

cc: [unclear]  
[unclear]

8/13/87  
[unclear]

AMC-ISF-R (SNOV/24 Nov 86) (495-806) to [unclear] Mr. Wickley/jls/AV 790-472  
SUBJECT: Railroad Usage within the Ravenna Plan.

Commander, U.S. Army Arsenal, Munitions and Chemical Command, ATTN:  
AMC-ISF-R, Rock Island, IL 61209-5000 7 AUG 1987

FOR: Commander, U.S. Army Materiel Command, ATTN: AMCSM-R, 5901 Eisenhower  
Avenue, Alexandria, VA 22304-3001

1. Reference FOMCOV along Ms. Jennifer Leonard, HQ, AMC, AMCSM-A, Mr. Gene  
Tefsky, HQ, AMC, AMCSM-R, and Mr. Tom Wickley, HQ, AMCSM, AMC-ISF-R,  
4 August 1987. AD.

2. As agreed during referenced FOMCOV, the Report of Environmental  
Consideration (REC) submitted by the installation in support of subject action  
has been revised. Copies of the revised REC have been submitted for the  
original.

3. The action of revising the REC was telephonically coordinated with the  
installation staff.

4. No further action was taken regarding a requirement for the licensee to  
prepare an environmental assessment as discussed in the last sentence, para-  
graph 1, 2d Endorsement. This requirement was previously established by  
paragraph 2g(4), 1st Endorsement.

5. The enclosed report of availability is returned for continued processing.

6. AMCSM - Providing Solidified the Lachive [unclear].

FOR THE COMMANDER:

ORIGINAL SIGNED

General Manager Ravenna Arsenal, Inc. FWD FOR	
<input type="checkbox"/>	Information
<input type="checkbox"/>	Compliance as applicable
<input type="checkbox"/>	Reply NLT

3 Encls.  
nc

GENE A. MARTEN  
Chief, Facilities Engr Division

CF:  
Commander, U.S. Army Toxic and Hazardous Materials Agency, ATTN: NIXT-AS-D,  
Aberdeen Proving Ground, MD 21010-5401  
Commander, Indiana AAP, ATTN: SMCIN-CO, Charlestown, IN 47111-9657  
Commander's Representative, Ravenna AA, ATTN: SMCV, Ravenna, OH 44266-3297

RECEIVED  
AUG 17 1987  
Engineering

8-17-87

OFFICE	
GM	
CO-OP	
ACCTG	
SP	
ENGR	(C)
PLN	
INSTR	
P&C	
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RETURN	

RAVENNA ARMY AMMUNITION PLANT  
8451 North Burt Road  
Ravenna, Ohio 44069-0007

RECORD OF ENVIRONMENTAL OPERATIONS

Title: Lease of North Half of Building 4700 and Associated Railroad Track at  
Ravenna Army Ammunition Plant.

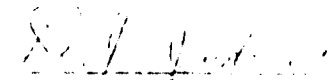
Description of Proposed Action:


Lease of 3,180 S.F. of Building 4700 and 470 L.F. of Railroad Track for  
a Railcar Rework Facility.


Anticipated Date and/or Duration of Proposed Action:

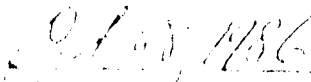
Lease for 5 Year Period.

It has been determined that the leasing action qualified for Categorical Exclusion  
No. A-24, Appendix A, AR 200-2, and no extraordinary circumstances exist as defined  
in paragraph 4-3, AR 200-2.

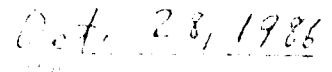
  
P. J. Jendrjak, Supervisor, Engineer, PAI

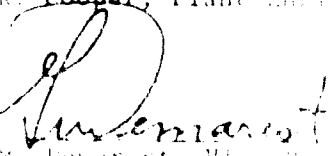
  
Date


  
E. M. Chanda, Environmental Engineer, PAI

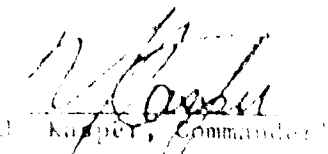
  
Date

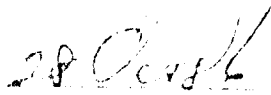
  
H. R. Cooper, Plant Engineer, PAI

  
Date 23, 1986

  
G. M. Lemarec, Vice President, Environmental Services, PAI

  
Date 28 Oct 86

  
R. J. Kasper, Commander, Representative, WAFB

  
Date 28 Oct 86

8/15/87


AMSIC-ISF-R (SMDRV/24 Rev 25) (485-806) 3d Ind  
 SUBJECT: Railroad Usage within the Ravenna Plant

Mr. Hickley/jls/AY 790-3421

Commander, U.S. Army Ammunition, Munitions and Chemical Command, ATTN:  
 AMSIC-ISF-R, Rock Island, IL 61209-0000 7 AUG 1987

FOR: Commander, U.S. Army Materiel Command, ATTN: AMCCN-R, 5001 Eisenhower  
 Avenue, Alexandria, VA 22304-0001

1. Reference FOYECOM along Ms. Jennifer Leonard, HQ, AMC, AMCCN-A, Mr. Gene  
 Sefsky, HQ, AMC, AMCCN-R, and Mr. Tom Hickley, HQ, AMCCOM, AMSIC-ISF-R,  
 4 August 1987, SAB.

2. As agreed during referenced FOYECOM, the Record of Environmental  
 Consideration (REC) submitted by the installation in support of subject action  
 has been revised. Copies of the revised REC have been substituted for the  
 original.

3. The action of revising the REC was telephonically coordinated with the  
 installation staff.

4. No further action was taken regarding a requirement for the lessee to  
 prepare an environmental assessment as discussed in the last sentence, para-  
 graph 1, 2d Endorsement. This requirement was previously established by  
 paragraph 2g(4), 1st Endorsement.

