COMMENTS RECEIVED

FOLLOWING

MARCH 13, 1997

ENVIRONMENT & LAND USE

COMMITTEE MEETING

Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809

50 YEARS 1947-1997
of Regional Cooperation, Leadership & Planning

ARC

March 13, 1997

Honorable Betty Hannah, Mayor
City of Fairburn
P. O. 145
Fairburn, GA. 30213

RE: Development of Regional Impact--Re-review of CSX Intermodal Facility

Dear Mayor Hannah:

In September, 1996, the Atlanta Regional Commission completed a Development of Regional Impact (DRI) Review of the proposed CSX Intermodal Facility. Based on the information available at that time, the Commission found that the proposed DRI was not in the best interest of the State at that time. Enclosed is the resolution adopted by the Commission. The major concerns were potential impact on Line Creek, potential impact on air quality, and potential impact on the surrounding community. During the review the City of Fairburn returned comments and a copy of those comments is also enclosed.

Since the September review, CSX has completed a number of studies in an effort to address the concerns noted in the DRI review. Some of these studies include traffic, air quality, noise, and protection of Line Creek. The CSX representative has sent the City of Fairburn information concerning their efforts to address Fairburn's specific concerns.

Fulton County has requested that ARC now re-review the proposed intermodal facility . The ARC staff considers that the additional studies have addressed the major concerns from the Commission's September review. At the March 13 meeting of the Commission's Environment and Land Use Committee, the Committee adopted a resolution finding the proposed DRI is now in the best interest of the State. This matter will be considered at the March 26 meeting of the Commission. The Environment and Land Use Committee requested that we contact the City of Fairburn to let you know that this matter will be on the March 26 agenda and that any comments the City might like to make would be considered. We would need to receive any comments by noon on Friday, March 21. Our staff and the CSX representative are available to meet with you or your representative if you have any questions or need further information concerning this matter.

Please feel free to call me or Beverly Rhea at 404-364-2562.

Sincerely,

Joel F. Stone, Jr., Director
Comprehensive Planning

Enclosures
c Mr. Anthony W. Cox

Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809

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ARC

March 13, 1997

Honorable Robert Sprayberry, Chairman
Fayette County
140 Stonewall Avenue
Fayetteville, GA. 30214

RE: Development of Regional Impact--Re-review of CSX Intermodal Facility

Dear Chairman Sprayberry:

In September, 1996, the Atlanta Regional Commission completed a Development of Regional Impact (DRI) Review of the proposed CSX Intermodal Facility. Based on the information available at that time, the Commission found that the proposed DRI was not in the best interest of the State at that time. Enclosed is a copy of the resolution adopted by the Commission. The major concerns were potential impact on Line Creek, potential impact on air quality, and potential impact on the surrounding community. During the review Fayette County returned comments and a copy of those comments is also enclosed.

Since the September review, CSX has completed a number of studies in an effort to address the concerns noted in the DRI review. Some of these studies include traffic, air quality, noise, and protection of Line Creek. The CSX representative has met with County staff members to explain the plan to protect Line Creek.

Fulton County has requested that ARC now re-review the proposed intermodal facility . The ARC staff considers that the additional studies have addressed the major concerns from the Commission's September review. At the March 13 meeting of the Commission's Environment and Land Use Committee, the Committee adopted a resolution finding the proposed DRI is now in the best interest of the State. This matter will be considered at the March 26 meeting of the Commission. The Environment and Land Use Committee requested that we contact Fayette County to let you know that this matter will be on the March 26 agenda and that any comments the County might like to make would be considered. We would need to receive any comments by noon on Friday, March 21. Our staff and the CSX representative are available to meet with you or your representative if you have any questions or need further information concerning this matter. You can call me or Beverly Rhea (404-364-2562).

Sincerely,

Joel F. Stone, Jr., Director
Comprehensive Planning

Enclosures
c Ms. Chris Venice

City of Fairburn
Comments on CSX Application for the Fairburn Intermodal Terminal

In our original comments, we stated that:

> "Large volumes of truck traffic will be directed to the I-85 / Hwy. 74 interchange. This exit is already severely overcrowded at peak hours. We have expressed concerns to the DOT about public safety at this intersection due to overcrowding. The CSX development will add to the traffic volume and will encourage additional transportation related development which will further compound the problem at this intersection."

The CSX response indicates that the impact would be minimal. The traffic study prepared by PBS&J for CSX indicates that in peak hours some areas will degrade from a class "D" (Long delays) to a class "E" Very long delays. The report characterizes a class "E" as very long delays at signalized intersections, very long queues and high levels of congestion are prevalent which result in lengthy delays. This impact would not be minimal to residents of Fairburn and the surrounding areas of Fulton and Fayette Counties. We continue to be concerned about this intersection.

In our original comments, we stated that:

> "Significant volumes of heavy truck traffic through the center of the historic district (Hwy. 29) will have a negative impact on the City's attempt to maintain an active retail center with a historic theme."

The CSX response is that the impact would minimal and would not have an impact on the retail area. The report states that 20% of the traffic would not use the Hwy 74 / Interstate 85 access to the site. The majority of those in this class would travle through Hwy 29 and the Fairburn Historic District. Fairburn has invested significant amounts to maintain a quaint atmosphere to encourage a niche market of specialty retail in the downtown. 20% of 1,000 trucks daily would, in our opinion, have a significantly detrimental effect on this area.

In our original comments, we stated that:

> "McLarin Road will be a major conduit for truck traffic from the development to Hwy. 74. This road is not designed to handle large volumes of heavy trucks. Degradation of the pavement quality and added congestion surrounding the existing businesses in the McLarin / Bohannon road area needs to be reviewed."

The response from CSX indicates a willingness to improve Fairburn's streets, but does not attempt to study or address the impact of increased traffic in the McLarin / Bohannon area.

In our original comments, we stated that:

> "Increased heavy truck traffic volume through Fairburn will increase the demand for police traffic enforcement and will increase number and severity of traffic accidents in Fairburn."

CSX does not respond to this issue. The degradation of public safety and the cost of enforcement remain concerns of the City.

In our original comments, we stated that:

> "The potential for trains to block railroad crossings during staging and "building" trains needs to be determined. Frequent and prolonged blockage of rail crossings would significantly impact the response times of Fire and Rescue personnel located on East Broad Street."

The CSX response indicates that this would not be a problem if the full site can be utilized as requested. This implies that if CSX were to attempt to develop the site without the full site, Fairburn's public safety could be adversely affected.

In our original comments, we stated that:

> "Issues of environmental impact need to be assessed. The impact on wetlands and the water table need to be determined. The level of noise, light, dust, and air pollution generated by the site needs to be assessed as well as the effectiveness of proposed mitigation efforts to control these factors."

The staff of the ARC is better qualified than the City of Fairburn to confirm if the studies prepared by CSX adequately address these concerns. It is clear, however that even if Metro area air quality is improved by relocation of the terminal, the area surrounding Fairburn will suffer significant degradation.

