

CHAPTER II: ENVIRONMENTAL COMPLIANCE ISSUES FACING SHORT LINE RAILROADS, A LISTING BY RAILROAD OPERATIONS

This chapter presents various short line railroad operations and their associated federal environmental compliance requirements. If you are familiar with the operations of your railroad, this chapter should help you determine what some of your responsibilities are under environmental law. Chapter III contains background information on the environmental laws that create the compliance responsibilities below. Consult Chapter III and the Glossary for clarification on the terminology and legal basis of these environmental regulations.

This chapter is divided into three sections, by railroad operation:

<i>Operation</i>	<i>Definition</i>	<i>Some Activities Regulated to Environmental Regulations</i>
<i>Mechanical</i>	Activities related to the maintenance and storage of locomotives, track repair equipment, or cars.	<ul style="list-style-type: none"> • Oil filter replacement and used oil disposal • Service fueling • Railcar cleaning (wastewater treatment)
<i>Engineering</i>	Any work done to maintain fully operational railroad track and facilities.	<ul style="list-style-type: none"> • Rail lubricator maintenance • Crosstie repair or replacement
<i>Transportation</i>	All activities associated with the movement of locomotives and trains over a section of track.	<ul style="list-style-type: none"> • Noise generation • Spill preparedness

Within each general operations category (e.g., Mechanical Operations), the discussion of environmental regulatory requirements is split into specific operations (e.g., Large Scale Equipment Cleaning). An example of this discussion format follows:

Example Section
General Operations Category at top of page (e.g., Mechanical Operations)
<u>Specific operation (e.g., Large Scale Equipment Cleaning)</u>
Major compliance issues: This section describes the environmental issues associated with the activity and identifies the environmental law(s) that apply to the activity.
What to do: This section overviews the compliance requirements associated with the activity.
Pollution prevention idea: The concept of pollution prevention involves changes in normal operations to reduce pollution production, such as product substitution, waste minimization, or process change. Pollution prevention ideas are presented if available.
Case example: If available, the compliance experiences of a short line railroad on this issue are discussed.
For more information: If appropriate, other sections in this handbook and other publications where additional information is available on the topics relevant to this operation are mentioned.

This report discusses only federal environmental laws and their related regulations. However, many state and local governments have been given the authority to put their own environmental programs in place if these programs are *at least as strict* as the federal ones discussed below. Even where federal regulations apply, individual states may impose additional requirements for environmental compliance. As a result, the type and difficulty of environmental requirements will differ from state to state. Since state standards may be considerably more restrictive, the compliance requirements discussed below should be considered as a *baseline*, the lowest potential level of activity required for compliance with environmental laws. *You can determine the compliance requirements particular to your state by contacting your state's environmental agencies listed in Appendix A.*