



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000
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February 9, 2021

Amie Blystone
Phillips 66 Ferndale Refinery
3901 Unick Road
Ferndale, WA 98248

RE: Coastal Zone Consistency Letter Correction for Corps Reference #NWS-2015-1061,
Phillips 66 Ferndale Refinery Dock Maintenance and Pile Replacement 2021-2026
Project, Ferndale, Whatcom County, Washington

Dear Amie Blystone:

On January 21, 2021, the Department of Ecology issued a Coastal Zone Management Consistency decision for the above project. In the letter, we inadvertently listed the project location as 1051 Hilton Avenue, in Bellingham, Washington. The correct project location is 3901 Unick Road, in Ferndale, Washington. Please accept this letter as a correction to our decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Burcar".

Joe Burcar, Section Manager
Northwest Regional Office, Shorelands and Environmental Assistance Program

Sent by electronic mail: Amie.Blystone@p66.com

e-cc: Randel Perry, U.S. Army Corps of Engineers
Chase Carter, VECA Professional Services
Lovel Pratt, Friends of the San Juans
ecyrefedpermits@ecy.wa.gov
Loree' Randall, Ecology
Chad Yunge, Ecology



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January 21, 2021

Amie Blystone
Phillips 66 Ferndale Refinery
3901 Unick Road
Ferndale, WA 98248

RE: Coastal Zone Consistency for Corps Reference #NWS-2015-1061,
Phillips 66 Ferndale Refinery Dock Maintenance and Pile Replacement 2021-2026
Project, Ferndale, Whatcom County, Washington

Dear Amie Blystone:

On November 4, 2020, the Department of Ecology received a Certification of Consistency with the Washington State Coastal Zone Management Program (WCZMP) for the above project. Ecology is concurring with the project as described below.

This decision is for the ongoing program of maintenance, repair, and replacement as follows:

- Piling Replacement – Piles (up to 40 per year) would be replaced in-kind, except for deteriorated creosote wooden causeway piling which would be replaced with 20-inch coated steel piles. The 24" diameter octagonal concrete pierhead piles would be replaced in kind, as needed. Proofing of new piles would be accomplished via pull test of a representative installed sample.
- Piling Repair – Work would involve replacement of pile tops and pile caps. New pile cap covers would typically be galvanized steel; some pile top repairs may be steel and/or wood. The new timber pile caps and pile tops would typically be treated with Chemonite or other (agency-approved) material. Some of the existing piles that show signs of deterioration may be repaired using a protective wrapping system (Seashield, or equal), and/or steel sleeves.
- Structural Repairs – Work would include replacement of cathodic anode protection; repair or replacement of wooden causeway bracing, brackets, roadway support beams, and roadway; repair or replacement of dock components including the dolphins and capstans; securing loose timbers, replacement of missing or damaged timbers, and replacement of damaged chain with new galvanized chain; repairing, reattaching, or replacement of missing or damaged slide plates at the breasting dolphins; repairing, reattaching, or replacement of missing or damaged components at fender systems; replacement of damaged steel and rubber fenders; repair or replacement of decks,

surfaces, handrails, platforms, gangways, support beams, fendering systems, etc.: and repair or replacement of building components including roofing, siding, walls, heating equipment, etc.

- Concrete Repair - Work also involves repairing spalled and/or cracked concrete for concrete dock components, piles, and pile caps. The deteriorated and/or damaged concrete would be prepared and then repaired with a specialty epoxy, concrete, or other comparable material. Repair of concrete piles would be conducted within forms, and secondary containment would be used to prevent any spillage into the water.
- Boat Ramp Maintenance - Periodically, the refinery's boat launch facility requires rail and pile support structure maintenance. Repair or replacement of the boat launch steel, concrete, and wood components are similar to the dock repair activities.
- Causeway Improvements –The scope of this work includes replacing the timber roadway with a concrete deck and removing 677, 12-inch steel and wood piles and replacing them with 196 epoxy coated 20-inch steel piles. For each new bent - beginning at Bent 9.5 and ending at Bent 124.5 - five steel piles would be installed. The steel pipe piles would be driven through an opening cut in the timber decking and inserted between the existing timber beams. Concrete would be placed in the steel piles, extending to the mudline. After the pile caps are in place, the timber decking would be replaced with precast concrete channel beams.

All of the work and activities identified above will be conducted at the project location: 1051 Hilton Avenue, in Bellingham, Washington, in Whatcom County.

Pursuant to Section 307(c)(3) of the Coastal Zone Management Act of 1972 as amended, Ecology concurs with Phillips 66 Ferndale Refinery's determination that the proposed work is consistent with the WCZMP. This concurrence is given with the understanding that the project will be limited to the maintenance and pile replacement activities described above and in accordance with the Revised Exemption from the Shoreline Management Program Substantial Development Permit Requirement, #SHX2017-00130, issued by Whatcom County Planning & Development Services, revised August 19, 2019 (see attachment).

Prior to construction, if the project should change significantly, thus triggering any of the enforceable policies of the WCZMP, pursuant to 15 CFR §930.66, the applicant must submit supplemental information to Ecology for review and approval.

If you have any questions regarding Ecology's consistency decision please contact Rebekah Padgett at (425) 649-7129.

YOUR RIGHT TO APPEAL

You have a right to appeal this decision to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this decision. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do all of the following within 30 days of the date of receipt of this decision:

- File your appeal and a copy of this decision with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this decision on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel RD SW STE 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

Sincerely,



Joe Burcar, Section Manager
Northwest Regional Office, Shorelands and Environmental Assistance Program

Sent by electronic mail: Amie.Blystone@p66.com

Attachment

e-cc: Randel Perry, U.S. Army Corps of Engineers
Chase Carter, VECA Professional Services
Lovel Pratt, Friends of the San Juans
ecyrefedpermits@ecy.wa.gov
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