

Engineering Committee 2023

- ▶ 49 Members
 - Up from 26 in 2019
- ▶ Meetings
 - 1 virtual, 1 in-person, 3 “unofficial” monthly
- ▶ Developed working group
 - 7 people
 - Develop a “Best Practices” for ALSRRA Members
 - 1st in-person scheduled for early January



A Short Line Experience With Oil Spill Response Plans

Transporting Oil in WA

Regulations

- ▶ Oil Spill Contingency Plans (OSCP)
 - WAC 173-186 & RCW 90.56.210
- ▶ Comprehensive Oil Spill Response Plan (COSRP)
 - 49 CFR Part 130 - PHMSA

OSCP – Washington State Law (RCW 90.56.210)

- ▶ Required for RR's transporting oil in bulk
 - Class III RR's transporting non-crude oil in bulk have fewer requirements (>49 tank carloads per year)
 - “Basic” contingency plans allowed for Class III RR's not transporting oil in bulk (<49 tank carloads per year)
- ▶ Does not apply to RR's owned and operated by the state.

Comprehensive Oil Spill Response Plan (COSRP) – PHMSA

- ▶ Required if:
 - Transporting a quantity of more than 42,000 gallons (1,000 barrels) of any liquid petroleum oil or other non-petroleum oil defined in this part.
 - A single train carrying 20 or more loaded tank cars of liquid petroleum oil in a continuous block or a single train carrying 35 or more loaded tank cars of liquid petroleum oil throughout the train consist.
 - ❖ Some exceptions apply

OSCP Compliance

- ▶ OSCP Maintenance (WA State Plan)
 - Evaluate plan annually and submit to DOE
 - Significant changes require DOE notification within 24 hrs. with a written plan update submitted within 30 days.
 - Plan expires every 5 years and needs to be resubmitted to ecology for review and approval. (3 mo. process and open for public comment)
 - Up to \$100,000 civil penalty for non-compliance (each day)
- ▶ WADOE OSCP requirements are more restrictive than PHMSA. Updates are provided to PHMSA as necessary.

OSCP Compliance cont.

▶ Drills

- One tabletop drill annually
- Two deployment drills annually
- One “worst case” drill in a triennial cycle
 - ❖ Requires simulation of a 479,808-gallon / 77,112-bbl spill (15% of the largest train handled)
- One wildlife rescue exercise in a triennial cycle
- One Multiplan holder large scale equipment deployment drill in a triennial cycle
- Emergency Coordinator/QI unannounced Notification Quarterly
- Government Initiated-Unannounced Exercise

