WASHINGTON FIRE CHIEFS

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Chief Executive Officer
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RE: Request for Information on Crude Oil Risks

The Washington Fire Chiefs is a professional membership association that represents fire agencies in the state of Washington. We have been following both the legislation and news related to recent rail disasters and regulations proposed for Bakken Oil with great concern.

The safety of our communities and firefighters is of utmost importance. We have seen the impacts that train derailments have had on communities where they have occurred. Specifically, the 2013 derailment in Lac-Megantic, Canada killed 47 people, burning homes from the inside out as fire erupted out of water pipes, drains and sewers. The 2014 derailment in Lynchburg, Virginia dumped oil in a nearby river. In North Dakota, in December, 2014, a derailment caused several oil tankers to burst into flames. More recently, on February 16, 27 cars derailed near the Kanawaha River in West Virginia. This incident luckily only resulted in one known injury. All of these incidents could have been even more catastrophic should they have occurred in major population centers.

In July of 2014, Seattle narrowly missed disaster when three tanker cars derailed at a rail yard under Seattle's Magnolia Bridge. The cars that derailed were carrying 27,000 gallons of Bakken oil each. The Washington Fire Chiefs has an interest to ensure the safety of our members and their communities. This interest goes far beyond a few training sessions.

The WFC is well aware that even if an infinite amount of foam was available, we can only provide defensive firefighting. This assumption is based on the guidance from the US Department of Transportation [DOT] Emergency Response Guidebook [Guide 127 and 128 on ethanol and crude oil, respectively] recommending a 1/2 mile evacuation zone if <u>only one tank car of these combustibles/flammables</u> is involved in a fire.

Normally we would be able to assess the hazard through right-to-know and other public documents; however, your industry has sought and gained exemptions to these sunshine laws. This exemption does not mean that your industry is exempt from taking reasonable steps to ensure catastrophic incidents do not occur. To that end, we are specifically requesting access to your information on what the US DOT calls High Hazard Flammable

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Trains operating most frequently with "unit trains" averaging 100 rail cars each, as well as on "manifest trains" with 10-20 cars of these cargoes that travel through the state of Washington.

Specifically, we request the following information:

1. Your railroad's own calculated **Worst Case Scenarios for a potential crude oil train emergency** in urban and sensitive environmental locales. What is the potential impact of a crude oil disaster in Washington communities?
2. Evidence of the **levels of catastrophic insurance coverage** your railroad has purchased relevant for potential serious releases in Washington State. For what level of potential disaster is your railroad covered?
3. Your high hazard flammable train **Comprehensive Emergency Response Plans,** both generic and for specific locations in Washington, urban and rural. Is there any credible emergency response to crude oil train disasters except evacuation? Please provide such plans covering all counties with crude train routes.
4. Your **route analysis documentation and route selection results for Washington State., pursuant to 2007 Public Law 110-53 on urban hazmat safety and security routing,** with the currently covered cargoes, especially chlorine and ammonia, as well as for the newly-recognized "key trains" of crude oil and ethanol. How have you weighted the 27 federal routing factors and whatever interchange agreements your railroad has struck with others to avoid high-risk areas?

We request that you promptly provide these documents to our organization within 30 days. These documents are vital to the safety and health of our fire agencies, communities and environment. Our citizens have a right to know what chemical disaster risks exist, and the various hazardous operations that are exposing them to this risk.

Sincerely,

Wayne Senter

Wayne Senter
Executive Director
Washington Fire Chiefs

CC:
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