



100-car Bakken oil train derailed under Magnolia Bridge, Seattle, Jul 24, 2014

04/06/15

Dear Commissioners:

Recently, I attended a conference put on by the organization Railroad Workers United, a unified front of workers from several historic unions representing the majority of railroad workers, in Olympia, Washington on Saturday, Mar 21. The accounts I heard from the speakers there were shocking, and before moving forward on Pembina's proposed propane terminal, you should think long and hard about the following factors:

Workers at the conference recounted stories of employer retaliation against whistleblowers, routine disregard for safety by management and a pervasive campaign aimed at cost-savings regardless of increased risks, all while blaming employees for any accidents. Rail companies are:

- Insisting on trimming down already inadequate sized train crews (in most cases, only two workers, an engineer and a conductor), leaving just a single worker handling an entire train;
- Adding weight and cars onto trains resulting in unprecedented, massive loads without engineering studies proving the safety of such changes;
- Neglecting even basic safety precautions in the yards themselves; trains have even derailed inside yards moving at less than five miles per hour, just because of waterlogged soil causing tracks to sink under loads, despite repeated complaints and warnings by workers about these conditions;
- Denying their workers paid sick leave;
- Pressuring workers to take long shifts without adequate relief, under conditions that would surely be illegal in the trucking industry, for example. Accidents have occurred because exhausted workers fell asleep.

Train engineers at the conference explained how extra long and heavy loads entailed in so-called "unit trains" (trains carrying payloads of a single uniform commodity, like crude oil, or propane) pose special and unusual hazards, due to the asymmetric forces generated while they are in motion. As a result, tanks full of liquids move both back and forth and laterally with more degrees of freedom than conventional, non-liquid cargoes. These combined lateral and longitudinal forces produce unpredictable additional risks of wear, damage to tracks and derailment.

The perverse insistence of rail companies on cutting employee crew sizes and overworking crews leaves accidents waiting to happen. Workers at the conference estimated that, in some cases, the companies are hauling loads that earn multimillion dollar profits but saving only three or four thousand dollars by cutting crew sizes in this way.

Combine these factors with the deficient safety engineering of the tanker cars themselves, which even federal regulators are recently in the news deploring, and we know there's a problem here that will take years to solve (see, for example, <http://www.foxnews.com/us/2015/03/27/oil-trains-put-us-on-target-for-more-derailments-warn-experts/>). The current tanker car designs are almost certainly unsafe, even the most recent "new, improved" ones, such as those implicated in the recent derailment and explosions in West Virginia. New "new" designs are not even on the drawing boards yet, let alone being rolled out.

Please, do not move forward with the Pembina proposal at this time. It must be suspended indefinitely,

at least until such time as the weakest link in the safety chain, the rail deliveries component, has progressed to the point that citizens can have some minimum degree of confidence in it. Also, please do not be swayed by any "hardsell" tactics on the part of Pembina: they are in no way at risk of having their doors banged down by eager suitors for their project, witness the rejection of a very similar project just this month (likewise involving a propane terminal supplied by rail) in Longview, Washington, a small city with a much less diversified and harder hit economy than Portland. If Longview can afford to say, "Thanks, but no thanks at this time," then surely Portland can. The risks and uncertainties at this time are simply too great

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