



**RSI-CTC Modifications on HM-251  
Executive Summary FACT SHEET  
October 1, 2014**

The RSI-CTC shares the U.S. Pipeline and Hazardous Materials Administration's (PHMSA) commitment to a safe and efficient rail transportation system and to ensuring the continued growth and vitality of an integrated North American energy market.

The following summarizes RSI-CTC's modifications to PHMSA's NPRM on HM-251:

- The RSI-CTC supports PHMSA's holistic approach to improving the safety of hazardous materials transportation by rail by focusing on derailment prevention in addition to post-derailment mitigation.
- Harmonization of the U.S. and Canadian requirements is essential to ensure the viability of key segments of the North American economy.
- A rule governing tank car specification that is predicated upon train makeup and railroad operations provides neither the necessary advance notice nor the certainty to determine packaging requirements. Accordingly, "High-hazard flammable trains" is not a workable concept for determining tank car specifications. Tank car specifications should instead be determined by the commodity transported.
- PHMSA's final rule should include only feasible, cost-justified, prescriptive standards, clear definitions, and achievable timelines.
- Newly built tank cars transporting crude oil and ethanol (in all Packing Groups) should be built with a 9/16 inch tank shell, jacket, full-height half inch head shields, top fittings protection, a reconfigured bottom outlet valve handle ("BOV"), a reclosing pressure relief valve ("PRV"), TC128 Grade B normalized steel, and a thermal protection system. This is consistent with Option 2 as referred to in the NPRM.
- Newly built tank cars transporting the balance of other Class 3, flammable liquids in Packing Group ("PG") I, II, or III, should be built with a 7/16 inch tank shell, jacket, full-height half inch head shields, top fittings protection, a reconfigured BOV, a reclosing PRV, TC128 Grade B normalized steel, and a thermal protection system. This is consistent with Option 3 as referred to in the NPRM.
- Existing tank cars serving all Class 3, PG I and II commodities including crude oil and ethanol should remain in service with the existing head and shell as a base and undergo modification that would include jackets (if not already present), full height half inch head shields, a reconfigured BOV, a reclosing and appropriately sized PRV, and a thermal protection system in accordance with 49 C.F.R. § 179.18.1 This is consistent with Option 3. The RSI-CTC agrees with PHMSA that top fittings protection is not a cost justified modification for existing tank cars.
- Modifications to existing tank cars transporting Class 3, PG III commodities should be limited to the application of a reconfigured BOV and a reclosing PRV.
- The compliance deadlines for the modification program must account for the complexity of the modifications and the constraints of the maintenance and repair facility network to provide sufficient time to avoid the substantial unintended consequences of an unrealistic modification timeline.
- We support rigorous benefit cost analysis to inform the final rule, and suggest elements of such an analysis.
- PHMSA's final rule should be free of legal uncertainties that could hinder effective implementation, public safety protections, or commerce.