



Railroad Safety Advisory Committee



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

report to the

50th Railroad Safety Advisory Committee Meeting

October 31, 2013
Washington, DC

Purpose

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.



Railroad Safety Advisory Committee



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.



Considerations

- Additional hazard classes
 - Oxidizers (Rosedale, MD)
 - Certain organic peroxides
 - Pyrophoric materials
 - **Maximum residue volume triggering notification of railroads**
 - **Reconcile Appendix A of EO 28 and OT-55-N**
 - Define “Key Train” in HMR
-



Issue 1 Action Items

- AAR provided a list of fleet, description and injury/accident data as related to car types
 - FRA to provide accident/non accident/injury based on car type.
 - FRA to provide a summary of recent regulations related to operational issues
 - Reconcile Appendix A and OT-55-N (WG agreement)
 - FRA to propose definition of “residue”
-



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.



Considerations

- Identification of “residue” tank cars containing volumes exceeding that determined in Task 1.
 - 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.
 - Job briefing prior to setting cars out for pick up.
-

Action Items

- Contingent upon a decision related about residue volumes.
- Labor to provide a list of training needed and not currently required by HMR.



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.



Considerations

- 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)).
 - Pre-trip inspections requirements
-

Action Items

- WG to review the Volpe report to Congress on train placement for future discussions.
 - FRA to define “main track siding”
 - Labor requested the addition pre-trip inspections (CFR Part 174.9) Compare method of inspections made by shippers and RR's.
-



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.



Considerations

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

Action Items

- WG determined to place route risk analysis in the parking lot. At this stage the WG does not desire to consider this issue or a guidance document in this area given the WG's tight time lines in addressing other issues that are required.

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.

- Discuss “Operation classification”
- Other (classes of HM) examples of classification issues

Considerations

- 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.
-



Action Items

- Mark Maday UP to evaluate concern regarding alignment of SDS and data used for classification and packaging.
- WG to review Special provision B-1 (49 CFR 172.102) and 49 CFR 173.150 (f) (exceptions for packages of flammable liquids) and consider elimination of combustible class or modification of same.
- FRA will consider the naming convention for sweet crude oil.
- Mr. Bill Maduzia will provide a link for a paper on chemical and physical properties of crude oil.

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.
-



Proposed meetings



- Week of 12/16
- Week of 1/27
- Week of 3/3



Hazardous Materials Issues Working Group



Questions?