

M. C. A.

TRANSPORTATION  
EQUIPMENT  
COMMITTEE  
MINUTES

1967-1978

VOL. 4

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## Manufacturing Chemists Association

## Minutes of Meeting

of the

## TRANSPORTATION EQUIPMENT COMMITTEE

Embassy Row Hotel  
Washington, D. C.

October 25-27, 1971

D. M. Long, chairman, presided and opened the meeting at 9:00 a.m. each day. The following members and guests were present:

MEMBERS

|                              |                                                  |
|------------------------------|--------------------------------------------------|
| D. M. Long, Chairman         | Pennwalt Corporation                             |
| S. L. Watts, Vice Chairman   | Hooker Chemical Corporation                      |
| W. H. Butterbaugh, Secretary | MCA Staff                                        |
| M. M. Anderson               | Union Carbide Corporation                        |
| A. D. Annand                 | Cities Service Company                           |
| W. Van V. Bacon              | FMC Corporation                                  |
| J. T. Curtis, Jr.            | U. S. Steel Corporation                          |
| C. S. Edmonds, Jr.           | Diamond Shamrock Chemical Corp.                  |
| J. C. Graves*                | Celanese Corporation                             |
| H. T. Hale                   | Monsanto Company                                 |
| W. L. Hammond                | PPG Industries, Inc.                             |
| E. G. Hansen                 | E. I. du Pont de Nemours & Co.                   |
| F. J. Heller                 | Phillips Petroleum Company                       |
| J. R. Hopkins                | The Dow Chemical Company                         |
| J. W. Kvech                  | Rohm and Haas Company                            |
| (for E. L. Magee)            |                                                  |
| G. B. Knox*                  | Hercules Incorporated                            |
| M. T. Miller                 | Canadian Industries Limited                      |
| R. H. Moulton                | Enjay Chemical Company                           |
| R. E. Phillips               | Ethyl Corporation                                |
| W. F. Rash                   | Hercules Incorporated                            |
| R. R. Roch*                  | International Minerals &<br>Chemical Corporation |
| G. A. Thompson*              | Shell Chemical Company                           |
| (for F. E. Brunjes)          |                                                  |
| R. E. Wilson                 | Stauffer Chemical Company                        |
| C. P. Woehrle                | American Cyanamid Company                        |

\*Nomination to membership approved subject to approval by MCA Board of Directors.

GUESTS

W. R. Atwood  
J. E. Allen  
W. F. Black  
L. R. Burkett  
A. C. Clark  
R. C. Collins  
C. J. Harvison (10/26 only)  
W. B. Jones  
R. E. Looney  
W. T. Skolnicki  
J. C. Zercher

Texas Gulf Sulphur Company  
U. S. Industrials Company  
Department of Transportation  
B. F. Goodrich Chemical Co.  
MCA Staff  
Allied Chemical Corporation  
National Tank Truck Carriers  
PPG Industries, Inc.  
Shell Chemical Company  
U. S. Steel Corporation  
MCA Staff

ASSOCIATE MEMBERS

V. G. Grey (10/26 only)  
C. E. Kreh (10/25 only)  
(for R. M. Graziano)  
G. W. Rousseau

Truck Trailer Manufacturers  
Association  
Bureau of Explosives - AAR  
Office of Hazardous Materials

TECHNICAL ADVISORS

G. E. Fitzgerald  
S. H. Moyes

Shippers Car Line Division  
ACF Industries, Inc.  
General American Transportation  
Corporation

ABSENT

C. J. Schoustra

Olin Corporation

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Note: Subjects were not necessarily discussed in the  
order in which they appear in these minutes.

1. Approval of Minutes - April 19-21, 1971 Meeting

The minutes of the April 19-21, 1971 meeting were approved  
as distributed.

2. TE-C-149 "Report of Rail Subcommittee - J. R. Hopkins, Chairman(a) TE-R-101.4 "Combination Safety Relief Valves"

A request received from the AAR Committee on Tank Cars' Subcommittee on Specifications to consider the efficacy of frangible discs and breaking pin devices installed in combination with safety relief valves has been referred to a task group of J. C. Graves, chairman, J. R. Hopkins and R. E. Phillips. The Subcommittee has concurred in the task group recommendations (1) that the parent Committee be surveyed to determine which commodities require the use of such combination safety relief devices, and if there is a preference for one device system over the other and, (2) the Secretary be requested to contact The Chlorine Institute regarding their experience with breaking pin combination safety relief devices. The purpose of the survey is to obtain information regarding member company practices and recommendations for review by the task group in their development of recommended response to this inquiry from the AAR. The task group is also considering possible means of precluding the build-up of pressure between the disc or the diaphragm and the safety relief valve seat and expects to report suitable recommendations at the next meeting of the Subcommittee.

