



## *Starches and Sweeteners North America*

May 3, 2019

Mr. Paul Stancil CHMM  
Senior Hazardous Material Accident Investigator  
National Transportation Safety Board  
490 L'Enfant Plaza East, SE  
Washington, DC 20594  
(via email)

RE: *Request for information related to UP derailment April 24, 2019 Fort Worth TX*

Dear Mr. Stancil:

Please accept the following as Cargill's response to the information request you submitted to the Cargill fleet and logistics managers via phone as well as e-mail on Friday April 26<sup>th</sup>. Please note that the SDS, BOLs and CofAs have been provided under separate communication at your request on Friday April 26<sup>th</sup> 2019. It is Cargill's understanding that with this information submittal, there is no outstanding information necessary from NTSB's perspective currently. To the extent you have further questions of Cargill, please let me know and we will do our best to assist in your ongoing investigation.

The information in this letter is considered voluntary and contains confidential and trade secret information. Cargill requests that this letter and the attachments are withheld from FOIA requests on these bases.

### **Procedures used to load the cars (i.e. were the cars loaded by volume or by weight)**

Cargill Blair exceeds the DOT and FRA requirements for loading and inspection. All railcars are inspected prior to them being brought on site for loading. Secondly the railcars are inspected in detail during the loading process to verify transportation requirements and finally are inspected again in the yard prior to being added to a train. All railcars are loaded by weight (mass flow meter) and are shipped within tolerance considering outage requirements as well as max weight.

### **Any tank outage calculations for the loads**

Tankcar outage calculations are a part of our programmed process to assist the loaders in loading rail cars. Attachment 1 attached to this email outlines the equations used to determine outage volumes by car at loading.

### **Pre-transport inspection documentation**

Pre transport inspection is completed for all ethanol shipments by a 3<sup>rd</sup> party repair company from the ground. Inspection items include checking for tool tight bottom fittings, seals missing, wheel issues,



visible leaks, placard holders not to standard, and any apparent repair needs. Our maintenance contractor maintains this information by exception.

In addition to the pre transport inspection, Attachment 2 includes top and bottom inspection reports at loadout by the technicians loading the railcar.

**Available maintenance files for the derailed tank cars**

Attachment 3 to this submittal includes an extraction of information and data responsive to this request from our contractor as well as our leasing agents for the derailed tank cars.

**General description of the ethanol refinery/loading facility (such as company structure, production capacity, number of unit train shipments per year)**

Cargill Blair is a large industrial complex sitting on 650 acres and is approximately 30 miles north of Omaha NE. This location employs approximately 540 people and an additional 400 contractors. In addition to ethanol, the Blair facility manufactures dextrose, corn syrup, livestock feed ingredients, and crude corn oil. The Blair ethanol plant produces 195 million gallons and ships out 75 ethanol trains per year. Blair has received OSHA Voluntary Protection Program STAR status since 2000.

Sincerely,

  
Sarah Britton  
Logistics Manager  
Cargill Starches Sweeteners and Texturizers

Attach (3)

cc: Kevin Klawitter Cargill  
Kevin Zimski Cargill  
Steven Bleser Cargill  
Pat Lighthart Cargill