

Paula Rotondi

I'm a resident of Whatcom County who has walked the Cherry Point beach many times, taken tours of the BP refinery, spent days in a small sailboat in the the Salish sea - oftentimes within sight of BP's and Conoco Phillips' piers and ships. The glaring, significant and serious risks of these facilities is frightening. I urge you to please take a few meager steps to try to avert some of the most horrific consequences that will result from human error and/or natural forces at these sites.

Please require 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 ask that the new rules:

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.

BP and Conoco Phillips have been making record profits and the cost of these new requirements is a small amount in comparison. I still hope these corporations will consider it their responsibility to take steps to prevent their operations from destroying our shared natural treasures upon which we and all after us depend.

Thank you for leading this process with interested stakeholders to amend regulations associated with facility oil handling standards and vessel oil transfer advance notice and containment requirements per ESHB 1578. Thank you for your efforts to improve the safety of oil transportation in Washington State.