



DEPARTMENT OF
ECOLOGY
State of Washington

**Rule Implementation Plan
Chapter 173-180 WAC, Facility Oil Handling
Standards and Chapter 173-184 WAC, Vessel Oil
Transfer Advance Notice and Containment
Requirements**

June 2023
Publication 23-08-010

Publication and Contact Information

This document is available on the Department of Ecology's website at:
<https://fortress.wa.gov/ecy/publications/summarypages/2308010.html>

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Implementation Plan

Chapter 173-180 WAC, Facility Oil Handling Standards

Chapter 173-184 WAC, Vessel Oil Transfer Advance Notice and Containment Requirements

Spill Prevention, Preparedness, and Response Program

Washington State Department of Ecology

Olympia, Washington

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Purpose

The Washington State Department of Ecology (Ecology) provides the information in this implementation plan to meet agency and Administrative Procedure Act (RCW 34.05.328) requirements related to rule adoptions.

Introduction

On June 6, 2023, Ecology adopted amendments to Chapter 173-180 WAC Facility Oil Handling Standards and Chapter 173-184 WAC Vessel Oil Transfer Advance Notice and Containment Requirements (AO # 21-03). The purpose of this rule implementation plan is to inform those who must comply with Chapters 173-180 and 173-184 WAC about how Ecology intends to:

- Implement and enforce the rule.
- Inform and educate persons affected by the rule.
- Promote and assist voluntary compliance for the rule.
- Evaluate the rule.
- Train and inform Ecology staff about the new or amended rule.

Also included in this plan is information about:

- Supporting documents that may need to be written or revised because of the new rule or amended rule.
- Other resources where more information about the rule is available.
- Contact information for Ecology employees who can answer questions about the rule implementation.

Implementation and Enforcement

Chapter 173-180 WAC (facility oil handling standards) establishes oil spill prevention and oil transfer requirements for regulated oil handling facilities. Chapter 173-184 WAC (vessel oil transfer advance notice and containment requirements) establishes oil transfer requirements for vessels delivering oil in bulk on or over waters of the state.

Ecology adopted amendments to Chapters 173-180 and 173-184 WAC on June 6, 2023.

The amendments implement updates to RCW 88.46.165. They also include necessary administrative updates, expand on existing requirements, and establish new requirements as described below.

In Chapters 173-180 and 173-184 WAC:

- Make changes to address inconsistent or unclear direction in the rule(s), and make any corrections needed.
- Evaluate and update codes and standards throughout the rule(s).
- Update and clarify enforcement provisions for expired plans, manuals, reports, and programs requiring re-approval for Class 1 and 2 facilities and delivering vessels.
- Update submittal requirements, recordkeeping requirements, and compliance schedules throughout the rule(s).
- For Rate A deliverers:
 - Clarify safe and effective determination and Boom Reporting Form submission requirements.
 - Expand Safe and Effective Threshold Determination Report content requirements and align report and review requirements.
- Expand advance notice of oil transfer reporting requirements for Class 1, 2, and 3 facilities and delivering vessels.

In Chapter 173-180 WAC:

- Clarify and expand plan content and drill requirements for Class 2 facility Oil Transfer Response Plans.
- For Class 1 facilities:
 - Establish facility out of service and decommissioning requirements.
 - Establish seismic protection requirements for transfer pipelines and storage tanks.
 - Clarify and expand plan preparation and plan content requirements for Prevention Plans, including secondary containment permeability and facility spill risk analysis criteria.
 - Clarify training and certification requirements.

In Chapter 173-184 WAC:

- Update advance notice reporting timeframe requirements for delivering vessels.
- Update and clarify pre-booming and safe and effective threshold determination requirements for lightering operations, and for short-term transfer location approval requests for Rate A deliverers.

The adopted rule revisions will not require additional staff for implementation. Existing Spill Prevention, Preparedness, and Response Program (Spills Program) staff will implement and enforce the rule. Staff will prioritize tasks to implement the rules, such as informing stakeholders and developing guidance, and will communicate with the regulated community during rule implementation.

The rule revisions will go into effect on July 7, 2023, 31 days after the rule is adopted, except those revisions with longer phase in periods, as described in the compliance schedule sections of the rules: WAC 173-180-080 and 173-184-055.

