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October 2, 2009

James K Hartmann
City Manager
City of Alexandria, VA
301 King Street, Suite 3500
Alexandria, VA 22314-32111

Dear Mr. Hartmann:

This responds to your letter of October 1, 2009, regarding Norfolk Southern Railway Company's communications following an ethanol release while unloading a rail tank car on September 29, 2009. Please be assured at the outset that the release was a minor release, which was completely contained within the facility and presented no danger to the general public. The facility is designed, and the Railroad's contractor is fully equipped and trained, to handle minor releases of this sort. Your letter specifically asks for a modification in communications in the future. In response to your letter, we have already modified our existing protocol to include contact with Alexandria as described below.

Regarding the September 29 release, the Railroad's contractor performed in a manner consistent with the existing Emergency Response and Spill Control Plan, which has been reviewed and discussed with Alexandria's Fire Department, among others. That Plan requires the Railroad's contractor first to assess the seriousness of any release, and second to respond regarding the release. If the release is considered large, and of a potentially serious nature, the Plan already required the first call to be made to 911. That has not been changed.

If the release is considered small and not of a potentially serious nature, however, then the Plan calls for the spill to be addressed and contained. Only after that does the Plan call for a series of notifications. A majority of these types of releases would not normally be considered "spills" in non-technical discussions, insofar as they would be fully contained within the spill pans that are placed below the transfer points during the transloading processes. (The release that happened on September 29 did overflow the spill pan but was fully contained within the bermed concrete pad and was readily

James K. Hartmann
October 2, 2009
Page 2

captured and properly disposed of). In any event, all of these small releases are of a non-emergency nature, and notifying the City via a 911 call would be inappropriate, and contrary to the intent of the 911 emergency contact system. Although we believe it appropriate to add a contact with the City of Alexandria Fire Communications center to the Emergency Response and Spill Control Plan (and have done so for any release that is not completely contained within a spill pan), we believe the appropriate number to do so is via 703-838-4660.

Please let us know as soon as possible if this does not adequately address the concerns you have raised.

Sincerely,



William A. Galanko

cc: David Lawson