



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

March 19th, 2024

Liem Nguyen
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. Nguyen:

This letter serves to communicate an update regarding BP Cherry Point's Oily Water Sewer Inspection relating to the 2023 inspection activities.

As noted in the 2022 Oily Water Sewer (OWS) Annual Progress Report cover letter, staged cranes and other heavy equipment for a nearby project prevented inspection activities in the sewers identified on bp Cherry Point's 10 year sewer inspection plan for the 2022 inspection year. This equipment was removed and the portions of the OWS identified for inspection in 2022 that were previously deferred were inspected in 2023. The descriptions, findings and actions are included in this submittal.

In addition to the 2023 inspection scope, a section of pipe from manhole 40-32 to 40-34 was also inspected. The descriptions, findings and actions are included in this submittal.

A map showing inspected sections for the years 2021, 2022 and 2023, as well as the remaining section to be inspected is included as Attachment A.

Sections of the oily water sewer were isolated in preparation for inspection. Pipes were cleaned by hydraulic jetting as needed until all surfaces of the pipe were visible for the camera inspection. Manholes were cleaned by fire water washing and vacuumed until all surfaces were visible for the camera inspection.

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

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

Regards,

A handwritten signature in blue ink that reads "Rikki Larson".

Erika (Rikki) Larson
Environmental Advisor
BP Cherry Point Refinery

Confidential



2023 OILY WATER SEWER SUMMARY REPORT

**BP Cherry Point Refinery
Blaine, WA**

March 2024

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Overview

As noted in the 2022 Oily Water Sewer (OWS) Annual Progress Report cover letter, staged cranes and other heavy equipment for a nearby project prevented inspection activities in the sewers identified on bp Cherry Point's 10 year sewer inspection plan for the 2022 inspection year.

This equipment was removed and the portions of the OWS identified for inspection in 2022 that were previously deferred were inspected as part of the 2023 work. The descriptions, findings and actions are included in this submittal.

In addition to the 2023 inspection scope, a 3' section of pipe between manhole 40-32 and manhole 40-34, was also inspected. The descriptions, findings and actions are included in this submittal.

Overall, inspected lines and manholes (MH) were intact and no evidence of releases or threatened releases were observed. The bulk of these inspected lines and manholes were in good repair, with little observed damage or degradation.

A map showing inspected sections is provided as *Attachment A*. Details regarding specific findings, actions and deviations are listed below.

Inspection Activity #1; MH 40-35

Description:

Manhole 40-35 is an epoxy lined concrete structure located on 10th street, just north of the calciner coke barns. It has one inlet and one outlet pipe, each 30" in diameter.

Prior to inspection the manhole was isolated and cleaned by fire water washing, then vacuumed until the surfaces of the manhole were visible for the camera inspection.

Findings of Sewer Assessment:

The camera operator observed that there was an accumulation of debris, including rocks and gravel, obscuring a complete view of the bottom of the vault. It was also noted that the cable lifting loops used during installation were visible. This is a common observation in manholes as they are permanent features of the concrete structure and are used during installation.

Nature and Extent of Releases and Corrective Actions Taken:

No releases were observed and no immediate remediation efforts were undertaken. This manhole is part of a sealed sewer system and is designed with a sump and water seal. As such, erosion from falling liquid is not a concern.

Although there are no structural concerns nor evidence of a release or threatened release observed, because the bottom of the manhole was not completely visible to the camera operator, this manhole will be reinspected at a future date. Results of that inspection, when complete, will be included in the Oily Water Sewer Summary Report.

Inspection Activity #2; MH 40-36

Description:

Manhole 40-36 is an epoxy lined concrete structure located on the northeast corner of calciner coke barn #2, just west of the intersection of 10th Street and Avenue D. It has three inlet pipes, two are 12" and one is 30".

Prior to inspection the manhole was isolated and cleaned by fire water washing, then vacuumed until the surfaces of the manhole were visible for the camera inspection.

Findings of Sewer Assessment:

The camera operator observed that there was approximately 6" of water in the bottom of this manhole, which prevented the inspection of the bottom-most portion. The portion of the manhole visible from the top down to the water line near the bottom is epoxy lined and appeared in good repair, without defects or missing sections of liner.

Nature and Extent of Releases and Corrective Actions Taken:

No releases were observed and no immediate remediation efforts were undertaken.

Although there are no structural concerns or evidence of a release or threatened release observed, because the bottom of the manhole was not completely visible to the camera operator, it will be reinspected at a future date. Results of that inspection, when complete, will be included in the Oily Water Sewer Summary Report.

Inspection Activity #3; MH 40-78 to MH 40-36

Description:

The section of sewer that runs from MH 40-78 to MH 40-36 is 12" diameter unlined concrete pipe approximately 91' in length.

Prior to inspection all sections of pipe were isolated and cleaned by hydraulic jetting until the pipe surfaces were visible for the camera inspection.

Findings of Sewer Assessment:

The camera operator observed a circumferential crack at a pipe joint approximately 76' south/south east of MH 40-78. There was evidence of groundwater intrusion by staining, but no active water inflow at the time of inspection.

Nature and Extent of Releases and Corrective Actions Taken:

No releases were observed and no immediate remediation efforts were undertaken.

This line service is considered low-risk and conveys mainly seasonal rainwater runoff from areas outside of unit boundaries on the west side of the refinery. Runoff from the fire training grounds are also captured in this sewer system.