5. The enclosed report of availability is returned for continued processing.

6. AMCCOM - Providing Soldiers the Decisive Edge.

FOR THE COMMANDER:

ORIGINAL SIGNED

General Manager Ravenna Arsenal, Inc.	
FWD FOR	
<input type="checkbox"/>	Information
<input type="checkbox"/>	Compliance as applicable
<input type="checkbox"/>	Reply NLT

3 Encls  
 nc

GENE A. WARTEN  
 Chief, Facilities Engr Division

OF:  
 Commander, U.S. Army Toxic and Hazardous Materials Agency, ATTN: AMTHA-AS-D,  
 Aberdeen Proving Ground, MD 21010-5401

Commander, Indiana AAP, ATTN: SICIN-CO, Charlestown, IN 47111-9657

Commander's Representative, Ravenna AAP, ATTN: SMDRV, Ravenna, OH 44866-9297

8-17-87

<input checked="" type="checkbox"/>	OFFICE	
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<input type="checkbox"/>	SAP	
<input type="checkbox"/>	RETURN	

RAVENNA ARMY AMMUNITION PLANT  
8451 State Route 5  
Ravenna, Ohio 44769-9297

RECORD OF ENVIRONMENTAL CONSIDERATION

Title: Lease of North Half of Building 47-50 and Associated Railroad Track at  
Ravenna Army Ammunition Plant.

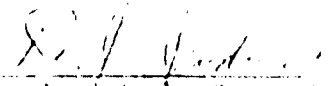
Description of Proposed Action:


Lease of 3,180 S.F. of Building 47-50 and 470 L.F. of Railroad Track for  
a Railcar Rework Facility.

Anticipated Date and/or Duration of Proposed Action:

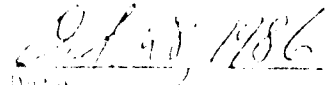
Lease for 5 Year Period.

It has been determined that the leasing action qualifies for Categorical Exclusion  
No. A-24, Appendix A, AR 200-2, and no extraordinary circumstances exist as defined  
in paragraph 4-3, AR 200-2.

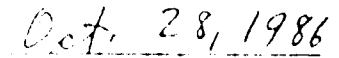
  
D. J. Jendrisak, Supervisory Engineer, RAI

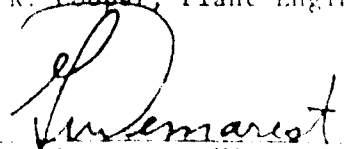
  
Date


  
T. M. Chanda, Environmental Engineer, RAI

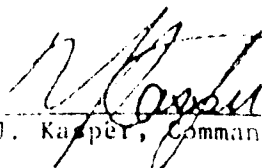
  
Date

  
H. R. Cooper, Plant Engineer, RAI

  
Date

  
G. M. Demarest, Vice President & General Manager, RAI

  
Date

  
R. J. Kasper, Commander's Representative, RVAAP

  
Date

51  
cc: R. Holford/T. Chanda  
D. Jendrisak  
file

AMXTH-IR-D (AMCEN-A/3 Apr 87) 1st End Mr. Torrisi/md/AUTOVON 584-3530  
SUBJECT: Railroad Usage Within the Ravenna Plant

U.S. Army Toxic and Hazardous Materials Agency, Aberdeen Proving Ground,  
MD 21010-5401 22 APR 1987

TO: Commander, U.S. Army Materiel Command, ATTN: AMCEN-A, 5001 Eisenhower  
Avenue, Alexandria, VA 22333-0001

4/27/87

TO	OFFICE
✓	GM
	CO-COR
	ACCTG
	SEC
	ENGR
	IR
	S&T&O
	P&CA
	SAF
	RETURN

1. Reference:

- a. Installation Assessment of Ravenna AAP Report #132, Nov 78.
- b. Reassessment of Ravenna AAP Report, DRXTH-AS-A-81132A, Apr 81.

2. Current regulations permit an installation to perform an evaluation of an area to determine if contamination exists as a first step in determining if a lease should be granted. This Agency would normally get involved in assessing a site such as the locomotive repair shop only if it was proposed for excessing per AR 405-90 (Disposal of Real Estate) or if it was identified as a potential source of contamination under a Remedial Investigation.

3. Based upon the referenced reports, there is no reason to suspect contamination at the locomotive repair shop. Since the area is being proposed for leasing and not for excessing, it is recommended that the U.S. Army Armament, Munitions and Chemical Command take the lead in implementing a baseline survey for the locomotive repair shop through the installation and utilize the same approach for all future environmental evaluations required for lease agreements associated with installations under their Command.

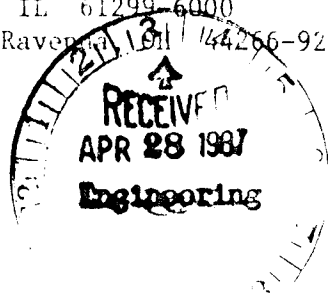
4. Based upon the priorities established for the Installation Restoration Program, the performance of a baseline survey for leasing purposes would be considered the lowest of all priorities. Since this Agency is currently conducting a large number of programs which are proposed for the National Priorities List, involve off-post contamination, or are politically sensitive/controversial, this Agency is unable to perform baseline surveys.

5. USATHAMA - Providing Soldiers the Decisive Edge.

2 Encls  
wd all encls

Signed  
F. A. THOMASSY  
Colonel  
Commanding

CF:  
Cdr, AMCCOM, ATTN: AMSMC-ISF(R), Rock Island, IL 61299-6000  
Cdr, RVAAP, ATTN: SMCRV, 8451 State Route 5, Ravenna, OH 44266-9297



4-28-87

TO	OFFICE	
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	P&CA	
	SAF	
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DEPARTMENT OF THE ARMY  
HEADQUARTERS, U. S. ARMY MATERIEL COMMAND  
5001 EISENHOWER AVENUE, ALEXANDRIA, VA 22333-0001

AMCEN-A

8 APR 1987

SUBJECT: Railroad Usage within the Ravenna Plant

Commander  
U.S. Army Toxic and Hazardous Materials Agency  
ATTN: AMXTH-IR  
Aberdeen Proving Ground, MD 21010-5401

1. Reference:

- a. 4th End, USATHAMA, AMXTH-IR-D, 20 Mar 86, to letter, USATHAMA, AMXTH-AS-D, 22 Mar 85, subject as above.
- b. 1st End, AMCCOM, AMSMC-ISF-R, 10 Feb 87, to letter, RVAAP, SMCRV, 24 Nov 86, subject as above (encl 1).
- c. DF, USAMC, AMCCC-S, 20 Mar 87, subject as above (encl 2).

