



CM: 7003 1680 0006 7307 1461

February 18, 2014

Washington Utilities and Transportation Commission  
1300 S Evergreen Park Dr. SW  
PO Box 47250  
Olympia, WA 98504-7250  
ATTN: Bob Boston

RECEIVED

FEB 26 2014

WASH. UT. & TP. COMM

Chemtrade Performance Chemicals (Kalama)  
404 Hendrickson Drive  
Kalama, WA 98625

RE: Chemtrade Performance Chemicals: Rule Exemption Request, Chapter WAC 480-60

As required under WAC 480-60-020 (4), Chemtrade Performance Chemicals is requesting a rule exemption as described below.

This request relates to an existing Chemtrade tank car unloading station on the Kalama site premises. The unload facility consists of a single load/unload station on a single dead end spur on the Kalama site. The existing unloading station gangway is being upgraded to a new retractable gangway with a safety cage to comply with OSHA fall control requirements.

**Rule Exemption Request:**

**WAC 480-60-040: Overhead Clearances**

The general rule states that overhead clearances shall be at least 22'-6" unless one of the provisions of the section applies. Provision (4) of the Section describes the minimum overhead clearance for "All other structures" in which the "minimum overhead clearance may be decreased to the extent defined by the half-circumference of a circle having a radius of 8'-6" and tangent to a horizontal line 22'-6" above the top of rail at a point directly over the centerline of the track."

- The minimum overhead clearance attained by the Chemtrade proposed design is less than that required by WAC 480-60-040 with the bottom of the safety cage being at 19'-9" above the top of the rail in the stowed position. See attached drawing S1.

**WAC 480-60-050: Side Clearances**

The general rule states that the side clearances must be 8'-6" unless one of the provisions of the section applies. Provision (6) of the Section describes minimum clearances for retractable platforms which are attached to permanent structures. The clearance of such platforms "must be designed so that when it is not in use no part of it shall fall within the clearance limits herein prescribed for a platform of that height above the top of the rail." The proposed retractable platform is defined as "icing platforms" per WAC 480-60-030, as they are structures used in performing the service of cars in the handling of commodities. Provision (7) describes icing platforms, a similar height structure, as requiring a side clearance of 7'-3".



Chemtrade Performance Chemicals US, LLC  
404 Hendrickson Drive, Kalama, Washington 98625  
T: 360-673-4503 F: 360-673-4506  
www.chemtradelogistics.com



- The minimum side clearance attained by the Chemtrade proposed design meets the criteria required by WAC 480-60-050 for icing platforms. The safety cage in the stowed position has approximately 8'-0" clearance from the track centerline. See attached drawing S1.

**Exemption Justification:**

- 1) The retractable platforms are to be extended to tank cars and operated by Chemtrade employees after delivery of cars by Burlington Northern Rail. The platforms will then be returned to the fully stowed position prior to removal of cars by Burlington Northern. Therefore the lower vertical clearance of the safety cage in the upright position does not negatively affect Burlington Northern operations. Burlington Northern will not service the unloading facility area unless the retractable platforms have been returned to the stowed position. Burlington Northern Rail will issue instructions to train crews advising of the maximum height of rail cars allowable to this spur.
- 2) The loading structures are to be located inside the fenced area at Chemtrade. With the proposed clearances and fully stowed retractable platforms, Burlington Northern trains will be able to clear the structures; however the close clearance would present a risk to individuals riding on the top of the railcar within the fenced area. Although train crewmembers have no reason to ride on the top of a railcar, all parties agree that any clearance exemption should be conditional upon a prohibition against riding on the top of a railcar approaching or underneath the loading structures; and clearly making and signing the proposed rail yard facility as having lower vertical clearances.
- 3) Although the proposed retractable platforms infringe on the overhead prescribed by WAC 480-60, the attached exhibit demonstrates that the fully stowed retractable platform allow, for ample clearance of a tank car and locomotive.
- 4) Burlington Northern Rail is the exclusive railroad operator within the Chemtrade facility, and is prepared to approve the facility improvements on the condition the WUTC approves these exemptions.

