## 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

#### 12/07/2022

Background

Ecology’s Spills Program is a comprehensive program for preventing, preparing for, 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, such as Phillips 66 and Tidewater, cover multiple facilities and typically have alternative drill programs where they will hold more than 3 drills per year. The Northwest Area Committee Exercise Schedule can be found [here](https://apps.ecology.wa.gov/naces/).

**Geographic Response Planning**: Geographic Response Plans (GRP) contain pre-identified response strategies to protect sensitive natural, cultural, and economic resources. Ecology develops GRPs for the water bodies that pipelines cross. These geographic response plans are referenced in industry contingency plans, and can be viewed [here](https://www.oilspills101.wa.gov/northwest-area-contingency-plan/geographic-response-plans-grps/list-of-geographic-response-plans/).

## 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’s 5-year approval expires on September 17, 2023. 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, with the final update being approved on July 7, 2022.

***2022 Drills:***

* 05/11/2022: Tabletop Drill, Moses Lake
* 05/12/2022: Equipment Deployment, Moses Lake
* 07/08/2022: Equipment Deployment, Spokane
* 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 4,903-foot long, 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 included changes to internal and external notifications and updates to the list of Qualified Individuals, and was approved on November 4, 2022.

***2022 Drills:***

* 05/11/2022: Equipment Deployment and Tabletop, Pasco
* 09/27/2022: Equipment Deployment and 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 a new 5-year approval on February 14, 2022, which included updates for the 12, 18, and 24-month rule phase-in requirements. The most recent plan update consisted of updates to the notification list in the plan and in the Emergency Response Action Plan. This update was approved on September 16, 2022.

***2022 Drills:***

* 04/06/2022: Equipment Deployment, Tacoma
* 06/16/2022: Worst Case Tabletop, Tacoma
* 11/03/2022: Equipment Deployment, Tacoma

***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 most recent plan update was an interim update due to a change in one of the qualified individuals and changes to names and phone numbers of members of the incident management team. This update was approved on April 26, 2022.

***2022 Drills:***

* 06/29/2022: Equipment Deployment, Spokane, GRP
* 11/08/2022: Equipment Deployment, Pasco
* 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 plan’s 5-year approval expires on June 9, 2026. 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, with the final update being approved on February 14, 2022.

***2022 Drills:***

* 06/07/2022: Equipment Deployment, GRP, Renton
* 06/22/2022: Equipment Deployment, Large scale
* 08/11/2022: Tabletop Drill, Castle Rock
* 10/13/2022: Equipment Deployment, Arlington

***Spills:*** *8/05/22, diesel/jet fuel spill into a containment vault at Allen Station. The source was a 20” control valve on the pipeline, with the suspected cause being compromised O rings. Olympic determined the volume to be 443 gallons. The vault was emptied and cleaned. No oil spilled outside of containment.*

*9/24/22, gasoline spill into a containment vault at Renton Terminal. The source was a pump connected to the 14” pipeline, and the cause being a seal failure. Olympic determined the volume spilled to be 10 gallons. The vault was emptied and cleaned. No oil spilled outside of containment.*

**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’s 5-year approval expires on December 26, 2023. The most recent update was an interim plan update which included a change in one of the qualified individuals and updates based on lessons learned from their last worst-case drill. This update was approved on June 14, 2022.

***2022 Drills:***

* 04/27/2022: Deployment Drill, GRP Deployment
* 12/14/2022: Deployment Drill, GRP Deployment
* 11/30/2022: Tabletop Drill, Bellingham

***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. Their plan received 5-year approval on October 4, 2021. The most recent update was an interim plan update due to personnel changes in their Spill Management Team. This update was approved on June 24, 2022.

***2022 Drills:***

* 02/28/2022: Equipment Deployment, Tacoma, Land spill
* 11/15/2022: Equipment Deployment, Tacoma
* 09/21/2022: Worst Case Tabletop Drill, Tacoma

***Spills****: No pipeline spills*

**Worst-Case Tabletop Drills in 2022:**

* SeaPort Sound Terminal, 06/16/22 (Virtual exercise)
* Phillips 66 ICP, 08/04/22 (In person, Spokane)
* US Oil/McChord Pipeline, 09/21/22 (In person, Tacoma)
* Andeavor Logistics NW Products System, 10/27/22 (In person, Pasco)

Rule Updates

Oil Spill Contingency Plan rule update: WAC 173-182 (facilities, pipelines, and vessels) was updated in 2020 and the required 12, 18, and 24-month phase-in periods for contingency plan updates have occurred. All pipeline plans were updated appropriately and approved.

Geographic Response Plan Updates

Part of the 2020 updates to the Oil Spill Contingency Plan rule (WAC 173-182) required all GRPs to be updated with details about water column and seafloor resources at risk from non-floating oil spills. These updates were completed in July 2021. All plan holders have incorporated these 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 (Snohomish, Skykomish Rivers)
* Clark, Cowlitz, SW Lewis
* South Puget Sound

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

**This concludes Ecology’s update.**