2. Ravenna Arsenal, Inc. has submitted a Report of Availability (ROA) for the property leasing request at Ravenna AAP. Since USATHAMA indicated that a baseline survey prior to leasing would be considered a low priority project to be conducted by USATHAMA (Ref 1a), AMCCOM has suggested that such survey be conducted by the lessee to serve as an environmental condition survey to be used at future date to determine responsibility for contamination (Ref 1b).

3. As advised by the AMC Office of the Command Council, if contamination of the proposed area to be leased is reasonably suspected, the Army should conduct an environmental survey prior to making the land available for leasing. On the other hand, if there is no reason to suspect that the land to be leased is contaminated, the Army has no objection on an environmental baseline survey to be conducted by the lessee (Ref 1c).

4. Request USATHAMA evaluate the Ravenna AAP case to determine if there is no reason to suspect the proposed area to be leased is environmentally contaminated. If your finding is negative and the environmental baseline survey shall be conducted by the lessee, for the purpose of Army-wide installations as well as Ravenna AAP, request USATHAMA develop and recommend proper procedures for lessee to conduct such survey which subsequently will be reviewed and approved by the Army prior to leasing.

AMCEN-A

SUBJECT: Railroad Usage within the Ravenna Plant

5. If the Army is responsible to conduct the environmental survey for property leasing and excessing actions and USATHAMA is unable to implement the actions because of manpower hardship, it appears that these actions may need to be performed by the USACE. Request USATHAMA notify this office, ATTN: AMCEN-A, promptly of your decision and capability of conducting these survey efforts. If you decide not to perform the survey, as the central program manager, you should indicate who will be the responsible agency for funding support, and this office will submit a request to HQDA (DAEN-ZCE) for USACE support IAW AMC/USACE MOU.

6. Request USATHAMA provide this headquarters your comments and recommendations regarding subject survey and related generic situation NLT 1 May 87.

7. Point of contact, this headquarters, is Mr. Paul Lin, AMCEN-A, AUTOVON 284-9016.

8. AMC - Providing Soldiers the Decisive Edge.

FOR THE COMMANDER:

2 Encls

1. 1st End, AMCCOM
2. DF, USAMC



WILLIAM N. HASSELKUS  
Chief, Environmental Quality Division  
Office of the Deputy Chief of Staff  
for Engineering, Housing and  
Installation Logistics

CF:

COMMANDERS  
AMCCOM, AMSMC-1SF-R  
LAAP, SMCIN-CO  
RVAAP, SMCRV

November 21, 1986

cf: G. Demarest  
W. Hamilton  
J. Watson  
R. Holford  
T. Chanda ✓  
file

Thru: Contracting Officer's Representative  
Ravenna Army Ammunition Plant  
8451 State Route 5  
Ravenna, Ohio 44266-9297

TO: Commander  
U.S. Army Armament, Munitions and Chemical Command  
ATTN: AMSMC-ISF-R  
Rock Island, IL. 61299-6000

Subject: Railroad Usage within the Ravenna Plant  
(AMSMC-ISF-R (SMCRV/6 Mar 86) lsr End, 14 Apr 86)

Dear Sir:

Report of Availability (ROA) for Railcar Rework as requested in paragraph 10, subject letter, is forwarded for your review and continued action.

Paragraph N.21 which required notification of the last contents of the car, has been deleted. Paragraph N. 21 requires that all railroad cars which contained toxic or hazardous material as their last shipment must be thoroughly cleaned prior to being brought onto Ravenna AAP. Ravenna Arsenal, Inc. believes that requirement adequately places the responsibility on the lessee to assure that cars are cleaned and that the operating contractor is not required to monitor for compliance with lease conditions. Therefore Ravenna Arsenal, Inc. has no requirement to know the last contents of the car.

Sincerely

RAVENNA ARSENAL, INC.



H.R. Cooper  
Plant Engineer

HRC/ejm

Attachments (5 cys) ROA w/Attachments  
CMDR AMCCOM Att: AMSMC-PCG-B Without Drawings  
CMDR AMCCOM Att: AMSMC-ISE Without Drawings



cf: G. Demarest  
W. Hamilton  
J. Watson  
R. Holford  
T. Chanda ✓  
file

November 21, 1986

Thru: Contracting Officer's Representative  
Ravenna Army Ammunition Plant  
8451 State Route 5  
Ravenna, Ohio 44266-9297

TO: Commander  
U.S. Army Armament, Munitions and Chemical Command  
ATTN: AMSMC-ISF-R  
Rock Island, IL. 61299-6000

Subject: Report of Availability for Leasing Railroad Trackage-Ravenna AAP  
(1st End AMSMC-ISF-R (SMCRV/10 April), 2 May 86)

Dear Sir:

The subject Report of Availability has been revised and is attached for review and continued action.

Paragraph N.12 which required notification of the last contents of the car, has been deleted. Paragraph N.13 requires that all railroad cars which contained toxic or hazardous material as their last shipment must be thoroughly cleaned prior to being brought onto Ravenna AAP. Ravenna Arsenal, Inc. believes that requirement adequately places the responsibility on the lessee to assure that cars are cleaned and that the operating contractor is not required to monitor for compliance with lease conditions. Therefore Ravenna Arsenal, Inc. has no requirement to know the last contents of the car.

Sincerely,

RAVENNA ARSENAL, INC.



H.R. Cooper  
Plant Engineer

HRC/ejm

Attachments (5 cys) ROA with attachments  
CMDR AMCCOM Att: AMSMC-PCG-B Without Drawings  
CMDR AMCCOM Att: AMSMC-ISE Without Drawings

# R.S.I.X. MANAGEMENT, INC.

---

208 SOUTH LASALLE STREET  
SUITE 525  
CHICAGO, ILLINOIS 60604  
(312) 236-3933

November 5, 1986

Mr. Wayne Hamilton  
Ravenna Army Ammunition Plant  
Ravenna, Ohio 44266

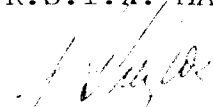
Re: NATX 18701

Dear Mr. Hamilton:

The subject car has been cleaned, as it had a zinc compound as its last load.

Sincerely yours,

R.S.I.X. MANAGEMENT, INC.