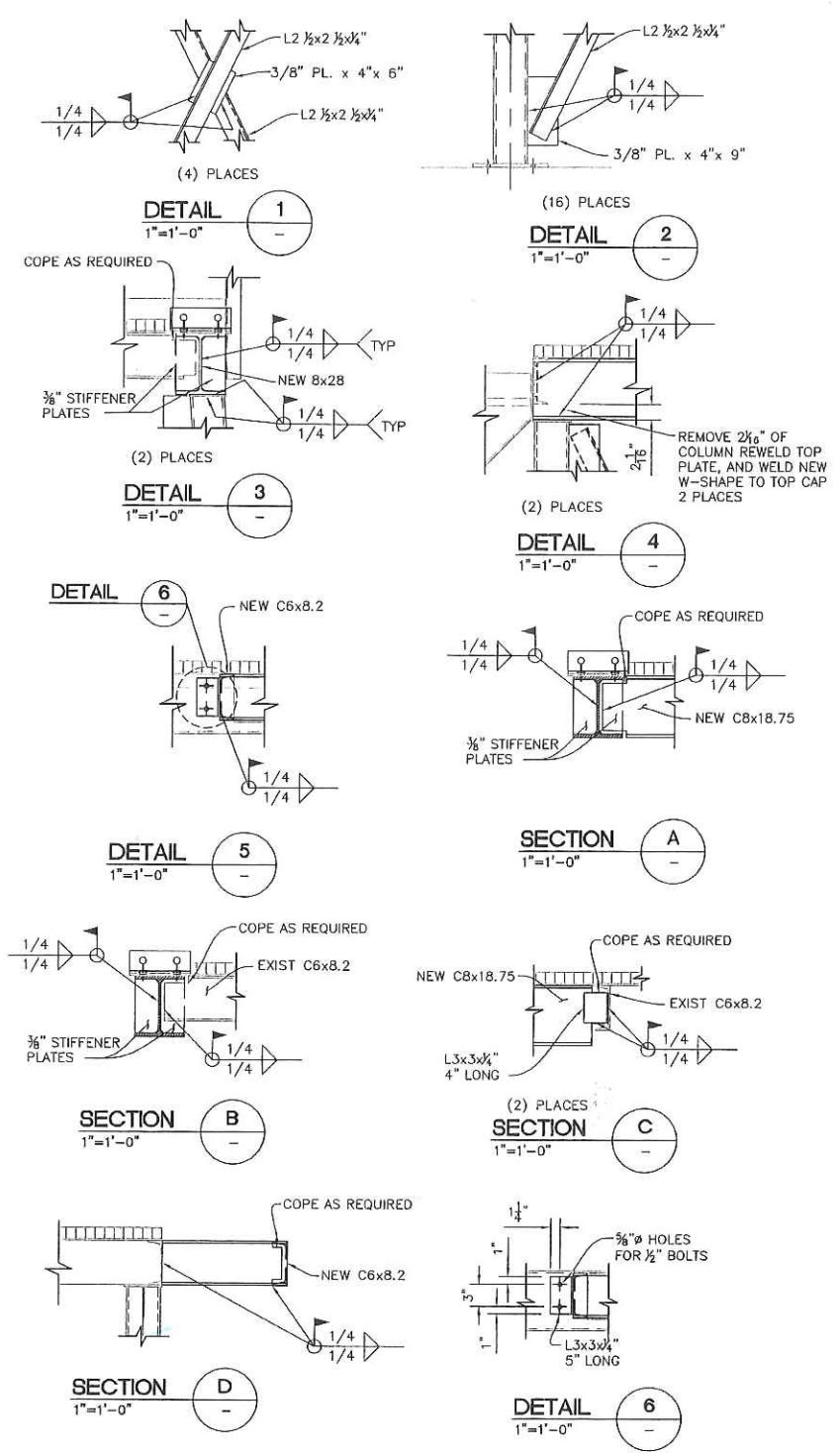
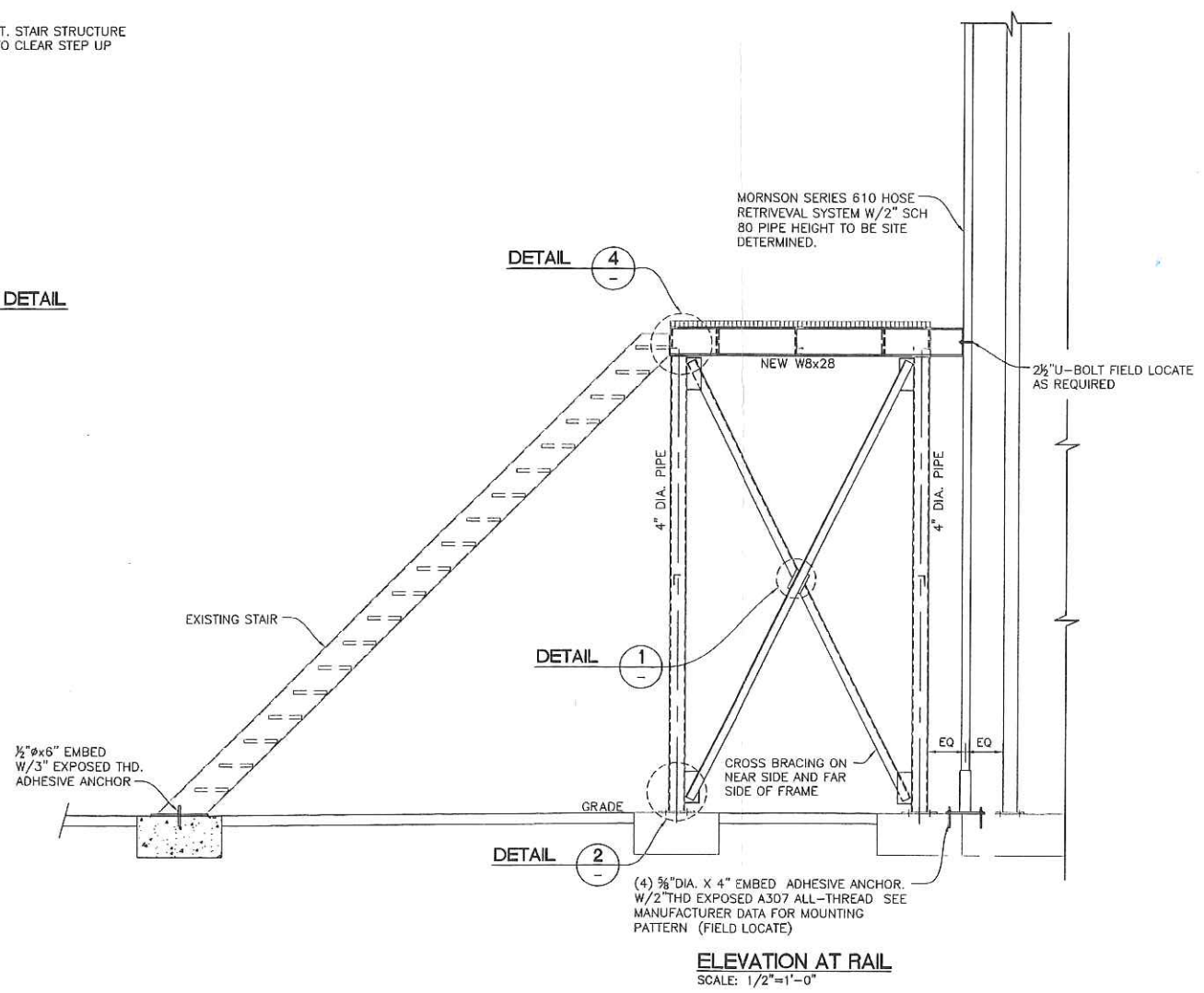
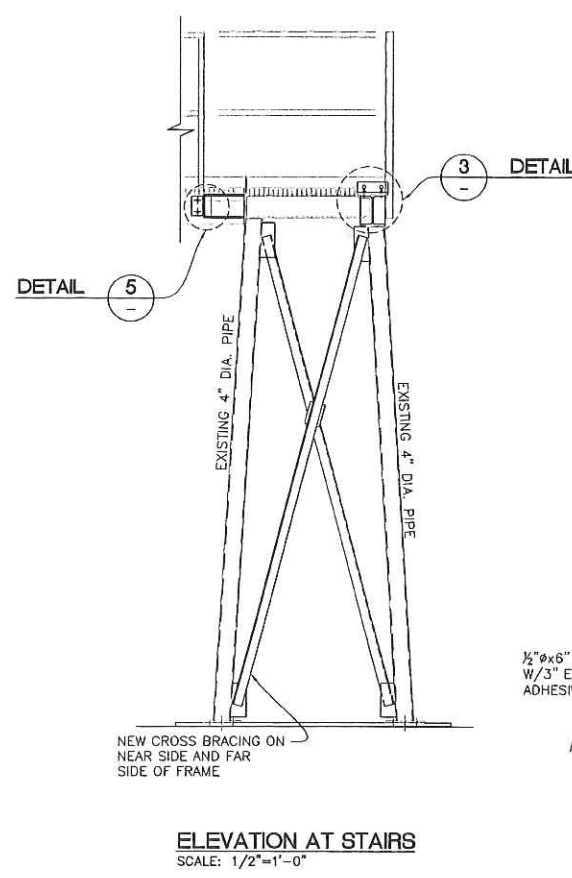