On the effective date of the rules:

- Owners and operators of all Class 1, 2, 3, and 4 facilities as defined in Chapter 173-180 WAC and vessels delivering oil on or over waters of the state as defined in Chapter 173-184 WAC, must meet updated code and standard requirements in the rules. Ecology has made each updated code and standard in both rules available at Ecology's library at 300 Desmond Drive SE, Lacey, WA for inspection as needed.
- All Equivalent Compliance Plans, Safe and Effective Threshold Determination Reports, Operations Manuals, Prevention Plans, and Oil Transfer Response Plans must be submitted to Ecology within the time frame required for re-approval before the expiration date. If they are not submitted within this time frame, the lapse is considered noncompliance and may result in the loss of approval of that plan, report, or manual. Ecology will work with facilities and delivering vessels to answer questions about requirements and to ensure documents are submitted for re-approval on time. Specific time frame requirements can be found in the following sections of the rules:
 - Equivalent Compliance Plans: WAC 173-180-217 and 173-184-105
 - Safe and Effective Threshold Determination Reports: WAC 173-180-224 and 173-184-130
 - Operations Manuals: WAC 173-180-430
 - Prevention Plans: WAC 173-180-650
 - Oil Transfer Response Plans: WAC 173-180-750
- All Class 1 and 2 facilities must coordinate with Ecology for re-approval of their Training and Certification Program at least 120 calendar days prior to their program's expiration date. The program will then be reviewed through an on-site evaluation. Ecology will work with facilities to answer questions about requirements.

- All Class 1, 2, 3, and 4 facilities and delivering vessels must meet amended submittal and recordkeeping requirements. All documents must be submitted electronically. Ecology will no longer accept paper copies or submissions via fax. Questions about submittal requirements can be sent to the Ecology contact listed on the relevant website.
- All Class 1 facilities must meet out of service and decommissioning requirements in WAC 173-180-910. Guidance materials and contact information for assistance regarding new requirements will be available at: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Guidance-for-oil-industry>.
- All Class 1 facilities with storage tanks constructed after the effective date of the rule must meet seismic protection requirements in WAC 173-180-330. Guidance materials and contact information for assistance regarding new requirements will be available at: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Guidance-for-oil-industry>
- All Class 1 facilities with transfer pipelines constructed after the effective date of the rule must meet seismic protection requirements in WAC 173-180-340. Guidance materials and contact information for assistance regarding new requirements will be available at: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Guidance-for-oil-industry>
- Any owner or operator of new facilities or a change in owner or operator of a facility must meet requirements in Chapter 173-180 WAC prior to beginning operations in Washington State.
- Any owner or operator of new delivering vessels or a change in owner or operator of a delivering vessel must meet requirements in Chapter 173-184 WAC prior to beginning operations in Washington State.

Within 30 calendar days from the effective date of the rules:

Owners and operators of delivering vessels and Class 1, 2, or 3 facilities must meet updated advance notice of oil transfer reporting requirements. Additional reporting requirements for crude oil products include region of origin, API or specific gravity, sulfur content, and viscosity. Requirements for Class 1, 2, and 3 facilities and delivering vessels are found in WAC 173-180-215 and 173-184-100.

Prior to the effective date of these requirements, Ecology will update the existing Advance Notice of Oil Transfer (ANT) System and Ecology Form ECY 070-175 to implement these new reporting requirements.

Facilities and delivering vessels subject to the additional advance notice reporting requirements are already subject to the existing advance notice reporting requirements. They will be able to enter the additional required information in the ANT System using their existing SecureAccess Washington (SAW) accounts.

Any new users of the ANT System must create a SAW account and request access to the ANT System before they will be able to submit advance notice of oil transfer reporting information.

Users can create SAW accounts at: <https://secureaccess.wa.gov/>. Once approved, facilities can log into SAW and open the ANT System to submit notification details for oil transfers.

Ecology's advance notice of oil transfer website will be updated to reflect the updated requirements and can be found here: <https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Advance-notice-of-oil-transfer>. The website will also include guidance materials and contact information for assistance with the new requirements.

Within 60 calendar days from the effective date of the rules:

Any delivering facility or vessel conducting Rate A transfers must meet pre-booming requirements in WAC 173-180-221 and 173-184-115. Prior to the effective date of these requirements, Ecology will update the Boom Reporting Form in the existing ANT System and Ecology Form ECY Form 070-215.

The following Ecology website will be updated with information regarding amended requirements, guidance documents, and contact information for assistance: <https://ecology.wa.gov/Regulations-Permits/Compliance-enforcement/Pre-booming-requirements>.

