

August 11, 2014

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

Shell Oil Products US  
Puget Sound Refinery  
Attention: Mark Boger  
8505 South Texas Road  
Anacortes, WA. 98226

**RE: Shell Oil Products, Puget Sound Refinery – PSR Feedstock Import Project: Rule Exemption Request, Chapter WAC 480-60**

On behalf of Shell Oil Products US and as required under WAC 480-60-020 (4), Shell Oil Products, Puget Sound Refinery is requesting a rule exemption as described below.

This request relates to a Proposed Puget Sound Refinery PSR Feedstock Import Project facility on the Puget Sound Refinery premises. The unloading facility consists of a two track seven car spot unloading facility at the Puget Sound Refinery site.

**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."

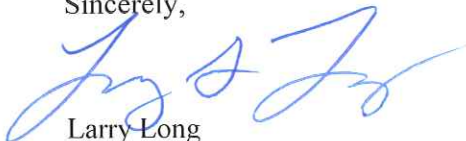
- The minimum overhead clearance attained by the Shell Oil Products proposed design is less than that required by WAC 480-60-040 with the bottom of the safety cage being at 21'-3' 1/8" above the top of the rail in the stowed position. See attached drawing 214810-C12.

Exemption Justification:

- 1) The retractable platforms are to be extended to tank cars and operated by Shell Oil Products employees after delivery of cars by BNSF to allow unloading of cars in a safe manner. The platforms will then be returned to the fully stowed position prior to removal of cars by BNSF. Therefore the lower vertical clearance of the safety cage in the upright position does not negatively affect BNSF operations. BNSF will not service the unloading facility area unless the retractable platforms have been returned to the stowed position. BNSF 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 Shell Puget Sound Refinery. The proposed clearances and fully stowed retractable platforms are over Shell tracks that will only be used for the unloading of crude oil tanker railcars. BNSF 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 allows for ample clearance of a tank car and locomotive.
- 4) BNSF is the Class 1 railroad operator within the Shell Puget Sound Refinery East Gate 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 909-806-8002 or Thomas Jacques, Wilson & Company at 909-806-8017 should you have any questions or require further clarification.

Sincerely,



Larry Long  
Vice President  
Wilson & Company

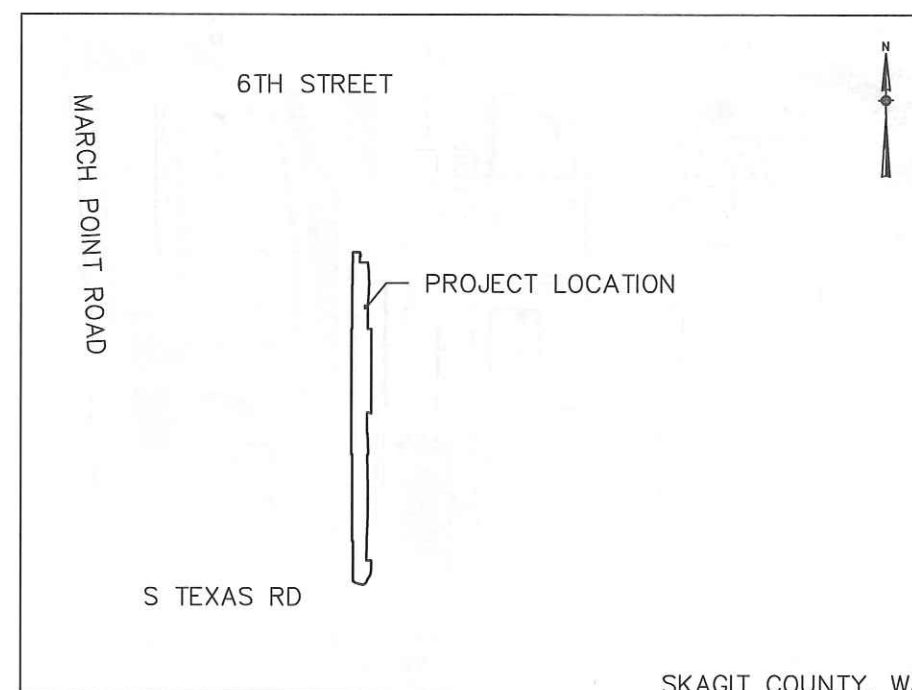
CC: Glen Gaz – BNSF  
Taylor Smith – BNSF  
Mark Boger – Shell



