update/annual update was approved February 18, 2022.

2022 Drills:

- 04/27/2022: Deployment Drill, GRP Deployment
- //2022: Deployment Drill
- //2022: Tabletop Drill

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 and 18-month phase-ins 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 received a new 5-year approval on October 4, 2021. The plan was recently updated for the 24-month phase-in requirement, and was approved on February 7, 2022.

2022 Drills:

- //2022: Equipment Deployment
- //2022: Equipment Deployment
- 09/21/2022: Worst Case Tabletop Drill, Tacoma

Spills: None

Worst-Case Tabletop Drills in 2022:

- Phillips 66 ICP, 08/04/22
- US Oil/McChord Pipeline, 09/21/22
- Andeavor Logistics NW Products System, 10/27/22

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 required 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 was due on January 18, 2022. The rule update effecting pipelines, WAC 173-182, required:

- The review and approval of Spill Management Teams including entities providing wildlife rehabilitation and recovery services.
- Readiness for spills of oils that, depending on their chemical properties, environmental factors (weathering), and method of discharge, may submerge or sink.
- Updated drill requirements to reflect legislative direction.
- Updated planning standards to align vessel and facility requirements and ensure best achievable protection is maintained in contingency plans.
- Enhanced 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, 2021. All plan holders are now aware of the updates and have incorporated them 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 (will be renamed Snohomish Basin)
- Clark, Cowlitz, SW Lewis

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

This concludes Ecology's update.