  
Spiro G. Kezios  
President

TOM,

SCK:ck

FOR YOU FILE - PLEASE  
FORWARD YOUR COMMENTS.

Harold Cooper

11/10/86

# RAVENNA ARSENAL, INC.

INTEROFFICE

November 13, 1986

TO MR. D. W. HAMILTON

FROM H. R. COOPER

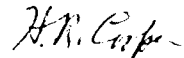
SUBJECT TANK CAR - NATX 18701

REFERRING TO LETTER OF 11/5/86 - R.S.I.X.  
MANAGEMENT, INC.

The referenced letter states that Tank Car NATX 18701 has been cleaned as it had a zinc compound as its last load.

Several Zinc compounds are listed under the Resource Conservation and Recovery Act as a toxic materials. The information given does not adequately describe the compound to ascertain that it is not toxic. If the car was in fact cleaned, we should have the name and location of the cleaning facility.

I recommend that additional information be obtained or that the car be removed.



H. R. Cooper

HRC:jb

cf: G. M. Demarest  
R. E. Holford  
T. M. Chanda  
D. J. Jendrisak  
File

NOVEMBER 12, 1986

MR. D. W. HAMILTON

T. M. CHANDA

TANK CAR - NATX 18701


11/5/86 - R.S.I.X.  
MANAGEMENT, INC.

This recurrent problem with Mr. Kezios and his tank cars continues to be a belaboring issue.

The subject letter does not provide any substantive data to support those actions mentioned by Mr. Kezios. There's a need to have a name and date attached to this cleaning operation as well as a specific name for last commodity; zinc cyanide is a "zinc compound".

One thing Mr. Kezios tends to overlook in this matter, is that, if an incident were to ever occur with a supposedly "clean tank car" that proved to be otherwise, many questions would arise concerning responsible management. If this incident were to result in significant impact to human health or environment, it wouldn't be Mr. Kezios name being mentioned in the news media; it would be the Ravenna Army Ammunition Plant.

The objective in having assurances to the cleanliness of these tank cars is not to make life difficult for any one person but to protect the concerned interests and welfare of all respective parties.



T. M. Chanda

TMC:jm

cf: G. M. Demarest  
H. R. Cooper  
R. E. Holford  
D. Jendrisak  
File

# R.S.I.X. MANAGEMENT, INC.

---

208 SOUTH LASALLE STREET  
SUITE 525  
CHICAGO, ILLINOIS 60604  
(312) 236-3933

November 5, 1986

Mr. Wayne Hamilton  
Ravenna Army Ammunition Plant  
Ravenna, Ohio 44266


Re: NATX 18701

Dear Mr. Hamilton:

The subject car has been cleaned, as it had a zinc compound as its last load.

Sincerely yours,

R.S.I.X. MANAGEMENT, INC.

  
Spiro G. Kezios  
President

SCK:ck

  
TOM,

FOR YOU FILE - PLEASE  
FORWARD YOUR COMMENTS.

Harold Cooper

11/10/86

---

On 7/1/85

Boys called regarding  
a tanker that carried  
Calcium Chloride —  $\text{CaCl}_2$   
is not a hazardous  
substance either from the  
standpoint of the CWA &  
RCRA → Material is  
used as a food preservative,  
medicine manufacturing, —  
formation of mineral water —  
Based upon the chemical  
regulatory history of the  
material the tank can be  
allowed to be brought in  
w/o a cleaning certificate.

May 13, 1986

THRU: Contracting Officer's Representative  
Ravenna Army Ammunition Plant  
8451 State Route 5  
Ravenna, OH 44266-9297

TO: Commander  
U.S. Army Armament, Munitions and Chemical Command  
ATTN: AMSMC-1SF-R  
Rock Island, IL 61299-6000

Subject: Report of Availability (ROA) for Leasing Railroad Trackage-  
Ravenna AAP  
(AMSMC-1SF-R(SMCRV/10 Apr 86) 1st End dtd 2 May 86)

Dear Sir:

Reference is being made to paragraph 1, subparagraph f, subject correspondence.

Ravenna Arsenal, Inc. believes that subparagraph N12 of the ROA which reads as follows is necessary.

"No railroad cars shall be sent to RVAAP for storage which previously contained oil or hazardous or toxic substances unless the car has been certified as properly decontaminated. The lessee shall be responsible for assuring conformance with this requirement. In addition, RVAAP shall be notified, in writing, of any tank car directed to RVAAP including the car number, last contents, and whether the car is to be cleaned. Cars which are to be cleaned will only be accepted if they have been marked as cleaned by the cleaning location. In addition, within 30 days of receipt of the tank car, a written confirmation of cleaning shall be provided to RVAAP. The confirmation must include car number and cleaning facility and be signed by an individual who takes responsibility for verifying the car has been cleaned. No cleaning of cars will be permitted at RVAAP."

The present lessee, R.S.I.X. Management, is and has been aware of the requirement to clean all railroad cars which contained toxic or hazardous materials as their last shipment. However, cars still came to Ravenna uncleaned. The placards had been removed. Due to the diligence of the RAI Environmental Engineer it was discovered that they had contained liquid pesticides and that they had not been cleaned. Since the cars are empty, Ravenna AAP does not receive a bill of lading/shipping orders which would show the last contents and last destination. Mr. Kazio blamed it on his customer and/or the railroad. Ravenna Arsenal, Inc. believes that it is the lessee's responsibility to assure the lease conditions are met and that adequate documentation is provided to enable Ravenna AAP to monitor his compliance.

Re: ROA for Leasing Railroad Trackage-  
Ravenna AAP

May 13, 1986

Request this matter be investigated and resolved. Ravenna Arsenal, Inc. will hold any further action on the Report of Availability pending resolution of this matter.

Sincerely,

RAVENNA ARSENAL, INC.

