



Railroad Safety Advisory Committee



Task No. 13-02 : Hazardous Materials Issues Working Group

to the

51st Railroad Safety Advisory Committee Meeting

March 6, 2014
Washington, DC



Overview



- Purpose
- Description
- Issues requiring special report
- Other issues



Purpose

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1. To re-evaluate the FRA Emergency Order 28 Appendix A and consider revised criteria that reflect the appropriate types and quantities of hazardous materials carried by a train that warrant special handling and operational controls.

 2. To ensure that handling and operational controls are in place regarding;
 - classification of hazardous materials,
 - identification,
 - movement,
 - route planning,
 - attendance, or
 - other recommended handling measure or operational control of trains and vehicles transporting hazardous materials.
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Description

Original documents for Review:

- 49 CFR Part 174
- 49 CFR Part 173 subpart D
- 49 CFR Part 172 subparts C, D, H, and I
- FRA Emergency Order No. 28, Notice No. 1
- Guidance on EO28
- Safety Advisory 2013-06
- Association of American Railroads Circular NO. OT-55-N



Description (cont.)



- Document Issued/Published since Emergency RSAC
 - Secretary's Call to Action (1/16/14)
 - ASLRRA letter to DOT (2/12/14)
 - DOT Commitment Letter (2/20/14)
 - Emergency Restriction/Prohibition Order (2/25/14)



Issues requiring specific report



Issue 1

- Identifying criteria reflecting the types and quantities of hazardous materials which are recommended to be required to comply with any special handling requirements or operational controls, including requirements that may be recommended as a result of this task, or Task Nos. 13-03 or 13-05.
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Items Considered



- Additional Hazard Classes and commodity groups
- Define “Key” train in HMR
- Modify Definition of “Residue”
- Reconcile Appendix A and Key Train definitions.
- Classification as Combustible



Recommendations



- Recommendation 1 - Modify definition of “residue”
- Recommendation 5 - Reconcile definitions



Issues requiring specific report



Issue 2

- Requirements of marking of tank cars, training of personnel, and information required on shipping papers, in addition to those contained in 49 CFR part 172 subparts D, H, and C, for trains for which special handling and/or operational controls are proposed.

Items Considered

- Identification of “residue” tank cars containing volumes exceeding that determined in Task 1. This could be information on a reverse waybill or preparation of a new manifest indicating a loaded car.
 - Document reflecting current position in train of each car containing HM must also indicate “Key Train” when appropriate.
 - Decal or stencil for tank cars containing Appendix A commodities.
 - Specify elements of function specific training that must be included to cover issued address in this RSAC.
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- Job briefing prior to setting cars out for pick up.



Recommendations



- Recommendation 6 - Labors training request



Issues requiring specific report



Issue 3

- Special handling requirements and/or operational controls for trains or vehicles meeting the criteria identified as requiring special handling and/or operational controls as a result of this task.

Items Considered

- Extend 173.10 *Tank car shipments* to include Appendix A trains.
 - **Shipper's responsibility for compliance with FRA regulations based on RSAC recommendations. Ex. Are they on main track or a main track siding?**
 - Placement of HM near rear of train.
 - **Securement at loading/unloading facilities (match MP&E requirements 232.103(n)).**
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Recommendations

- Recommendation 3 - Guidance document regarding securement and security on private track
- Recommendation 4 – PHMSA re-engage is certain loading, unloading, storage and transportation practices



Issues requiring specific report



Issue 4

- Expand the applicability of Part 172 subpart I, to require rail transportation route analysis and security plans for trains or vehicles meeting the criteria identified as requiring special handling and/or operational controls as a result of this task.

Items Considered

- Include all Appendix A trains on the requirements for a route risk analysis.
- Additional or weighting of current risk factors
- Consider requirements for constructively placed tank cars and a requirement to notify nearby communities.



Recommendations



- None
 - See AAR/DOT Agreement (February 20, 2014)



Issues requiring specific report



Issue 5

- Accurate, efficient, and proper frequency of hazardous material testing and classification of flammable liquids, including crude oil and ethanol prior to filling/loading of rail tank cars.

Items Considered

- Develop and comply with a sampling/analysis plan
 - Sampling/testing frequencies (statistically significant)
 - Analytical methods
 - Source dependent
 - Eliminate “combustible” classification will harmonize HMR with international regulations.
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Recommendation



- Recommendation 2 – Prevent the use of non-DOT Specification Tank Cars for Crude Oil
 - (See Emergency Restriction/Prohibition Order, February 25, 2014)



Other Issues



- Notify task nos. 13-03 and 13-05 of the recommended hazmat recommended to comply with special handling requirements or operational controls, as well as any recommendations to PHMSA for changes to the HMR affecting the handling of placarded tank cars.
- Evaluate the risks of leaving trains or vehicles meeting the criteria identified as requiring special handling and/or operational controls unattended and report the results to task no. 13-03.



Path Forward

- Due to inclement weather the March 3 Hazardous Materials Working Group was postponed.
- FRA is working to reschedule.



HAZMAT Issues WG Update



Questions?