

EI-16435

February 10, 2009

Danielle Gosselin
Surface Transportation Board
395 E Street SW
Washington, D.C. 20423

Attention: Environmental Filing STB Finance Docket Bo. 35116

SUBJECT: STB draft Scope of Study for the Environmental Impacts for the Proposed Project "RJ Corman Railroad Company Pennsylvania Lines, Inc. in Centre and Clearfield Counties, PA

Problem: The STB proposed Scope of Study fails to address the environmental impacts of the train-hauled contents for Impact Categories 1-12. The first 12 categories are supposed to address "the proposed activities associated with the construction or rebuilding and operation of the proposed 20 miles of rail line and the potential environmental impacts, as appropriate". Not to include the train-hauled contents as part of "operation" presumes the train will run empty both ways. If so, there is no need for this rail line nor the R.J. Corman petition.

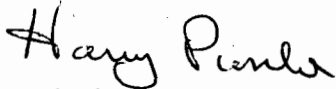
The environmental impact of the train hauled contents needs to be addressed in categories 1-12 in terms of typical losses when standing, en route, up to and including major spills due to containment failure and accidents. Considering the nature of the materials being transported, their environmental impact equals, if not exceeds, the impact of the other operations and construction of the rail line (especially in Impact Categories 1-2, 4, 6-12).

Realities: The whole and only purpose of this railroad project is to service RRLLC's proposed municipal landfill, industrial park and quarry, with the quarry being the smallest component by far. During trash transport, litter, leakage, vermin and odor losses are common and well documented. Moreover, municipal trash is now a primary depository for low-level radioactive wastes and household pharmaceutical wastes, including expired/unused prescriptions. There is also risk of fire, some by spontaneous combustion. RRLLC has promoted, by word and press, biofuel production as a key component. This includes methane from the landfill and both ethanol and biodiesel from industrial park operations. This will require large imports of corn, soybeans and chemicals, and exports of ethanol, diesel and other liquid fuels, stillers grain (mostly liquid) and other waste products not permitted for disposal in their municipal landfill.

Frequency of Occurrence: The occurrence frequency for some losses is documented to be very high, approaching routine for litter, leakage and odor. Thus, these are likely to be chronic and continuing problems. The frequency of occurrence for major spills due to containment failures or accidents would be much lower and incidental. However, RRLLC's landfill permit application requests approval for 40-million ton capacity over a 28-year life. Based on at least two train trips per day to service the landfill plus the biofuel component of the industrial park, this sums to 20,000 train trips. Thus, the number and size of major spills projected for the life of the landfill could be unacceptably high. This needs to be addressed in the EIS analysis by the appropriate Impact Category for the full range of routine to incidental losses.

Area of Occurrence: The landscape position of the proposed rail line has key features that, when combined with occurrence frequency, can greatly increase their environmental impact. Early rail lines, compared to modern four-lane highways, were located more to minimize construction costs and to directly intersect population and commerce centers. Geographically, they follow the course of least construction resistance, using stream corridors, gaps, and flat areas. Also, they typically run through, rather than around towns and backyards. Railroad beds also infiltrate, rather than shed rainfall as highways do. Basically, this delineates critical source areas (CSA) by Impact Category, recognizing these CSA's can change from Category to Category. Litter, leakage, odor and similar emissions will heavily impact rail side residences, communities, recreation properties and historical sites. Major liquid spills will be most serious in stream side areas (direct entry of large volumes of fuels or biological oxygen demand into small streams) and on tracks and/or the shallow coarse soils typically found on these ridge tops and slide slopes (quick entry into the ground or underlying ground waters). With liquid spills, prevention is critical because remediation is unlikely to be effective.

Respectfully,



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