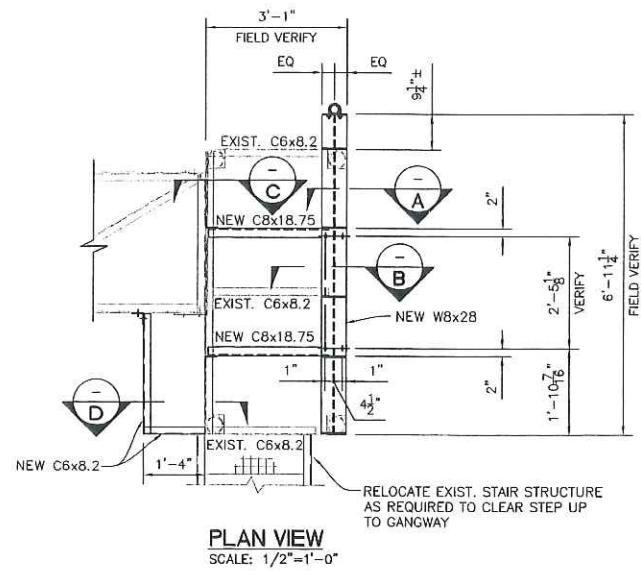
We look forward to your response to our rule exemption request. Please contact me at 360-673-4503 or Dale Marlett, Norwest Engineering at 503-200-5193 should you have any questions or require further clarification.