Regarding traffic management, the CSX response indicates that they will prepare a traffic management plan to divert truck traffic from local streets. This does not address our concern about major increases in truck traffic on state highways through Fairburn. Highways 29, 74, and 92 will not be addressed in this plan. Injection of truck traffic on these routes will impact both residential (Hwy. 92) and commercial areas (Hwy. 29).

The CSX corporation also suggests that the development of the terminal will result in additional development in the area. This new development will take the form of distribution warehousing and truck terminal facilities. If this related development should occur, the problems which are outlined above would be increased and the negative impacts to Fairburn could be significantly greater than outlined in the CSX studies.

Based on these concerns, the City of Fairburn feels that the CSX terminal is not in the best interest of our residents as it is currently proposed.

Betty Hannah
Mayor

The Creekwood Coalition, Inc.
7870 Creekwood Road
Fairburn, Georgia 30213
770-969-8575 • 770-969-4478

March 11,1997

Mr. Harry West
3715 Northside Parkway
Atlanta, Ga.30327-2809

Dear Mr.Harry West,

It has come to our attention , that CSX Intermodal has applied successfully to the ARC , for reconsideration of their Intermodal Facility ,to be constructed in Fairburn. The facts have not changed since August '96.The figures have just been rearranged.Fairburn is still in the non-attainment area, and this facility will heavily impact Fulton County. I have enclosed several supporting facts that I would appreciate you reading, before you consider approving this operation. Most importantly , is the Toxic Release Inventory Report(see enclosure) We have several companies in our area that are already polluting this end of the county. CSX claim they are transferring 48 million miles a year from the Atlanta roads to Fairburn is only creative diversification. Atlanta has 98 million miles (daily) CSXS' sacrifice is minuscule .

Ms. Rosa Mary Johnson, Mayor of Lithia Springs, and a member of your board, is fighting the same nightmare we are. She is well read on this matter. It would behoove you to listen to her. She is not only trying to save her town but is very concerned about the citizens of Georgia as well as we .

Fairburn is on the Historical Registry , and we take much pride in our town.We would appreciate it very much, if you would find it in your heart to vote "NO" on this proposal!

Thank you,

Sandra Hardy President

Sandra Hardy

- Agenda Summary

Economic Impact Study:

April 1995, Wilbur Smith Associates was hired by CSX to put together a proposal for the intermodal facility in Fairburn, Ga. We agree that over the road miles taken off the highways is very beneficial and cost effective. Hauling freight from one state to another is not our concern. It is Regionally, that is going to impact us the most. Taking miles off the Atlanta Roads, and putting them in Fairburn, is being creative but not effective. Fairburn is still in the non-attainment area. The claim that CSX will bring jobs to Fairburn is very questionable. The office staff will be employed at the facility, but from what we can ascertain, additional jobs are not in the future, unless you are a truck driver. The study also predicts that at total build out, they will be shipping 750,000 containers a year. That is 2055 trucks shipped daily ,86 hourly, and 1.43 a minute. We must protect the FUTURE Had someone kept our best interest at heart 35 years ago, we wouldn't be fighting for our survival now.

Drayage

Drayage has not been mentioned in any studies. It is a way of life for Intermodal. Draying cargo into Atlanta is putting additional miles back on the road!!

Air Quality

Holton Environmental Associates, Inc. Conducted an air quality prospectus for CSX. They claim that 4 trains a day will be moved , from Hulsey yard , to Fairburn, along with 2 locomotives per train.
That is a prediction that can't be made. Because depending on how much weight is to be pulled , is how many locomotives will be assigned to a train. In Fairburn, we have never seen less than 4 locomotives per train. The Environmental Protection Department announced on Feb.6, 1997 that a

locomotive belches as much nitrogen oxide as 3,000 cars(see enclosure)

Please take the time to review the study done on Diesel Exhaust: A critical analysis of emissions, exposure, and health effects.

Water Quality

Georgia depends on no one for her water resources. Georgia is self reliant. Georgia's priority for 1997 is water and transportation.Due to the water compacts between Alabama and Florida , water is a critical issue. It is unconscionable on how we allow contamination of our precious water resources. Fining is not a stiff enough penalty..
Flint River is the river that we are concerned about. It is endangered by the fast growth and no protection guidelines set in place. Line Creek is a tributary feeding the Flint.The head water of Line Creek begins on the property that CSX owns.
It has so many problems. It has 2 dead spots,listed as 303D high in toxicity, number 1 priority and is in litigation.The Environment Protection Agency, The Environment Protection Department, and The Army Corps of Engineers have expressed their concern about this body of water and rightfully so. It is the water supply for Creekwood Road residents and The neighboring residents as well as Fayetteville, Ga. and Peachtree City, Ga.
CSX has told us, if our water becomes contaminated, we can sue.. CSX has a total disregard for our natural resources, as shown in their 1995 report to the stock holders on contingent liabilities. Why should the citizens be exposed to this kind of treatment?

Supporting Material

Look at that big picture. We have the Gwinnette Mega Mall, The Douglasville Mall, The Newnan Mall, Hartsfield Airport just proposed a $50 million air cargo facility(their cargo has to meet its' destination also) and of course Norfolk Southern, and CSX. Will our elected officials ever start saying NO to these companies that threaten our environment?
Are we expected to sacrifice our health,quality of life, and the

value of our property for ECONOMY SAKE?

WE CAN GROW THE ECONOMY & PROTECT THE ENVIRONMENT! WE MUST WORK TOGETHER!!

. The disregard CSX has for its neighbors is deplorable! Residents in Florida were told by CSX that they had to pay a fee for them to cross over 15 feet of their tracks. That was the only way the land owners had access to their homes Is this the way you want your neighbors to be treated?
Pollution penalties are a reoccurring event for CSX. Do you believe we could coexist? I don't think so.
We have read some letters from the Mayor of Lithia Springs Rosa Mary Johnson. Austell is facing an intermodal facility also, Norfolk Southern. Also please take the time to read the letter from George Purdy , that we have included. He is an experienced truck driver with over 1 1 1/2 million driving miles.And is an ex container hauler.

NATIONWIDE

CSX applied for a nationwide permit through the Army Corps of Engineers. And the citizens of South Fulton County response was amazing in its' opposition. Over 3000 letters were sent to different agencies, expressing their concerns. CSX lost the Nationwide and will now have to go for an Individual Permit

LAW ENFORCEMENT

December 18,1996 Sandra Hardy spoke before the Fulton Commissioners concerning our Law Enforcement.
We as concerned citizens must be made aware of the needs of our Law Enforcement Department. With the pressure of development on our heels, we must address the most important issue and that is training and KEEPING the officers that we have. We have 40 positions, not filled for 1996 and with development going at the rate it is , we are in trouble!

