



KEYERA

UTC Rail Safety
P.O. Box 47250
Olympia, WA 98504-7250
Subject: Clearance Waiver Request

July 15, 2011

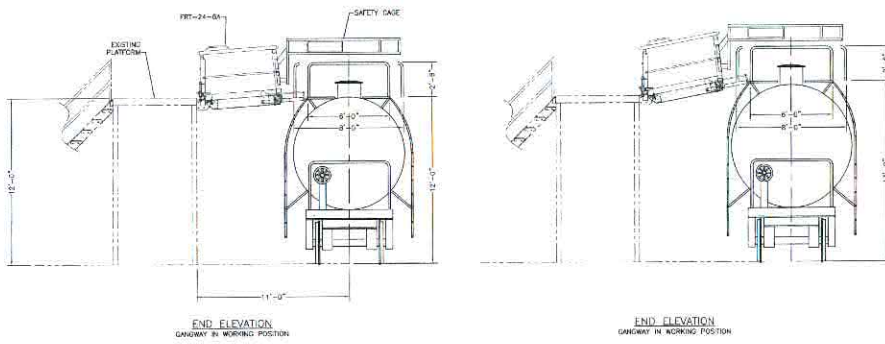
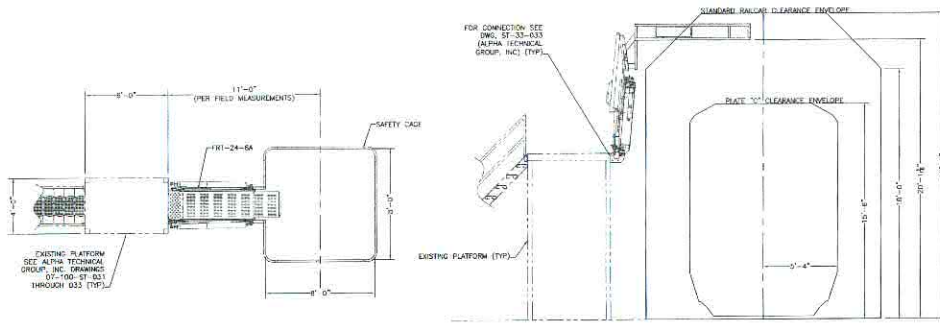
Thank you for reviewing our request for a permanent waiver of WAC 480-60-040 regarding overhead clearances. Our current facility project for adding a rail tank car loading rack will require a clearance height waiver in order for us to proceed. This is due to the fact that the fall protection safety cage, when in its retracted/upright position, does not meet the minimum required height of 22 feet, 6 inches measured to a point directly above the center of the rack.

The exact height of the cage, when in its retracted/upright position, is 20 feet 1-1/16 inches above the center point of the track. This loading rack is a manufactured railcar loading/unloading rack designed by Saferack Loading Rack Technologies of Sumter, SC (866-761-7225) and Peterson Industrial Products of Portland, OR (503-222-9446). It has been designed specifically for our facility in an attempt to minimize the cost, while maximizing the safety of our employees. I have included a copy of the PE Stamped drawings provided to us by Saferack and Peterson Industrial Products on page two. I will also include the drawing as a separate document for ease of review.

