Targus, Lorri (UTC)

From: Tim Newcomb <Tmnewcomb@msn.com>
Sent: Wednesday, June 24, 2015 4:11 PM
To: UTC DL Records Center
Subject: Comments on UTC Rail Safety Rulemaking, Docket # TR-151079

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?

I would like to point out that at least one percent of Baaken oil is Benzene. My concern is that benzene is a known carcinogen!!

The OSHA standards call for no more than ONE PART PER MILLION of benzene in water. A typical DOT-111 oil car will contain approximately 373 gallons of Benzene if it carries a full load.

That amount would require an enormous quantity of water to reduce the benzene concentration below the threat level.

Before the low acceptable level is reached by dilution, poisoning of fish, turtles, seals, and other animals is very likely.

Thank you,

Tim M. Newcomb, M.A.

- First and foremost, a worse case spill must take into account where the train is traveling and what is alongside that train, as well as what type of crude oil the train is hauling. 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?
- 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.

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

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