*H. R. Cooper*

H. R. Cooper  
Plant Engineer

HRC:jb





DEPARTMENT OF THE ARMY  
RAVENNA ARMY AMMUNITION PLANT  
RAVENNA, OHIO 44268 -9297

SMCRV

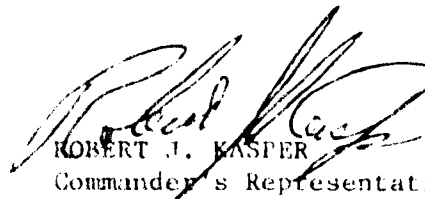
21 May 86

SUBJECT: Report of Availability (ROA) for Leasing Railroad Trackage -  
Ravenna AAP

Commander  
U.S. Armament, Munitions and Chemical Command  
ATTN: AMSMC-ISF-R  
Rock Island, IL 61299-6000

1. Reference Ravenna Arsenal Inc. (RAI) letter dated 13 May 86, SAB.
2. This office has reviewed the subject ROA Submission, Subparagraph N12 and concurs that it is required. We were not notified of the negative condition of the received cars.
- \* 3. Recommend RAI's environmentalist develop a procedure to inspect incoming cars for compliance with cleanliness, and the cost of this inspection be charged to the lessee.
4. Forwarded for your comments, review and disposition.
5. POC is John Cicero, AUTOVON 346-3126
6. Ravenna AAP - Providing Leaders the Decisive Edge.

FOR THE COMMANDER:

  
ROBERT J. KASPER  
Commander's Representative

5-21-86

TO	OFFICE
✓	GM
	CO-COR
✓	ACCTG
	SEC
✓	ENGR (2)
	IR
✓	S&T&O
✓	P&CA
	BAF
	RETURN



his compliance

# RAVENNA ARSENAL, INC.

## INTEROFFICE

July 9, 1985

TO MR. D. W. HAMILTON

FROM H. R. COOPER

SUBJECT STORAGE OF TANK CARS ON LEASED TRACK REFERRING TO LETTER OF  
AT RVAAP

I have personally inspected 10 of the tank cars stored at Ravenna and reviewed applicable parts of Tariff No. BOE-6000-D. I believe that we must adopt the following policy.

RAI will be notified in writing from Mr. Kezios the last contents of each tank car to be received (by car number). This notice should be received before the cars arrive. Mr. Kezios should annotate on the notice the cars which are to be cleaned. (Note: Any car which contained hazardous material must be cleaned.) A copy of each notice will be provided to the Engineering Division by Stores and Transportation.

Upon deliverance of the cars by the railroad, the cars shall be inspected by the Rail Crew and action taken as follows:

Any cars with no written description of last contents will not be accepted.

Any cars with red cardboard signs will not be accepted.

Any cars with white cardboard signs saying "car has not been cleaned, do not open valves, etc." will not be accepted.

Any cars which were to be cleaned and have no green tag will not be accepted.

Any cars which have hazardous material placards in place will not be accepted even if they are also labeled empty.

Any cars with legible green tags saying "car has been washed" and dated within the last 30 days can be accepted pending written confirmation.

Within 30 days of receipt of any car which required cleaning, some written means of confirming the cleaning shall be provided to RAI. This confirmation must identify the car number and the cleaning facility and be signed by an individual who takes responsibility for the fact that they have been thoroughly cleaned.

  
H. R. Cooper

HRC:jb

cf: T. M. Chanda  
File

## Tank Cars

Green Card indicates Wash & rinse

White Card Indicates Contaminated

Tank Car 71111 → Here <sup>1<sup>st</sup> day</sup> when first counted  
But absent @ Roundhouse on  
6/25/85.

# RAVENNA ARSENAL, INC.

## INTEROFFICE

TO MR. C. L. DAVIS  
MR. L. C. BOGGS

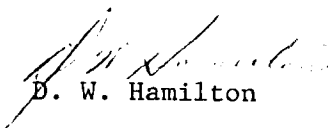
FROM D. W. HAMILTON

SUBJECT RAILROAD TANK CARS

REFERRING TO LETTER OF

### INSTRUCTION TO ENGINE CREW WHEN RAILROAD TANK CARS ARE RECEIVED

1. Check each car for white cleaning notice tag. Usually found on top step of ladder. Must have the current date, less than 30 days. These cars can be put into storage.
2. Cars displaying a red placard, generally have hauled hazardous materials and have not been cleaned. These cars should not be stored but put on the outbound track. Notify T. M. Chanda, Ext 221, when cars have been put on outbound track. Also notify Mr. Hamilton's Office, Ext 751.
3. Cars that do not display the white cleaning tag or the red placard will remain in the class yard until letter is received providing certification that car has not hauled hazardous material prior to arrival at Ravenna Army Ammunition Plant. These cars will only be stored after approval has been received by my office. LEAVE THESE CARS IN CLASS YARD.

  
D. W. Hamilton

cf: L. C. Boggs  
C. L. Davis (4)  
H. R. Cooper  
~~T. M. Chanda~~

RECEIVED  
MAY 2 1945  
Engineering

one Black tank  
religion house  
2 Tanks. four  
Tobels signifying  
Clement - Charles  
& Anne

---

2 White tanks  
Both carrying Tobels  
signifying not Clement  
of our room allowed  
as principals

{ NATX 21376 - No Cd  
 NATX 22159 - No Cd  
 NATX 75276 - ACRPho  
 NATX 75277 - " "  
 NATX 24937 - 0 +  
 NATX 24938 - 0 +

Red  
 Yellow  
 Green

NATX 71111 - No TAG  
 NATX 21318 - Used Killer  
 NATX 22791 - Wood Killa  
 NATX 23756 - LARD  
 NATX 23246 - No TAG  
 ? NATX 21203 - No TAG

EXCEPT #  
 Chem Rec #

in Case of Sp. 11

iNATX : 75452 - Green TAG

# R.S.I.X. MANAGEMENT, INC.

---

208 SOUTH LASALLE STREET  
SUITE 525  
CHICAGO, ILLINOIS 60604  
(312) 236-3933

February 24, 1986

Mr. Wayne Hamilton  
Ravenna Army Ammunition Plant  
Ravenna, Ohio 44266

Dear Mr. Hamilton,

The following cars have been cleaned, as they both had a non-hazardous commodity as their last load.

