Univar USA Inc. 6100 Carillon Point Kirkland, WA 98033 PO Box 34325 Seattle, WA 98124-1325 USA

T 425 889 3400 F 425 889 4100 www.univarusa.com





2013 OCT -3 AM R: 29

Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive S.W. PO Box 47205 Olympia, WA 98504-7250

September 23, 2013

RE: Olympic Chemical: Rule Exemption Request, WAC-480-60-40, WAC-480-60-50

Olympic Chemical Corporation 1002 E. D Street Tacoma, WA 98421

Phone: 253-572-4215 Contact: Geoff Black

As required under WAC 480-60-20(4) Olympic Chemical Corporation (a wholly owned subsidiary of Univar USA Inc.) is requesting a rule exemption as described below.

Rule Exemption Request:

- 1) Written request to the Commission requesting exemption from railroad clearance rules in WAC 480-60.
- 2) WAC 480-60-040 generally requires an overhead clearance of at least 22'-6" measured from the top of the track. Although the rules provide for exceptions, the structure associated with Olympic Chemical Corporation's (OP's) request is subject to the general rule.
- 3) WAC 480-60-050 generally requires a side clearance of at least 8'-6", measured from the centerline of the track. Although the rules provide for exceptions, the structure associated with Olympic Chemical Corporation's (OP's) request is subject to the general rule.
- 4) The BNSF Railway Company (BNSF), as the primary rail operator within the OP facility, has tentatively approved our facility improvement requiring the proposed exemption. BNSF's support is conditional upon the Commission granting an exception for the proposed clearances.

- 5) The request relates to the installation of a tracking railcar unloading rack which will provide additional safety / fall protection for personnel while unloading railcars. Reference attachment "A" OP Railcar Unloading Rack and Attachment "B" OP Railcar Unloading Rack Description.
- 6) The overhead track clearance attained by the proposed railcar unloading design is less than that required by WAC-480-60-40. The overhead clearance under the rack safety cage (in stored position) would be reduced to 18'-0" for the length of the 8' x 8' horizontal safety cage.
- 7) The lateral track clearance attained by the proposed railcar unloading design is less than that required by WAC-480-60-50. The side clearance between the three foot wide unloading rack (in stored position) would be a minimum of 7'-0".
- 8) The proposed overhead track clearance exception is as follows: Clearance below the loading rack (in stored position) to be reduced to 18'-0" for the length of 8'-0" directly below the horizontally stored rack with safety cage.
- 9) The proposed side clearance exception is as follows: Clearance between the face of the tracking unloading rack to be reduced to a minimum clearance of 7'-0".
- 10) Olympic Chemical, with direction from the BNSF, will clearly mark and sign the structure identified above as having substandard clearances.

I look forward to your response to our rule exemption request. Please contact me at the above number or my mobile number 253-219-9186 should you have any questions or require further clarification.

Sincerely,

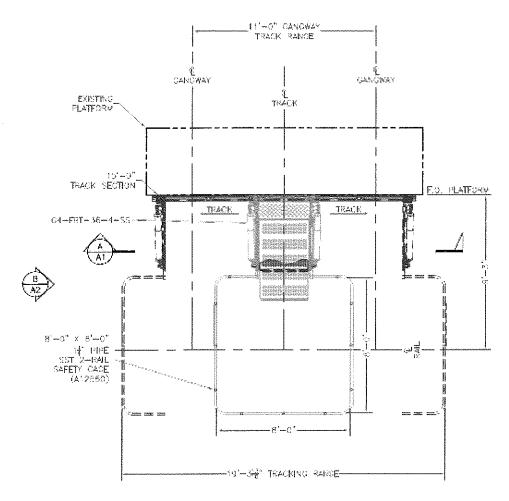
Geoff Black

Operations Supervisor

Med

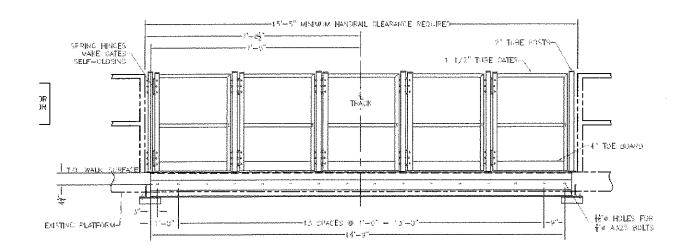
cc: Mark Rogers

Attachment A – OP Railcar Unloading Rack (Drawings)