Diesel locomotives on EPA's list

New regulations set timetable for pollutant reduction

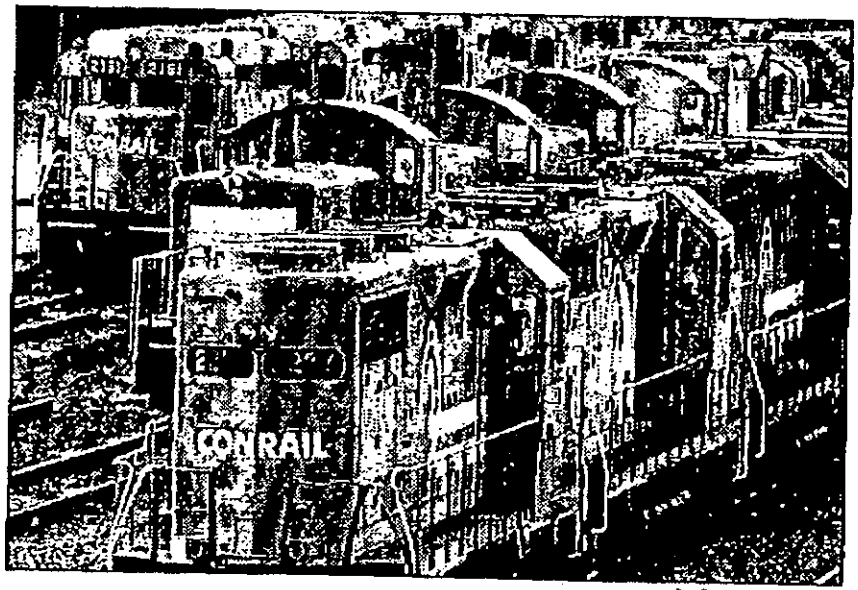
By Rae Tyson
USA TODAY

The EPA already has ordered lower emissions from cars, trucks, boats, tractors and even lawn mowers in its quest for cleaner air. Now there's a new target: diesel locomotives.

The agency says a single locomotive belches as much smog-forming nitrogen oxide as 3,000 cars. In busy rail hubs such as Chicago and El Paso, trains can account for 10% of all smog-forming pollutants.

So the Environmental Protection Agency is issuing regulations next week that will set up a timetable for reducing nitrogen oxide and other pollutants. As engines are upgraded and replaced over a period of several decades, the EPA says, emissions will be cut by two-thirds, or about 600,000 tons a year.

The agency's plan actually will establish two sets of clean-air standards for train engines. Beginning in 2000, existing locomotives will have to be modified to meet one set. Stricter limits will be imposed on all new locomotives beginning in 2005.



By Gene J. Puskar, AP

When locomotives belch: Trains can account for 10% of all smog-forming pollutants in busy rail hubs such as Chicago and El Paso, the EPA says.

Michael Rush of the Association of American Railroads says it will cost about $80,000 each to refit the nearly 19,000 locomotives already in service.

The changes, mostly to cooling and fuel systems, will be made when a locomotive engine is overhauled, which on average is once every million miles.

Stricter emissions standards for new locomotives won't begin until 2005 in part because engineers will have to design cleaner-burning engines.

"Right now, we don't know exactly how we are going to control emissions from these new engines," Rush says.

While applauding the pending announcement, environmentalists are concerned that the Environmental Protection Agency is leaving most of the emissions testing to engine manufacturers and to the railroads themselves.

"If you don't have good tests, the new standard is irrelevant," says Gail Ruderman-Feuer of the Natural Resources Defense Council in Los Angeles.

Before the proposed rules can be implemented, they must go through a 30-day public comment period.

Cutting locomotive emissions is but one step ordered by Congress when it amended the Clean Air Act in 1990.

The overall plan for improving air quality also calls for cleaner-burning engines in equipment ranging from cars to garden tractors. The next EPA target: commercial marine engines.

More than 100 million people are living in areas with unhealthful air. And smog can cause serious respiratory illness.

Another diesel pollutant — particulates in EPA-talk, soot to a layperson — has been linked to cancer and premature death.

Table 3: 1994 Releases/Transfers from Facilities by County (in pounds)

County Name	SIC Code	Facility Name	AIR Fugitive	AIR EMISSIONS Stack	SURFACE WATER	ON-SITE LAND	ON-SITE TOTAL	OFF-SITE POTW	TRANSFERS Other	TOTAL RELEASES
EMANUEL	3471	SWAINSBORO ELECTRO PLATING, I	1,000	0	0	0	1,000	0	0	1,000
EMANUEL		Sub-Total:	1,000	0	0	0	1,000	0	0	1,000
EVANS	2015	CLAXTON POULTRY FARMS INC	250	0	0	300	550	0	0	550
EVANS	3479	SOUTHERN STATES GALVANIZING	1,750	0	0	0	1,750	250	0	2,000
EVANS		Sub-Total:	2,000	0	0	300	2,300	250	0	2,550
FAYETTE	2821	GEORGIA-PACIFIC RESINS, INC.	179	1,371	0	0	1,550	292	5,922	7,764
FAYETTE	3669	MATSUSHITA COMMUNICATION IND	11,469	23,568	0	0	35,037	0	0	35,037
FAYETTE	3672	PHOTOCIRCUITS CORP ATLANTA	8,590	22,265	0	0	30,855	515	0	31,370
FAYETTE		Sub-Total:	20,238	47,204	0	0	67,442	807	5,922	74,171
FLOYD	2381	ARNUCHES GLOVE COMPANY	0	0	0	5	5	0	0	5
FLOYD	3315	EBKAHRT CORPORATION	14,684	3,958	505	0	19,147	1,715	33,222	54,084
FLOYD	2211	BRIGHTON PLANT-GALEY AND LOR	0	41,000	0	0	41,000	0	0	41,000
FLOYD	3253	FLORIDA TILE INDUSTRIES, INC	79	27,444	255	0	27,778	0	12,400	40,178
FLOYD	3612	GE CO.	12,005	60,750	0	0	72,755	755	250	73,760
FLOYD	2899	HOPTON TECHNOLOGIES, INC	15	750	0	0	765	1,250	0	2,015
FLOYD	2821	HUNTSMAN CHEMICAL CORPORATIO	845	8,660	0	0	9,505	5	500	10,010
FLOYD	2611	INLAND - ROME, INC.	19,615	2,761,040	5,550	0	2,786,205	0	0	2,786,205
FLOYD	3363	ITT LESTER	0	5	0	0	5	5	250	260
FLOYD	3411	METAL CONTAINER CORP.	125,000	64,950	0	0	189,950	250	250	190,450
FLOYD	3354	PROFILE EXTRUSION COMPANY	750	17,000	0	0	17,750	0	0	17,750
FLOYD	2491	S.I. STOREY LUMBER COMPANY I	0	0	0	0	0	0	250	250
FLOYD	2599	VTI OF GEORGIA, INC	1,600	27,400	0	0	29,000	0	0	29,000
FLOYD	2015	Z-BIRD POULTRY	32,247	0	0	0	32,247	0	0	32,247
FLOYD		Sub-Total:	206,840	3,012,957	6,310	5	3,226,112	3,980	47,122	3,277,214
FORSYTH	2048	GEORGIA PROTEINS, INC.	65,250	2,400	0	48,000	115,650	0	0	115,650
FORSYTH	3562	HOOVER PRECISION PRODUCTS, I	53,402	0	0	0	53,402	0	0	53,402
FORSYTH	2015	TYSON FOODS, INC.	750	0	0	0	750	0	0	750
FORSYTH		Sub-Total:	119,402	2,400	0	48,000	169,802	0	0	169,802
FULTON	3082	AEROQUIP CORPORATION	0	9,051	0	0	9,051	0	0	9,051
FULTON	2038	ALL AMERICAN GOURMET CO	244	0	0	0	244	0	0	244
FULTON	2047	ALLIED FOODS INC	0	0	0	0	0	0	0	0
FULTON	2899	ALPHA METALS INC.	0	520	0	0	520	0	0	520
FULTON	3354	ALUMAX INC	505	505	0	0	1,010	0	0	1,010