After discussion, the Committee requested the Secretary to survey the Committee and contact The Chlorine Institute as recommended.

(continued on agenda)

(b) TE-R-101.10 "Safety Valve Retest - Carbon Bisulfide"

The task group assigned to this docket has reported progress in the development of recommendations for inclusion in the next edition of Chemical Safety Data Sheet SD-12 "Carbon Disulfide" regarding the selection of materials for carbon disulfide safety relief valves and operating procedures for inspection and retest requirements for these valves.

(continued on agenda)

(c) TE-R-111.6 "Commodity Marking on Tank Cars"

The Committee discussed in its April 19-21, 1971 meeting a proposal received from the AAR Committee on Tank Cars' Subcommittee on Specifications that the name of the commodity contained therein be stencilled on a tank car tank. The MCA

response to AAR, recommended by the Committee, was among the comments discussed at the May 1971 meeting of the AAR Subcommittee. Because of the nature of the comments received, the AAR task group developing this proposal was requested to give further consideration to the matter. The Secretary attended a July 8, 1971 meeting of this AAR task group. The group endorsed the concept of identifying the nature of the hazard(s) of the commodity contained in a tank car tank in some suitable manner on the outside surface of the tank car. Agreement could not be reached, however, as to what system of identification should be used, although several were discussed, including MCA THI and NFPA 704-M.

After discussion of the apparent impass,

ON MOTION, duly made and seconded, the Committee

VOTED: to support the principle of enlarging the size of letters in present regulatory commodity stencilling from present sizes to at least four inches high.

It was specifically noted that the intent of this recommendation did not address itself to permissive commodity stencilling.

The Secretary was requested to transmit this recommendation to the AAR for consideration by the Committee on Tank Cars' Appendix C Working Group. Mr. Heller and Mr. Hansen were recorded as being opposed to the foregoing recommendation.

(removed from agenda)

(d) TE-R-125.0 "AAR Interchange Rules - Miscellaneous"

Mr. Hopkins presented the text of a proposed letter to AAR developed with Mr. Moyes at the request from the Subcommittee. The purpose of the letter was to incorporate the sense of discussion at the September 15 meeting of the Subcommittee regarding provisions in the AAR Interchange Rules for privately owned cars that were considered unrealistic or discriminatory versus the provisions allowed for railroad owned equipment under similar circumstances.

Following review and discussion of the proposed draft, the Committee recommended the proposed draft form the text of a letter to be transmitted to AAR on behalf of MCA.

(removed from agenda)

(e) TE-R-126 "AAR Arbitration Committee"

Mr. Moyes discussed his written report. The Secretary was requested to distribute Mr. Moyes' report to the Committee for its information.

(f) TE-R-129.5 "Revisions to Appendix A, Table A4"

The Committee accepted the Subcommittee's recommendations that (1) regulatory requirements for propylene oxide similar to those for ethylene oxide were not necessary because propylene oxide was a much more stable commodity and has had a very satisfactory transportation experience record and (2) that no changes regarding propylene oxide appear necessary in the provisions of Table A4 of Appendix A of the AAR Tank Car Specifications. The Secretary was requested to include these conclusions in the response to the AAR request for consideration for commodity reference requirements in the Hazardous Materials Regulations for propylene oxide.

(removed from agenda)

(g) TE-R-130.0-1 "Tank Car Unloading"

The Secretary reported review of the data in the file regarding the recommendations approved by the parent Committee under this docket in its April 19-21, 1971 meeting indicated that insufficient information was available to support the presentation of these proposals as recommended revisions to the Hazardous Materials Regulations. This matter was discussed at the July 28, 1971 meeting of the TEC Policy Advisory Subcommittee where several suggestions were made and have since been incorporated by the Secretary into a draft of a transmittal letter to DOT. This draft is presently being reviewed by the Policy Advisory Subcommittee as there are several areas where clarification of background is still desirable.

It was brought out in discussion that most of the recommendations contained in the subject proposals apply to old cars as well as to other cars no longer in service. It was believed that any recommendations presented by MCA should be more up to date and address only cars currently in service. The review of the transmittal draft to DOT was continued in the Policy Advisory Subcommittee for further consideration.

