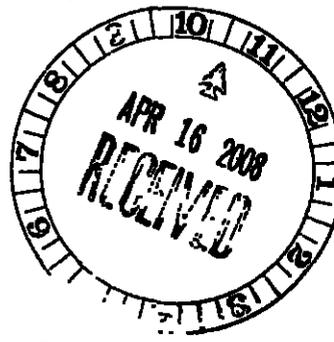


April 15, 2008

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222095

Surface Transportation Board.

Ex Parte No. 677

We are a 119-year old family-owned manufacturer of bleach and household cleaning products wishing to respond to the American Association of Railroads appeal to cease production of, what they referred to as "dangerous chemicals". to relieve them of their obligation to haul certain chemicals that are classified as inhalation hazards I just want to go on record as saying that would be nothing short of a critical mistake, and I just want to present my view and the sentiment of the James Austin Company regarding this matter.

The chemical specifically mentioned by Edward R Hamburger (President of the AAR) was chlorine. Chlorine has hundreds of uses, but the most obvious of these would be for water treatment. Mr. Edwards stated that there are alternatives for this purpose, such as using liquid bleach. The problem with that idea is that bleach is produced by using chlorine, as are numerous other products and chemicals. Not only would chlorine derivatives be affected, but hundreds of other products using caustic soda (sodium hydroxide a chemical produced in the production of chlorine) would also be eliminated by such a rash decision.

You can't eliminate a single chemical without reviewing what could and would be far reaching consequences. Newton's third law of motion "for every action there is an equal and opposite reaction", is not only practical in a scientific sense; but also in a practical every day sense Before we make any hasty decisions, we must exercise wisdom and discernment before reaching a final conclusion.

What would happen if chlorine and caustic soda were eliminated? Most, if not all businesses and industries would be affected. Let us look at a listing of some products that would be affected, or may need to be replaced with more expensive alternatives.

Food Industry	Transportation	Healthcare	Building
Sanitizers	Light weight plastic	Pharmaceuticals	PVC piping
Disinfectants	for construction of:	Penicillin	Vinyl siding
Dishwashing soap	Automobiles	Ibuprofen	Vinyl window
Vacuum seal packs	Airplanes	Aspirin	frames
Plastic food containers	Trains	Heart Valves	Plastic anchors
Milk jugs	Boats	Sutures	Molding

The items above are just a very small fraction of everyday items that could be eliminated or face using much more costly alternatives to replace or produce those products. In fact, 80% to 85% of all pharmaceuticals either contain or are manufactured using chlorine. That includes both over the counter and prescription drugs. What would that do to health care? I also need to mention that police and firemen depend on bullet proof vests, fire gear, radios, and computer systems that are all in

some way manufactured using chlorine. Removing chlorine from those applications could compromise the safety of the people we depend on to protect us. I could write a book on the applications and uses of chlorine, but I'm trying to keep this letter brief since you probably have a lot of information to sort through, as well as people to hear from.

In addition to mentioning some items and uses for hazardous chemicals, I also need to point out what has been done to insure safe handling of these chemicals. In 1988, the American Chemical Council instituted the Responsible Care Program to set and implement guidelines for the safe handling and use of chemicals. We at the James Austin Co. have adopted those guidelines. As a result of the Responsible Care guidelines, and recommendations by the Department of Homeland security, we have systems in place such as automatic shut off valves, monitors, surveillance cameras, and security systems to insure the safety of our workers and the community. We also work together with local and county police and fire officials, through the use of training presented by the chemical industry, to learn how to resolve any problems that would arise. The cost of safety is high. Insurance costs and safety training is high for both us and the railroads, but we're willing to make the sacrifice.

At this time, I just want to ask the Surface Transportation Board to do an extensive study to determine what the far-reaching consequences of any decision to remove any chemicals would mean to our economy and our future. At a time when we are losing jobs to foreign competition and a weak economy we can't afford to put any more people out of work. A decision to remove chlorine alone could result in the loss of thousands, maybe millions of jobs; and compromise our safety and well-being as well

Without chlorine and caustic, the future of our company will be jeopardized. Bleach accounts for 65% of our business. We sell the bleach to customers who use the product for cleaning, sanitizing, disinfecting, and water treatment. We also make a variety of other products with caustic soda (the derivative of chlorine manufacturing) in their formulas. Without these two critical elements in our production our company and its' 217 employees will be gone. There is no way for us to survive without them. Other alternatives to chlorine and caustic soda are either too costly, or the finished products are not as effective for cleaning or water treatment. Please take into account the best interest of A.I.I. concerned and not just the railroad industry when you make this crucial decision.

Respectfully,

JAMES AUSTIN COMPANY



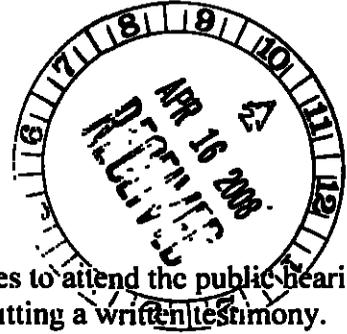
Harry Austin
President

222095

April 15, 2008

Ex Parte No. 677

Surface Transportation Board:



Unfortunately the James Austin Company is unable to send representatives to attend the public hearing scheduled for April 24th. However, we would like to participate by submitting a written testimony.

Per the board's request there are 10 copies enclosed for the board to review. We request consideration of our presentation, along with all the other participants, so that you can make a wise and intelligent decision based on the information presented by all parties involved.

Sincerely,

James Austin Company

A handwritten signature in black ink, appearing to read "H. G. Austin III".

Harry G. Austin III
President
James Austin Company

Office of Procurement

APR 16 2008

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