



Shell Chemical LP

July 10, 2008

Anne K. Quinlan
Acting Secretary
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Dear Secretary Quinlan,

Shell Chemical LP submits the following written comments in advance of the hearing scheduled for July 22, 2008 on STB Ex Parte No. 677 (Sub-No. 1) Common Carrier Obligation of Railroads – Transportation of Hazardous Materials.

Shell Chemical LP is an affiliated entity of Shell Oil Company, the US affiliate of Royal Dutch Shell plc. Shell has extensive operations in the United States. Its organizations explore, develop, produce, purchase, transport and market crude oil and natural gas. They also purchase, manufacture, transport and market oil, motor fuel and chemical products and provide technical and business services.

Shell Chemical LP manufactures a variety of bulk products such as olefins, aromatics, solvents, ethylene oxide/glycols, to name several. Manufacturing facilities are operated in Texas, Louisiana (2), and Alabama. Because chemical products manufactured by Shell are predominantly "base" or "intermediate" chemicals, our customers are most often other manufacturers that supply products that are present in virtually every aspect of our daily lives. Countless products that we all use every day in our homes, our cars, at work, or while we relax owe their beginnings to the raw materials that Shell Chemical LP provides.

Many of the products produced by Shell Chemical LP are regulated as hazardous materials by the Department of Transportation. Shell Chemical LP relies heavily on rail transportation to deliver these products across North America. Shell Chemical LP is a large producer of Ethylene Oxide (a TIH material), yet we consume most of our production internally and only transport a small portion of the overall production. Ethylene Oxide is widely used in the production of a number of products such as anti-freeze, polyester fibers, cosmetics, pharmaceuticals, paints, detergents, soaps, and brake fluid to name a few.

Shell Chemical LP is an active participant in Responsible Care® and TRANSCAER® and conducts a robust product stewardship program for its products, especially Ethylene Oxide.

Shell Chemical LP is a member of the American Chemistry Council (ACC) and has executive representation in various committees within ACC. Shell Chemical LP fully supports the written testimony submitted by the ACC in relation to this Ex Parte 677 (Sub-No. 1) proceeding.

Sincerely,

Joseph V. Kelly
Global Category Manager – Rail Transportation
Contracting & Procurement – Shell Downstream Inc.
On behalf of Shell Chemical LP



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Anne K. Quinlan
Acting Secretary
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Dear Secretary Quinlan,

I certify that I have this day served copies of document upon all parties of record in this proceeding, by electronic mail

A handwritten signature in black ink, appearing to read "Joseph V. Kelly", written over a horizontal line.

July 10, 2008

(49 U.S.C. 10321, 5 U.S.C. 553) [47 FR 49554, Nov. 1, 1982, as amended at 48 FR 44827, Sept. 30, 1983, 61 FR 52711, Oct. 8, 1996, 69 FR 18499, Apr. 8, 2004]

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph V. Kelly", written over a horizontal line.

Joseph V. Kelly
Global Category Manager – Rail Transportation
Contracting & Procurement – Shell Downstream Inc.
On behalf of Shell Chemical LP
910 Louisiana St
Houston, TX 77002