## HM-251 – Fast Act Comparison

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### Scope of Cars Affected
- **HM-251**: High-Hazard Flammable Trains (HHFT) and High-Hazard Flammable Unit Trains (HHFUT).
- **Fast Act**: All DOT-111 including CPC-1232 tank cars in flammable liquids service regardless of train composition.
- **Outstanding Issues**: None.
- **Status**: Scope of car affected is clear.

### Enhance Braking Requirements
- **HM-251**: 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).
- **Fast Act**: 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.
- **Outstanding Issues**: None.
- **Status**: FRA rescinds requirement for ECP brakes 9/25/2018.

### Enhance Standards for Tank Cars
- **HM-251**: New tank cars constructed after October 1, 2013 must meet enhanced DOT Specification 117. Existing tank cars must be retrofitted in accordance with DOT-prescribed retrofit design.
- **Fast Act**: DOT-111 specification railroad tank cars used to transport Class 3 flammable liquids shall meet the DOT-117, DOT-117P or DOT-117R.
- **Outstanding Issues**: None.
- **Status**: Standards for new and retrofit cars are clear.

### Retrofit Schedule
- **HM-251**: 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).
- **Fast Act**: 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).
- **Outstanding Issues**: See timeline.
- **Status**: See Quarterly Fleet Status Report.

### Thermal Blankets
- **HM-251**: Not included in 117J or 117R Specification.
- **Fast Act**: Tank Cars built to meet the DOT-117 specification and each non-jacketed tank car must be equipped with an insulating blanket with at least 1/2-inch-thick material meeting 179.18 requirements.
- **Outstanding Issues**: None.
- **Status**: 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
- **HM-251**: Not required.
- **Fast Act**: Specific design requirements issued for protective housing and pressure relief devices.
- **Outstanding Issues**: None.
- **Status**: Top fittings retrofit requirements are clear.

### Train Operating Speed Restrictions
- **HM-251**: HHFTs to 50-mph maximum speed. HHFTs 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.
- **Fast Act**: No changes to HHFT’s speed restrictions.
- **Outstanding Issues**: None.
- **Status**: Train operating speed restrictions are clear.