Table 3: 1994 Releases/Transfers from Facilities by County (in pounds)

County Name	SIC Code	Facility Name	AIR EMISSIONS Fugitive	AIR EMISSIONS Stack	SURFACE WATER	ON-SITE LAND	ON-SITE TOTAL	OFF-SITE POTW	TRANSFERS Other	TOTAL RELEASES
FULTON	3211	ARMSTRONG WORLD INDUSTRIES	250	3,200	0	5	3,455	0	15	3,470
FULTON	2491	ATLANTA PRESSURE TREATED	15	15	0	0	30	0	3	33
FULTON	3315	ATLANTIC STEEL COMPANY	260	160	0	0	420	135	98,910	99,465
FULTON	3088	BATHROOM DESIGNS	2,150	2,400	0	0	4,550	0	0	4,550
FULTON	3241	BLUE CIRCLE CEMENT INC	0	18,295	0	0	18,295	0	0	18,295
FULTON	2023	BUNGE FOODS GROUP	0	0	0	0	0	264	0	264
FULTON	9511	CAMP CREEK WPC PLANT	0	0	70,863	0	70,863	0	0	70,863
FULTON	2992	CATO OIL AND GREASE COMPANY	0	0	0	0	0	5	0	5
FULTON	2086	COCA-COLA BOTTLING, ATLANTA	0	0	0	0	0	6,650	0	6,650
FULTON	2087	COCA-COLA USA	0	0	0	0	0	0	0	0
FULTON	3411	CROWN BEVERAGE PACKAGING	65,034	195,108	0	0	260,142	250	5	260,397
FULTON	3411	CROWN CORK & SEAL CO. INC.	71,000	177,000	0	0	248,000	5	250	248,255
FULTON	2752	DITTLER BROTHERS, INC.	100	100	0	0	200	0	0	200
FULTON	2992	DRYDEN OIL COMPANY	0	0	0	0	0	0	0	0
FULTON	2821	DURON, INC.	23	160	0	0	183	3	1,075	1,261
FULTON	2851	DYNATRON/BONDO CORPORATION	1,500	37,000	0	0	38,500	0	0	38,500
FULTON	2053	EDWARDS BAKING COMPANY	300	0	0	0	300	1,500	0	1,800
FULTON	2893	FLINT INK CORPORATION	31	808	0	0	839	0	103	942
FULTON	3711	FORD MOTOR COMPANY-ATLANTA A	46,942	1,102,089	0	0	1,149,031	27,367	55,431	1,231,829
FULTON	2521	GEIGER INTERNATIONAL	14,600	38,600	0	0	53,200	0	0	53,200
FULTON	2819	GENERAL CHEMICAL CORP-ATLANT	0	4,455	0	0	4,455	0	0	4,455
FULTON	2851	GLIDDEN CO.	25,860	410	20	0	26,290	22,025	1,501	49,816
FULTON	3714	GO/DAN IND.	0	34	0	0	34	0	0	34
FULTON	2842	HILL MANUFACTURING COMPANY	5	755	0	0	760	515	0	1,275
FULTON	3714	HOLCOMBE ARMATURE COMPANY	0	0	0	0	0	0	0	0
FULTON	2842	I. SCHNEID, INC.	1,718	0	0	0	1,718	0	605	2,323
FULTON	2656	INTERNATIONAL PAPER	9,060	3,020	0	0	12,080	0	0	12,080
FULTON	2052	KEEBLER COMPANY	0	83,000	0	0	83,000	0	0	83,000
FULTON	2819	KOR-CHEM, INC	0	0	0	0	0	500	0	500
FULTON	2022	KRAFT FOODS INC	0	0	0	0	0	0	0	0
FULTON	2024	LAND-O-SUN DAIRIES, INC	17,256	0	0	0	17,256	0	0	17,256
FULTON	9511	LITTLE BEAR CREEK WPCP	0	0	1,643	0	1,643	0	0	1,643
FULTON	2899	MCGEAN-ROHCO, INC.	0	49,986	0	0	49,986	1,504	0	51,490
FULTON	3479	METALPLATE GALVANIZING, INC.	0	2,955	4,109	0	7,064	0	0	7,064
FULTON	2842	MOMAR, INCORPORATED	0	0	0	0	0	5	0	5
FULTON	4959	MORNING CREEK PUMPING STATIO	0	0	0	0	0	30,000	0	30,000
FULTON	2052	NABISCO BRANDS - ATLANTA BKY	11,013	31,718	0	0	42,731	0	0	42,731
FULTON	2491	NARJOE TIMBER AND SUPPLY	0	0	0	0	0	0	0	0
FULTON	2821	NESTE POLYESTER INC.	4,288	250	0	0	4,538	10	500	5,048
FULTON	2841	NIAGARA NATIONAL CORPORATION	2,005	0	0	0	2,005	2,250	0	4,255
FULTON	2869	NOTTINGHAM COMPANY	0	0	0	0	0	250	0	250
FULTON	2899	NOVAMAX TECH. U.S. INC.	0	0	0	0	0	765	0	765
FULTON	3221	OWENS-BROCKWAY GLASS CONTAIN	2,500	66,850	0	0	69,350	0	0	69,350

