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As a retired oil industry professional and having managed the Chevron Pt Wells Refinery at Richmond Beach I fully support requiring additional seismic protection measures, retrofits for oil storage tanks and transfer pipelines, updating decommissioning requirements for out of service oil storage tanks and oil transfer pipelines. In addition to advance notice of oil transfers, and disclosure of the type, origin and characteristics of the crude oil being transferred.

Your leadership in the process with interested stakeholders to amend regulations is timely. Reducing threats to our Salish Sea and specifically southern resident killer whales by improving the safety of oil transportation, facility oil handling standards and vessel oil transfer advance notices and containment requirements to implement ESHB 1578.

However, this rulemaking should also:

To address a forecasted Cascadia Rising I suggest requiring all new and existing containment structures (that prevent spilled oil from reaching the waters of the state) to withstand seismic forces:

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.

Restrict all oil transfer operations to daylight hours, particularly when it's not safe and effective to pre-boom.

Thank you for your efforts to improve the safety of oil transportation in Washington State.