(continued on agenda)

(h) TE-R-171.1 "Ethylene Oxide in Aluminum Tank Cars"

Mr. Hopkins reported the Subcommittee has proposed that the recommendation approved by the parent Committee in its April 1971 meeting under this docket be rescinded and that the docket be closed. It was noted in the September 15, 1971 meeting of the Subcommittee there appeared to be insufficient experience with the use of DOT 105A100ALW tank cars operating in ethylene oxide service under DOT special permit to support a recommendation for revision of the regulations.

The Subcommittee's proposal was accepted, noting in the event sufficient experience becomes available, the docket could be reopened for consideration of recommendations regarding the use of these cars in this service.

(removed from agenda)

(i) TE-R-264.1 "Hydrofluoric Acid in Tank Cars"

(1) The recommendations developed jointly with the Chemical Packaging Committee were submitted in letter ballot to the respective committees and have been approved. Although there were a few editorial changes made to the proposal in resolution of comments received with the letter ballot, there were no technical changes involved and transmittal of the combined recommendations to DOT is being progressed (see TE-T-176.0 "Hydrofluoric Acid in Tank Trucks" of these minutes).

(2) Mr. Hopkins reported the Subcommittee has requested the task group to review bolting materials for hydrofluoric acid and anhydrous hydrogen fluoride services and to develop recommendations for review and consideration at the next meeting of the Subcommittee. A member commented that there has been some indication that tank cars in anhydrous hydrogen fluoride service appear to need special consideration in such areas as weld metals. The task group was requested to review these additional areas also.

(continued on agenda)

(j) TE-R-281.1 "Formic Acid in Tank Cars"

At the September 15 subcommittee meeting, the Secretary reported review of data in the file regarding the recommendation approved by the parent Committee in its April 19-21, 1971 meeting indicated sufficient information was

available to support the presentation of the subject recommended revisions to the Hazardous Materials Regulations. Although additional information has been requested from member companies manufacturing this commodity, to date only one member has responded.

In view of interest expressed during discussion of the Subcommittee report, the Committee declined acceptance of the Subcommittee recommendation that the docket be closed for lack of interest. Interested members were requested to submit additional information to the Secretary for consideration in the development of the transmittal of the subject recommendations to the Department of Transportation as recommended revisions to the Regulations.

Secretary's Note: Subsequent to the meeting, the Chairman requested that progression of the recommendation previously approved under this docket be referred to the TE-R-296.0 Task Group on the basis of the precedent provided by the disposition of Docket TE-R-315 "Vinyl Methyl Ether in Tank Cars" and the docket closed.

(removed from agenda)

(k) TE-R-296.0 "Review of Part 173 - Hazardous Materials Regulations"

Mr. Hopkins reported that a request from W. F. Black to the Secretary that MCA consider undertaking a review of Part 173 of the Hazardous Materials Regulations to determine (1) what tank car specifications with regard to chemicals should be cancelled and (2) what special provisions, which were needed at one time but the need for which has since ceased to exist, should be removed, was withdrawn by Mr. Black at the September 15 meeting of the Subcommittee. It appears that several recent developments in FRA have resulted in projects which would accomplish the principle items covered in the request received from Mr. Black.

The Subcommittee has recommended that the docket be closed because these DOT projects are of such nature that it would not be appropriate for the Subcommittee to undertake such activity at this time. The Committee concurred in the Subcommittee's recommendation. After discussion, however, it was concluded that the Committee could be of assistance to OHM in developing suggested revisions to the regulations to incorporate the provisions for a considerable number of outstanding special permits, as well

as suggesting cancellation of certain obsolete specifications or provisions as they apply to transportation of chemicals. After discussion, a task group of R. E. Phillips, chairman, D. M. Long, S. L. Watts and G. E. Fitzgerald was requested to review these two areas with Mr. Rousseau and develop suggested changes for further consideration.

Secretary's Note: Recommendations previously approved by the Committee under the following dockets have been referred to the TE-R-296.0 Task Group for inclusion in recommended revisions to the Hazardous Materials Regulations developed for consideration by DOT.