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County Name	SIC Code	Facility Name	AIR EMISSIONS Fugitive	AIR EMISSIONS Stack	SURFACE WATER	ON-SITE LAND	ON-SITE TOTAL	OFF-SITE POTW	TRANSFERS Other	TOTAL RELEASES
FULTON	2952	OWENS-CORNING FIBERGLAS	5,060	279,061	1	0	284,122	0	2,804	286,926
FULTON	2821	PAVE MARK CORPORATION	500	500	0	0	1,000	0	0	1,000
FULTON	2841	PDQ MFG. INC.	0	0	0	0	0	5	0	5
FULTON	3089	POREX TECHNOLOGIES CORP.	30,851	1,000	0	0	31,851	0	0	31,851
FULTON	2851	PPG ARCHITECTURAL FINISHES	1,064	201,345	0	0	202,409	0	39,681	242,090
FULTON	2759	PRINTPACK INCORPORATED	16,514	3,870	0	0	20,384	0	0	20,384
FULTON	2842	PURITAN/CHURCHILL CHEMICAL C	0	0	0	0	0	0	0	0
FULTON	2047	RALSTON PURINA COMPANY	0	0	0	0	0	0	0	0
FULTON	3714	RAYLOC DIV GENUINE PARTS CO	0	90,962	0	0	90,962	0	13,957	104,919
FULTON	2842	RECKITT & COLMAN INC.	0	750	0	0	750	0	0	750
FULTON	2851	S. L. GILLMAN PLANT	2,250	0	0	0	2,250	0	0	2,250
FULTON	2841	SCHOLLE CORPORATION	750	750	0	0	1,500	0	0	1,500
FULTON	2754	SCIENTIFIC GAMES, INC.	750	31,000	0	0	31,750	0	0	31,750
FULTON	2842	SELIG CHEMICAL INDUSTRIES	1,260	0	0	0	1,260	1,000	744	3,004
FULTON	3471	SIMMONS PLATING WORKS, INC.	5	250	0	0	255	5	0	260
FULTON	2796	SOUTHERN GRAPHIC SYS. INC.	0	0	0	0	0	250	0	250
FULTON	3999	SPURLIN IND. INC.	0	83,906	0	0	83,906	0	0	83,906
FULTON	2819	SSC INDUSTRIES	5	750	0	0	755	250	0	1,005
FULTON	3559	STERILIZATION SERVICES	1,050	2,900	0	0	3,950	62,000	0	65,950
FULTON	2752	STEVENS GRAPHICS INC	3,716	0	0	0	3,716	0	0	3,716
FULTON	3356	TARACORP EVANS, INC.	0	0	52	0	52	0	0	52
FULTON	3313	TECPRO CORPORATION	0	250	0	0	250	0	0	250
FULTON	2842	TRANSCHEM INDUSTRIES INC	15	0	0	0	15	0	0	15
FULTON	2491	UNIVERSAL FOREST PRODUCTS	0	0	0	0	0	0	0	0
FULTON	2992	VALVOLINE COMPANY	5	5	5	0	25	0	52	67
FULTON	2299	VANTAGE INDUSTRIES, INC.	5	250	0	0	255	0	0	255
FULTON	2891	W.R. GRACE & CO	4,811	3,239	0	0	8,050	363	140	8,553
FULTON	2821	W.R. GRACE & CO.-CONN.	4,507	7,404	0	0	11,911	0	0	11,911
FULTON	2891	WHITE LIGHTNING PRODUCTS COR	250	0	0	0	250	0	0	250
FULTON	2491	WILLIAM C. MEREDITH CO., INC	5	250	0	0	255	0	0	255
FULTON	2841	ZEP MANUFACTURING COMPANY	6,334	2,569	0	0	8,903	298	0	9,201
FULTON		Sub-Total:	356,366	2,539,455	76,693	5	2,972,519	158,174	215,776	3,346,469
GLYNN	2812	ALLIED UNIVERSAL CORPORATION	5	0	0	0	5	0	0	5
GLYNN	2611	GEORGIA-PACIFIC CORP.	25,707	1,675,114	21,823	17,506	1,740,150	0	804	1,740,954
GLYNN	2861	HERCULES INC BRUNSWICK PLT	1,299,220	96,540	0	0	1,395,760	71,610	60,940	1,528,310
GLYNN	2092	KING & PRINCE SEAFOOD CORPOR	12,500	0	0	0	12,500	0	0	12,500
GLYNN	2037	RICH-SEAPAK CORPORATION	5	0	0	0	5	0	0	5
GLYNN	2869	SCM GLIDCO ORGANICS	36,001	38,605	0	19,028	73,634	0	0	73,634
GLYNN	3482	US TREASURY FEDERAL LAW ENFO	0	0	0	6,690	6,690	0	0	6,690
GLYNN		Sub-Total:	1,373,438	1,810,259	21,823	43,224	3,228,744	71,610	61,744	3,362,098

George W. Purdy III
2764 Janet Street
Lithia Springs,Ga. 30057
27 September 1996

Mayor Rosa Mary Johnson
City of Lithia Springs
P.O. Bx. 595
Lithia Springs,Ga.30057
Re:Proposed Piggy Back Term.

Ms. Mayor

I have received your notice about Norfolk Southern proposed rail yard or piggy back terminal to be located in the Lithia Springs \Thornton Road area .

I to must express my opposition to this enterprise as the Lithia Springs \ Austell area is not the best area to put a rail yard . We do not have the space for the yard or the physical resources to handle the truck traffic to support the "yard".

I am talking from experience about the trucking side of this issue as a truck driver with over 1 1/2 million driving miles, as an ex container hauler and as a licensed driving instructor in the state of Georgia.

The traffic on Thornton Road is extremely bad during the rush hour times of the day. With the added truck traffic, much of it at or above the legal 80,000 pound load limit, extensive reworking of the traffic control system will have to be done to regulate traffic due to the older and/or under powered trucks that will be slowing traffic at each of the lights along the route to I-20 and the Fulton Industrial area, down Bankhead towards Atlanta and Austell and Powder Springs Roads towards Marietta. This coupled with the fact that most automobile drivers in the Metro Atlanta area (which we are a member) the "Atlanta 500 Syndrome " (you're not going fast enough for me) will be in effect worse than it is now on Thornton Rd. We will definitely see an increase in car/car and car/truck accidents including fatalities.

Of major concern to me as a driver is the sorry condition of th chassis (the part of the trailer that the container goes on containing the wheel, brakes and lighting system) used by Norfolk Southern. I know for a fact that if a chassis is not reported by a driver as having a defect ie: non working brakes, or brake lights the chassis is released from the yard. Oh, yes, the chassis is inspected before it leaves the yard but the extent of this inspection is for marker lights and bad tires and to be sure that they (the rail yard) is releasing the correct trailer. I'm sad to say that the truck

drivers aren't doing their jobs by reporting the defects on the chassis and N.S by not doing a better job of inspecting their equipment more than once a year as required by law . There also are no truck stops or restaurants in the area equipped to service these trucks and the problem of trucks pulling into the few restaurants and shopping centers poses a very realistic problem of severe truck/car accidents not to exclude fatalities. These same shopping centers and restaurants will have an increase of damage to their parking lots due to the increase of truck traffic . This will effect the current truck traffic that patronize these establishments as the owners will ban trucks on their lots completely and lose this form of income . These trucks are mainly over the road drivers who in the case of Kroger are buying supplies to stock their refrigerators or ice chests and are getting a few minutes of relief from their trucks .

Finally, as a resident of Lithia Springs the existing train traffic is bad and loud enough already. I live about 1/4 mile north of the tracks at the intersection of Bankhead and Sweetwater. The blaring of train horns along this section includes 3 rail crossings with in 1/2 mile is hard enough with the amount of traffic now but to increase it will be intolerable. Especially at night when sound travels father and louder ! Then there is the main crossing at Bankhead Hwy and Sweetwater. This crossing has been in need of **COMPLETE** reconstruction as long I have lived here since 1963 . It needs to be leveled and widened to accommodate the growing amount of traffic that we have but to add more train traffic will only bring about cars trying to "beat the train" on an already dangerous crossing.