NATX 18368      Petroleum oil additives  
TLDX 114057      Liquid Aluminum

Sincerely yours,



Spiro G. Kezios  
President

SGK/sz

cf: H. Cooper  
T. Chanda

2/27/86  
DWH/clw



# R.S.I.X. MANAGEMENT, INC.

---

208 SOUTH LASALLE STREET  
SUITE 525  
CHICAGO, ILLINOIS 60604  
(312) 236-3933

June 25, 1985

Mr. H.R. Cooper  
Ravenna Army Ammunition Plant  
RAVenna, Ohio 44266

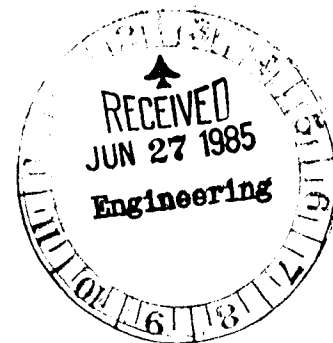
Dear Mr. Cooper,

In regards to our conversation today, I believe that the enclosed information, paragraph 172.510 section C may be helpful.

Sincerely yours,

  
Spiro G. Kezios  
President

cc: Mr. Wayne Hamilton





Ala. P. S. C. No. 20  
⊕Ark. T. C. No. 25  
C. T. C. No. 23  
Conn. P. U. C. No. 22  
F. P. S. C. No. 14  
Ga. P. S. C. No. 3  
I. P. U. C. No. 21  
Ia. C. C. No. 19  
Ill. C. C. No. 11  
I. R. C. No. 21  
P. S. C. I. No. TR-19

K. R. C. No. 21  
P. S. C. Md. No. 37  
M. D. P. U. No. 22  
M. D. O. T.—BOE-6000-D  
Minn. P. S. C. No. 21  
Miss. P. S. C. No. 14  
Mont. R. C. No. 21  
P. U. C. N. J. No. 21  
N. M. S. C. C. No. 14  
D. O. T.-N. Y. No. 18

P. U. C. O. No. 21  
Pa. P. U. C. No. 36  
R. I. P. U. A. No. 21  
P. U. C. S. D. No. 19  
R. C. T. No. 21  
P. S. C. U. No. 14  
Vt. P. S. B. No. 21  
V. C. C. No. 21  
P. S. C. W. Va. No. 21  
⊕P. S. C. Wis. No. 19  
Wyo. P. S. C. No. 19

**I. C. C. No. BOE-6000-D**

(Cancels I.C.C. No. BOE-6000-C)

**F. M. C. F. No. 32**

(Cancels F.M.C.F. No. 31)

⊕Applicable except where it conflicts with State statutes.

## **Bureau of Explosives**

(Thomas A. Phemister, Agent)

(Laura L. Smith, Alternate Agent)

### **TARIFF No. BOE-6000-D**

PUBLISHING

## **Hazardous Materials Regulations of the Department of Transportation**

BY

### **AIR, RAIL, HIGHWAY, WATER**

AND

### **MILITARY EXPLOSIVES BY WATER**

INCLUDING

## **SPECIFICATIONS FOR SHIPPING CONTAINERS**

(Regulations for Transportation of Explosives and Other Dangerous Articles in Rail Express and Rail Baggage services are also included herein for information.)

Prescribed under the Act of September 6, 1970 (74 Stat. 808: 18 U. S. C. 831-835)

**AND RESTRICTIONS COVERING THE ACCEPTANCE AND TRANSPORTATION OF EXPLOSIVES AND OTHER DANGEROUS ARTICLES BY CARRIERS PARTIES TO THIS TARIFF**

ISSUED May 1, 1984

EFFECTIVE May 31, 1984

Rule 1 of Tariff Circular waived: I. C. C. Permission No. SP 78-3113  
Published under authority of Federal Maritime Commission Special Permission No. 6177

The provisions published herein will, if effective, not result in an effect on the quality of the human environment.

Issued by: Thomas A. Phemister, Agent  
Laura L. Smith, Alternate Agent  
Association of American Railroads  
Bureau of Explosives  
1920 L St., N.W.  
Washington, D.C. 20036  
Telephone: 202-835-9500

(b) A freight container, motor vehicle or rail car containing two or more classes of materials requiring different placards specified in Table (2) may be placarded DANGEROUS in place of the separate placarding specified for each of those classes of material specified in Table (2). However, when 5,000 pounds or more of one class of material is loaded therein at one loading facility, the placard specified for that class in Table (2) must be applied. This paragraph does not apply to a portable tank, cargo tank, or tank car.

(c) No placard is required on a—

(1) Motor vehicle, or a freight container if transported by highway only, containing less than 1,000 pounds (aggregate gross weight) of one or more materials covered by Table (2), or

(2) Rail car loaded with freight containers or motor vehicles when each freight container or motor vehicle contains less than 1,000 pounds (aggregate gross weight) of one or more materials, covered by Table (2).

This paragraph does not apply to portable tanks, cargo tanks, or tank cars or to transportation by air or water.

(d) Any packaging having a capacity of 110 gallons or less that contains only the residue of a hazardous material covered by Table 2 of this section need not be included in determining the applicability of the placarding requirements.

§ 172.506 Providing and affixing placards: highway. (a) Each person offering a motor carrier a hazardous material for transportation by highway shall provide to the motor carrier the required placards for the material being offered prior to or at the same time the material is offered for transportation, unless the carrier's motor vehicle is already placarded for the material as required by this subpart.

(b) No motor carrier may transport a hazardous material in a motor vehicle, unless the placards required for the hazardous material are affixed thereto as required by this subpart.

(c) Until July 1, 1978, a placard or marking meeting the requirements of § 177.823 of this subchapter in effect on June 30, 1976, may be substituted in accordance with the following table for a placard required by this subpart to be affixed to a motor vehicle transporting a hazardous material by highway:

The motor vehicle may be marked or placarded in the format, letter size and color prescribed in 49 CFR 177.823 in effect on June 30, 1976.

If this subpart requires the motor vehicle to be placarded.

Explosives A	Explosives A.
Explosives B	Explosives B.
Nonflammable Gas	Compressed Gas.
Flammable Gas	Flammable Gas.
Combustible	Combustible or Flammable.
Flammable	Flammable.
Flammable Solid	Flammable.
Corrosive	Corrosives.
Poison	Poison.
Oxidizer	Oxidizers.
Radioactive	Radioactive.
Dangerous	Dangerous

(d) Until August 1, 1978, the provisions of paragraph (c) of this section continue to apply to any cargo tank (commonly known as a nurse tank and considered an implement of husbandry) transporting anhydrous ammonia, and operated by a private carrier exclusively for agricultural purposes.

