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March 25, 2021
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Public Record

March 22, 2021

Ms. Cynthia T. Brown
Chief of the Section of Administration, Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D. C. 20423

Re: Docket No. FD 36472, *CSX Corporation and CSX Transportation, Inc. - Control and Merger - Pan Am Systems, Inc., et al.*

Dear Ms. Brown:

I am writing to support the application by CSX Corporation and CSX Transportation, Inc. (collectively "CSX") filed with the Surface Transportation Board (the "Board") on February 25, 2021 seeking authority to acquire Pan Am Systems, Inc. and its railroad subsidiaries, including its operating subsidiary, the Springfield Terminal Railroad Company ("Springfield Terminal").

I am the Chief Executive Officer for Arrowhead Environmental Partners ("Arrowhead"), a waste disposal company which operates across 33 states and provides safe, environmentally responsible disposal options for our customers. We rely upon direct rail access via Norfolk Southern Railway and Pan Am Southern to reach our wide customer base, which includes customers located within New England and the New York/New Jersey metro area.

According to the application submitted by CSX, its proposed acquisition will enhance the competitiveness of the Springfield Terminal and, importantly for Arrowhead, the agreement reached between CSX and Norfolk Southern will preserve competitive rail options and will increase fluidity of rail operations in New England. Arrowhead's Alabama landfill site is one of the largest rail-served facilities east of the Mississippi River. We rely upon direct rail access via Norfolk Southern and connecting carriers to provide a uniquely designed, high capacity and environmentally sound disposal facility for customers, communities, and a wide range of industries. The proposed transaction will preserve critical access to Norfolk Southern rail service for our New England business.

Corporate Office

Arrowhead Environmental Partners, LLC
65 Challenger Road, Suite 312
Ridgefield Park, NJ 07660
Phone: 551-999-8261

Landfill Site

Arrowhead Landfill
622 Tayloe Road
Uniontown, AL 36786
Phone: 334-628-4844



We support this proposed acquisition and believe our business, along with our customers, will benefit from its adoption. We respectfully ask the Board to give CSX's request its full and fair consideration, consistent with applicable statutes and regulations. Thank you for your time and consideration.

Sincerely yours,

William W. Gay
Chief Executive Officer
Arrowhead Environmental Partners, LLC

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CERTIFICATE OF SERVICE

I hereby certify that a copy of Arrowhead Environmental Partners' Comments in Support of FD 36472 was served by first-class mail, postage prepaid, or by a more expeditious manner, this 25th day of March 2021, on all parties of record.

/s/ Crystal M. Zorbaugh

Crystal M. Zorbaugh

Attorney for Norfolk Southern Railway Company