

02/28/2024

**RE: 173-187 WAC, Financial Responsibility**

Thank you for affording me time to comment.

My wife and I retired from the oil industry in 2014 choosing Bellingham, WA as our home after 30+ years moving throughout the world in my career for both international and national oil companies.

I am speaking on behalf of myself, the local community and taxpayers of WA State in urging the Dept. of Ecology to fulfill its stated responsibility to the citizens of WA State... by requiring local industries to maintain a fact based level of Environmental Impairment Liability insurance (EIL) of \$60,000/barrel minimum to cover costs related to a major catastrophe.

My professional career includes operations assignments as refinery manager at Chevron Pt. Wells now known as Alon Asphalt, and marketing & business development assignments with Chevron Aviation in Singapore and project development in Saudi Arabia. My professional experience allows me to speak with insight on the oil industry.

In my view, the proposed level of financial responsibility is far from adequate to cover actual cleanup and restoration costs of a worst case scenario...which is a Cascadia Fault earthquake. It appears DOE is more focused on the short term financial success of industries than its stated obligation to the citizens of WA State by allowing the industry to define what is 'affordable'.

As we say in the oil industry...***it is not whether an incident will happen, it is WHEN.*** This is why we have Spill Response Plans and annual drills.

The oil industry has plenty of examples of major incidents/spills that can be used by the DOE or engaging an *independent* insurance industry expert that will develop an up to date cleanup cost estimate using current dollars.

WA State cannot depend on the federal govt. support via the **Oil Spill Liability Trust Fund (OSLTF)** of \$1Billion as a backup. A change in Administrations every four years can undermine those funds as was seen in 2017 when Congress suspended collecting those levies from the oil industry.

In closing, allow me to highlight the DOE Environmental Justice statement...

"All Washington residents, regardless of income, race, ethnicity, color, or national origin, have a right to live, work, and recreate in a clean and healthy environment. Low-income communities, communities of color, and indigenous people in Washington and across the

country often bear the brunt of pollution and the impacts of climate change. **We're committed to making decisions that do not place disproportionate environmental burdens on these communities.**"

Therefore, I ask DOE to review their proposed inadequate financial limits and develop true current dollar cost based financial responsibility limits, thereby placing WA taxpayers ahead of oil industry shareholders.

Dirk Vermeeren

Bellingham, WA