§ 172.507 Special placarding provisions: Highway. Each motor vehicle used to transport a package of highway route controlled quantity radioactive materials (see § 173.403(l) of this subchapter) must have the required RADIOACTIVE warning placard placed on a square background as described in § 172.527.

§ 172.508 Placarding and affixing placards: rail. (a) Each person offering a hazardous material for transportation by rail shall affix to the rail car containing the material, the placards specified by this subpart for the material unless the placards already displayed on motor vehicles, transport containers, or portable tanks that are on the rail car comply with § 172.502 and 172.504 as these sections pertain to placarding the rail car.

(b) No rail carrier may accept a rail car containing a hazardous material for transportation unless the placards for the hazardous material are affixed thereto as required by this subpart.

§ 172.510 Special placarding provisions: rail. (a) Square background required. Each Explosive A placard, Poison Gas placard and poison gas—empty, placard affixed to a rail car must be placed on a square background as described in § 172.527.

(b) DOME placard. Each domed tank car containing a flammable liquid having a vapor pressure exceeding 16 p.s.i. at 100° F. (37.8° C) must have a DOME placard affixed thereto as specified in § 173.119(h) of this subchapter.

(c) EMPTY placard. Each empty tank car must be placarded with an EMPTY placard as required and described in § 172.525 or paragraph (a) of this section, as appropriate, that corresponds to the placard that

was required for the material the tank car last contained unless the tank car last contained a combustible liquid or has been—

(1) Reloaded with a material not subject to this subchapter; or

(2) Sufficiently cleaned of residue and purged of vapor to remove any potential hazard.

(d) FUMIGATION placard. Each freight container, motor vehicle, and rail car containing lading that has been fumigated or treated with poisonous liquid, solid, or gas, and that is offered for transportation by rail must have the placard specified in § 173.9 of this subchapter affixed on or near each door.

§ 172.512 Freight containers and aircraft unit load device. (a) Capacity of 640 cubic feet or more. Each person who offers for transportation, and each person who loads and transports, a hazardous material in a freight container or aircraft unit load device having a capacity of 640 cubic feet or more shall affix to the freight container or aircraft unit load device the placards specified for the material in accordance with § 172.504. However,—

(1) The placarding exception provided in § 172.504(c)(1) applies to motor vehicles transporting freight containers and aircraft unit load devices,

(2) The placarding exception provided by subparagraphs (c)(1) and (c)(2) of § 172.504 applies to each freight container and aircraft unit load device being transported for delivery to a consignee immediately following air or water shipment, and,

(3) Placarding is not required on a freight container or aircraft unit load device if it is only transported by air and is identified as containing a hazardous material in the manner provided in Part 5, Chapter 2, Section 2.7, of the ICAO Technical Instructions.

(b) Capacity less than 640 cubic feet. Each person who offers for transportation by air, and each person who loads and transports by air, a hazardous material in a freight container or aircraft unit load device having a capacity of less than 640 cubic feet shall affix one placard of the type specified by paragraph (a) of this section unless the freight container or aircraft unit device—

(1) Is labeled in accordance with § 172.406(e)(3);

(2) Contains radioactive materials requiring the Radioactive Yellow III label and is placarded with one Radioactive placard and is labeled in accordance with § 172.406(e); or,

(3) Is identified as containing a hazardous material in the manner provided in Part 5, Chapter 2, Section 2.7, of the ICAO Technical Instructions. When hazardous materials are offered for transportation, not involving air transportation, in a freight container having a capacity of less than 640 cubic feet the freight container need not be placarded. However, if not placarded it must be labeled in accordance with Subpart E of this part.

(c) Notwithstanding paragraphs (a) and (b) of this section, packages containing hazardous materials, other than ORM-D, offered for transportation by air in freight containers are subject to the inspection requirements of § 175.30 of this subchapter.

§ 172.514 Cargo tanks and portable tanks. (a) Each person who offers for transportation a cargo tank or a portable tank containing a hazardous material shall affix the placards specified for the material in accordance with § 172.504(a) However, if placarded instead of labeled as provided in § 172.406(e)(4), a portable tank having a rated capacity of less than 1,000 gallons need be placarded on only two opposite sides.

(b) Each cargo tank and portable tank that is required to be placarded when it contains a hazardous material must remain placarded when it is emptied unless it is—

(1) Reloaded with a material not subject to this subchapter; or

(2) Sufficiently cleaned and purged of vapors to remove any potential hazard.

§ 172.516 Visibility and display of placards. (a) Each placard on a motor vehicle and each placard on a rail car must be readily visible from the direction it faces except from the direction of another motor vehicle or rail car to which the motor vehicle or rail car is coupled. This requirement may be met by the placards displayed on the freight containers or portable tanks loaded on a motor vehicle or rail car.

(b) The required placarding of the front of a motor vehicle may be on the front of a truck-tractor instead of or in addition to the placarding on the front of the cargo body to which a truck-tractor is attached.

(c) Each placard on a transport vehicle, portable tank or freight container must—

(1) Be securely attached or affixed thereto or placed in a holder thereon. (See Appendix C to this part.)

(2) Be located clear of appurtenances and devices such as ladders, pipes, doors, and tarpaulins;

(3) So far as practicable, be located so that dirt or water is not directed to it from the wheels of the transport vehicle;

(4) Be located away from any marking (such as advertising) that could substantially reduce its effectiveness, and in any case at least 3 inches (76.0 mm.) away from such marking.

(5) Have the words or identification number (when authorized) printed on it displayed horizontally, reading from left to right;

(6) Be maintained by the carrier in a condition so that the format, legibility, color, and visibility of the placard will not be substantially

**§ 172.525 Standard requirements for the EMPTY placard.**

(a) Each EMPTY placard must be as follows:

- (1) The triangle at the top of the placard must be black. The word "EMPTY" must be white.
- (2) The midsection and lower triangle on the EMPTY placard must be as specified in § 172.519 and Appendix B to this part, and §§ 172.528, 172.530, 172.532, 172.536, 172.540, 172.542, 172.546, 172.548, 172.550, 172.552, 172.554, and 172.558 as appropriate for the residue of the commodity being transported and required by this subchapter to be placarded.

