RAILWAY SUPPLY INSTITUTE
Support, Connection, Advocacy

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Recommendations to DOT on HM-251

The following position on HM-251 represents the consensus of several tank car manufacturing and leasing companies that are members of the Railway Supply Institute ("RSI") Committee on Tank Cars ("CTC"), including American Railcar Industries, American Railcar Leasing, CIT Rail, GATX Corporation, General Electric Railcar Services Corporation, Trinity Rail Group, LLC, and Union Tank Car Company. Nothing in this document is intended to relieve shippers of their responsibility for proper classification of products, as codified in 49 C.F.R. § 173.22.

1. **Newly ordered tank cars:**

    a. Ordered after **(a date certain agreed upon by PHMSA)**, to be used to transport properly classified Class 3, PG I and II materials (including crude oil and ethanol) must be built with a minimum 7/16" normalized steel tank, full height head shields, top fittings protection, and ½" thick thermal blanket with a steel jacket. High flow capacity pressure relief device and re-configured bottom outlet valve handle will be applied based on standards established by the AAR Tank Car Committee (AAR TCC).

    b. Ordered after **(a date certain agreed upon by PHMSA)**, to be used to transport properly classified Class 3, PG III materials will be built to current standards, provided that the tank is normalized steel and the cars are equipped with top fittings protection. High flow capacity pressure relief device and re-configured bottom outlet valve handle will be applied based on standards established by the AAR TCC.

    c. It is possible that some types of crude oil may require packaging in a DOT tank car class other than a DOT 111.

2. **Cars in the current new car order backlog:**

    a. **For crude oil and ethanol:**

        i. Jacketed cars built after **(a date certain agreed upon by PHMSA)** must be built to CPC-1232 standards and have ½" thermal protection blanket with a steel jacket. High flow capacity pressure relief device and re-configured bottom outlet valve handle will be applied or retrofitted as soon as possible after standards are established by the AAR TCC and component parts are commercially available.

        ii. Non-Jacketed cars built after **(a date certain agreed upon by PHMSA)** must be built to CPC -1232 standards. High flow capacity pressure relief device and re-configured bottom outlet valve handle will be applied or retrofitted as soon as possible after standards are established by the AAR TCC and component parts are commercially available.

b. **For other Class 3, PG I and II materials:**

i. Jacketed cars built after **(a date certain agreed upon by PHMSA)** must be built to CPC-1232 standards and have ½" thermal protection blanket with a steel jacket. High flow capacity pressure relief device and re-configured bottom outlet valve handle will be applied or retrofitted as soon as possible after standards are established by the AAR TCC and component parts are commercially available.

ii. Non-Jacketed cars built after **(a date certain agreed upon by PHMSA)** must be built to CPC -1232 standards. High flow capacity pressure relief device and re-configured bottom outlet valve handle will be applied or retrofitted as soon as possible after standards are established by the AAR TCC and component parts are commercially available.

c. **For Class 3, PG III materials:**

i. Cars can be built as ordered, including non-normalized tank. High flow capacity pressure relief device and re-configured bottom outlet valve handle will be applied or retrofitted as soon as possible after standards are established by the AAR TCC and component parts are commercially available.

3. Until such a time when standards applicable to legacy tank cars are developed, non-CPC-1232 compliant tank cars should not be newly assigned into crude oil or ethanol service.

4. Tank cars currently in service built to the CPC-1232 standard (both jacketed and non-jacketed) will be allowed to remain in unrestricted service for their full statutory life, with modification to those existing tank cars limited to pressure relief devices and bottom outlet valve handles based on future regulatory requirements or industry standards.

5. Non-jacketed legacy tank cars used to transport crude oil must be modified to include a steel jacket, full height head shield, improved protection of top fittings, ½" thermal protection blanket, and pressure relief devices and bottom outlet valve handles based on future regulatory requirements or industry standards, or be removed from crude oil service by **(a date certain agreed upon by PHMSA)**.

6. Non-jacketed legacy tank cars used to transport ethanol must be modified to include a steel jacket, full height head shield, improved protection of top fittings, ½" thermal protection blanket, and pressure relief devices and bottom outlet valve handles based on future regulatory requirements or industry standards, or be removed from ethanol service by **(a date certain agreed upon by PHMSA)**.

7. Non-jacketed legacy tank cars used to transport all other Class 3, PG I and II materials must be modified to include half height head shields, improved protection of top fittings, and pressure relief devices and bottom outlet valve handles based on future regulatory requirements or industry standards, or be removed from Class 3, PG I and II service by **(a date certain agreed upon by PHMSA)**.

8. Jacketed legacy tank cars used to transport Class 3, PG I and II materials (including crude oil and ethanol) will be allowed to remain in unrestricted service for their full statutory life, with modification to those cars limited to pressure relief devices and bottom outlet valve handles based on future regulatory requirements or industry standards.

9. Jacketed and non-jacketed legacy tank cars (non-CPC-1232 compliant) used for Class 3, PG III materials will be allowed to remain in unrestricted service for their full statutory life, with modification to those existing tank cars limited to pressure relief devices and bottom outlet valve handles based on future regulatory requirements or industry standards.