

Laurence Brown

Thank you for reviewing regulations for facility oil handling and transfer per ESHB 1578, to reduce threats to southern resident Orca.

I support requiring more safety-increasing seismic protection measures and retrofits for oil storage tanks and transfer pipelines, storage tank & pipeline decommissioning requirements, as well as for increased advance notice of oil transfers, and more complete disclosures of the type, origin and characteristics of the crude oil being transferred.

In particular, this should include:

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 coastal environment of Washington State.