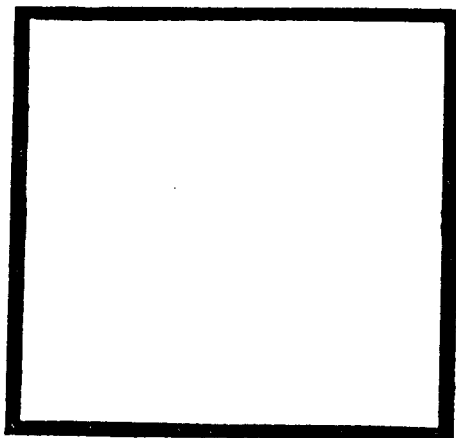
(b) The top part of each EMPTY placard must be as specified in Appendix B to this part and as illustrated on the **FLAMMABLE—EMPTY** placard which, except for size and color, must be as follows:



(c) The EMPTY placard must be as shown in paragraph (b) of this section and may be—

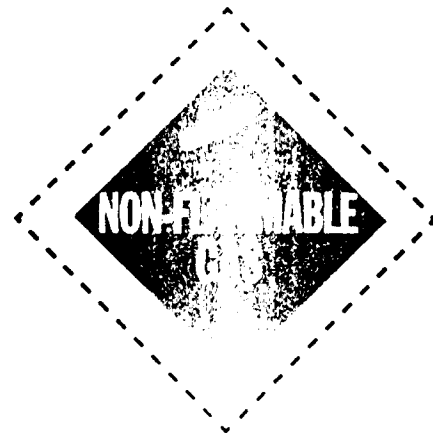
- (1) A separate placard;
- (2) On the reverse side of a placard, or
- (3) A composite made by covering the top triangle of the appropriate placard with a black triangle bearing the word "EMPTY" in white letters.

**§ 172.527 Background requirements for certain placards.** (a) Except for size and color, the square background required by § 172.510(a) for certain placards on rail cars, and § 172.507 for placards on motor vehicles containing a package of highway route controlled quantity radioactive materials, must be as follows:



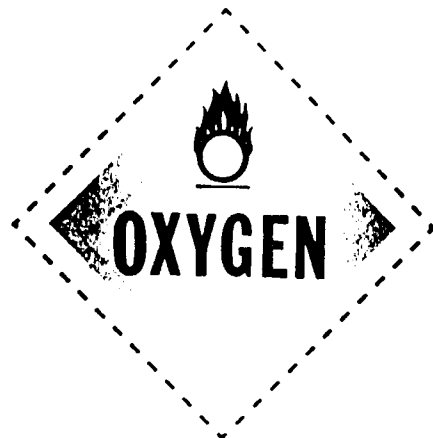
(b) In addition to meeting the requirements of § 172.519 for minimum durability and strength, the square background must consist of a white square measuring 14 1/4 inches (362.0 mm.) on each side surrounded by a black border extending to 15 1/4 inches (387.0 mm.) on each side.

**§ 172.528 NON-FLAMMABLE GAS placard.** (a) Except for size and color, the NON-FLAMMABLE GAS placard must be as follows:



(b) In addition to meeting the requirement of § 172.519, and Appendix B to this Part, the NON-FLAMMABLE GAS placard must be green with the symbol, inscription, and 1/2 inch (12.7 mm.) border white.

**§ 172.530 OXYGEN placard.** (a) Except for size and color, the OXYGEN placard must be as follows:



(b) In addition to meeting the requirements of § 172.519, and Appendix B to this Part, the OXYGEN placard must be yellow with 1/2 inch (12.7 mm) white border. The symbol and inscription must be black.

**§ 172.532 FLAMMABLE GAS placard.** (a) Except for size and color, the FLAMMABLE GAS placard must be as follows:



(b) In addition to meeting the requirements of § 172.519, and Appendix B to this Part, the FLAMMABLE GAS placard must be red with the symbol, inscription, and 1/2 inch (12.7 mm.) border white.

# R.S.I.X. MANAGEMENT, INC.

*Sept 28 1985*

208 SOUTH LASALLE STREET  
SUITE 525  
CHICAGO, ILLINOIS 60604  
(312) 236-3933

September 20, 1985

Mr. Wayne Hamilton  
Ravenna Army Ammunition Plant  
Ravenna, Ohio 44266

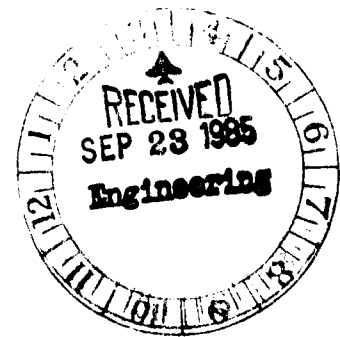
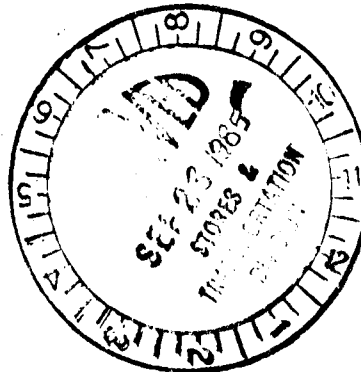
Dear Mr. Hamilton,

The attached list of 10 tank cars that are currently stored at Ravenna AAP have been cleaned.

Sincerely yours,

*Spiro G. Kezios*  
Spiro G. Kezios  
President

SGK/sz



SEARCH BY CAR TYPE T AT LOCATION RA USING THE CURRENT FILE

CAR NUMBER	LOC CODE	GRP	TRACK	CAR TYPE	TRK ACC	TRK CAP	TRACK POSITION	ARRIVAL DATE	DEPARTURE DATE
NATX021203	RA ✓			T			/	04/28/85	/ /
NATX021313	RA ✓			T			/	04/26/85	/ /
NATX021375	RA ✓			T			/	04/09/85	/ /
NATX022159	RA ✓			T			/	04/09/85	/ /
NATX022791	RA ✓			T			/	04/28/85	/ /
NATX022888	RA ?			T			/	09/07/85	/ /
NATX023246	RA → there was no tag			T			/	04/28/85	/ /
NATX023575	RA ✓ hard			T			/	04/26/85	/ /
NATX071111	RA ?			T			/	04/15/85	/ /
NATX075452	RA ✓			T			/	04/03/85	/ /