

## Barbara Keller

I want to thank you for finally taking on this important and timely update. There is probably no one other more dangerous threat to our waters than an uncontained oil spill. While I have personally taken training in oil spill response, the one real lesson I learned from it was that once released, with our tides, currents, storms, etc., stopping the damage is virtually impossible.

I want you to know of my support for the new decommissioning requirements for out of service oil storage tanks and oil transfer pipelines, requiring additional seismic protection measures for oil storage tanks and transfer pipelines to help prevent oil spills during earthquakes, and updating the requirements to mitigate the impacts of spills from oil transfer operations.

To implement ESHB 1578, Reducing threats to southern resident killer whales and all other, though less dramatic species, by improving the safety of oil transportation, this rule should also:

- 1) Require ALL secondary containment structures (that prevent spilled oil from reaching waters of the state) to withstand seismic forces - it's not like we don't have earthquakes!
- 2) Require ALL oil transfer operations to be pre-boomed (when safe and effective to do so) and eliminate the Rate B loophole that allows oil transfers at 500 gallons per minute or less to occur without pre-booming;
- 3) Restrict all oil transfer operations to daylight hours or, at the very least, restrict all oil transfer operations to daylight hours when it's not safe and effective to pre-boom. (But, hey, maybe they should not be done under those conditions at all!)

Thank you for your consideration.