

November 27, 2013
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Mr. Stephen Posner, interim EFSEC manager,
Energy Facility Site Evaluation Council
Post Office Box 43172,
1300 S. Evergreen Park Drive S.W.,
Olympia, Washington 98504-3172

Dear Sir:

I am a retired Railroad Conductor who worked in the Columbia Gorge for 35 years. This has allowed me to experience most all mishaps that occurred on a railroad.

The BNSF has well maintained the road-bed, they have safe operating crews and a good transport record. I believe that the speed for trains, that exceed 100 tons per operative brake, is 45 miles per hour.

This, however, gives rise to the question: How do you avoid the unexpected and unavoidable? Of course, you can't. You can only reduce the damage.

There are train-vehicle accidents, equipment failure, slides, washouts and rail sun-kinks. Known slide areas are protected by slide fences and signal indicators. However, I have experienced passing a "proceed" signal then the slide occurs and the fence, on occasion, will not hold the slide. This is not the norm, but it does happen. Rail sun-kinks seem to occur randomly when the temperature exceeds 90 degrees.

Tank cars 111-111A, which were constructed prior to October 1, 2011, have no head shields, skins of 11mm thick and have a proven failure rate in accidents. The volatility of the fracking crude has been demonstrated in Quebec and Alabama during recent derailments.

A speed restriction of 30 miles per hour with a train consist having tank cars 111 and 111A constructed prior to October 1, 2011, can reduce the environmental effects in a derailment. Though these tank cars comply with DOT Regulations, it does not reduce their known failure rate.

There are no restrictions that prevent Tesoro-Savage from upgrading the tank cars to October 1, 2011 standards, to protect our environment.

I offer the enclosed information as another view to the EFSEC Board for their deliberations.

Very truly yours,



Wilfred J. Hudson

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1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document outlines the various methods and techniques used to collect and analyze data. It includes a detailed description of the experimental procedures and the statistical tools employed.

3. The third part of the document presents the results of the study, including a comparison of the different methods and a discussion of the implications of the findings. It also includes a section on the limitations of the study and suggestions for future research.

4. The fourth part of the document provides a comprehensive overview of the theoretical background and the conceptual framework of the study. It discusses the relevant literature and the key concepts used in the research.

5. The fifth part of the document describes the methodology used in the study, including the selection of the sample, the data collection process, and the statistical analysis. It also includes a section on the ethical considerations and the approval of the study.

6. The sixth part of the document discusses the results of the study in detail, including the main findings and the statistical significance of the results. It also includes a section on the practical implications of the study.

7. The seventh part of the document provides a conclusion and a summary of the key findings. It also includes a section on the limitations of the study and suggestions for future research.

References

Appendix