Targus, Lorri (UTC)

From: Eric Strid <ericwstrid@gmail.com>
Sent: Monday, June 22, 2015 12:11 AM
To: UTC DL Records Center
Subject: Comments on UTC Rail Safety Rulemaking, Docket # TR-151079

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. King,
The risk of an oil spill here in Washington is already great and only growing. I'd like to answer each of the questions you ask:

What is your definition of a reasonably likely worse-case spill of oil?
- We live in the Bakken Blast Zone, in White Salmon, WA. Since the only firefighting strategy is to evacuate, an oil train derailment on the tracks below us in the dry season (June through October) would ignite a wildfire that would travel up the wooded bluff here within 15 minutes (as one did near here last September) and threaten hundreds of homes and downtown White Salmon (or all of Bingen just a mile east of here). If there is a strong wind at the time (30-40 mph winds are why kitesailors and boardsailors flock to here in the summer), that wind would rapidly drive the fire downwind. While the oil cars are burning (potentially for days like they did in a recent explosion), fire crews would need to consider exposure to toxics from the oil (which are highly variable from well to well and largely unknown). Not endangering our volunteer firefighters would imply letting this monster fire deforest the Columbia Gorge National Scenic Area for miles with little or no firefighting.
- Evacuation could be catastrophic, as there are few routes to evacuate in many cases. Evacuees from towns along Gorge may have to travel downwind more than 20 miles before they escape the toxic fumes. There are approximately 500 people working in companies on Bingen Point which could be stranded by a train derailment, the only escape being a tiny dock in the river nearby.
- The risk is not theoretical, as we have seen in the 11 large-scale crude oil derailments since the tragic accident in Lac Megantic in July of 2013. In that accident, an estimated 1.6 million gallons spilled. It is reasonable to assume that a worse case spill would be the whole 120 car unit train of over 1 million gallons, and up to 3.5 million gallons, of crude oil. The derailment could result in a spill of tar sands or Bakken crude oil and could be in a forested area sparking fires, into the Columbia River during salmon migration, through the middle of a densely populated area like Seattle, or in a rural community where it will be difficult to get resources to the scene.

What is the reasonable per-barrel cleanup and damage cost of spilled oil?
- The roughly one-million gallon spill of tar sands oil into the Kalamazoo River cost over $1 billion in cleanup efforts, and the damage was so severe that ecosystem restoration after the cleanup is in question. To first order: $40,000 per barrel, not counting loss of life or species. A full train: $3 billion, well over the level any insurance company will insure.
- It is hard to assess the price of human life, environmental quality, clean water, and the lives of other species. We have seen in the disaster of Lac Magnetic where 47 people died that those lives have not been fully accounted for. The UTC needs to take into human health and livelihoods, environmental quality and health, uneven impacts on proximate communities to the rail and crossings, long-term economic impacts of a spill and/or explosion, and the actual cost of cleaning up the spill.

What risk factors should the Commission consider in establishing safety standards at private crossings?

- The risk factors are numerous and include: number of trains, type of oil being carried, number of crossings, location of crossing to communities and waterbodies, history of derailment and maintenance, type of car being used and the length and weight of train.
- I am amazed at how many rednecks here cling to their guns as if the gub'ment is coming to get them. If one of those crazies gets pissed off one day, they may take aim at an oil train just to see what would happen. Just sayin'...

Thank you for taking public comment on how to assess the impacts and risks.

As an engineer by training, I have concluded that railroads cannot significantly reduce the risks of oil spills without a massively stronger tank car design, which no one has even suggested; and that the only option physically capable of significantly reducing explosion risk of Bakken crude is to pre-refine the oil to remove volatiles in North Dakota before transporting it, as Texas has always required. The recent explosion of Alberta tar sands oil was apparently due to the diluant, which needs further study.

By strengthening its role around rail safety, the UTC can be a leader in how and what types of impacts are evaluated. As a citizen of Washington, I am counting on you to accurately reflect the risk.

Eric Strid
PO Box 2028
White Salmon, WA 98672