

Oulwa Research Studio

Conclusions

In conclusion, Oulwa Research Group supports the activity and efforts by the Department and appreciates the opportunity to provide these comments. We look forward to working cooperatively with the Washington State Department of Ecology and other stakeholders to support pollution prevention efforts.

Project Title: Tesoro Logistics - Port Angeles Terminal - Prevention Plan - Formal public comment period

Year: February 22, 2023 1:00 P.M. EST

Site Conditions: Unavoidable Activities

Company: Oulwa Research Studio

Public Notice Date: January 25, 2023 **Comment Period Ends:** February 24, 2023

This integrated Spill Prevention, Control, and Countermeasures (SPCC) Plan and Oil Spill Prevention (OSP) Plan describes the procedures and technologies in place at the Tesoro Port Angeles Terminal to prevent and minimize the occurrence and consequences of oil spills. The Plan was prepared to fulfill federal and State of Washington requirements set forth in Title 40 of the Code of Federal Regulations Part 112 (40 CFR 112) and State of Washington Administrative Code (WAC) 173-180. The Port Angeles Terminal is located between the Strait of Juan de Fuca and the Port Angeles Harbor, approximately 1.83 miles northwest of Port Angeles, at North Latitude 48° 08' 13.83" and West Longitude 123° 27' 43.44". The Port Angeles Terminal occupies approximately 2 acres of land leased from McKinley Paper Company (McKinley) in Clallam County at 1720 Ediz Hook Road, Port Angeles, Washington. Marine loading and unloading operations occur at the Port Angeles Terminal's dock facility that is located in Port Angeles Harbor at North Latitude 48° 08' 12" and West Longitude 123° 27' 43". The purpose of this SPCC/OSP Plan is to present a comprehensive federal/state spill prevention program that minimizes the potential for a discharge. The Port Angeles Terminal was constructed between 1983 and 1984 and has been in operation since 1985 as a bulk petroleum storage facility. As defined in Part 112.2 of the SPCC Rule, the Port Angeles Terminal is a complex facility subject to oversight by more than one federal agency.

The Port Angeles Terminal operates under McKinley's National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater General Permit issued by the State of Washington. Spill prevention and contingency plans are required by the U.S. Environmental Protection Agency (EPA), U.S. Coast Guard, and Washington State Department of Ecology (Ecology) regulations in the form of SPCC Plans (40 CFR 112), a Facility Oil Handling Plan (33 CFR 154 and 156), and Spill Prevention Plans (WAC 173-180), respectively. Facility Oil Spill Response Plans (OSRPs) are required by the State of Washington (WAC 173-182) and have been required by the U.S. Coast Guard (33 CFR 154) and EPA (40 CFR 112), as mandated by the Oil Pollution Act of 1990, since February 18, 1993.

The Code of Federal Regulations requires owners or operators of facilities to review and evaluate their SPCC Plan at least every 5 years starting from the date the plan was implemented. This is to determine if any new, more effective spill prevention and control technology exists that could improve the Terminal's SPCC/OSP Plan. If, after the review, it is determined that new, more effective spill prevention and control technology exists, it must be



incorporated into the SPCC/OSP Plan, and the Plan must be amended and certified by a registered engineer.

A single spill at the Port Angeles Terminal occurred in 2015. On March 30, 2015, a release of 209 bbl of diesel occurred within the Tank Farm Dike #1 from Tank 1802 piping. A small nipple with a pressure gauge under a section of insulated piping was corroded, which allowed diesel to drain from the piping. The diesel drained to the oil water separator and was subsequently transferred to McKinley Facility wastewater treatment plant due to failure of the hydrocarbon spring loaded actuator valve. The spill was reported to Ecology and EPA by McKinley. The corroded piping was replaced without insulation to facilitate visual inspections, and a new hydrocarbon sensing unit was installed in the oil water separator in July 2016. A new solenoid shutoff valve was added to the system in December 2016. The spill, reporting, and corrective actions are documented in Table 3-1, per WAC 173-182-264.

No reportable discharges have occurred at the Port Angeles Terminal during the last 5 years.

The maximum quantity of product that could be discharged is based upon the capacity of the largest storage tank (Tank 80001), which is approximately 3,326,610 gallons (79,205 bbl). However, a spill of this magnitude is not likely, as it would have to be the result of a catastrophic failure.

The rate of flow would vary depending upon the location and character of the tank leak or failure. If this tank were to fail, the dike walls would contain the released product. Spilled product would drain to the low point of the containment area and would be contained by the closed position of the dike drain valve. Spilled product would be removed by a vacuum truck and transferred to another tank for recovery on site.

For the purposes of this Plan, the pipelines have been divided into two categories in accordance with the definitions provided in WAC 173-180: 1. "Process pipelines" means a pipeline used to carry oil within the oil processing units, process unit to tankage piping, and tankage interconnecting piping. This is the majority of the piping at the Terminal and can be referred to as "process piping" or simply "piping." "Transfer pipeline" is a buried or aboveground pipeline used to carry oil to or from a tank vessel or transmission pipeline, or to a vessel and the first valve inside secondary containment at the facility, provided that any discharge on the facility side of that first valve will not directly impact waters of the State. The Port Angeles Terminal operates transfer pipelines between the Terminal Dock and the Tank Farm. NM J\\\N

Comments,

No further questions we look forward to the next review.



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Signed,

February 22, 2023 10:30 A.M. E.S.T

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