As I have already stated,I oppose the proposed Piggy back yard and will help as much as possible to stop it . If Norfolk Southern would look at an area between Douglasville and Villa Rica or north of Dallas on their lines, I'm sure they can find a much more suitable spot for a larger yard, one which will have the room to be expanded in the future, take into account the existing traffic problems of an area and the homes and privacy of the residents.

Sincerely

George W. Purdy III

P.S.
Ms. Johnson,
I don't know if I will be in town on Thursday night but if I'm not please make my opinion known to the forum.

PREPRINT COPY APRIL 1995

Diesel Exhaust:

A Critical Analysis of Emissions, Exposure, and Health Effects

A Special Report of the Institute's Diesel Working Group

Health Effects Institute

April 1995

HEI

Executive Summary

Diesel engine emissions are highly complex mixtures. They consist of a wide range of organic and inorganic compounds distributed among the gaseous and particulate phases. Public health concern has arisen about these emissions for these reasons:

- The particles in diesel emissions are very small (90% are less than 1 μm by mass), making them readily respirable.
- These particles have hundreds of chemicals adsorbed onto their surfaces, including many known or suspected mutagens and carcinogens.
- The gaseous phase contains many irritants and toxic chemicals.
- Oxides of nitrogen, which are ozone precursors, are among the combustion products in the gaseous phase.
- There is a likelihood for humans to be exposed to diesel emissions or their atmospheric transformation products in both ambient and occupational settings.

Diesel emissions have the potential to cause adverse health effects. These effects include cancer and other pulmonary and cardiovascular diseases. However, diesel engines are only one of many sources of ambient particulate matter and gaseous air pollutants. Therefore, it is difficult to measure the exposures from various sources, and to distinguish the potential health risks attributable to exposure to diesel exhaust from those attributable to other air pollutants.

For over a decade, HEI has supported a broad-based research program to evaluate the health risks of diesel emissions, including investigations of carcinogenesis, modeling studies, and emissions characterization. The purpose of this Special Report is to examine what is known, not known, and still uncertain about the health risks of exposure to diesel emissions. The HEI Diesel Working Group, which was appointed by the HEI Review Committee and chaired by Dr. Gareth M. Green, evaluated the research on diesel emissions supported by the Institute and other organizations. The Working Group included members of the HEI Health Research Committee, Health Review Committee, staff, and other scientists.

The HEI Diesel Working Group focused its evaluation on a set of issues that it thought were critical to assessing the carcinogenic risks of exposure to diesel exhaust. As a first step, members of the Working Group prepared background papers that addressed these issues. These papers underwent external peer review by qualified experts and form Part II of this report. They include in-depth discussions of emissions, exposure, toxicity, carcinogenicity, and dose-response relations.[1]

The Working Group then met to:

- evaluate the scientific information relevant to the potential for diesel emissions to cause cancer;
- determine what conclusions could be drawn from the available scientific data; and
- identify important information gaps.

Part I of this report presents the Working Group's conclusions and addresses their implications for risk assessments of diesel engine emissions. The major findings are discussed in this summary.

EMISSIONS

The composition of diesel exhaust varies considerably depending on engine type and operating conditions, fuel, lubricating oil, and whether an emissions control system is present. Diesel engine emissions have changed dramatically over the last 30 years because of improvements in engine technology, emissions controls, and fuel formulation. Emissions of oxides of nitrogen and particulate matter from the diesel engines introduced in the late 1980s and early 1990s are significantly lower than those from older engines. As a result, characterizations of modern-day diesel exhaust cannot be used to estimate past exposures, nor can they be used reliably to project future emission profiles.

EXPOSURE

It is very difficult to assess exposure to diesel emissions because they are highly complex mixtures and constitute only a small portion of a broader mix of air pollutants. For example, combustion of other materials, such as fossil fuels and tobacco, produce many of the same chemical components that are present in diesel emissions; furthermore, both natural and man-made sources of respirable particles are

[1] Although noncancer risks of exposure to diesel emissions are briefly discussed in some of the background papers, they were not a focus of the Diesel Working Group's discussions. A separate HEI analysis, the Particle Epidemiology Evaluation Project, is currently under way to address this issue.

common. No single constituent of diesel exhaust serves as a unique marker of exposure; however, scientists can use the levels of fine particles or elemental carbon (both of which are much higher in diesel emissions than in other combustion products) as surrogate indices of diesel exhaust particulate matter. When estimating exposure to diesel emissions, the following factors need to be considered:

- Because of improvements in engine design and emissions control technology, and the use of reformulated fuels, future human exposures to diesel engine emissions will differ from past and current exposures. However, reductions in exposure to diesel emissions will be gradual because of the long life of heavy-duty diesel engines, and will be offset as the use of diesel engines grows.
- The fact that the chemical and physical characteristics of diesel emissions will change as new technology and fuels are implemented cautions against automatically assuming that a decrease in the amount of emissions will result in a decrease in risk.
- Once emitted, diesel emissions undergo atmospheric transport and transformation processes that may alter the toxic, mutagenic, or carcinogenic properties of the original constituents, creating new products that may be either more or less hazardous than the original emissions.

Exposure to diesel exhaust particulate matter has been assessed in occupational settings and some ambient environments. Although the existing data are limited, some estimates of the range of human exposure to diesel emissions can be made:

- In some occupations, diesel emissions contribute a high proportion of the particulate and gaseous air pollutants. The estimates for workplace exposures to diesel exhaust particulate matter range widely, from approximately 1 to 100 $\mu g/m^3$ (eight-hour averages) in some occupations such as trucking or transportation, to 100 to 1,700 $\mu g/m^3$ for occupations such as underground mining where equipment powered by diesel engines is often used in enclosed spaces.
- The information on ambient exposures is sparse. In an analysis conducted in the Los Angeles basin in the early 1980s, diesel emissions accounted for approximately 3% of the mass of total particulate matter and 7% of the mass of fine particles emitted into the atmosphere. Average monthly values for ambient levels of diesel exhaust particulate matter ranged from 1 to 3 $\mu g/m^3$ in areas with low levels of air pollution. These values are in general agreement with the range of nationwide annual average values derived by the U.S. Environmental Protection Agency using vehicle emissions factors, sales information, and pollutant exposure models. In the Los Angeles study, the highest monthly average levels of diesel particulate matter were approximately 10 $\mu g/m^3$ at the most polluted locations during winter months, the period of highest exposures. Short-term or peak exposures to diesel particulate matter, especially in urban settings such as street canyons, are usually higher than monthly or annual average concentrations.

HUMAN RESPONSES

Given the limited exposure information, it is a challenge to determine the contribution of diesel exhaust to human cancer. The Diesel Working Group developed the following conclusions after reviewing over 30 epidemiologic studies of workers exposed to diesel emissions in occupational settings for the period 1950 through the early 1980s.