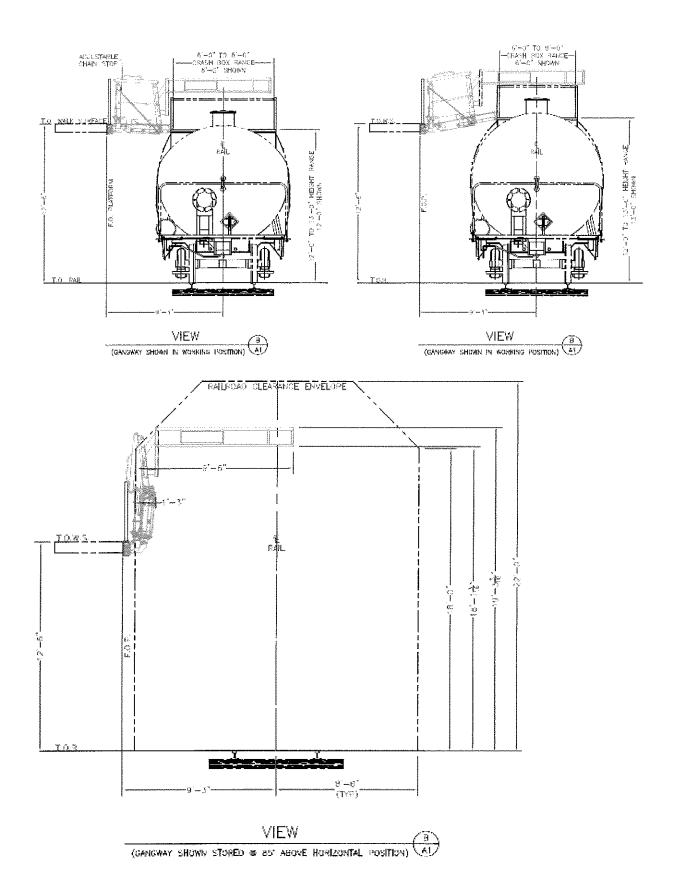


FLAN VIEW
(GANGWAY SHOWN & HORIZONTAL)

(ROPTE				\Box	¥Ε	àn'
CUSTOWER INFORMATION: CLEWFIC CHEMICAL DIES FAST 'U' STREET TACGAS, RA SER 21 ATTO: ERICH GALER 503.222,3448			UNLESS OTHERWISE SPECIFIED			
			TULERANDEN LIKEAR ± (* ANGULAR ± (*)	PROJECTION:		
DRAWN BAH 8-21-13	d	i Xa.				
OHECK, SAG		e		_	أه	
Đ⊀3: ₩₩ 8-2'-13			ateR			
APAL: RE	- ALIES	Lea	· 医乳管 电水体件 工業化		-Losi	E÷
HOME OFFICE: 730 ELEC	FE	ORNE SU	MIER, SC 28153			
CESCOPPITON: GENERAL A	RIVAS	GEN ENT				
G4-FRT STYLE GANG	የ አተላ	& TRAC	K FOR RAILO	4.17	ACGE	T.E
845≢ 212348-A1			SHEETS 1 OF 2		REV:	_
P.D.€ 6016¥#01	SCALE: 3,	LE: 3/8" = 1'-0"		SIZE:	D	
Pod Sonement All Information Contrain Proprietably and May No Prior Writing Consider	an a∎	ENERY IS absolosi	CONFIDENTIAL AN	441	Hot	ıı



SECTION (A)



Attachment B – OP Railcar Unloading Rack (Description)

RE: FLAT RAMP GANGWAY WITH TRACK

- 1 (G4) FRT TRACKING FLAT RAMP WITH TELESCOPING END SAFE ACCESS GANGWAY (3 feet wide) STAINLESS STEEL
 - * SINGLE PIECE PATENTED "U" body frame support design is stamped and formed from one integral, continuous unbroken piece of stainless steel all structural welding eliminated in areas of high load concentration no structural welds that could break
 - * Centerline 8'-6"
 - * Molded ergonomically crafted handle allows for easy positioning of the 11" or 21" extension which eliminates gaps
 - * Two (2) oversized 1" diameter solid stainless steel pivot rods with pivoting bushings at all load bearing pivots for unmatched strength, long life and a more solid walk surface
 - * High strength spring counterbalance mechanism ensures easy operation of system for any and all operators
 - * Over travel stops with rubber bumpers provide a "smooth, soft, and buffered" return of the gangway if retracted with strong force.
 - * Outboard gangway uprights are 2" x 4" tube that increases load bearing capabilities which provides a stronger, safer support for the cage assembly
 - * Manufactured, stamped and formed components along with CNC machined pivot points with .004 tolerances ensures reduced wear and repeatable quality
 - * Patented foot lock design offers improved reliability over other designs for many years of trouble free operation
 - * Base tread uprights come standard with hot dipped Galvanized steel construction, but is also available in stainless steel
 - * Laser keyed upright chain stay design helps keep chains untangled around foot lock and lift rope along with increasing the systems strength.
 - * Unit is self supporting and has a 500 lb load capacity

1 36" WIDE TRACK MOUNT CARRIAGE

* Allows gangway to track left or right along the face of the platform.

1 TRACK SECTION

- * 15' 0" track with uprights
- * 3' 0" wide, self closing swing gates (some assembly required)
- * Galvanized steel construction

1 SAFETY CAGE

- * 8'-0" x 8'-0" Two (2) rail safety cage (12") deep
- * Stainless steel construction