

Kristin Edmark

Please update the rules regarding spill prevention, preparedness and preparedness to better protect our major Washington waterways which are now being used for increased shipping. I support the draft rule's new decommissioning requirements for out of service oil storage tanks and oil transfer pipelines, and the updates that mitigate the impacts of spills from oil transfer operations.

Please also revise the draft to address:

- Include secondary containment systems, including those before 1994, which can withstand seismic forces in addition to additional seismic protection measures for oil storage tanks and transfer pipelines to help prevent oil spills during earthquakes.
- Eliminate the Rate B loophole and instead require operations to be pre-boomed. Please analyze the safety of any operations which cannot be pre-boomed and restrict those operations to daylight hours.

Thank you for addressing this issue which is so important to the health of wildlife and people of Washington. Thank you for addressing the strengthening of prevention because clean-up, at best, cannot avoid huge destruction in most cases.

Respectfully submitted, Kristin Edmark. MPH RD