# SHELL PUGET SOUND REFINERY FEEDSTOCK IMPORT PROJECT



PROJECT AREA



VICINITY MAP  
NTS

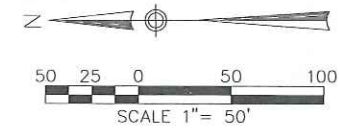
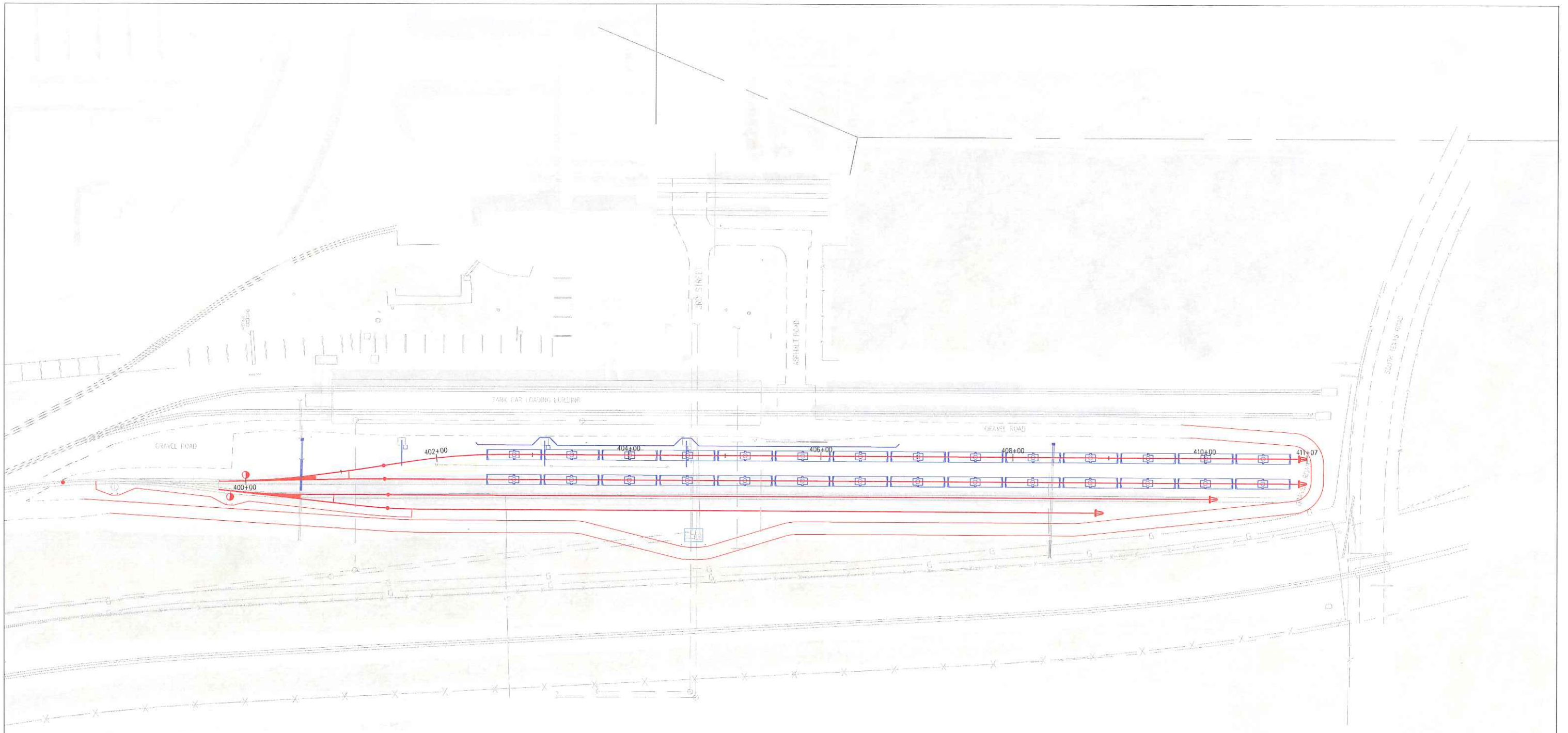
PROJECT NO. 13-400-056  
P.E. THOMAS JACQUES

**WILSON  
& COMPANY**

625 E. CARNEGIE DRIVE, SUITE 100  
SAN BERNARDINO, CA 92408  
PHONE: (909) 806-8000  
FAX: (909) 806-8099

BM 11428  
SHELL PSR NO. PU001-C13034

PATH: C:\wcp\wld0120760\Border.dwg  
 PRINTED: 2013/04/23 8:31 AM  
 BY: BOCKENSTETTE, ROBERT CURTIS



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**SHELL OIL PRODUCTS**  
 PUGET SOUND REFINERY  
 ANACORTES, WASHINGTON  
 SHELL PSR  
 SITE PLAN