By the currently approved Safe and Effective Threshold Determination Report's next expiration date:

Delivering facilities and vessels conducting Rate A transfers must meet expanded report requirements in WAC 173-180-224 and 173-184-130.

Delivering facilities and vessels will need to include updated and expanded information in their Safe and Effective Threshold Determination Report prior to their report's expiration date. Ecology will review each report to ensure all new information is included and will work with each facility and vessel company to aid in compliance. Information regarding updated and new requirements and contact information for assistance will be available on Ecology's website: <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Safe-effective-threshold-determination-reports>.

By the currently approved Operations Manual's next expiration date:

All Class 1 and 2 facilities must meet manual requirements in WAC 173-180-420 and 173-180-421.

Updated requirements and contact information for assistance will be available on Ecology's website: <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Operations-manual-for-regulated-facilities>.

By the currently approved Training and Certification Program's next expiration date:

All Class 1 and 2 facilities must meet program requirements in WAC 173-180-510 and 173-180-511.

Updated requirements and contact information for assistance will be available on Ecology's website: <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Facilities-training-certification>.

By the currently approved Prevention Plan's next expiration date:

All Class 1 facilities must meet plan requirements in WAC 173-180-630.

Facilities will need to include updated and expanded information in their Prevention Plan prior to their plan's expiration date. Ecology will review each plan to ensure all new information is included and will work with each facility to aid in compliance. Ecology will develop guidance documents to assist with expanded requirements for the facility spill risk analysis. Guidance documents will also be available to assist with secondary containment permeability criteria. Ecology will work with each facility to assist with compliance and will host trainings as needed and requested. Updated requirements, guidance materials, and contact information for assistance will be available on Ecology's website: <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Spills-prevention-plans-for-facilities>.

Within 12 months from rule effective date:

All Class 2 facilities must meet Oil Transfer Response Plan requirements in WAC 173-180-730 and submit the plan to Ecology for re-approval.

Class 2 facilities will need to include new information in their Oil Transfer Response Plans. Ecology will create example templates and a review checklist for these plans to assist facilities with meeting new requirements. Ecology will publish this guidance ahead of the compliance schedule deadline. Guidance materials and contact information for assistance will be available on Ecology's website at: <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Contingency-planning-for-oil-industry/Spill-response-plans-for-mobile-oil-facilities>.

Once Ecology approves the Oil Transfer Response Plan for each Class 2 facility:

The triennial planning cycle for each facility's drill program will begin, as required in WAC 173-180-810 and 173-180-815. The facility will need to schedule drills and provide documentation of drill completion.

Ecology will develop evaluation checklists for the new drill requirements. Guidance materials and contact information for assistance will be available on Ecology's website at: <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Contingency-planning-for-oil-industry/Oil-spill-drills>.

Within 10 years from the rule effective date or by the next scheduled internal API Standard 653 (2014 with Addendum 1 (2018) and 2 (2020)) inspection, whichever is later:

Any Class 1 facility storage tank constructed before the effective date of this rule must meet seismic protection measures in WAC 173-180-330. Ecology will work closely with each facility to aid in compliance and review any proposed alternative seismic protection measures.

Updated requirements, guidance materials, and contact information for assistance will be available on Ecology's website: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Guidance-for-oil-industry>.

Within 10 years from the rule effective date or by the next scheduled API Standard 570 (2016 with Addendum 1 (2017) and 2 (2018), and Errata 1 (2018)) inspection, whichever is later:

Any Class 1 facility transfer pipeline constructed before the effective date of this rule must meet seismic protection measures in WAC 173-180-340. Ecology will work closely with each facility to aid in compliance and review any proposed alternative seismic protection measures.

Updated requirements, guidance materials, and contact information for assistance will be available on Ecology's website: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Guidance-for-oil-industry>.

Enforcement

The following and existing enforcement provisions are applicable to all violations of Chapter 173-180 WAC:

- Chapter 90.56 RCW – Oil and hazardous substance spill prevention and response.
- Chapter 90.48 RCW – Water pollution control.
- Chapter 88.46 RCW – Vessel oil spill prevention and response.

The following and existing enforcement provisions are applicable to all violations of Chapter 173-184 WAC:

- Chapter 88.46 RCW – Vessel oil spill prevention and response.

Informing and Educating Persons Affected by the Rule

Throughout the rulemaking process, Ecology staff communicated with the regulated community, interested stakeholders, and the public through emails, phone calls, meetings, workshops, and public hearings to inform them about the rule development and to capture input.

