

HM-251 — FAST ACT COMPARISON

	HM-251	Fast Act	Outstanding Issues	Status
	May 1, 2015	December 4, 2015		
Scope of Cars Affected	High-Hazard Flammable Trains (HHFT) High-Hazard Flammable Unit Trains (HHFUT)	All DOT-111 including CPC-1232 tank cars in flammable liquids service regardless of train composition.	None.	Scope of car affected is clear.
Enhance Braking Requirements	HHFT require EOT or DP Braking System. HHFUT must be equipped with ECP Brakes by 2021 or 2023 (dependent upon train length, packing group and speed of train).	GAO is required to conduct an independent study of cost/benefit related to ECP brakes. Results of study to be issued in a report to congress by June 2017.	DOT has completed its ECP Brake Study and issued and revised Regulatory Impact Analysis. AAR and RSI issue comments on the RIA calling for DOT to repeal the ECP mandate.	Pending DOT decision to repeal ECP Brake Requirement.
Enhance Standards for Tank Cars	New tank cars constructed after October 1, 2015 must meet enhanced DOT Specification 117. Existing tank cars must be retrofitted in accordance with DOT-prescribed retrofit design.	DOT-111 specification railroad tank cars used to transport Class 3 flammable liquids shall meet the DOT-117, DOT-117P or DOT-117R.	None.	Standards for new and retrofit cars are clear.
Retrofit Schedule	2017 - 2025 for all DOT 111s in HHFT service. Priorities based on car type (jacketed/non-jacketed), design (111 or CPC-1232) and class 3 material packing group (I, II, III).	Prioritized phase-out of all DOT-111's and CPC-1232 tanks in flammable liquid service prioritized by car type and service (crude oil, ethanol, other flammable liquids).	See timeline.	See Quarterly Fleet Status Report.
Thermal Blankets	Not included in 117J or 117R Specification.	Tank Cars built to meet the DOT-117 specification and each non-jacketed tank car modified to the 117R Specification must be equipped with an insulating blanket with at least 1/2-inch-thick material meeting 179.18 requirements.	None.	RSI receives letter from FRA indicating that RSI thermal analysis of fiberglass insulation meets 179.18 requirements. Transport Canada issues RSI an Equivalency Certificate for existing Jacketed CPC-1232 Tank Cars.
Top Fittings Protection for 117R Tank Cars	Not required.	Specific design requirements issued for protective housing and pressure relief devices.	None.	Top fittings retrofit requirements are clear.
Train Operating Speed Restrictions	HHFT's to 50-mph maximum speed. HHFT's that contain any tank cars not meeting the enhanced tank car standards required by this rule operate at a 40-mph speed restriction in high-threat urban areas.	No changes to HHFT's speed restrictions.	None.	Train operating speed restrictions are clear.