



CHLOR ALKALI  
PRODUCTS

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Office of Proceedings

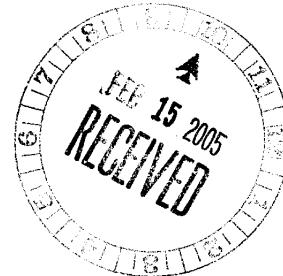
FEB 15 2005

February 14, 2005

Hon. Vernon Williams  
Secretary  
Surface Transportation Board  
1925 K Street NW  
Washington DC 20423-0001

Part of  
Public Record

Finance Docket No. 34662  
CSX Transportation, Inc. -- Petition for Declaratory Order



Dear Secretary Williams:

The Olin Chlor Alkali Products Division of Olin Corporation supports the CSX Transportation, Inc. (CSXT) petition for a declaratory order against the ordinance recently passed by the City Council of the District of Columbia restricting rail transportation of hazardous materials through that jurisdiction. The petition asked the Board to declare that the D.C. Ordinance is preempted by 49 U.S.C. 10501 (b) and that, subject to compliance with applicable federal safety and hazardous materials transportation statutes and regulations, that carriers may continue to route shipments of these materials along the routes to which the District of Columbia ordinance would apply.

Olin Chlor Alkali Products manufactures chlorine and caustic soda, sodium hydrosulfite, hydrochloric acid and bleach products. Chlorine chemistry makes thousands of products critical to national defense, public health and public safety, from pharmaceuticals and medical supplies to safe drinking water. In fact, chlorine has been deemed by the federal government to be part of the nation's critical infrastructure. These products must be delivered to customers throughout the country. We rely on the railroads and trucking companies to transport these products safely and in a timely manner.

Chlorine has been transported by rail in North America since 1909 and rail transportation continues to be the safest way to move these products so critical to our nation's well being. Our company and our industry will continue to work with the railroads and government agencies to further enhance the safety and security of rail transportation of these materials.

The Hazardous Materials Transportation Act (HMTA) prescribes regulations for safe transportation of hazardous materials in intrastate, interstate and foreign commerce. Our shipments are made in compliance with all applicable regulations. As a nation, we need to protect the timely movement of these materials in interstate commerce.

We respectfully seek your support of this petition.

Very truly yours,

John McIntosh  
President  
Olin Chlor Alkali Products

Michael D. Gilley  
Vice President,  
Administration and Logistics