- The epidemiologic data are consistent in showing weak associations between exposure to diesel exhaust and lung cancer. The available evidence suggests that long-term exposure to diesel exhaust in a variety of occupational circumstances is associated with a 1.2- to 1.5-fold increase in the relative risk of lung cancer compared with workers classified as unexposed.
- Despite the concern that confounding by cigarette smoke might explain the observed risk elevations, most studies that controlled for smoking found that the association between increased risk of lung cancer and exposure to diesel emissions persisted after such controls were applied, although in some cases, the excess risk was lower. Only a few epidemiologic studies considered other potential confounders such as nondiesel particles, environmental tobacco smoke, asbestos exposure, diet, and socioeconomic factors. At present, there is insufficient evidence to conclude whether confounding by these factors influenced the results.
- As is frequently the case in epidemiologic studies of air pollutants, none of the studies measured exposure to diesel emissions or characterized the actual emissions from the source of exposure for the period of time most relevant to the development of lung cancer. Most investigators classified exposure on the basis of work histories reported by the subjects or their next of kin, or by retirement records. Although these data provide relative rankings of exposure, the absence of concurrent exposure information is the key factor that limits interpreting the epidemiologic findings and using them to make quantitative estimates of cancer risks.

ANIMAL RESPONSES

The carcinogenic activity of diesel emissions has been convincingly demonstrated in rats. Nearly lifetime exposure for 35 hours or more per week to high concentrations of diesel exhaust particulate matter (2,000 to 10,000 $\mu g/m^3$) causes an exposure-dependent increase in the incidence of benign and malignant lung tumors in rats. No consistent evidence suggests that diesel emissions induce cancer in rats at sites other than the lung. Prolonged exposure to diesel emissions does not produce lung tumors in hamsters, and the results in mice are equivocal, which suggests that species-specific factors play a critical role in the induction of lung tumors by diesel emissions.

Recent reports from two independent laboratories support the idea that the particle-associated organic chemicals play little or no role in the development of lung tumors in rats exposed to high concentrations of diesel emissions. No significant differences were noted in tumor incidence or histopathologic characteristics between rats exposed to diesel exhaust and those exposed to carbon black (a surrogate for the diesel particles minus the adsorbed organic compounds). These results do not completely eliminate a possible role for the adsorbed chemicals, some of which are potent mutagens and carcinogens. If bioavailable, they could play a role in carcinogenesis that might not be detectable in the rat bioassay because their effect is either too subtle or is masked by the overwhelming response of the rat's lungs to high concentrations of inhaled particles.

Even though the evidence strongly suggests that prolonged exposure to high concentrations of diesel exhaust particulate matter induces lung tumors in rats, the Diesel Working Group recommends caution in extrapolating these results to humans for the following reasons:

- The lung tumors observed in rats exposed to high concentrations of diesel emissions may be due to a species-specific response to inhaled particulate matter rather than to a carcinogenic mechanism that also occurs in humans. When rats and other laboratory animals are exposed to high concentrations of diesel exhaust particulate matter or other poorly soluble nonfibrous particles for long time periods, lung clearance mechanisms are impaired and particles gradually accumulate in the lungs; this condition is referred to as lung overload. In the rat, lung overload has a characteristic threshold and initiates a progressive series of cellular responses, including inflammation, alveolar epithelial cell proliferation, and fibrosis. These responses are more severe in rats than in mice or hamsters, and appear to be associated with the subsequent development of lung tumors.
- Although characteristic exposure thresholds for lung overload, as well as for the nonneoplastic and neoplastic responses, have been noted in the rat, extrapolation of no-effect levels for exposure to diesel exhaust from one species to another is problematic because of wide inter- and intraspecies variations in particle clearance rates and in susceptibility to cancer.
- Our knowledge of the mechanisms by which prolonged exposure to high concentrations of diesel emissions produces lung tumors in rats is incomplete. At the high concentrations of diesel emissions used in the rat bioassay, the data imply that the diesel exhaust particulate matter triggers inflammation and cell proliferation. Such responses are thought by many scientists to cause cancer through indirect or "nongenotoxic" mechanisms rather than by direct interaction with DNA, as would be caused by the mutagenic chemicals adsorbed to the particles. At this time, however, only circumstantial evidence supports the hypothesis that diesel emissions induce rat lung tumors by nongenotoxic mechanisms.
- The rat bioassay data do not exclude the possibility that diesel exhaust may induce lung cancer by different mechanisms in different species, or by different mechanisms in the same species at different exposure levels (e.g., predominantly nongenotoxic mechanisms under high-dose exposure conditions and genotoxic mechanisms under low-dose exposure conditions).

The Diesel Working Group cautioned that using the rat bioassay data (obtained at high-dose exposure levels) to make quantitative estimates of the carcinogenic risk of exposure to diesel emissions at environmentally relevant exposure concentrations may overestimate risk if the mathematical models used to extrapolate from high to low doses and from animals to humans do not (1) account for particle overload and associated inflammatory and proliferative processes, (2) recognize the apparent existence of a threshold for particle-induced biologic responses, such as impairment of lung clearance mechanisms, inflammation, cell proliferation, and tumor development, and (3) consider the mechanistic relation of the nongenotoxic injuries to the development of lung tumors in laboratory rats.

INTEGRATING EXPOSURE DATA WITH INFORMATION FROM HUMAN AND ANIMAL STUDIES TO CHARACTERIZE THE POTENTIAL CARCINOGENICITY OF DIESEL EMISSIONS

The Diesel Working Group found that it is not presently possible to base a risk characterization of diesel exhaust solely on either the human or the animal data. Instead, the Working Group evaluated and integrated the available in-

formation from diverse data sets to make the most informed judgments about the potential carcinogenicity of exposure to diesel exhaust.

Key issues concerning the human health risk of diesel exhaust are: Does particle overloading occur in humans under environmental exposure conditions, and if so, does it trigger processes that lead to lung cancer. In the rat, the animal species most sensitive to diesel exhaust, lung tumors are produced after nearly lifetime exposures for 35 hours or more per week to high concentrations of diesel exhaust particulate matter (2,000 to 10,000 $\mu g/m^3$). These concentrations are approximately three orders of magnitude higher than current estimates of average atmospheric concentrations of diesel exhaust particulate matter (1 to 10 $\mu g/m^3$). One mathematical extrapolation model suggests that lung clearance mechanisms would not be impaired in humans even if they were exposed continuously (24 hours per day) to levels of particulate matter in this ambient range. According to this model, the levels of respirable particles that would be needed to depress lung clearance mechanisms in humans under continuous exposure conditions are greater than 100 to 200 $\mu g/m^3$. This, however, is an unlikely exposure scenario, even for most workers. Under more realistic intermittent exposure conditions (eight hours per day, five days per week), the model predicts that the concentration of particulate matter needed to impair lung clearance would be 500 to 1,000 $\mu g/m^3$. Only a limited number of workers, primarily miners, are exposed to concentrations of diesel exhaust particulate matter close to this range.

