

September 25, 2019

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RECEIVED
Department of Ecology

OCT 01 2019

Spills Program

Sonja Larson
Department of Ecology Spills Program
PO Box 47600
Olympia, WA 96504-7600

Dear Ms Larson:

Thank you for your informative presentation and the opportunity to ask questions at the 9/24 Public hearing in Vancouver, WA. I am thankful Washington is dealing with this real present threat. I am glad to hear about the coordinated effort, checks, planning and preparedness including subcontractor drills.

I am writing to ask you to take the Washington State Legislature mandate seriously and demand carriers of non-floating fossil fuels to plan for immediate clean up before much product sinks. As you said sometimes the clean-up causes more harm like in the case of dredging. We know total restoration is impossible, that deoxygenation, leaching, etc. begin immediately but please demand the ability to recover a significant amount before sinking. Please make the standards as high as you feel are practical.

Not directly related to this program I would also like to make a few suggestions.

The Department of Ecology has the ability to look at the big picture and if a project would greatly complicate the Spill Recovery Program that program can coordinate with other parts of Ecology to limit permitting. Prevention of the threat is the best prevention of spills. I agree with others that non-floating fossil fuels have no place on or near our waterways; but, since they are there, we can coordinate to prevent increase of these very problematic substances. All new fossil fuel facilities increase the risk.

Please consider mandated third party pipeline and rail car inspection. Self-inspection is too risky with some carriers and some substances. LNG pipeline self-inspection is especially worrisome because of the growing evidence of the greenhouse effects of fugitive methane.

The Department of Ecology should pressure the State of Washington to coordinate spill prevention with Canada and permitting with Canada. Likewise, the department should pressure for coordination with Oregon.

The Department of Ecology should consider mandating insurance for clean-up for all companies from extraction through transport which cannot demonstrate adequate capital to pay clean up contractors. For example, the executives for the proposed methanol refinery in Kalama have a history of bankruptcy in Pocatello, ID leaving massive unpaid obligations. That company would try to claim they have no liability for LNG flowing to the refinery or methanol from the refinery. Earnings would be realized by the parent Chinese companies and unavailable.

Thank you for all that you do to keep our environment and ecosystems as safe as possible.

Sincerely,



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