



**FIRE DEPARTMENT**  
900 Second Street  
Alexandria, Virginia 22314-1395

Adam K. Thiel  
Fire Chief

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April 29, 2008

Mr. Michael A. Webb  
Manager Distribution Services  
Southern Region  
Norfolk Southern Corporation  
Three Commercial Place, Box 252  
Norfolk, VA 23510

Dear Mr. Webb:

The City of Alexandria (City) is keenly interested in working with the Norfolk Southern Corporation (NS) to ensure adequate fire protection for the bulk ethanol transloading terminal located at the NS Van Dorn Intermodal Facility. Recognizing Norfolk Southern's commendable effort to design/build this facility with safety in mind, there are a number of remaining issues that must be addressed to help assure the City's ability to protect life, property, and the environment in case of an incident involving bulk quantities of ethanol at the facility.

As we discussed during our meeting on Friday, April 25, 2008, this letter provides the current needs assessment—based on information about the ethanol transloading operation that your group provided last Friday—of City staff from the Fire Department (AFD), AFD Code Enforcement Bureau (Code), AFD Office of Emergency Management (OEM), Planning and Zoning Department (P&Z), and Transportation and Environmental Services Department (T&ES). At your request, this communication is presented as an overview, but we are certainly available to discuss the details at your earliest convenience.

#### Fire Department (AFD)

After our meeting last Friday, AFD staff conducted a site visit to the facility and completed installation of the facility keys into the Knox Box™ rapid-entry key system. This site visit confirmed the City's need for additional equipment, supplies, and training to safely and effectively handle an incident involving bulk quantities of ethanol. The principal need is for a delivery system to apply a sufficient flow of alcohol-resistant aqueous film forming foam (AR-AFFF) to an ethanol spill/fire on the facility; neither the AFD nor the surrounding mutual-aid jurisdictions currently possess an appropriate delivery system. Large quantities of AR-AFFF must also be secured/maintained in a ready state and routinely replaced according to the manufacturer's recommendation (i.e., when the expiration date is reached). The City requires additional spill response equipment/supplies to protect the environment, especially adjacent waterways, from a bulk

ethanol release. Specialized training to contain/confine/extinguish ethanol releases/spills/fires is also needed for AFD and mutual-aid firefighters (Fairfax and Arlington Counties), as well as for members of the Alexandria/Arlington Hazardous Materials Response Team. Our estimate for providing the requisite equipment/supplies/training to protect the NS ethanol transloading terminal is \$321,020; with a recurring annual maintenance (i.e., equipment depreciation, ongoing training, and rotating expired AR-AFFF) cost of \$50,000.

AFD Code Enforcement Bureau (Code)

Code staff met with Mr. Tony Rosenthal of RSI Logistics (Norfolk Southern's terminal manager) on Monday, April 28, 2008. Generally speaking, the facility is in compliance with Section 3406 of the Fire Prevention Code (FPC). Remaining issues include: 1) confirmation of grounding compliance for the offloading track rails; 2) confirmation of secondary containment capacity; 3) new fire hydrant flushing/finalization; 4) provision of material safety data sheets (MSDS) for the 1500 gallon foam reserve stored on-site; and 5) development/review/approval of a comprehensive fire safety and evacuation plan for the facility, as required by Section 404 of the FPC.

AFD Office of Emergency Management (OEM)

As discussed during our meeting, OEM staff will meet with Mr. Rosenthal to conduct a homeland security threat assessment of the facility, and will include it in the City's overall emergency management planning process. Additional recommendations could result from these activities and will be shared with NS as soon as possible.

Transportation and Environmental Services Department (T&ES)

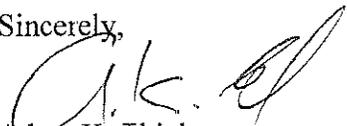
During our meeting, T&ES staff raised two issues: 1) the requirement for bulk tank trucks leaving the facility to obtain haul permits from T&ES; and 2) the need for a stormwater pollution and prevention plan as required by the state Department of Environmental Quality (DEQ).

One final issue concerns the ongoing need for collaboration between NS and the City to provide accurate information for our community concerning the NS Van Dorn Intermodal Facility and ethanol transloading terminal.

In summary, the City looks forward to working in partnership with NS to protect your investment, our citizens, infrastructure, and the environment. Since ethanol transloading operations are underway at your facility, we know NS will continue viewing this matter with a sense of urgency and I look forward to our next discussion and/or meeting.

Please feel free to contact me anytime via email ([adam.thiel@alexandriava.gov](mailto:adam.thiel@alexandriava.gov)) or mobile phone (703.898.0838).

Sincerely,

  
Adam K. Thiel  
Fire Chief

Cc: James K. Hartmann, City Manager  
Michele R. Evans, Deputy City Manager  
Mark Jinks, Deputy City Manager  
Ignacio B. Pessoa, City Attorney  
George A. McAndrews, Assistant City Attorney  
John Catlett, Code Enforcement Director  
Faroll Hamer, Planning and Zoning Director  
Stephen Milone, Planning and Zoning Division Chief  
Richard Baier, Transportation and Environmental Services Director  
William Skrabak, Transportation and Environmental Services Division Chief  
Mark Penn, Emergency Management Coordinator  
John North, AFD Battalion Chief