Docket EF-131590 Tesoro Savage CBR Scoping Comment #4663

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 cares 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 Tesora-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,

W. J. Hudson

Wilfred J. Hudson

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