

Lori Erbs

Thank you for leading a process with interested stakeholders to amend regulations associated with facility oil handling standards and vessel oil transfer advance notice and containment requirements to implement ESHB 1578, Reducing threats to southern resident killer whales by improving the safety of oil transportation.

I support requiring additional seismic protection measures and retrofits for oil storage tanks and transfer pipelines, new decommissioning requirements for out of service oil storage tanks and oil transfer pipelines, additional advance notice of oil transfers, and disclosure of the type, origin and characteristics of the crude oil being transferred.

However, this rulemaking should also:

Require 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.