



City of Alexandria, Virginia
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March 24, 2015

The Honorable Anthony Foxx
Secretary of the US Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Re: Rail Transportation of Crude Oil and Ethanol Products

Dear Secretary Foxx:

On behalf of the City of Alexandria, Virginia ("City"), I am writing to reiterate our extreme concern with the significant risks associated with rail transportation of hazardous and/or highly flammable materials such as crude oil and ethanol through densely populated areas, particularly the City of Alexandria. Recent train derailments involving oil tank cars have resulted in fires and explosions in Fayette County, West Virginia as well as Northwest Illinois and Gogama, Canada, which have caused serious concerns and anxiety in our communities and neighborhoods located near railways and or ethanol transloading facilities.

On September 30, 2014, our City submitted written comments and recommendations to your department on the proposed regulation PHMSA-2012-0082 (HM-251) titled "Hazardous Materials: Enhanced Tank Car Standards and Operational Controls for High-Hazard Flammable Trains (HHFT)". Our comments and recommendations are summarized as follows:

1. The City recommends that PHMSA seriously consider banning the siting of transloading facilities within 0.5 mile of densely populated residential areas to minimize the risk associated with a catastrophic event. Furthermore, due to the significant impacts of these facilities on local communities, the City believes that the siting of these facilities should be subject to local land use planning and policy.
2. The City recommends that HHFT be defined as a train carrying greater than 5 tank cars instead of 20 cars considered in the proposed rulemaking, which reduces the threshold to about 200,000 gallons.
3. The proposed rulemaking limits speeds to 40 mph in many areas, including high threat urban areas and areas with a population of 100,000. The City supports lowering the train

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speed in densely populated communities and urban areas, and recommends the speed be reduced to 20 mph, consistent with the present tank car standards.

4. The City supports the proposed enhanced standards for both new and existing tank cars and the adoption of PHMSA and FRA designed tank cars having a minimum 9/16-inch shell thickness. Furthermore, the use of ultra-high tensile strength steel having a minimum of 1 GPa tensile strength should also be adopted to increase crash resistance of these tank cars.
5. At a minimum, the ethanol transloading facilities should be addressed as part of this proposed rulemaking. If another rulemaking is needed to more comprehensively address these facilities, it should be enacted as soon as possible. PHMSA should consider issuing an emergency order to address immediate safety concerns.

The City is very concerned with the following facts that follow the recent oil train derailments in West Virginia as well as Lynchburg, Virginia and Northwest Illinois:

- The 109-car derailment in West Virginia involved all newer CPC 1232 oil tank cars designed to provide better resistance from puncture than the standard DOT-111 car manufactured before 2011. CSX also confirmed that this newer tank car design was involved in the Lynchburg, Virginia train derailment as well as the damaged tank cars in the Illinois derailment. To date, this newer tank car design has failed in at least four derailments this year and at least two in 2014.
- According to the Federal Railroad Administration, which is investigating the Illinois derailment, the 105-car train was traveling at just 23 mph when it left the tracks, well **below** the maximum speed allowed. Likewise, the Fayette County train was going 33 mph at the time of derailment in the Mount Carbon Community of West Virginia, well below the present limit of 50 mph.

Based on the above outlined recommendations, we strongly urge US DOT to reduce the train speed limit to 20 mph or less in densely populated communities and urban areas.

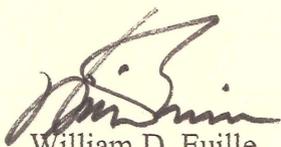
Furthermore, as recently as March 19, the City was informed by Norfolk Southern that they are proceeding with a plan to significantly increase the capacity of its ethanol transloading facility in Alexandria which is located about 200 feet from neighborhoods with thousands of residents. This is not a responsible decision by Norfolk Southern in light of the increased safety hazards that have been proven to be associated with rail transportation of flammable liquids. Rail operations are governed by federal laws and communities across the country, including Alexandria, urgently need your department's leadership to pass regulations that help maintain their safety and quality of life.

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We kindly request that your department expedite the decision on the proposed rulemaking in such a manner that it would bring relief to communities located near the railways and transloading facilities and at the same time regain public trust on the safety of transportation of flammable liquids by rail cars.

Thank you in advance for your consideration regarding our community's concerns and request.

Sincerely,



William D. Euille
Mayor

cc: The Honorable Mark R. Warner
The Honorable Tim Kaine
The Honorable Don Beyer
The Honorable Brian Moran
The Honorable Members of City Council
Mark B. Jinks, Acting City Manager