

U.S. Oil & Refining Co.

Please find comments from USOR attached.

Thanks,
Dina Brown

U.S. OIL & REFINING CO.

December 10, 2020

Wendy Buffett
Department of Ecology, Spills Program
PO Box 47600
Olympia, WA 98504-7600

RE: Comments on Updated Central Puget Sound Geographic Response Plan

Dear Ms. Buffett:

General Comments

Overall, the new Geographic Response Plan (GRP) web-based format provides a good presentation of the material that is intuitive and easy to use. We appreciate the care and consideration Ecology is trying to follow as we move to a web-based format. A careful balance must be maintained to allow progress in access to information that technology brings, while honoring the practicalities of actual spill response when internet access may be limited or even unavailable. We commend the publication of an easily printable/pdf version of the Central Puget Sound GRP.

As we have commented on numerous previous occasions, please do not renumber the response/booming strategies. We use the current booming strategy numbers as an effective method to communicate to our spill response team our tactical spill response measures. As such the current booming strategy numbers are deeply embedded in all our preparedness planning tools. When renumbering too often, the action tends to render the numbering system superfluous and may mean that a naming system, using an actual location name, may be preferred. Really it comes to how best communicate the response measures. I understand that this topic is currently up for review and discussion in the NWAC GRP Workgroup. Once that committee makes a recommendation, will the numbering system change again? That will lead to even more confusion within the spill response community. Until these issues are resolved and a final numbering/naming system is chosen, we recommend that the strategies not be renumbered at this time.

On a more specific note, in presenting the GRP for review it was difficult and not intuitive to find the link to the updated Plan. The link was buried near the bottom of the comment form. It would have been good to include the link in your email, or at least provide the link to the document at the top of the comment form.

Errata

CPS-GRP Spill Response Contact Sheet

The telephone number listed for the McChord Pipeline (253-572-7203) is not correct. The telephone number should be listed as (253) 593-6085. This number is answered 24 hours per day.

CPS-GRP Site Description

The following are all broken links within the site description document:

- All watershed links (Cedar-Sammamish, Duwamish-Green, etc.)
- WRCC
- Northwest Seaport Alliance

CPS-GRP Response Strategies and Priorities

Sector CPS-10a map, found on page 39 of the GRP, is actually an inset to the Sector CPS-8 map and should be renamed **Sector CPS-8a** map, and moved to page 37.

Thank you for the opportunity to provide comments on this important spill planning and preparedness document.

Sincerely,

Dina E. Brown

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