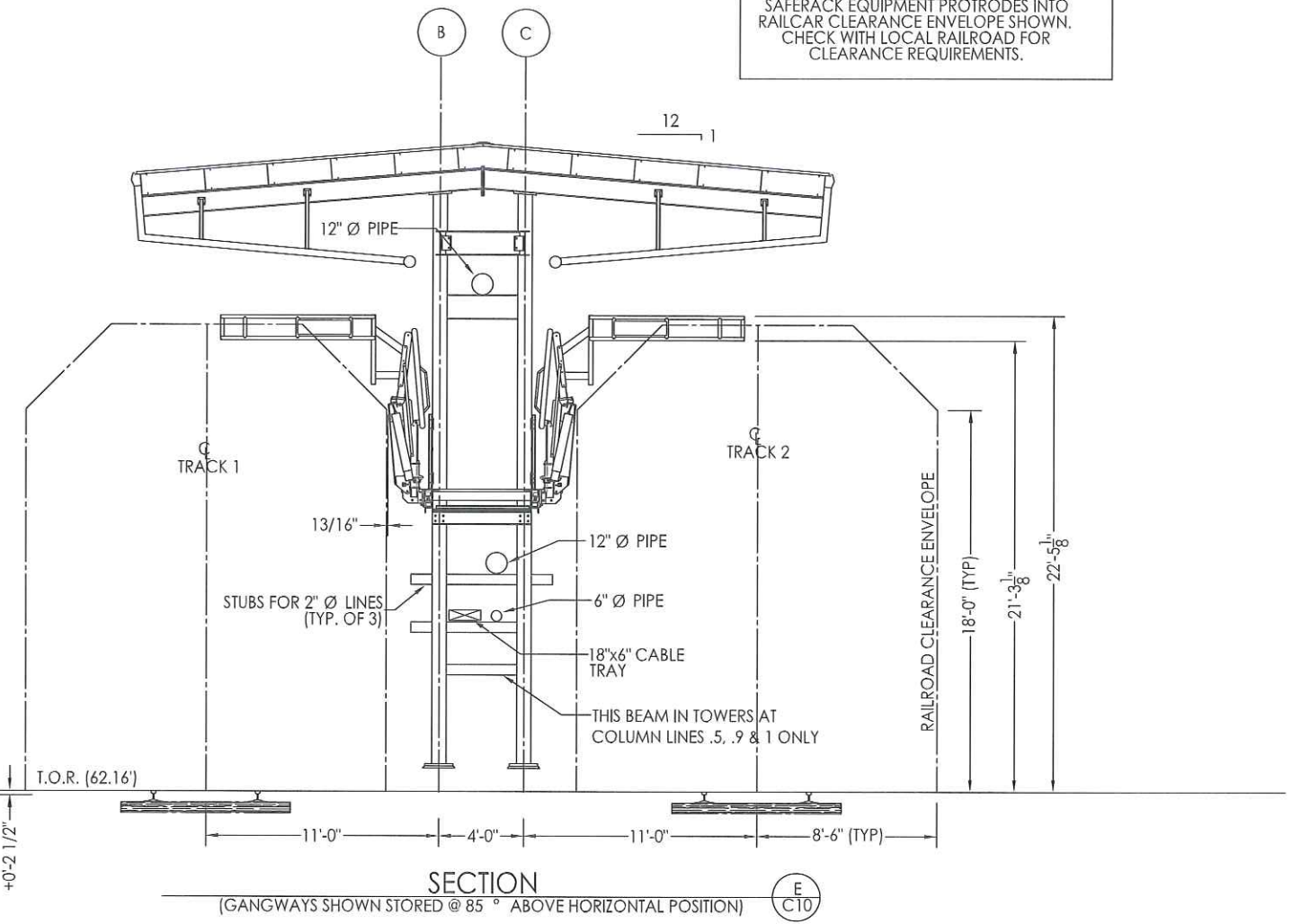
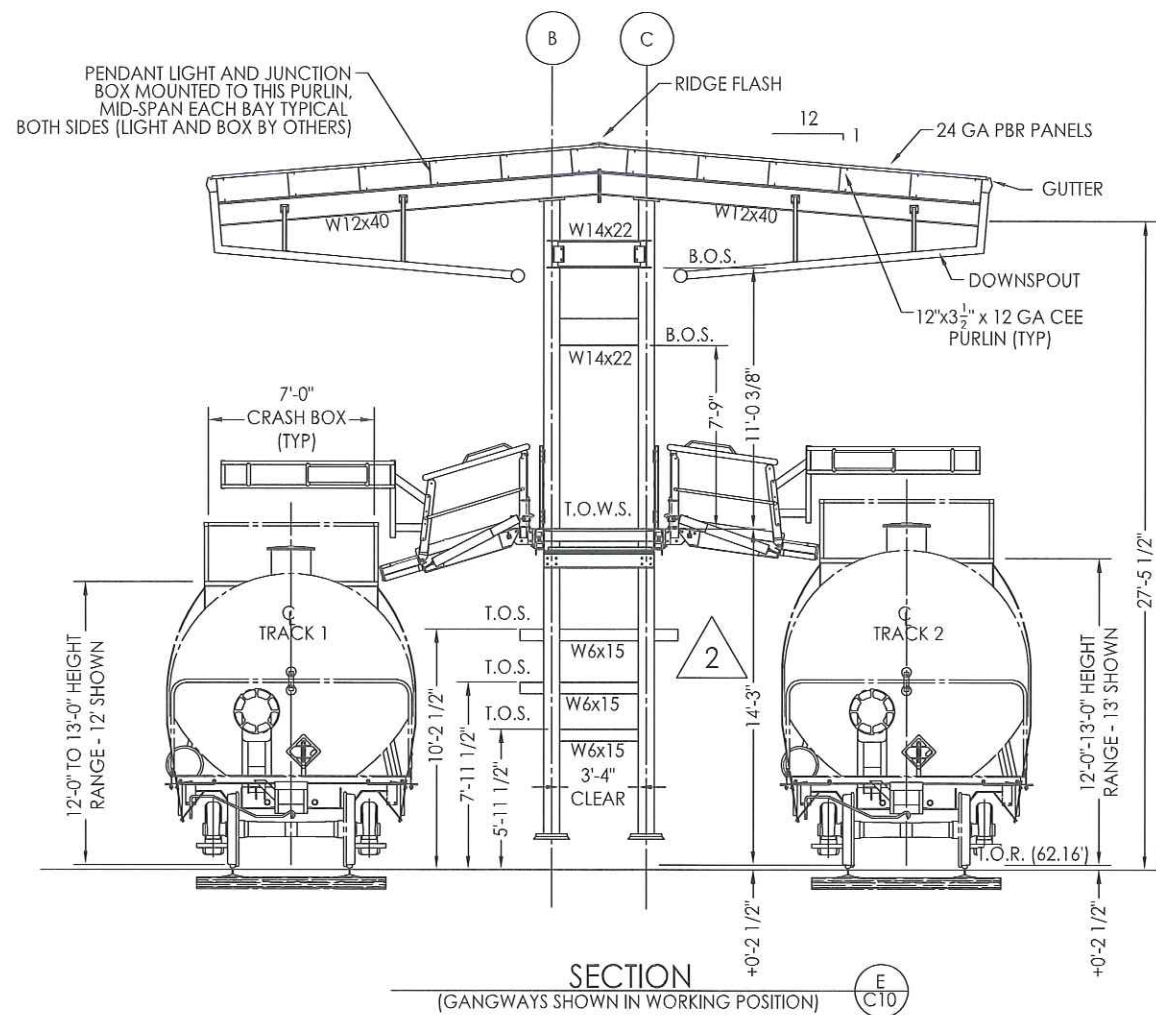
**WILSON & COMPANY**

