

Jon Lossing

I agree with these statements:

One is dealing with requirements for readiness for spills of oils that may weather and sink. AKA sinking oils or sometimes called non-floating oils. We are seeing more of that oil from the Canadian Tar or Oil Sands. Canada's Crude by Rail traffic jumps 40 percent. 6.25.19.

We know that in Spokane County, from Jan through March of this year, 23,147 crude oil rail cars came through Spokane County. We, the public, don't know the origin or the destination. Oil sands oil is often shipped in the form of diluted bitumen or Dilbit. Dilbit can be chemically analyzed of course, and what is used is a seasonal variation. The formula is also proprietary. It's considered a sinking oil. I have been reading several studies on the impacts of Dilbit on amphibians and fish.

Fresh water is very vulnerable to Dilbit spills for many reasons. See this quick powerpoint http://nas-sites.org/dilbit/files/2015/03/2_Peter-Hodson_freshwater-marine-comparison.pdf presentation by Dr. Peter Hodson, Professor Emeritus of Queen's University. I am really worried about a Dilbit Spill near Spokane. The factors are numerous and varying and there will be damage. We really need more prevention and more protection.

Two is the requirement for having Spill Management Teams and entities for wildlife rehab and recovery services. The latter will cost the Type A RR! (DOE uses Type A , Type B and Type C in this state for the planning standards). Type A is UP, BNSF and Tacoma Rail.

I would like a quicker response time than 6 hours for an oil spill. Safety has to be first so it may be that if a fire occurs, a spill clean-up will not likely happen within 6 hours. Other safety factors could delay a clean up. Even with an equipment cache nearby it would surprise me if it happens within 6 hours. I would prefer an incident Commander to be in state within 3 hours.

DOE really needs support in making RR have wildlife rehab services on retainer! It will cost the RR so they may balk at this. But people who rescue and rehab oiled wildlife have a tough job and they need assurances that their services are valuable.