



State of Wisconsin
Governor Tony Evers

Department of Agriculture, Trade and Consumer Protection

May 22, 2020

Layne Kortbein, EIT
USA Antea@Group
5910 Rice Creek Parkway, Suite 100
Shoreview, MN 55126

Ms. Kortbein,

The request for closure in place of the underground pipeline segments associated with the previously closed pipelines that were part of the former Amoco (BP) terminal (closed since 1999) located at 2904 Winter Street in Superior, Wisconsin, is approved based on your request and investigation/recommendation/work plan. Closure in place shall include flushing of the pipeline, removal of all liquids, and capping the pipelines. As discussed, due to the location of the pipelines within several right-of-way corridors which renders the future use of the pipelines highly unlikely, if not impossible, and the large volume of the pipelines, the filling of the pipelines is recommended, but not required.

Due to the several factors listed below we will not be requiring an inspector be on site for the closure in place of these pipelines. These factors are:

- 1) ATCP 93.460 only refers to the closure of a registered aboveground tank and a change of registration associated with that tank. We do assign piping to a specific tank when we register a tank, however that is only if the owner provides that information, as would be the case for a new installation. When we do register piping we register it under the tank as sub-equipment so that when the piping is closed the change in service and associated paperwork is kept under the tank record. In this case the tanks associated with these pipelines were installed/registered/closed many years ago and we have no way to tell which of the 14 pipes went to which tanks. I would guess these pipelines were at some point manifolded together and could be used to transfer product between many of the tanks, with no pipeline associated with any specific tank.
- 2) A majority of the pipeline runs have already been removed. Since these were associated with field-erected tanks no certified remover-cleaner is required.
- 3) Currently due to the COVID-19 pandemic we are not sending any of our staff out in the field for closure inspections.

When your closure in place work is completed in accordance with your work plan and my approval letter, send me another letter detailing the work that was completed and I will add it to the facility record that was associated with the former Amoco facility. Note at some point the name the facility was registered under was changed to BP Products North America Inc.

Greg Baretta P.E.
Chief – Storage Tank Regulation
Bureau of Weights and Measures
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Wisconsin Department of Agriculture, Trade and Consumer Protection

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