

**From:** de Hueck, Mark <[mdehueck@chemtradelogistics.com](mailto:mdehueck@chemtradelogistics.com)>  
**Sent:** February-20-19 2:54 PM  
**To:** Lidija Lebar <[Lidija.Lebar@otc-cta.gc.ca](mailto:Lidija.Lebar@otc-cta.gc.ca)>  
**Subject:** Revised : 2019 Vancouver Freight Rail Investigation - Request for Information from Vancouver Port Terminals  
**Importance:** High

Hello Ms. Lebar;

First and foremost thank you to you and the Canadian Transportation Agency for taking the time to look into the issues we have had as it pertains to rail service in Vancouver. Please disregard our first submission as we felt this matter very important and dedicated a number of key resources at it in order to provide a more thorough response. We also realized the deadline was not last week but rather today- apologies. We tried to keep the response as concise as possible however if you have any questions please feel free to reach out. The key message is that a lack of rail service both in and out of our plant caused us to turn the plant production back thus reducing revenues while also increasing overall costs. Also we have a considerable amount of additional data we could provide if needed but are not sure how confidential it would be and how deep a dive you want to take. There are multiple tabs on the one spreadsheet and multiple graphs on the other.  
Thank you again.

Best regards,

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**From:** Enquête-Ferroviaire / Inquiry-Rail (OTC-CTA) [<mailto:Enquete.ferroviaire-Inquiry.rail@otc-cta.gc.ca>]  
**Sent:** Thursday, February 14, 2019 1:33 PM  
**To:** Lidija Lebar <[Lidija.Lebar@otc-cta.gc.ca](mailto:Lidija.Lebar@otc-cta.gc.ca)>  
**Cc:** Wilfred Wong <[Wilfred.Wong@otc-cta.gc.ca](mailto:Wilfred.Wong@otc-cta.gc.ca)>; Ryan Dallaway <[Ryan.Dallaway@otc-cta.gc.ca](mailto:Ryan.Dallaway@otc-cta.gc.ca)>  
**Subject:** 2019 Vancouver Freight Rail Investigation - Request for Information from Vancouver Port Terminals

Good day:

As you may be aware, the Canadian Transportation Agency is currently conducting an own motion inquiry into possible freight rail service issues in the Vancouver area (**2019 Vancouver Freight Rail Investigation**).

As part of this investigation, I have been named an Inquiry Officer by the Agency.

In my role, I am expected to collect relevant information, and consult interested parties.

One line of inquiry has led to a discussion of port terminal track capacity, unloading capacity, and timeliness of rail car delivery at your Vancouver facilities.

We are therefore requesting you to please provide data and information in response to the questions that follow this message.

We respectfully ask that you please provide the Inquiry Officer with your submission by no later than **close of day, Wednesday, February 20, 2019**, via email to the Inquiry Officer, at: [enquete.ferroviaire-Inquiry.rail@otc-cta.gc.ca](mailto:enquete.ferroviaire-Inquiry.rail@otc-cta.gc.ca).

If you need additional clarification about the information you have to provide, please contact the Inquiry officer as soon as possible, via email, to confirm your understanding of the questions.

**Questions / Requests for Information Required:**

1. What is the track capacity of your terminal (how many cars can your terminal receive at one time)? **270 railcars working capacity, we are able to 285 cars maximum capacity. Our operating target is 250 cars to allow for onsite movement. We can receive a maximum of 42 cars per shunt inbound given track and operating constraints.**
2. What is the daily unloading capacity (number of cars or container feet) of your terminal? **This is not a terminal, but rather a manufacturing site that produces and loads up to a maximum of 29 railcars per day (subject to product mix- 3 products) when the plant is producing at 100% capacity. We produce three products 1. Caustic 2. Hydrochloric Acid 3. Liquid Chlorine, the product mix has a bearing on the number of railcars filled. We only have onsite tank storage for caustic therefore the balance must be processed into railcars for shipping and or onsite railcar storage.**
3. What was the daily scheduled railcar delivery (number of cars scheduled for delivery and scheduled arrival time) for the periods: October 2017 to January 2018 and October 2018 to January 2019? **Daily schedule is 6 day per week service for rail switching i.e. Monday to Saturday, normally 20 – 25 cars per day of product on average outbound depending on customer orders and a similar average number of empty returns for refilling. We**

will provide the actual data requested. During the periods in question the plant was in a sold out state meaning that we could have sold essentially every tonne produced and shipped. Failure to produce and or ship would equate to a lost sale that can never be recouped. In order to produce a tonne of caustic a similar amount of either chlorine or hydrochloric acid must be produced as a by-product.

Railcar service is typically 16:30PM until 6:30AM with CN having complete autonomy as to when they will arrive if at all.

4. What was the daily actual railcar delivery (number of cars delivered and actual arrival time) for the periods: October 2017 to January 2018 and October 2018 to January 2019? **To be provided under separate cover. It will address item 5 as a function of railcars / tonnes.**
5. What were the daily numbers of feet of containers received at your terminal from October-December for the periods: October 2017 to January 2018 and October 2018 to January 2019? **Not applicable, this is not a container terminal, it is a manufacturing plant that produces bulk liquid chemical that are shipped out primarily by rail 95% and truck >5%.**

**The primary raw materials are electricity and salt which is imported via vessel as our plant is situated on water.**

### **Confidentiality**

You are reminded that as all submissions will form part of the public record of this investigation, participants should indicate, with a clear rationale, if they believe that any of the information being submitted is commercially sensitive and that the public release of any of the information could potentially cause them specific direct harm.

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Two versions of the documents containing confidential information must be filed with the request: a confidential version and a public version. The public version should redact the information identified as confidential. The confidential version should indicate, by highlighting or other means, what information was redacted from the public version.

Participants should also indicate who may have access to the confidential version of the document(s), for example: (1) the Inquiry Officer and the Agency only, (2) the Inquiry Officer, the Agency, and railway companies participating in the investigation, and (3) the Inquiry Officer, the Agency, and all of the participants in the investigation.

The Agency will render a decision on your request for confidentiality; the Agency may grant it in full, or in part, or deny your request. In considering a request for confidentiality, the Agency applies a three-step approach:

- The first step is to determine whether the document is relevant to the investigation.
- The second step is to determine whether specific direct harm would likely result from the disclosure of the information claimed as confidential.
- The third step is to determine whether the public interest in having the document disclosed outweighs the specific direct harm demonstrated.

Please keep these considerations in mind when setting out the rationale in support of your request for confidentiality.

The public version of your documents will be posted on the Agency's website and be made available to the public.

All material submitted to the Agency since the beginning of this investigation that has not been granted confidentiality will be publicly available and posted on-line on the Agency's Investigation website.

Thank you.

**Lidija Lebar**

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