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October 21, 2015

Daniel R. Elliot, III
Chairman
U.S. Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Positive Train Control (PTC) Deadline
Subj: Docket No. FD35964

Dear Chairman Elliot,

For over sixty years, Allied Universal Corporation, herein after "Allied", has packaged, manufactured and distributed hazardous and non-hazardous chemicals for the sanitation of water, food, industrial and medical equipment throughout the southeastern and central United States and Caribbean. Allied has several packaging, manufacturing and distribution facilities, including facilities in **Miami, Jacksonville and Ft. Pierce, Florida, Brunswick and Ranger, Georgia, and Ellisville, Mississippi** as well as a working relationship with another family owned facility in **Tampa, Florida**. Allied is a member of the Chlorine Institute and the National Association of Chemical Distributors. Under the principles of Responsible Distribution, implemented company-wide, Allied is committed to protecting human health and the environment as well as fostering the proper, safe and secure handling and transporting of our products.

We are writing to express the critical need to address the approaching deadline for positive train control (PTC) implementation. As a leading producer, distributor, and consumer of chemicals that are used every day to help provide safe drinking water and a plentiful food supply in the southeastern United States and beyond, we are deeply concerned that we are going to be out of business at the end of this year, resulting in the loss of hundreds of jobs. The loss of our business will have a crippling affect on water treatment in the State Florida and Georgia. Many water and wastewater treatment facilities rely on our products to serve the public every day, and without them, loss of clean water and many more boil water orders will occur.

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As you are aware, the Class I railroads, the Federal Railroad Administration, and the Government Accountability Office have all said that the December 31, 2015 deadline for PTC implementation is unattainable. PTC is required by statute on lines that ship toxic inhalation hazard (TIH) chemicals. More than 96 percent of all manufactured goods are directly touched by chemistry, including TIH chemicals such as chlorine and sulfuric dioxide. Just about every corner of our economy relies on these chemicals, including health care, farming, manufacturing, renewable energy production, construction, and water treatment. According to The U.S. Department of Transportation, "TIH materials are essential to the economy and national health." Halting the movement of these critical materials could have a negative ripple effect throughout many aspects of the economy. In fact, a report from the Harvard University John F. Kennedy School of Government made clear that "without the movement of [hazardous] materials, gas stations would close, crop yields would diminish, potable water prices would rise, and many manufacturing activities would come to halt."

We strongly support the American Chemistry Council, the Chlorine Institute and the Fertilizer Institute's petition for an order declaring the common carrier obligation to ensure railroads continue to transport TIH chemicals, despite their failure to implement PTC, to avoid any potential disruptions in shipping TIH chemicals by rail. The importance of addressing the deadline, which is nearly two months away, is critical and could have serious ramifications for the U.S. economy as well as our family business which has proudly served the southeastern and central United States, including Puerto Rico and the Caribbean, to ensure safe drinking and bathing water for decades.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Namoff', with a large, stylized flourish above the name.

Robert M. Namoff
Chairman/Owner
Allied Universal Corporation
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the letter regarding extending the PTC deadline was submitted to the American Chemistry Council, The Chlorine Institute and the Fertilizer Institute on October 21, 2015.

By David Rosenstock
VP Vertex



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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of October, 2015, I electronically served a copy of Robert M. Namoff's , of Allied Universal Corporation, submission to Docket No. FD35964 to the following parties listed below:

<p>Robyn Kinsley Senior Director, Transportation The Chlorine Institute Arlington, VA Electronic Submission to: rkinsley@CL2.com</p>	<p>Jeffrey O. Moreno Thompson Hine LLP 1919 M Street NW, Suite 700 Washington, DC Electronic Submission to: jeff.moreno@thomspsonhine.com Counsel American Chemistry Council & The Fertilizer Institute</p>
<p>Samuel M. Sipe Steptoe & Johnson LLP 1330 Connecticut Avenue NW Washington, DC Electronic Submission to: ssipe@steptoe.com Counsel BNSF Railway Company</p>	<p>David Hirsh Harkins Cunningham LLP 1700 K Street NW, Suite 400 Washington, DC Electronic Submission to: dhirsh@harkinscunningham.com Counsel Canadian National Railway Company</p>
<p>David Rifkind Stinson Leonard Street 1775 Pennsylvania Avenue NW, Suite 800 Washington, DC Electronic Submission to: david.rifkind@stinson.com Counsel Canadian Pacific Railway Company</p>	<p>Paul Moates Sidley Austen LLP 1501 K Street NW Washington, DC Electronic Submission to: pmoates@sidley.com Counsel CSX Transportation, Inc. and Norfolk Southern Railway Company</p>
<p>William Mullins Baker & Miller PLLC 2401 Pennsylvania Avenue NW, Suite 300 Washington, DC Electronic Submission to: WMullins@bakerandmiller.com Counsel Kansas City Southern Railway Company</p>	<p>Michael Rosenthal Covington & Burling LLP One City Center 850 10th Street NW Washington, DC Electronic Submission to: mrosenthal@cov.com Counsel Union Pacific R.R. Co.</p>

Robin E. Bolte

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