

UNION PACIFIC RAILROAD

Public Comment
Trash Amendments
Deadline: 8/5/14 by 12:00 noon

August 5, 2014



Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814

SUBJECT: Comments Letter on the Trash Amendments

Dear Ms. Townsend:

Union Pacific Railroad is providing these comments to the Proposed Amendments to Statewide Water Quality Control Plans to Control Trash.

The amendments will certainly have an impact at preproduction plastic pellet transfer sites that include transload facilities and other tracks where UPRR has leased property to customers for transload of preproduction plastic pellets. Given the number of these facilities in the state, the regulations will impose a significant cost on those facilities to comply.

Union Pacific's main concern however is with the broad definition of trash and the prohibition of trash in discharge. The definition seems to capture the entire railroad regardless of the process or activity conducted on land used for industrial purposes. This broad definition and the trash prohibition would set up an impossible standard for the railroad to meet – it would be infeasible to install full capture systems or monitor other compliance options along every mile of track in this state 24 hours per day. Although UP understands the reason for the trash amendments, the Board should consider the impact of the requirements on non-traditional facilities such as railroad tracks and clearly exclude railroad tracks and spurs from the definition of "production, manufacturing, or processing operation".

Union Pacific Railroad appreciates the opportunity to comment on these regulations.

Sincerely,

A handwritten signature in blue ink that reads "Liisa L. Stark".

Liisa L. Stark
Director, Public Affairs

Public Affairs
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