



## Marion County Board of County Commissioners

### Fire Rescue ▪ Headquarters

2631 SE Third St.  
Ocala, FL 34471  
Phone: 352-291-8000  
Fax: 352-291-8098



December 4, 2025

Walter Green, Mayor  
City of Dunnellon  
20750 River Drive  
Dunnellon, FL 34431

Dear Mayor Green:

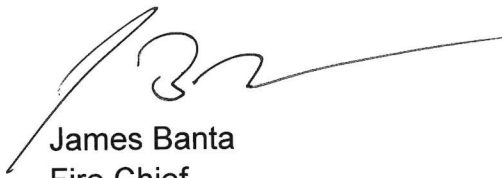
Pursuant to our conversation, I am providing an operational overview of the decisions Marion County Fire Rescue (MCFR) would face if a fire were to occur involving the creosote-treated railroad ties currently stored in Dunnellon. My intent is to outline the practical fire service implications and the environmental constraints that would guide our response. Creosote-treated railroad ties create a unique type of incident. A fire involving these materials is not a standard wood fire. Creosote behaves more like a petrochemical, burning extremely hot, producing heavy black smoke, and generating contaminated runoff capable of polluting soil and waterways. If these ties ignited, MCFR would immediately be forced into a series of challenging tactical decisions. One of the most difficult decisions would be determining whether to aggressively extinguish the fire or to allow it to burn under control. Aggressive suppression would require very large volumes of water and foam, producing contaminated runoff that could easily reach stormwater systems, wetlands, and ultimately the Rainbow River watershed. Even with rapid deployment of containment equipment, our ability to manage that runoff would be limited. The alternative of allowing the pile to burn in a controlled manner is sometimes used in industrial fuel fires when suppression would worsen environmental damage. However, this strategy would require isolating the pile, protecting nearby exposures, and accepting prolonged smoke impacts on air quality and public health. Neither option is favorable, and both carry significant environmental and public-safety consequences.

In addition to these suppression concerns, we must factor in the potential need to protect nearby homes, businesses, or wooded areas. If exposures are threatened, resources would be diverted to structural protection, reducing our ability to fully control the tie fire itself. Firefighter health and safety is another critical concern, as burning creosote releases toxic vapors and particulates. Suppression efforts would require extended use of self-contained breathing apparatus (SCBA) and decontamination procedures, while still posing long-term exposure risks to personnel. A fire of this nature would also require immediate multi-agency coordination involving hazmat teams, environmental agencies, law enforcement for road closures and air-quality alerts, and public health officials for potential shelter-in-place or evacuation guidance. This level of coordination places a substantial strain on resources and impacts the broader community.

From strictly a fire-service perspective, the safest and least damaging fire is the one prevented. The railroad ties, as stored now, present an extremely high fire load in a location where access becomes limited once a fire is fully involved. Any suppression effort would create contaminated runoff, while allowing it to burn would expose the community to prolonged toxic smoke. Either choice carries unavoidable environmental and public health impacts. Removing the ties eliminates these difficult decisions entirely and prevents the city from being placed in a situation where every available option is harmful.

I offer this assessment not from a regulatory or political standpoint, but from a fire chief's perspective grounded in operational realities and community safety. My responsibility is to protect life, property, and the environment, and in this case, all three are put at unnecessary risk by the continued storage of creosote-treated ties.

Respectfully,

A handwritten signature in black ink, appearing to read 'JBanta', with a long horizontal flourish extending to the right.

James Banta  
Fire Chief