

## HF Sinclair Puget Sound Refinery (KEVIN OUYOUMJIAN)

WAC 173-182-030

Definitions (5) Boom, Response Equipment and Recovery Systems

The ASTM standards (2023 series) should apply to new boom, response equipment and recovery systems procured by the plan holder or the Primary Response Contractor (PRC). Boom, response equipment and recovery systems already owned by the plan holder and PRC should be grandfathered.

WAC 173-182-030

Definitions (34) NWACP superseded by suit of plans

Request that Ecology consider providing an implementation period, to affect any changes from NWACP being superseded by a suite of plans to the OSRP and into software such as IAP.

WAC 173-182-250 (1)

Request clarification on how spill assessment is different from how it is currently done.

Specifically, what forms are necessary to filled out, and when does it need to be done? There may be scenarios where the product spilled or sheen observed, may not be immediately known, in which case the requirement for spill assessment, including product identification, should not impede Agency Notification requirements.

WAC 173-182-321 (3)(b)

How will Ecology require OSRO/PRCs to meet the new Aerial Oil Surveillance planning standards?