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BY	DATE	ESTIMATE	B.M.	BY	DATE	DESCRIPTION	SYMBOL
APPROVED						REVISIONS	
INITIALS-	DATE	SCALE	50	SCALE			
DWN BY		CAD FILE NO.					
CHKD BY		DRAWING NUMBER					
APRVD BY							
SUPERVISOR							

**SITE PLAN**

BSIZE 11/21/2011 0753



**ATTENTION:**  
SAFERACK EQUIPMENT PROTRUDES INTO RAILCAR CLEARANCE ENVELOPE SHOWN. CHECK WITH LOCAL RAILROAD FOR CLEARANCE REQUIREMENTS.

ISSUED FOR CONSTRUCTION

2	MODIFIED B.O.S. ELEVATIONS ISSUED FOR CONSTRUCTION	6-20-14	VN
1	RAISED THE PLATFORM ELEVATION FROM 13'-6" TO 14'-3" ISSUED FOR CONSTRUCTION	6-9-14	VN
0	REVISED PER MARKUPS DATED 5-7-14 ISSUED FOR CONSTRUCTION	5-20-14	VN
#	DESCRIPTION	DATE	BY

CUSTOMER INFORMATION:		UNLESS OTHERWISE SPECIFIED	
SHELL PUGENT SOUND REFINERY (SOPUS) 8505 S. TEXAS RD ANACORTES, WA 98221		TOLERANCES:	PROJECTION:
		LINEAR ± 1/8"	THIRD ANGLE
		ANGULAR ± 1/2°	

DRAWN: VN	4/9/14
CHECK: RLS	4/9/14
ENG: RLS	4/9/14
APVL: RE/SH	4/9/14



HOME OFFICE: 730 ELECTRIC DRIVE, SUMMER, SC 29153			
DESCRIPTION: GENERAL ARRANGEMENT PLATFORM SYSTEM FOR RAILCAR UNLOADING			
DWG# 214810-C12	SHEET: 12 OF 29	REV: 2	
P.O.# 4551243242	SCALE: 1:48	SIZE: D	

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