

From: [John Lindsey](#)
To: [Roles, Gary W. \[US-US\]](#)
Subject: EXTERNAL: Additional Information
Date: Wednesday, November 15, 2017 1:41:55 PM
Attachments: [Transfer Exceutive Summary and Plan Titan.doc](#)

Gary, Here is an additional item that pertains a method of transferring waste soil and debris that could be an interesting option for the SSFL Project. The establishment of facility where the SSFL wastes could be transferred from containers to high capacity 100 ton plus Gondola cars would greatly expedite the project and reduce the costs versus shipping containers on Flatcars.

If you have any questions, please let me know, at your convenience.

John

John Lindsey
Waste By Rail
1111 "A" Quail Street
Newport Beach, CA 92660
[REDACTED]
(949) 673-1247 Office
(949) 673-0846 Fax
[REDACTED]

EXECUTIVE SUMMARY

The Establishment of a Rail Served Soil Transfer Facility for Soils

ECDC Environmental, LLC of Salt Lake City, Utah, ("ECDC") has developed a plan for the establishment of a contaminated soil transfer facility within Southern California. The ECDC plan is to apply their extensive experience in the transportation of waste materials, by rail, to ensure the safe and environmentally acceptable implementation of this plan. The plan is imaginative, cost effective and will be considered a state-of-the-art alternative method to the transportation of contaminated soils and debris, long distances by truck, to a very limited number of permitted disposal facilities.

The concept is not new to the State of California. A federally exempt facility dedicated to the container to railcar transfer of California Regulated and Non-Regulated soils and debris is currently in operation in The Port of San Francisco. This facility routinely allows Northern California Generators a reliable, safe and cost efficient alternative to long haul trucking. To our knowledge, this facility has been operated for approximately seven (7) years, without serious incident.

The concept is to seek the permitting of a soil transfer facility where a loaded container (roll off box) to container (railcar) transfer can be performed. The advantages of trucking soils and debris, short distances, to a permitted, rail served, facility where the container contents are transferred into railcars, will be substantial. Current transportation methods for this type of material i.e: trucking, will still be used. The exception will be that the long haul component of the transportation will employ the much safer and significantly more environmentally advantageous services of regularly scheduled trains. These trains, operated by the Union Pacific or Burlington Northern Railroad, will move the waste to secure, permitted, out of state, disposal facilities.

The objective of ECDC Environmental is to secure the approvals and permits necessary from the Regulatory Agencies with jurisdiction over the project, and to commence the operation of a proven, modern and environmentally friendly method of soil transportation which offers significant improvement over the current method. Our turnkey approach, as presented in this proposal, will allow future generations to benefit from the continuous improvements being made by the railroad transportation industry in the areas of Health and Safety, Security and Environmental Awareness.

INTRODUCTION

Over the past several years, generators of Non RCRA and Non Hazardous wastes have had to look to disposal facilities, outside of the State of California, due to the dramatically reduced ability of the two California permitted Class one Landfills to accept their wastes. In order to meet the considerable demand for safe, long term disposal of contaminated soils and debris from remediation sites across the State, many generators have been forced to utilize out of state disposal facilities. Generally, waste materials from remediation sites are loaded onto trucks and transported distances of up to one thousand miles, much of this over California highways, in order to reach permitted disposal sites.

ECDC recognizes the need to provide an alternative to the present limited options for contaminated soil disposal. We also believe that with the

establishment of a rail served, soil transfer facility within Southern California, we will be able to reduce Greenhouse Gas Emissions by 75% (Statistics from the American Association of Railroads and the EPA) due to the reduction of the number of long haul trucks used on each project. By minimizing truck traffic the overall Carbon Footprint of each remediation project will be reduced. Reducing the number of trucks required to complete projects will also contribute to the lessening of traffic congestion, on local streets and state highways.

ECDC and WBR will maintain the highest operating standards, and safe guard their reputations as good corporate citizens, during the establishment and operation of this facility. Employees, for the facilities operation, will be hired from the local community. It is anticipated that the facility staffing will require four to ten full time employees including operators, laborers, clerks and accounting. Truck transportation, to the facility, will be provided by licensed, minority owned transporters, all of which will be required to meet the current stringent air quality standards established by the SCAQMD for diesel truck operations.

The benefits of our proposed program are numerous and consist of these basic elements:

- Safe, reliable secure transportation via the nations rail system
- Reduced Greenhouse Gas Emissions due to the use of regularly scheduled trains
- Uninterrupted, safe transportation of contaminated soils, even in periods of inclement weather
- Significant reduction in truck traffic within the Los Angeles Area (one train is equal to 300 trucks)
- Professional Project Team with many years of transportation and environmental management experience
- Community based hiring with emphasis on diversity
- Long-term option for future transportation of soils and debris without volume limitations.
- Access to competitive disposal alternatives will facilitate the completion of site remediation projects, at reduced costs to the owners.

