

# ASARCO Smelting Site Railroad Removal Plan El Paso, Texas

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## **1 Company Profile**

National Salvage & Service Corporation has successfully removed thousands of miles of abandoned trackage across the United States. Over the last 30 years, we have purchased and removed trackage that was owned by every major railroad. The reference from CSX is enclosed. We currently have contracts with CSX, Norfolk Southern and Union Pacific Railroads.

National operates the largest railroad tie processing and grinding operation in the country. We handle over 2 million ties annually for Norfolk Southern, in addition to the ties from CSX and Canadian National. National maintains \$8 million in liability insurance and can provide performance and payment bonds on projects in excess of \$10 million.

Whether it is 1 mile for a town or 100 miles for a Class 1 railroad, the project will be performed safely and as agreed upon. Every project will be used as a reference.

## **2 Work Plan**

The Burlington Northern Santa Fe Rail Road (BNSF) and Union Pacific Rail Road (UP) provided rail services to the ASARCO ore smelting and refining site until final termination of services in 2008. Termination of the site rail services coincided with a bankruptcy proceeding. Currently, the Texas Custodial Trust (Trust) controls the site. The Trust decided to remove the track, rail ties, switches and other track material (collectively "the track") from the site, as part of the overall site asset recovery and demolition. The track will be removed in two phases. Phase I Track Removal operations will occur as part of the initial phase of asset recovery at the site. All track materials, except a single rail line of ~2650-ft for potential future use during plant asset recovery and demolition operations. Phase II Track Removal operations will consist of removing the balance of the track during the final phase of the site demolition activities.

The purpose of this work plan is to document how track materials are to be removed, rinsed, loaded and transported offsite for appropriate reuse and recycle in accordance with regulatory and Trust requirements. The following procedures are intended to permit safe, efficient and compliant track removal operations.

### *Pre-Construction Activities*

1. Identify and designate the limits of the track to be removed during each of the two Track Removal Phases.
2. Conduct a visual review of the rail bed areas for potential worker exposure to raw materials and products that may have accumulated from

former operations. Any significant findings will be addressed in the health and safety plan so that engineering controls, monitoring and minimum personal protection equipment (PPE) requirements can be established in compliance with health and safety procedures and regulatory requirements.

3. Attend a pre-construction meeting with the Trust representatives and rail rining contractor to review their respective site HASP, work plans, schedule and other pertinent operational and safety information. During the meeting, clarification of site safety, operational and contract requirements will be discussed prior to the initiation of site construction activities.
4. Notify the Texas utilities “one call” system sufficiently in advance of planned track removal activities so that utilities that enter and cross the site can be properly located and marked. As necessary, utilize a private utilities locator service to locate onsite utilities. No rail tie removal or other digging activities will proceed or continue without proper notification and marking of the utilities.
5. Provide required training and medical surveillance documentation to The Texas Custodial Trust for all personnel who are to be assigned to the work.

#### *Construction Activities*

1. Mobilize project personnel, equipment and materials to the site. Personnel will include one superintendent, two operators and 3 laborers. Mobilized equipment will include the following: one Cat 312 excavator with grapple and magnet attachments; one Bobcat 300 skid steer loader with forks and bucket attachments; one Mack DM 690 boom truck with log loader; one track wrench; one water truck; and miscellaneous tools (torches, spike bars, etc.)
2. Provide site orientation to all personnel. Review the HASP, the ERM HASP, and all other pertinent plans with operational personnel prior to commencing work. Document the training. All personnel will meet daily to coordinate safety, track removal and rining activities. Tailgate safety meetings to discuss work tasks, hazards, hazard mitigation, safe work practices and safety alerts will be held at the beginning of each work day and upon return from the mid-day lunch break.
3. Designate and set up the work and support zones for construction activities.

4. Prior to removal, a representative photo will be taken of the materials. .
5. The track removal crew will commence removal of the rail and other track material (OTM). The track bed will be cleared with the excavator and/or skid steer loader. Adequate dust control measures shall be employed throughout all rail, OTM and tie removal operations, including restoration activities.
6. The track wrench will be utilized to remove the bolts from the joint bars. Any bolts that the track wrench cannot access will be cut with a torch. After the bolts are removed, the excavator will remove the rail from the ties with a rotating grapple. The rail will be stockpiled in groups of 6, just off the edge of the ties. The remaining spikes will be pulled with a spike bar. The plates, spikes, bars and bolts (other track materials "OTM") will be removed from the ties with a magnet on the excavator. The OTM will be temporarily stockpiled in small piles just off the edge of the ties.
7. The rinsing contractor will use a bobcat with hammer attachment to vibrate the rail and release accumulated hardened materials from the rail, where necessary. The rinsing contractor will then rinse dust and accumulated soil from the rails, plates, spikes and switches in place using no more than 3,000psi. Rinse water will aid dust control measures and be allowed to evaporate. The rinsing contractor will remain at least three hundred feet (300') behind the track removal operations so that the rinsing and removal crews maintain a safe working distance from each other.
8. The rinsed track will receive a final visual observation and a representative photo of the post-rinsed materials will be taken.
9. Following final approval of the rinsing activities, the temporarily stockpiled rail and OTM will be loaded onto trucks and hauled to a temporary stockpile location for segregation and consolidation. Segregated and consolidated rail and OTM will be loaded onto trucks and shipped directly to a steel mill. Each load of rail and OTM shall be accompanied by a completed and signed bill-of-lading. A copy of all documentation shall be retained at the site.
10. Following rail and OTM removal activities, rail ties will be carefully removed by mechanical means (Bobcat skid loader with forks or excavator with a grapple) from the rail track beds and loose soil will be removed by machine. Care will be taken to minimize displacement of the ballast bed. Ties will be rinsed as removed and temporarily staged along the rail track beds. Pre-rinse and post-rinse photos of the ties shall also be taken.

11. Removed rail ties will be graded and segregated into two categories: re-usable ties and those destined for recycle (shredding and use as permitted boiler fuel.)
12. The sorted ties will be bundled and loaded onto trucks for offsite shipment with a bill-of-lading. The re-usable ties will be shipped to retailers, the recycle ties will be shipped to a cogeneration facility. A copy of the bills-of-lading shall be retained at the site.
13. The rail removal contractor will inspect all trucks loaded with rail, OTM and ties prior to leaving the site. Significant dust or soil that may have accumulated on the truck beds and/or tires during loading shall be rinsed off at the onsite wash pad prior to the trucks exiting the plant.
14. At the completion of track removal operations, rail beds will be back-dragged with existing ballast, filling voids and creating a level surface. Crossings will be brought to surrounding paved grades with existing ballast, effecting a compacted, smooth and continuous transition between the surfaces.
15. Restored rail beds and other work areas shall be left into a “broom” clean condition prior to project demobilization.
16. Equipment used in the track and tie removal operations will be taken to the wash pad and rinsed prior to demobilization.
17. Demobilize all personnel, equipment and materials.

*Post Construction Activities*

1. Complete and submit paperwork and photographs documenting track and tie removal activities.

Deviations from this procedure shall be reviewed and approved in advance by the ERM Construction Manager prior to implementation.