Sincerely,

Gloria Owen  
Plant Manager  
Chemtrade Performance Chemicals

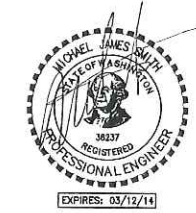
Attachments:  
Chemtrade Logistics drawing 140-0100-20 S1-S2





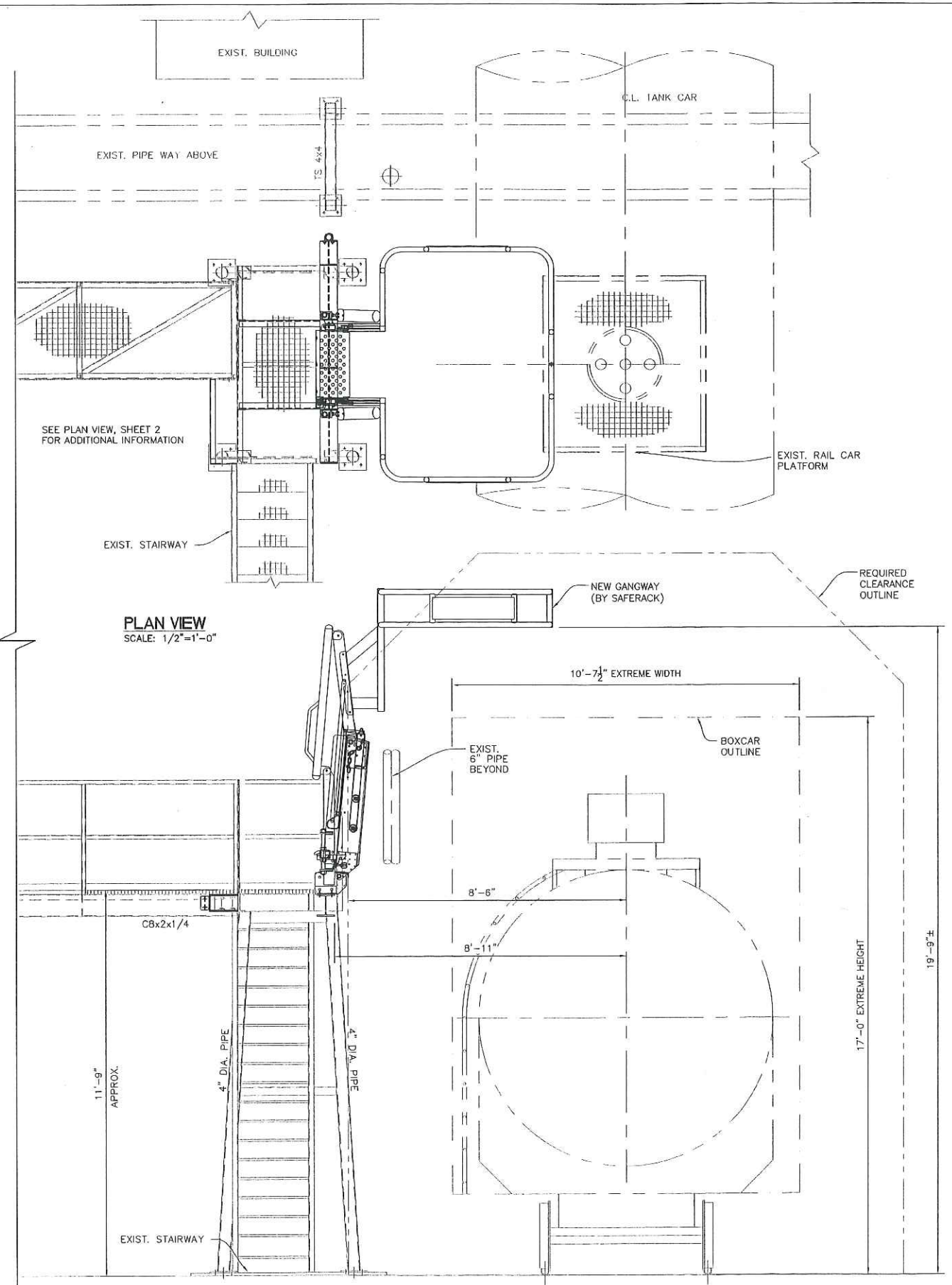
- NOTES:**
1. ALL BOLTS ARE A325 GALV.
  2. ALL FIELD WELDS TO BE CLEANED AND PANIATED W/ (2) COATS OF GALVACON.
  3. GRATING FASTENERS ARE STAINLESS STEEL.
  4. ALL STEEL TO BE A-36.
  5. ALL WELDS TO BE E70XX PER AWA 1.1.
  6. FIELD VERIFY ALL DIMENSIONS PRIOR TO FABRICATION.
  7. RE-INSTALL HANDRAIL AS REQUIRED.

<b>NORWEST ENGINEERING</b> CONSULTING ENGINEERS 503-254-0110	N.E. # 0376	SCALE: SHOWN				
		DWN.	SJE	12-19-13	LOCATION	AREA
		CHK'D	-	-	140	0100
APP.	-	-		CODE	SERIES	
				20	-	
					REVISION	
					A	



0	1/17/14	DLM	SMJ	ISSUED FOR CONSTRUCTION	
REV	DATE	BY	APPD	DESCRIPTION OF REVISION	
<b>CHEMTRADE LOGISTICS</b>					360-673-4503
					404 Hendrickson Drive Kalama, WA, 98625
<b>ACCESS WALKWAY/GANGWAY PLANS, SECTIONS AND DETAILS</b>					