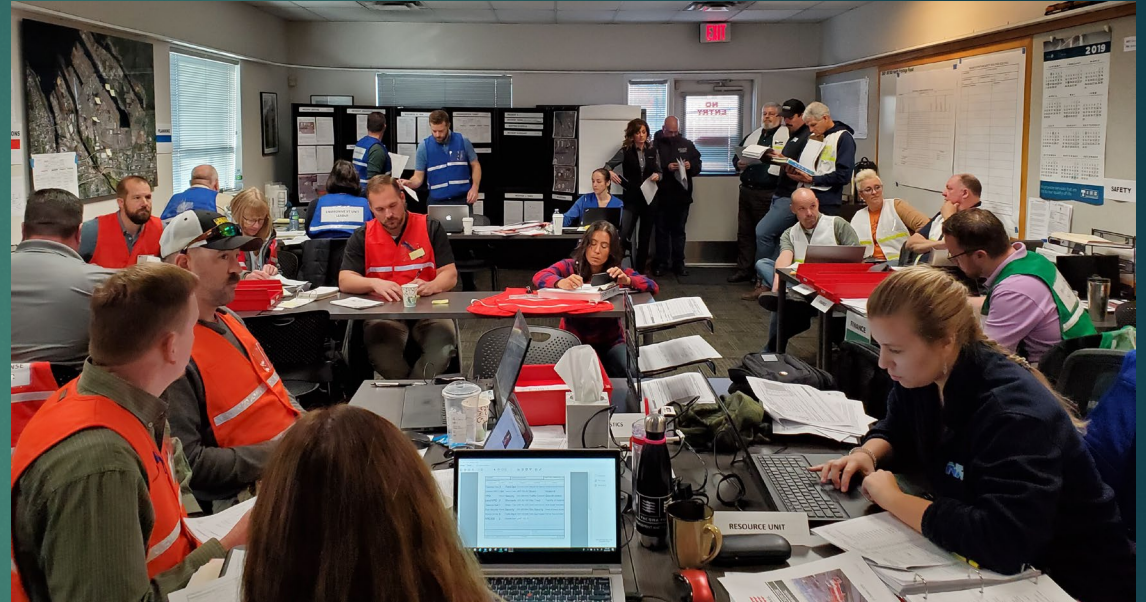
Compliance



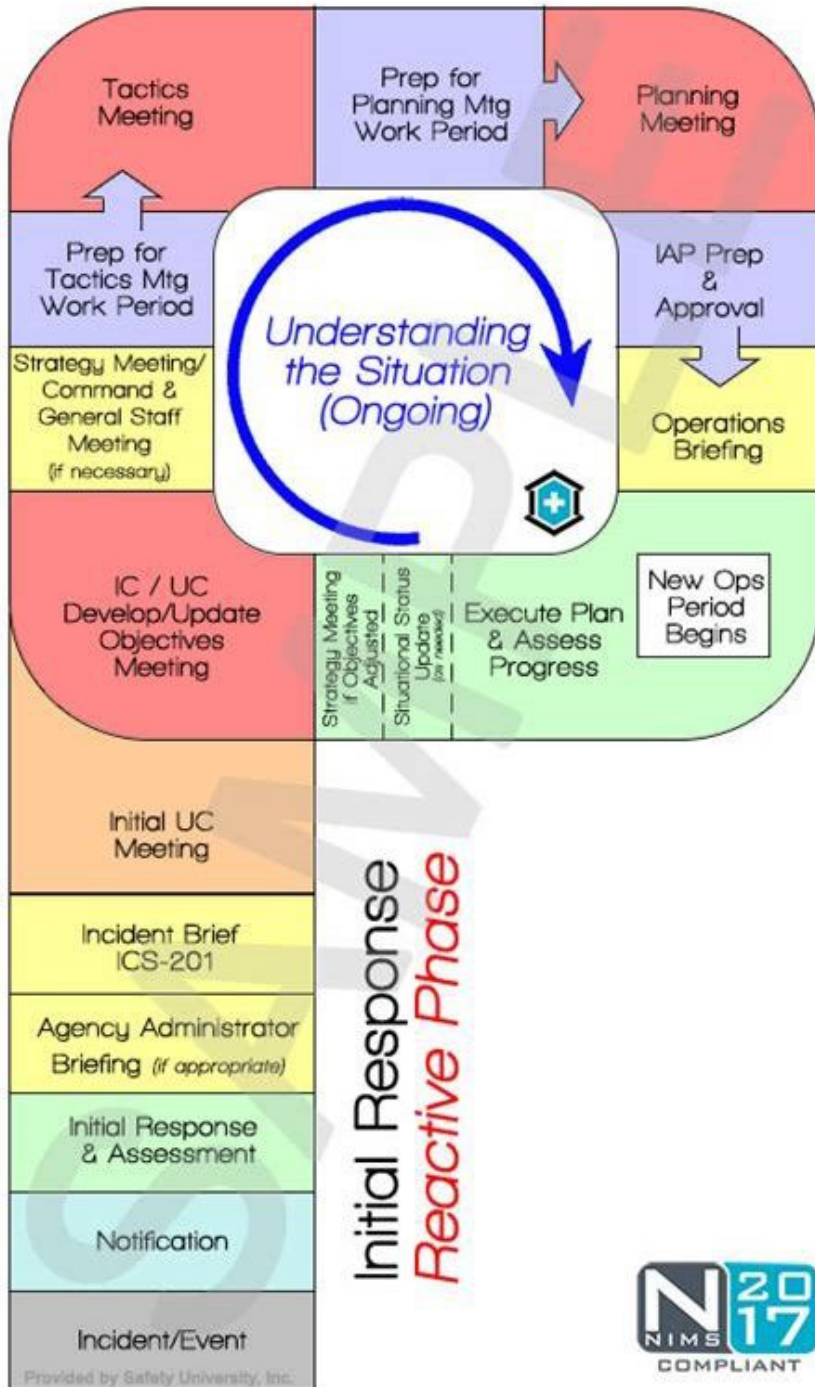
Deployment Exercises



Compliance



Tabletop Exercises



Planning P



Costs

- ▶ Our RR's average cost to comply including training:
 - \$117,000 per year since 2018 – Or we could have purchased:
 - ❖ ~1,200 ties
 - ❖ ~2,500 feet of new HH 115RE
 - ❖ ~26,411 gallons of diesel (\$4.43 gal.)

States Requiring Oil Spill Plans

- ▶ Washington, California, Oregon, Minnesota
- ▶ Others?

Questions?

