



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

The RSI-CTC shares 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 points summarize RSI-CTC's proposed modifications timelines submitted to PHMSA's Notice of Proposed Rulemaking on HM-251:

- **Legacy DOT-111 Crude Oil and Ethanol Tank Cars:** All legacy (jacketed and non-jacketed) tank cars transporting crude oil (all Packing Groups) would be modified or removed from crude oil and ethanol service by **December 31, 2020**. This would require modification of approximately 36,000 non-jacketed legacy tank cars and 5,100 jacketed legacy tank cars. In the event a final rule is not in place by January 1, 2015, then the compliance period would be 72 months after publication of a final rule.
- **Non-Jacketed CPC-1232s Crude Oil and Ethanol:** All non-jacketed CPC-1232 tank cars transporting crude oil and ethanol (all packing groups) would be modified or removed from crude oil and ethanol service by **December 31, 2022**. This would require modification of approximately 22,000 tank cars in crude oil service and 750 tank cars in ethanol service. In the event a final rule is not in place by January 1, 2015, then the compliance period would be 96 months after publication of a final rule.
- **Legacy DOT-111s in Class 3, PG I & II Service:** All legacy (jacketed and non-jacketed) tank cars transporting Class 3 Packing Group I and II materials other than crude oil and ethanol would be modified or removed from Class 3 PG I and II service by **December 31, 2025**. This would require modification of approximately 14,300 non-jacketed tank cars and 5,400 jacketed tank cars in other flammable liquids service. In the event a final rule is not in place by January 1, 2015, then the compliance period would be 120 months after publication of a final rule.
- **Jacketed CPC-1232s in any Class 3, PG I & II Service:** All jacketed CPC-1232 tank cars transporting Class 3 PG I and PG II materials (including crude oil and ethanol) would be modified at next shopping event or requalification, whichever occurs first, but no later than **December 31, 2025**. This would require modification of approximately 1,580 tank cars in other flammable liquids service. In the event a final rule is not in place by January 1, 2015, then the compliance period would be 120 months after publication of a final rule.
- **Legacy DOT-111s in Class 3, PG III Service:** All legacy DOT-111 tank cars transporting Class 3 PG III materials would be modified at next shopping event or requalification, whichever occurs first, but no later than **December 31, 2025**. This would require modification of approximately 4,925 tank cars in other flammable liquids service. In the event a final rule is not in place by January 1, 2015, then the compliance period would be 120 months after publication of a final rule.

**Exhibit A3: Modifications by Existing Tank Car Sub-fleet**

Sub-fleet	Number of Tank Cars (Adjusted for 28% early retirement)	Deadline for Modification	Modifications Required
NJ Legacy DOT-111s	16,625 (crude oil) 19,467 (ethanol)	12/31/2020	Full-height head shield, Jacket, Thermal Protection System, Reclosing PRV, Reconfigured BOV, Increase to 286k GRL
	14,279 (other FL, PG I & II)	12/31/2025	
J Legacy DOT-111s	5,052 (crude oil) 63 (ethanol)	12/31/2020	Full-height head shield, Thermal Protection System, Reclosing PRV, Reconfigured BOV, Increase to 286k GRL
	5,421 (other FL, PG I & II)	12/31/2025	
NJ CPC-1232s	21,993 (crude oil) 751 (ethanol)	12/31/2022	Jacket, Thermal Protection System, Reclosing PRV, Reconfigured BOV
	2,395 (other FL, PG I & II)	12/31/2025	
J CPC-1232s	35,608 (crude oil) 23 (ethanol) 1,580 (other FL, PG I & II)	12/31/2025	Thermal Protection System, Reclosing PRV, Reconfigured BOV
All existing tank cars in PG III Service	4,925 (FL, PG III only)	12/31/2025	Reclosing PRV, Reconfigured BOV