DWG-S2



**PLAN VIEW**  
SCALE: 1/2"=1'-0"

**ELEVATION**  
SCALE: 1/2"=1'-0"

**DESIGN CRITERIA**

1. 2012 INTERNATIONAL BUILDING CODE.
2. GROUND SNOW LOAD: 20 PSF.
3. FROST DEPTH: 12".
4. WIND LOADS AND PRESSURES IN ACCORDANCE WITH CHAPTER 6 OF ASCE/SEI 7-05
  - BASIC WIND SPEED (3 SECOND GUST): V = 85 MPH
  - EXPOSURE B
  - IMPORTANCE FACTOR:  $IW = 1.0$
5. SEISMIC DESIGN CRITERIA IN ACCORDANCE WITH CHAPTER 11 OF ASCE/SEI 7-05
  - IMPORTANCE FACTOR:  $IE = 1.0$
  - SITE CLASS: D
  - MAPPED ACCELERATION PARAMETERS:  $SS = 0.062g$   $S1 = 0.329g$
  - SEISMIC DESIGN CATEGORY: D

**CONCRETE ACCESSORIES**

1. ADHESIVE FOR DRILL AND ANCHOR REINFORCING BARS AND ANCHOR RODS TO BE HILTI HY150 MAX-SD ANCHORING ADHESIVE. INSTALL PER MANUFACTURER'S INSTRUCTION AND USE HILTI CERTIFIED PERSONNEL FOR MISCELLANEOUS EQUIPMENT INSTALLATION, ANCHOR RODS TO BE ASTM F1554 GRADE 36, THREADED RODS, FURNISH BLACK. FURNISH WITH 45° CHISEL POINT FOR EMBEDDED END.
2. EXPANSION ANCHORS TO BE HILTI KB-TZ, CARBON STEEL WITH STANDARD COATING. INSTALL PER MANUFACTURER'S INSTRUCTIONS. EXPANSION ANCHORS FOR INTERIOR USE ONLY EXCEPT AS NOTED.

**STRUCTURAL STEEL**

1. FABRICATION & ERECTION OF STRUCTURAL STEEL TO BE IN ACCORDANCE WITH THE AISC SPECIFICATION FOR STRUCTURAL STEEL BUILDINGS ANSI/AISC 360-05 AND AISC CODE OF STANDARD PRACTICE FOR STEEL BUILDINGS AND BRIDGES AISC 303-05.
2. MATERIAL WILL MEET THE REQUIREMENTS OF THE FOLLOWING SPECIFICATIONS, UNLESS NOTED OTHERWISE (U.N.O.):
  - W-SHAPES AND TEES - ASTM A992
  - PLATES, BARS AND OTHER SHAPES - ASTM A36
  - PIPE SECTIONS - ASTM A53 GR. B
3. ALL 3/4" BOLTS TO BE ASTM A325, BOLTING PRACTICE TO BE IN ACCORDANCE WITH RCSC SPECIFICATION FOR STRUCTURAL JOINTS USING ASTM A325 OR A490 BOLTS, JUNE 30, 2004. ALL BOLTS TO BE FULLY TENSIONED, VERIFY WITH TURN-OF-THE-NUT TIGHTENING OR TENSION CONTROL BOLTS. ALL 5/8" BOLTS TO BE A307.
4. ALL WELDING TO BE DONE IN ACCORDANCE WITH AWS D1.1. WELDING ELECTRODES TO BE E70XX.

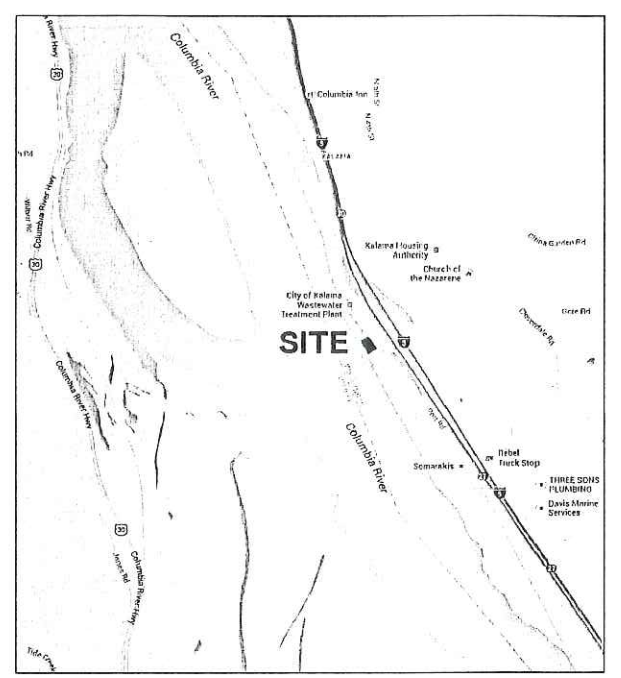
**SPECIAL INSPECTIONS**

THE FOLLOWING SPECIAL INSPECTIONS ARE REQUIRED FOR THIS PROJECT:

	CONTINUOUS	PERIODIC
1. MATERIAL VERIFICATION OF STRUCTURAL STEEL AND COLD-FORMED STEEL DECK:		
a. FOR STRUCTURAL STEEL, IDENTIFICATION MARKINGS TO CONFORM TO AISC 360.	-	X
b. FOR OTHER STEEL, IDENTIFICATION MARKINGS TO CONFORM TO ASTM STANDARDS SPECIFIED IN THE APPROVED CONSTRUCTION DOCUMENTS.	-	X
c. MANUFACTURER'S CERTIFIED TEST REPORTS.	-	X
2. MATERIAL VERIFICATION OF WELD FILLER MATERIALS:		
a. IDENTIFICATION MARKINGS TO CONFORM TO AWS SPECIFICATION IN THE APPROVED CONSTRUCTION DOCUMENTS.	-	X
b. MANUFACTURER'S CERTIFICATE OF COMPLIANCE REQUIRED.	-	X
3. INSPECTION OF WELDING:		
a. STRUCTURAL STEEL AND COLD FORMED STEEL DECK:		
1) COMPLETE AND PARTIAL JOINT PENETRATION GROOVE WELDS.	X	-
2) MULTI-PASS FILLET WELDS	X	-
3) SINGLE-PASS FILLET WELDS $\leq 3/16$	-	X
4) FLOOR DECK WELDS	-	X
4. INSPECTION OF STEEL FRAME JOINT DETAILS FOR COMPLIANCE:		
a. DETAILS SUCH AS BRACING AND STIFFENING.	-	X
b. MEMBER LOCATIONS.	-	X
c. APPLICATION OF JOINT DETAILS AT EACH CONNECTION.	-	X
5. 4. INSPECTION OF ANCHORS POST-INSTALLED IN HARDENED CONCRETE MEMBERS.*	-	X

\* SPECIFIC REQUIREMENTS FOR SPECIAL INSPECTION SHALL BE INCLUDED IN THE RESEARCH REPORT FOR THE ANCHOR ISSUED BY AN APPROVED SOURCE IN ACCORDANCE WITH ACI 308.2R OR OTHER QUALIFICATION PROCEDURES. WHERE SPECIFIC REQUIREMENTS ARE NOT PROVIDED, SPECIAL INSPECTION REQUIREMENTS SHALL BE SPECIFIED BY THE REGISTERED DESIGN PROFESSIONAL AND SHALL BE APPROVED BY THE BUILDING OFFICIAL PRIOR TO THE COMMENCEMENT OF THE WORK.

THE OWNER WILL RETAIN A CERTIFIED SPECIAL INSPECTOR TO PERFORM THE INSPECTIONS OUTLINED ABOVE. THE CONTRACTOR SHALL BE RESPONSIBLE FOR NOTIFYING THE INSPECTOR TWO DAYS PRIOR TO ALL REQUIRED INSPECTIONS.  
ENGINEER OF RECORD STRUCTURAL OBSERVATION TO BE PROVIDED BY NORWEST ENGINEERING.



**VICINITY MAP**  
N.T.S.

DWG-S1



0	1/17/14	DLM	SMJ	ISSUED FOR CONSTRUCTION
REV	DATE	BY	APPD	DESCRIPTION OF REVISION

**CHEMTRADE LOGISTICS** 360-673-4503  
404 Hendrickson Drive  
Kalama, WA, 98625

ACCESS WALKWAY/GANGWAY  
GENERAL ARRANGEMENT

**NORWEST ENGINEERING**  
CONSULTING ENGINEERS 503-254-0110  
4110 NE 122ND AVE #207  
PORTLAND, OREGON

SCALE: SHOW	DRAWING NUMBER					
DWN. BY SE	DATE	LOCATION	AREA	CODE	SERIES	REVISION
CH'K'D	12-11-13	140	0100	20	-	A
APP.						