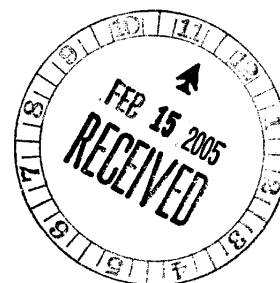




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February 14, 2005

Mayor Anthony Williams
District of Columbia
1350 Pennsylvania Avenue, NW, Suite 600
Washington, D.C. 20004

**Re: Docket 34662 - Terrorism Prevention in Hazardous Materials Transportation
Emergency Act of 2005**

Industrial Resources Group is a large rail distributor of "Anhydrous Ammonia", an inhalation hazard. We do not ship ammonia or other hazardous materials through the District of Columbia, but are still concerned about the proposed legislation from your city council. It is our fear that other municipalities may follow the lead, which would be detrimental to many sectors of the U.S. economy, especially the farm economy.

Anhydrous Ammonia is a primary source of nitrogen for the U.S farmer and is utilized in many of the states west of the District of Columbia. Anhydrous Ammonia also has many production uses in manufacturing as noted in the list below.

Anhydrous Ammonia

- ❖ Production of hexamine for explosives
- ❖ Neutralizing sulfuric acid in the production of paraminophenol, which is used in the production of acetaminophen
- ❖ Manufacture of plastics and intermediates, detergents and wetting agents
- ❖ MDI and TDI
- ❖ Metal processing
- ❖ Etching gas in semiconductor manufacturing
- ❖ Mixed with silane to make silicon nitride
- ❖ Raw material in the textile industry
- ❖ Acid production, dyes, insecticides, fertilizers, synthetic resins and related industries
- ❖ Catalytic agent in manufacturing processes
- ❖ Water treatment
- ❖ Refrigerant
- ❖ Pollution Control

Ammonium Hydroxide (Aqua Ammonia)

- ❖ An intermediate in the production of ammonia salts, amines and amides, household cleaners and metal polishes
- ❖ Source of nitrogen for fermentation
- ❖ In the production of dyes, glass and plastics
- ❖ Extraction of metals
- ❖ Textiles
- ❖ A neutralizer in oil refining.
- ❖ Pulp and paper industry
- ❖ Pollution control
- ❖ Waste treatment
- ❖ Catalyst for UF resin production
- ❖ For pH adjustment

Natural gas is a primary feedstock, which has increased in price substantially, since December of 2000. Due to the increased domestic price of natural gas, there have been many ammonia production plants closed in the U. S., necessitating alternative supply sources. Other countries, such as Trinidad, have an ample supply of natural gas at low cost, resulting in several new ammonia plants being built offshore. These changes coupled with the many restrictions added since 9/11/01, as well as, increased truck insurance cost has necessitated a change in the distribution of ammonia to the agricultural users in the U. S. While I would be surprised to learn there are additional cars of ammonia passing through the District of Columbia, it has created increased rail movement to the breadbasket of the U. S. utilizing many other major metropolitan areas. This movement is vital to maintaining the U. S. farmers' competitive supply of feed grains and food to this country and to the world.

We feel the proposed legislation could, if enacted by other municipalities:

1. significantly increase transit times and handling of cars, thereby actually increasing exposure to the public in other metropolitan areas,
2. halt interstate commerce of hazardous products by rail, which means there would need to be many more trucks on the nations highways and/or,
3. significantly impact the transportation cost of hazardous products, thereby increasing the cost of a multitude of products nationwide.

We cannot stop flying airplanes, just because a militant group decides to use them as a means to make a statement and do not think we should radically alter commercial shipping based on the risk someone will use a rail car next. It is our opinion, that the public is best served, by the expeditious shipment and reduced handling of hazardous material cars and we urge you not to set a precedent by signing the proposed legislation. Rules and regulations by several governing bodies are in place for hazardous products already. The hazardous product shippers and associated trade groups are aware of the exposure and potential problems that could occur with rail cars and have enacted safety programs to minimize the risks associated with handling these products.

Thank you for considering our input into this vital decision.

Albert

E. A. Allen, Jr.

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