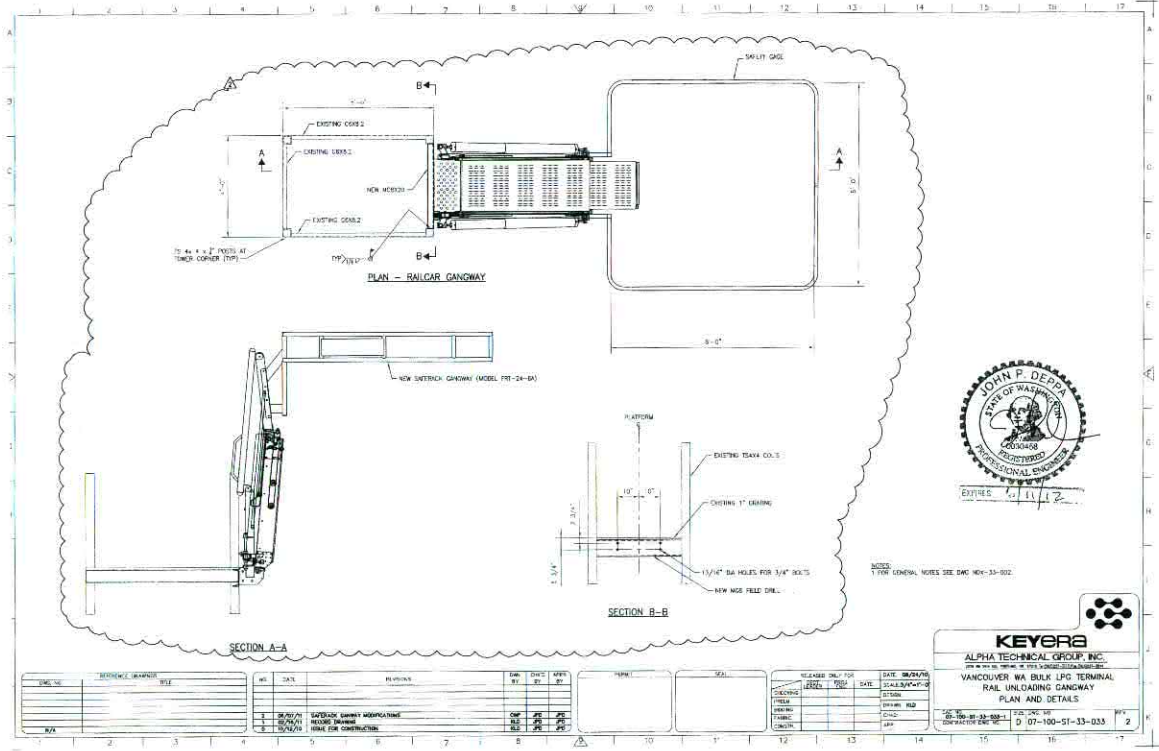
There are, as with any projects, other options available to us, but due to budget constraints we are somewhat limited. We therefore request a waiver on the clearance height based on the following factors:

- Our current loading station has been deemed unsafe by OSHA because of our lack of fall protection safety cage. The lack of an approved OSHA safety cage puts our operators at risk of falling from the top of railcars. The addition of the Saferack rail loading system will greatly improve the safety of our loading operators.
 - The fall protection safety cage is automatically lowered down and onto the top of the railcar to provide better fall protection for our employees. As you probably know, the railing on the top of railcars does not meet the criteria for protection. To protect the employees working on the tops of these cars, Saferack developed a safety cage that is lowered down and works in conjunction with the railing on the railcar to provide better fall protection for the employees. The height of the safety cage is influenced by the height of the gangway that will be lowered and extended to the top of the rail tank car. The design of the rail loading rack allows the gangway, which employees will utilize to traverse from the rack of the railcar, to remain as level as possible. This will minimize the possibility of an employees slipping or tripping due to a slope created by the rail rack being lower or higher than the car.

Saferack Railcar Loading Rack Drawing



1. DRAWN BY	2. CHECKED BY	3. DATE	4. SCALE
5. CUSTOMER INFORMATION	ALL INFORMATION CONTAINED HEREIN IS CONFIDENTIAL AND PROPRIETARY AND MAY NOT BE DISCLOSED IN ANY FORM WITHOUT PRIOR WRITTEN CONSENT OF SAFERACK LOADING RACK TECHNICAL GROUPS		
6. DRAWN: 07-25-11	7. CHECK: 07-25-11	8. SCALE: 3/8" = 1'-0"	
SafeRack LOADING RACK TECHNOLOGIES			
DESCRIPTION: GENERAL ARRANGEMENT RAILCAR ACCESS/FALL PREVENTION			
DWG/ RE110525-1-P1	SHEET 1 OF 1	REV 1	SIZE: D



KEYORA		ALPHA TECHNICAL GROUP, INC.	
VANCOUVER WA BULK LPG TERMINAL RAIL UNLOADING GANGWAY PLAN AND DETAILS			
DATE: 07-25-11	SCALE: 3/8" = 1'-0"	REV: 1	SHEET: 1 OF 1

DATE	DESCRIPTION	BY	CHECKED BY
07/25/11	SAFETY GATE	JPD	JPD
07/25/11	NEW MOVERS	JPD	JPD
07/25/11	NEW ENTRY GANGWAY	JPD	JPD
07/25/11	NEW AISL FILL DRIL	JPD	JPD



Thank you for your assistance in this matter. I look forward to working with you on this. Feel free to contact me or Erick Kruse with Peterson Industrial Products (503-780-3918) anytime with any questions or comments that you may have.

Regards,

Lance McKinnon P.Eng.
Facility Engineer
Keyera Corp.
403-205-8354