



BP Cherry Point Refinery
4519 Grandview Road
Blaine, Washington 98230
Telephone 360 371-1500

March 30, 2022

Greg Gould
Industrial Section
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Re: Oily Water Sewer Annual Progress Report for the BP Cherry Point Refinery per Agreed Order 16296.

Dear Mr Gould:

This letter serves to communicate an update regarding BP Cherry Point's Oily Water Sewer Inspection and Response Plan relating to the 2021 inspection activities.

Sewer Inspection and Integrity Assessment: Sections of the oily water sewer identified in the 2021 scope were isolated and cleaned by hydraulic jetting until all surfaces of the pipe were visible for the camera inspection. Camera inspection was performed on the entirety of the main trunk line, two Reformer Unit tertiary lines and parts of two Coker Unit tertiary lines. Deviations from the planned 2021 work scope are covered in more detail in the section "*Deviation from the Investigation and Response Plan*" below.

The cleaned sections were inspected using an inspection camera in general accordance with NASSCO guidelines by the contractor's certified sewer inspection technician. The camera inspection report was reviewed to identify any irregularities that would indicate a potential release. A recording of the camera inspection has been kept.

Findings of Sewer Assessment: All inspected lines were intact and no evidence of releases or threatened releases were observed. In general, all sections of inspected pipe were in good repair, with no observed damage or degradation. No actions were taken or repairs to the system were planned based on the results of these inspections. No corrective actions or interim measures were taken to remediate soil or groundwater.

Nature and Extent of Releases and Corrective Actions Taken: No releases or potential for release were observed in the inspected lines. No corrective actions were taken, nor any interim measures put in place.

Deviations From the Investigation and Response Plan: Due to pipe diameter and baffle design, one Coker tertiary line contained sections of inaccessible pipe. This line runs from manholes 40-29 to 40-82. A smaller and more suitable camera will be purchased and inspection of this section of tertiary Coker oily water sewer line will be inspected at the next available interval and results included in a future Annual Progress Report.

The #1 Diesel line running from manhole 40-14 to 40-18 was identified as part of the 2021 inspection scope, but was cleaned and inspected in 2020 as part of BP's voluntary oily water sewer inspection program. This line was not re-inspected as part of the 2021 work. This section of oily water sewer line will be inspected as part of the 2025 inspection work which includes nearby lines. Results of this inspection will be included in a future Annual Progress Report.

No areas previously determined to be inaccessible were inspected as part of the 2021 plan.

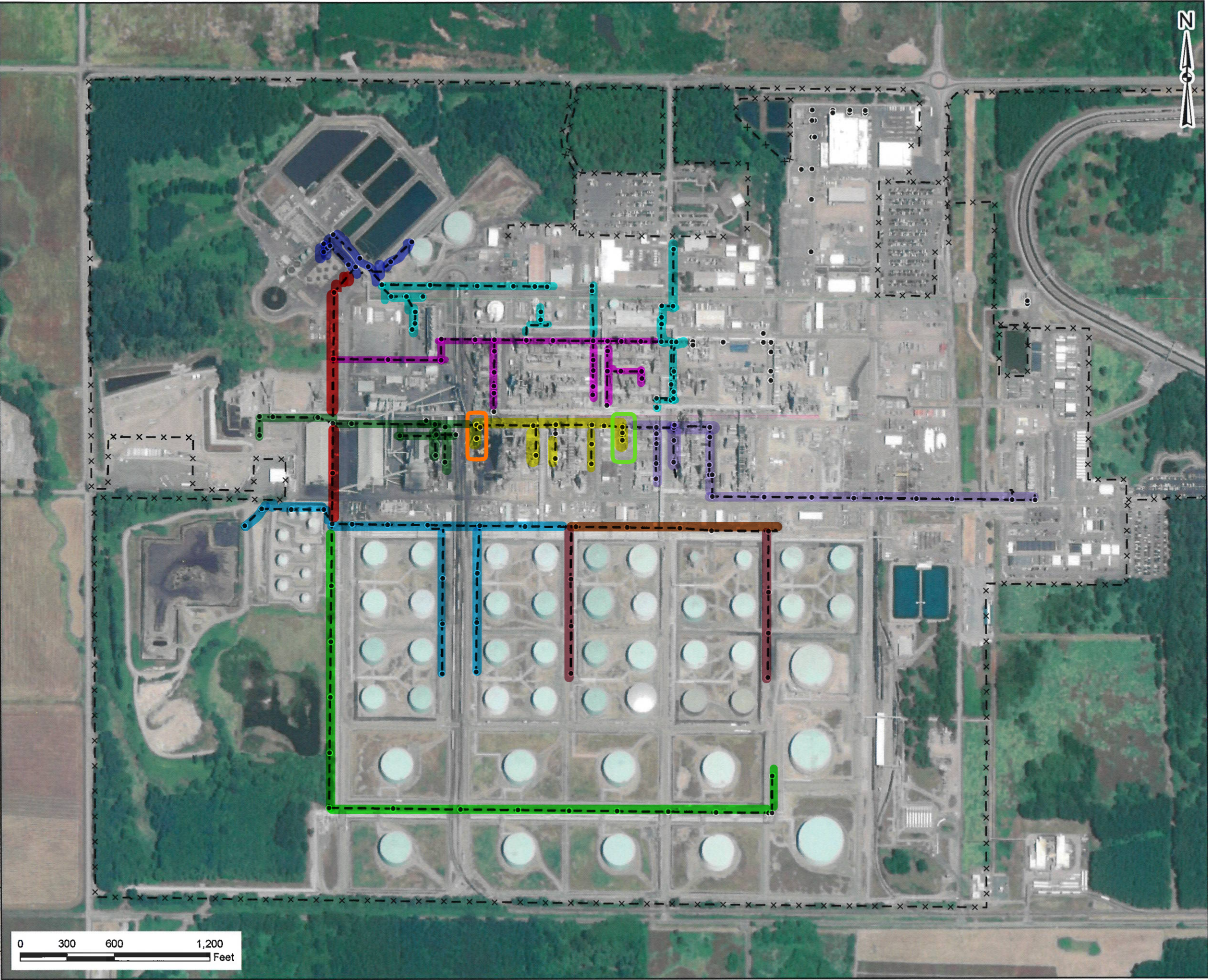
Please contact Rikki Larson at (360) 296-4283 if you have any questions regarding this submittal.

Regards,

A handwritten signature in black ink, appearing to read "Ken Taylor".

Ken Taylor
Environmental Superintendent
BP Cherry Point Refinery

attachments



Legend

- Oily Water Sewer Manholes
- - Oily Water Sewer Piping (Main Trunk Lines)
- x - Fenceline

- 2021 - Yellow
- 2022 - Green
- 2023 - Red
- 2024 - Blue
- 2025 - Purple
- 2026 - Magenta
- 2027 - Turquoise
- 2028 - Brown
- 2029 - Light Blue
- 2030 - Lime green

Coker tertiary line from manhole 40-29 to 40-82

#1 Diesel line from manhole 40-14 to 40-18



Oily Water Sewer - Main Trunk Lines
 BP Cherry Point
 Ferndale, Washington