

Friends of the San Juans

The Western States Petroleum Association's comments include the report from Turner, Mason & Company (February 16, 2023) ECONOMIC IMPACT ASSESSMENT OF WASHINGTON STATE PROPOSED AMENDMENT TO WAC CHAPTER 173-180, 184, which states (on page 4):

"The existing tankage infrastructure is aged, with 89% of the tanks being built prior to the first implementation of WAC 173-180-330 in 1994."

"Some API STD 650 tanks could require significant modifications or even a rebuild to meet the more demanding loads accounted for in Annex E."

The MEMBER FACILITY STATISTICS, Storage Tank ♦ Construction Year / Design Standard (page 16) states that of the 283 storage tanks (out of 291) with a known year of construction that would potentially be impacted by a change in the rules, 60% are more than 63 years old and 69% are more than 53 years old.

Ecology should answer these questions: What is the life span of a storage tank? At what age should storage tanks be required to be rebuilt or replaced? How many Class 1 facility storage tanks exceed that age?

To comply with the legislature's direction and to meet existing state requirements, this rule should require the rebuild/replacement of storage tanks that have exceeded their safe usage. All storage tanks should be required to meet API Standard 650 (2020) seismic design requirements, including Annex E and section E.7.3 Piping Flexibility. Also, at the very least, the 10-year compliance schedule should be the effective date of WAC 173-180-080, and not the effective date of this rule.