Notices of rule adoption will be sent immediately after the rule is adopted to entities subject to the rule, Tribes, interested stakeholders, federal and state agencies, environmental groups, Ecology's mailing list of interested parties, and members of the public who provided contact information with their comments for the rule.

Additionally, the Spills Program will use a combination of outreach materials to inform and educate persons affected by the rule, including:

- Updates to Ecology's website to notify users of the rule adoption and to direct them to published supporting documents and contact information.
- Outreach to regulated facilities and delivering vessels to provide links to guidance documents, offer training on expanded and newly established requirements, and offer technical assistance.
- Inform and educate the regulated community and the public as we interact with them.

Promoting and Assisting Voluntary Compliance

Educating stakeholders about the updated and newly established requirements will help to promote voluntary compliance. Ecology staff responsible for implementing this rule will work directly with affected entities to assist with compliance. These individuals are updating the tools needed for successful implementation of the rule changes.

Ecology will promote voluntary compliance by maintaining close communication with regulated facilities and delivering vessels as the rule amendments become effective. Training opportunities and technical assistance will be provided to help regulated entities and others to understand the changes in the amended rules, and to clarify expectations for the new requirements. Staff will also answer questions and direct people to useful information and resources on our webpages during regular inspections and site visits.

Evaluating the Rule

To evaluate whether the rule amendments achieve the purpose for which they were adopted, Ecology will continue to monitor compliance by regulated facilities and vessels delivering oil in bulk on or over waters of the state that are subject to the rules.

Ecology will monitor compliance for:

- Submission of the Equivalent Compliance Plans, Safe and Effective Threshold Determination Reports, Operations Manuals, Prevention Plans, and Oil Transfer Response Plans for re-approval by tracking when documentation was submitted to Ecology for re-approval. For Training and Certification Programs, Ecology will track when facilities reach out to schedule their on-site training and certification program re-approval evaluation. Ecology may disapprove a specific plan, report, manual, or program if the facility or delivering vessel does not submit documentation or coordinate with Ecology on time.
- Electronic submittal requirements by tracking which documents are submitted properly. We will work with facilities and delivering vessels to provide guidance on how to submit requirements electronically, as we will no longer accept paper or fax copies.
- Out of service and decommissioning requirements by tracking which facilities have notified Ecology prior to decommissioning or returning storage tanks or transfer pipelines back into service.
- New owners and operators of facilities and delivering vessels by ensuring they meet requirements in Chapter 173-180 WAC and Chapter 173-184 WAC prior to beginning operations.
- Updated advance notice of oil transfer reporting requirements by reviewing submissions for accuracy and timeliness.
- Updated oil transfer requirements for Rate A deliverers by reviewing Boom Reporting Form submissions for accuracy and timeliness of re-submissions.
- Updated Safe and Effective Threshold Determination Reports, Operations Manuals, Prevention Plans, and Oil Transfer Response Plans. We will review these reports, manuals, and plans during the approval process to ensure updated and expanded requirements are included. Ecology will conduct on-site evaluations of the Training and Certification Programs to ensure updated criteria are also incorporated.
- Class 2 facility drill programs by tracking adequacy and timeliness of notification requirements, and credit for tabletop and deployment drills through on-site evaluations and checklists.
- Seismic protection requirements by working with each Class 1 facility to review and approve seismic protection measures for existing storage tanks and transfer pipelines.

We will continue to evaluate feedback we receive on the rules from the regulated community and use that feedback to improve our guidance and training as needed.

Training and Informing Ecology Staff

Both rules have specific staff responsible for implementation. The same staff that currently implement and enforce these rules are also responsible for implementation of the updated and new requirements, and already work directly with the regulated community. These staff are also involved with internal processes related to implementation of these rules, including plan and manual development and review, oil transfer inspections, and technical assistance.

The staff involved in development of the rule updates have begun preparing documents needed to implement the rule updates. The updated rule changes are actively discussed, and implementation will occur through internal team meetings and guidance. They will also share information on the rule updates with the Spills Program through presentations to program staff.

List of Supporting Documents that May Need to be Written or Revised

The following supporting materials or systems may need to be developed or revised as a result of the amended rules.

