

## Sean Edmison

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.

I urge you to make sure the final rule is as strong as possible, that it holds the oil industry accountable for the risks their operations pose to all of us. In particular, the rule needs to include the following provisions:

Require that any and all containment structures to prevent spilled oil from reaching our waters be designed to withstand seismic forces, and the large-scale earthquake that is overdue to our region;  
Require all oil transfer operations to be pre-boomed wherever it is 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, or at the very least, restrict all oil transfer operations to daylight hours when its not safe and effective to pre-boom.

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