

October 28, 2003

By Messenger

Victoria Rutson, Esq.
Chief, Section of Environmental Analysis
Surface Transportation Board
1925 K St., N.W.
Washington, D.C. 20423



RE: HolRail, LLC; STB Finance Docket No. 34421, Petition for Exemption from 49 U.S.C. § 10901 to Construct and Operate a Rail Line in Orangeburg and Dorchester Counties, South Carolina

Dear Mrs. Rutson:

Pursuant to our meeting with the Section of Environmental Analysis ("SEA") on October 14, 2003, HolRail, LLC ("HolRail") hereby requests a waiver of the six-month pre-filing notice requirement set forth in 49 C.F.R. § 1105.10(a) in accordance with 49 C.F.R. § 1105.10(c).

As described at the meeting, HolRail proposes to construct and operate a new two (2) mile line of rail in Orangeburg and Dorchester Counties, South Carolina. The primary purpose of the proposed line is to create competitive rail service at the Holly Hill cement production facility ("Holly Hill"), located in Orangeburg County, which is owned by HolRail's corporate parent, Holcim (U.S.) Inc., ("Holcim"). Presently, Holly Hill is served only by CSX Transportation, Inc. ("CSX"). The proposed line will connect Holly Hill to a rail line operated by Norfolk Southern Railway Company ("NSR").

The preferred route of the proposed line extends south over swampland, parallel to the existing CSX line that serves Holly Hill. The last approximate 1/10 mile of the route passes over land owned by a neighboring cement manufacturer, Giant Cement Co. As noted at our meeting, HolRail intends to construct the line within the existing CSX rail corridor. HolRail has selected this route, in part, because it would significantly reduce environmental impacts that might otherwise result, if HolRail were to construct an entirely new corridor. HolRail has studied the layout and dimensions of the existing CSX corridor and believes that its preferred route is feasible and will not affect CSX's operations. There are no residences near the proposed line and the surrounding area is generally wooded and bordered at each end of the proposed rail corridor by industrial sites.

As noted at the meeting, HolRail has selected an alternate route (in the event construction within the existing corridor proves infeasible), which would parallel the existing CSX corridor approximately 50 yards east. The major difference between the two routings is that the alternate route would involve clearing a right-of-way for a second rail corridor.

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When Holcim's Holly Hill facility is operating at its peak production level, HolRail will transport roughly 6,440 outbound carloads of cement on an annual basis. Inbound, HolRail will transport approximately 1,500 carloads of coal, Holly Hill's primary fuel. A Holcim subsidiary, also located at the plant site, will receive roughly 260 tank cars of waste chemicals, which are blended for incineration as fuel. The Holly Hill facility consumes a portion of the blended product, and the remaining amount (roughly 120 carloads) is shipped to other Holcim facilities. The coal would be transported in 70 car blocks approximately once every 17 days, and the other commodities would move in a daily train of up to 60 cars.

At the October 14 meeting with SEA, Holcim representatives described the essential aspects of the proposed construction project. From an environmental standpoint, the primary considerations are that Dorchester County is part of South Carolina's coastal management zone, and that the line construction, including three rail trestles, will involve depositing fill material to build and support the roadbed. HolRail does not anticipate that the project will raise air quality, noise, or cultural resource issues, or affect minority or low-income populations. As stated at the meeting, HolRail intends to fully address any environmental issues that arise because of the project and to take appropriate mitigation measures. HolRail intends to engage a third-party environmental contractor, to be directed by SEA, to prepare necessary environmental documentation for the project.

In light of the recent meeting with SEA to discuss the scope of the project, HolRail requests a waiver of the requirement contained at 49 C.F.R. § 1105.10(a) that an applicant consult with SEA a minimum of six (6) months prior to the filing of a petition for exemption from 49 U.S.C. § 10901 to construct and operate a rail line. If you have any questions regarding the proposed project or this request for waiver, please do not hesitate to contact me.

Very truly yours,



Jeffrey O. Moreno
Michael H. Higgins