Description of the Container-to-Container Transload

Each project shall be reviewed on a case-by-case basis, and shall be accepted through the existing Waste Acceptance criteria that are specified for all non-RCRA waste acceptances. This includes material that can be disposed or recycled at only the direct rail served destination, in this case the ECDC Landfill in East Carbon, Utah. In all cases, the only transload activities that will be performed by a container-to-container transfer shall be for non-RCRA or Non-regulated solid waste, only. The container transfer and consolidation into a railcar will involve interstate transportation that utilizes truck to rail. ECDC shall oversee the container loading operations project site. This will insure that the material being loaded into the specialized, plastic lined containers shall be suitable for transloading. The material will be conditioned during loading, for example:

- Adequate moisture added to prevent particulate emissions during transload.
- PID readings for VOC's if required at the specified site.
- Removal of anything that may impair a container-to-container transfer.

After loading of the material, each container will be transported to the private rail yard via truck and will be accompanied by a Bill Lading or a Manifest containing all the necessary information from the shipper or the generator. Included with the shipping documents shall be a detailed description of the material and each payload will be visually checked, prior to the Transload, to confirm the description. Once all the documentation is validated, the truck shall be directed to the offloading area adjacent to the rail cars. The rail cars will be staged within the yard in an area with ample space to accommodate typical Intermodal container handling equipment equipped with a specialized tipping mechanism that will lift the container off the truck and weigh the payload (Figure 1 and Figure 2).



Figure 1



Figure 2

Description of the Container to Container Transload

After the loaded container has been removed from the truck the container handler will elevate the loaded container and weigh the total load, the weight is recorded and the container handler will continue to elevate the container over the side of the of the stationery rail car. The rail car will typically have the capacity of approximately 4000 cubic feet (about 150 cubic yards, Figure 3). The cars capacity will more than accommodate the entire Intermodal container of approximately 25 cubic yards. The container handler has the ability to position and suspend the loaded container within the rail car's vacant capacity (Figure 3 and Figure 4).

QuickTime™ and a decompressor are needed to see this picture.

Figure 3

The exclusive tipping mechanism has the ability to rotate to 180 degrees to the left or the right. This allows the payload to be distributed evenly within the 50ft. long rail car. During the tipping of the contents of the container within the rail car, there is no labor required and once the empty container is grounded, technicians can secure the door and prepare the container for transport back to the project site.

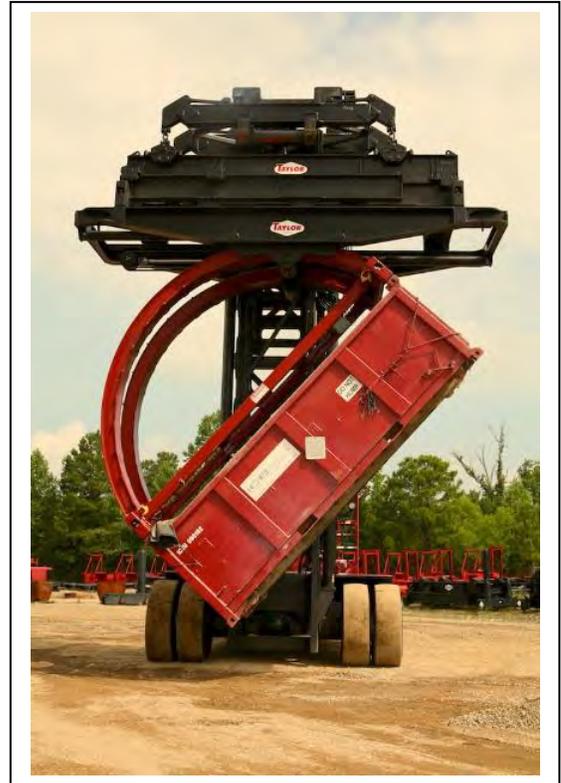


Figure 4

The average rail car can carry approximately 4-5 container loads or 95-100 tons. Only loads from a single generator will be consolidated into each rail car. This practice will insure that waste quantities will be accurate and accounted by project profile number.

Additionally, each shipping document received will have the rail car number that the material has been consolidated into written on the original shipping document. The receiving facility will verify the total quantity per rail car after the car is weighed on a rail car scale.

Throughout the container-to -container transload, no material will be sorted or repackaged other than Transload from container to Gondola Car.

The management and operation of the Intermodal rail yard will require 3-5 operators and technicians and up to 10 to 20 truck drivers on a given project. The average roundtrip dray miles for trucks will usually be less than 12 miles, a distance considerable less than the 300 round trip miles that is typical to transport the same material via truck to landfills in the central valley of California.

The key points are as follows:

- Container-to-Container transfer for interstate transportation via rail.
- The material is never being grounded.
- The consolidation of multiple loads from a single generator to one hauler.
- Significant decrease in highway truck miles.
- Trucks park and start everyday from the local transfer yard