Although there are no structural concerns or evidence of a release or threatened release observed, it is recommended that this section of sewer pipe is relined to strengthen it because this section is subjected to heavy traffic and equipment loads.

Inspection Activity #4; MH 40-32 to MH 40-34

Description:

The section of sewer that runs from MH 40-32 to MH 40-34 is 6" diameter cast iron pipe approximately 3' in length.

This small section of pipe was identified as part of the 2021 inspection activities, but inspection was not conducted at that time. This section was inspected in 2023 and is included in this report.

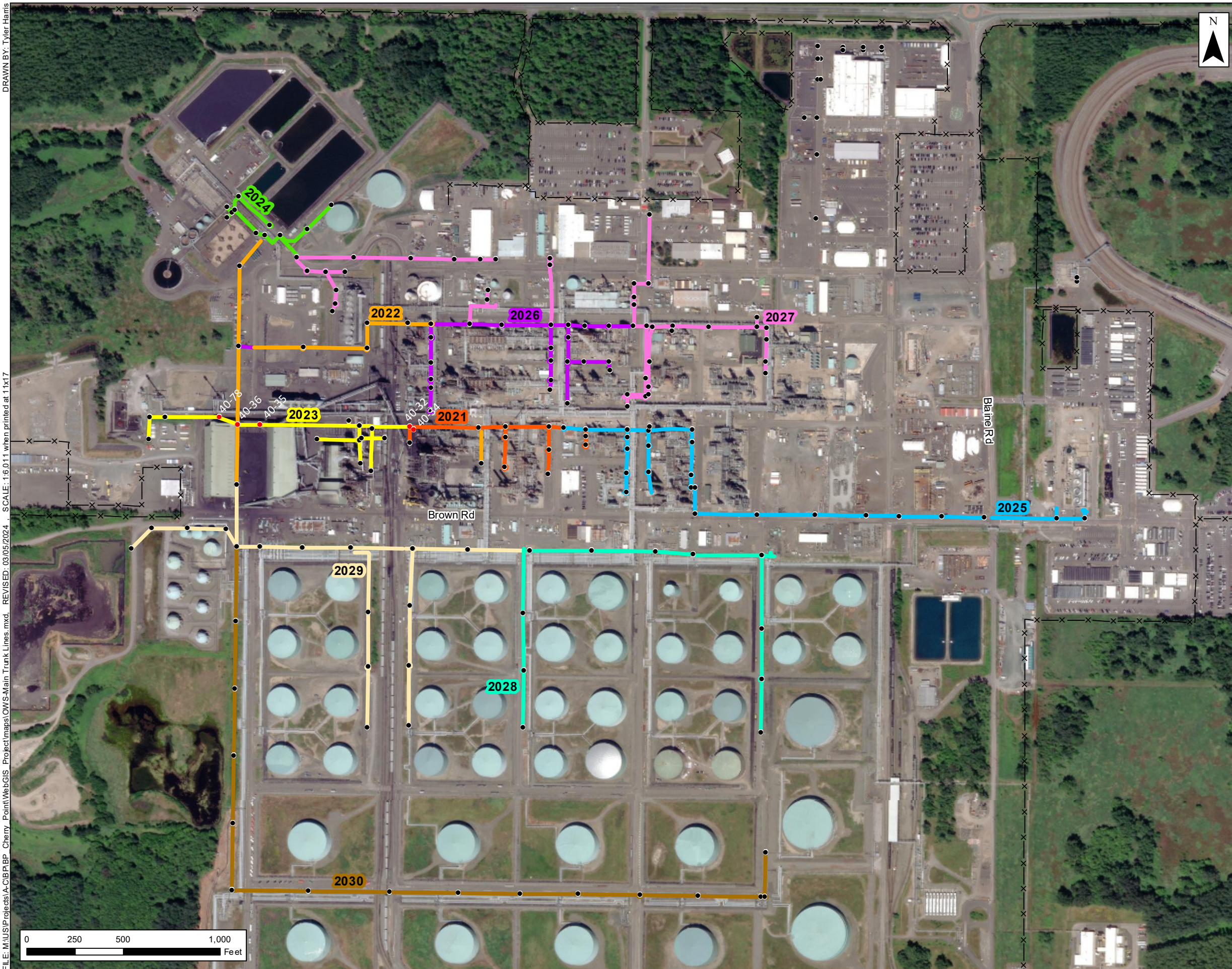
Prior to inspection this section of sewer was isolated and confirmed free of liquid and debris. No jetting was required to expose the surfaces for inspection.

Findings of Sewer Assessment:

This line was intact and no evidence of releases or threatened releases were observed. It was in good repair, with no observed damage or degradation.

Nature and Extent of Releases and Corrective Actions Taken:

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.



- Legend**
- Oily Water Sewer Manholes
 - x—x Fenceline
- Main Trunk Line Segments**
- Inspection and Assessment Year**
- 2021 – Complete
 - 2022 – Complete
 - 2023 – Complete
 - 2024 – Planned
 - 2025 – Planned
 - 2026 – Planned
 - 2027 – Planned
 - 2028 – Planned
 - 2029 – Planned
 - 2030 – Planned

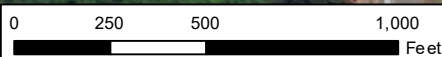


Figure 1
Oily Water Sewer -
Main Trunk Lines
 BP Cherry Point
 Ferndale, Washington