If we assume that particle-induced mechanisms of lung tumorigenesis operate similarly in rats and humans, the analysis above implies that there is some biological rationale for extrapolating the rat bioassay data to the small population of workers who are routinely exposed to high concentrations (greater than 1,000 $\mu g/m^3$) of diesel exhaust particulate matter and who may have impaired lung clearance mechanisms. Because of the large interspecies differences in particle clearance, the rat bioassay data also may be relevant to those workers who are exposed to levels of diesel particulate matter one order of magnitude lower (100 to 1,000 $\mu g/m^3$). However, the toxicity and modeling data do not support the assumption that exposure to diesel exhaust particulate matter alone at the levels found in most ambient settings (1 to 10 $\mu g/m^3$) would be sufficiently high to overwhelm lung clearance processes and, thus, induce lung tumors by a mechanism driven by inflammation and cell proliferation.

SUMMARY

A wealth of information is available about the potential for diesel emissions to cause cancer. However, the lack of definitive exposure data for the occupationally exposed study populations precludes using the available epidemiologic data to develop quantitative estimates of cancer risk. When appropriate human information is not available, some policymakers have relied on the results of animal bioassays to estimate human risk. This document raises questions about the validity of using the rat bioassay data to characterize the potential human risk associated with ambient exposure to diesel emissions. The reason for this uncertainty is that the mechanism of lung tumor induction that appears to operate in rats continuously exposed to high concentrations of diesel exhaust and other particulate matter may not be relevant to most humans, who are exposed intermittently to levels of diesel exhaust particulate matter that are two or three orders of magnitude lower than those used in the rat bioassays. The development of unique markers of exposure to diesel emissions and a better understanding of the mechanisms of carcinogenesis would help to establish scientifically valid links between the lung cancers observed in laboratory animals and the human disease, thus improving the accuracy of cancer risk assessments.

TROUTMAN SANDERS LLP

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Norman L. Underwood

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February 3, 1997

Harry West
Executive Director
Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, GA 30327-2809

Beverly Rhea
Review Coordinator
Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, GA 30327-2809

Re: Proposed CSX Intermodal Facility
South Fulton County

Dear Harry and Beverly:

You will recall that following the September meeting of Atlanta Regional Commission, resolutions were transmitted to local governments concerning both the proposed Norfolk Southern terminal in Cobb County and the proposed CSX terminal in Fulton County. I want to acknowledge that I am functioning as attorney and advocate in this matter, and therefore, may not be objective, but I want to tell both of you, respectfully, that I do not believe the September action on the CSX application met the usual high standards of analysis and fairness of the ARC in addressing regional planning issues. Specifically, the full Commission was given the general impression (perhaps inadvertently) that the proposed privately financed terminal facilities were governed by the same conformity standards as a transportation project financed with federal funds. Because of the frustration level of all local officials concerning the nonattainment status of the Atlanta region, and the difficulty of implementing transportation projects, that impression was highly prejudicial to the proposed terminal facilities.

The resolution also appears to convey the impression that the Georgia Department of Transportation had opposed the terminal facility, when in fact we had worked with Georgia DOT for many months in evaluating road capacity and accessibility to the proposed site. DOT was not opposed to the project and is a strong supporter of such intermodal facilities. The combination of the misimpression about the conformity issue under the Clean Air Act coupled with the impression that Georgia DOT was opposed to the terminal presented to the local government a perception of the project which is not supported by the factual record compiled in the DRI Review. The political dynamics of zoning are such that a resolution of the kind sent to the local government in this case can be used in ways that are unintended by ARC.

Following the September resolution, we arranged for a study to evaluate the practical effect of the proposed facility on NOx emissions within the Atlanta region. We have submitted that study to the Georgia Environmental Protection Division with a request that their review of the study be informally communicated to the ARC staff.

Attached is a request to you that the ARC give further consideration to its review of the proposed CSX terminal in light of the study we have now conducted. I will communicate with Beverly to set up a meeting to discuss any other information that we could provide which may be useful to the DRI Review process.

We believe an intermodal facility of the type and in the location proposed has much to offer to a region struggling with air quality and meeting its transportation needs. We will appreciate your attention to our request, and I will contact Beverly about a follow up meeting.

Thank you for your courtesy in connection with these issues.

Sincerely,

Norman L. Underwood

NLU/dpo
Enclosures (included with both letters)

0057926.01

Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809

ARC

Harry West
Director

September 26, 1996

Hon. Mitch Skandalakis, Chairman
Fulton County Commission
141 Pryor Street
Atlanta, GA. 30303

RE: Development of Regional Impact Review
CSX Intermodal Facility

Dear Mitch:

I am writing to officially transmit the resolution which the Atlanta Regional Commission adopted on September 25, 1996, concerning the proposed CSX Intermodal Facility Development of Regional Impact (DRI). The Commission found that based on the information currently available, the DRI is not in the best interest of the State at this time. I also am sending you copies of comments received from other agencies during the review.

ARC staff is available to work with the County and the railroad on the concerns noted to see if they can be resolved. Please feel free to call us if you have any questions at all about this review.

Sincerely,

Harry West
Director

Enclosures

c Ms. Nancy Leathers, Fulton Co. Planning & Economic Dev.
Ms. Angela Parker, Fulton Co. Planning
Ms. Robyn MacDonald, Fulton Co. Development Services
Mr. Norman Underwood, Troutman Sanders ✓
Hon. Betty Hannah, Mayor of Fairburn
Hon. Rick Price, Chairman, Fayette County
Mr. Frank Danchetz, Georgia DOT
Mr. Harold Reheis, Georgia EPD

RESOLUTION BY THE ATLANTA REGIONAL COMMISSION CONCERNING THE PROPOSED CSX SOUTH FULTON INTERMODAL FACILITY

WHEREAS, pursuant to the Georgia Planning Act of 1989 and DCA Rules for Review of Developments of Regional Impact (DRI's), the Atlanta Regional Commission has reviewed an Intermodal Facility proposed by CSX Railroad in South Fulton County; and

WHEREAS, it is recognized that an industrial use is recommended in the local future land use plan for the relevant site; and

WHEREAS, the City of Fairburn, Fayette County, and Georgia Dept. of Transportation have expressed concerns about the proposed CSX facility (see attached); and

WHEREAS, the ARC staff review raised concerns about the environmental impact of the proposed facility; and

WHEREAS, the applicant and local government have been informed of the concerns raised in the review process; and

WHEREAS, at this time there is not sufficient information available to address the resolution of some of the concerns which have been raised about the proposed DRI; most particularly potential impact on Line Creek; potential impact on air quality in the Atlanta Region; and potential impact on the surrounding communities;

NOW, THEREFORE, BE IT RESOLVED, based on the information currently available concerning the proposed CSX Intermodal Facility, that the Atlanta Regional Commission finds this DRI is not in the best interest of the State at this time.