- Advance Notice of Oil Transfer (ANT) System.
- Advance Notice of Oil Transfer (ECY 070-175): This form is submitted to Ecology to provide advance notice of oil transfers on or over Washington state waters.
- Boom Reporting Form (ECY 070-215): This form is submitted by Rate A deliverers when it is not safe and/or effective to pre-boom.
- Bunker Pre-Loading Plan (ECY 050-51): This is a sample form provided by Ecology to vessels indicating what information is required to be in compliance with WAC 317-40-050(3) prior to the start of a bunkering operation.
- Class 2 Oil Transfer Response Plan Review Checklist: This form is used by Ecology to evaluate Oil Transfer Response Plans.
- Delivering Facility Transfer Checklist (ECY 070-283): This form is used by Ecology during oil transfer inspections at a facility.
- Delivering Vessel Transfer Checklist (ECY 070-284): This form is used by Ecology during oil transfer inspections on a vessel.
- Example Oil Transfer Response Plan for Class 2 facilities: A boilerplate plan that provides examples of the type of language we are looking for to meet requirements.
- Focus on Preventing marina spills during fueling (Publication No. 09-08-008): This focus sheet provides guidance on Ecology's best practices for preventing spills at Class 4 facilities.
- Focus on Pre-booming Requirements for Vessels and Facilities Delivering Oil (Publication No. 06-08-031): This focus sheet provides an overview of Ecology's requirements for vessels and facilities delivering oil.
- Guide for Users of the Advance Notice of Oil Transfer (ANT) System (Publication No. 06-08-040): This guide provides step-by-step guidance on how to submit an ANT and to make changes to the ANT entry as needed.
- Marinas and Small Fueling Facilities – Class 4 Inspection Checklist (ECY 070-313): This form is used by Ecology during Class 4 facility inspections.
- Marinas and Small Fueling Facilities – Class 4, Oil Transfer Reporting Form (ECY 070-242): This form is submitted by Class 4 facilities to Ecology to report oil transfers.

- Oil Transfer Load Plan (ECY 070-243): This is a sample form provided by Ecology. This form is used for fueling facilities to plan out oil transfers before starting an oil transfer.
- Oil transfer requirements for vessels and facilities delivering oil (Publication No. 06-08-035): This focus sheet provides information about oil transfer requirements.

Other guidance documents may need to be developed as we receive feedback from program staff and the regulated community on their needs.

The following documents may be determined obsolete as a result of the amended rules:

- Class 2 – training and certification records – compliance review checklist (ECY 070-319).
- Focus on marinas and small fueling facilities (Publication No. 06-08-033).
- Focus on Boom Reporting Forms (Publication No. 21-08-020).
- Focus on Pre-Booming Requirements, Alternative Measures and Equivalent Compliance for Oil Handling Facilities (Publication No. 06-08-036).
- Guidance Document for Review of Safe and Effective Threshold Determination Reports (Publication No. 07-08-018).
- Mobile Facility Response Plan Preparation Guide (Publication No. 06-08-039).
- Oil-handling training and certification guidance for Class 1 & 2 facilities (Publication No. 07-08-006).
- Oil Transfer Rule – Washington Administrative Code (WAC) 173-180 Facility Applicability Table (Publication No. 070-334).
- Operations manual review guide for Class 1 and Class 2 facilities (Publication No. 07-08-003).
- Small tank farms and terminal – a guide for Class 3 facilities (Publication No. 10-08-003).

Other existing documents may be determined obsolete as new guidance documents are developed or updated.

More Information

For more information, please see the following Ecology webpages:

- Advance notice of oil transfer: <https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Advance-notice-of-oil-transfer>
- Chapters 173-180 and 173-184 WAC rulemaking page: <https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Spills-Prevention-Preparedness-Response/Rules-directing-our-work>
- Oil spill drills: <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Contingency-planning-for-oil-industry/Oil-spill-drills>
- Oil spill prevention plans for facilities: <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Spills-prevention-plans-for-facilities>
- Oil transfers and transfer inspections: <https://ecology.wa.gov/Regulations-Permits/Compliance-enforcement/Oil-transfers>
- Operations manual requirements: <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Operations-manual-for-regulated-facilities>
- Pre-booming, alternative measures, and equivalent compliance: <https://ecology.wa.gov/Regulations-Permits/Compliance-enforcement/Pre-booming-requirements>
- Regulatory guidance for oil industry: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Guidance-for-oil-industry>
- Safe and effective threshold determination reports: <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Safe-effective-threshold-determination-reports>
- Spills Program rules and laws: <https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Spills-Prevention-Preparedness-Response/Rules-directing-our-work>
- Spill response plans for Class 2 mobile facilities: <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Contingency-planning-for-oil-industry/Spill-response-plans-for-mobile-oil-facilities>
- Training and certification for facilities: <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Facilities-training-certification>

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