TE-R-281.1 "Formic Acid in Tank Cars"  
TE-R-317.1 "Nitric Acid in Tank Cars"  
TE-R-315 "Vinyl Methyl Ether in Tank Cars"  
TE-R-336 "Utilization of Non-Pressure Tank Cars"

(continued on agenda)

(1) TE-R-307 "Pressure - Temperature Loading Concept"

It was noted that specifications for tank cars designed for shipment for certain commodities under cryogenic conditions were proposed in HM-91; Notice 71-25 distributed to the Committee by the Secretary's October 20, 1971 letter. Since this subject was being carried on the agenda only for information and the release of Notice 71-25 effectively concludes the developments of the proposed specifications for this service, the docket was ordered closed.

(removed from agenda)

(m) TE-R-315 "Vinyl Methyl Ether in Tank Cars"

The Secretary reported at the last meeting of the Subcommittee that review of the docket file in preparation of the transmittal of the Committee's April 19-21, 1971 recommendation to DOT indicated that the information necessary to substantiate the recommendation was not available. It was noted that the recommendations formerly considered under this docket could be incorporated in the considerations before the task group assigned to TE-R-296.0

After discussion it was concluded that transmittal of this recommendation to DOT at this time should be deferred and the entire matter referred to Docket TE-R-296.0 for further consideration.

(removed from agenda)

(n) TE-R-317.1 "Nitric Acid in 111A Tank Cars"

ps, Mr. Hopkins reviewed the discussion of the Subcommittee regarding the recommendation approved under the subject docket at the April 1971 meeting of the Committee.

ed After discussion it was concluded that although the 111A60W7 tank car included in the subject recommendation is basically the same specification as the 103CW specification presently authorized for transportation of certain concentrations of nitric acid, in actuality there was no current interest in the Committee for the utilization of this class tank car in this particular service. Consequently, this part of the recommendation approved at the April 1971 meeting of the Committee was rescinded. The Secretary was requested to progress the balance of the subject recommendations in presentation to DOT as soon as record of sufficient shipment experience with this class of tank car in this service is received from interested members of the Committee. This docket was removed from the agenda.

(removed from agenda)

o Secretary's Note: Subsequent to the meeting, the Chairman requested that progression of the recommendation previously approved under this docket be referred to the TE-R-296.0 Task Group on the basis of the precedent provided by the disposition of Docket TE-R-315 "Vinyl Methyl Ether in Tank Cars" and the docket closed.

y (o) TE-R-335 "Safe Transportation of Ethylene Oxide"

The Secretary reported that provisions to "grandfather" cork insulation had been approved by the parent Committee in letter ballot. The recommendations approved by the Committee at its April 1971 meeting, as revised by the letter ballot, were presented to DOT on August 11 by MCA as recommended revisions to the Hazardous Materials Regulations. Copies of the letter to DOT transmitting these recommendations were presented to the AAR for the information of the Committee on Tank Cars; the Southern Railway System because of their interest in ethylene oxide safety; and the MCA Safety and Fire Protection Committee. This docket was ordered closed.

(removed from agenda)

(p) TE-R-336 "Utilization of Non-Pressure Tank Cars"

Mr. Hopkins reported the Subcommittee had recommended that this docket be closed because of lack of interest in progressing changes discussed previously under this docket.

After discussion it was noted that the changes proposed under this docket were within the scope of the assignment to the TE-R-296.0 Task Group. Consequently, the subject recommendations were referred to that task group for consideration and the docket was closed.

(removed from agenda)

3. TE-C-151 "Report of Truck and Portable Tank Subcommittee -  
J. T. Curtis, Chairman

(a) TE-T-163 "Tank Truck Manuals"

Mr. Curtis reported the task group assigned to develop a proposed manual on loading and unloading flammable liquids from cargo tanks presented a second draft for consideration at the September 22 meeting of the Subcommittee. After discussion, the Subcommittee referred several recommendations to the task group for consideration and development of a third draft.

When the third draft has been completed by the task group, it will be distributed by the Secretary to the Subcommittee for review and comment. It is anticipated that a revised draft will be released by the Subcommittee for review and comment by the parent Committee and the Safety and Fire Protection Committee well in advance of the April 1972 meeting.

(continued on agenda)

(b) TE-T-176.0 "Hydrofluoric Acid in Cargo Tanks"

The Secretary reported at the September 22 Subcommittee meeting the letter ballot conducted recently in the parent Committee regarding the proposed recommendations to be presented to DOT to revise the regulations for the transportation of hydrofluoric acid and anhydrous hydrogen fluoride had been approved. However, subsequent to that meeting, the Secretary noted in the development of the transmittal of these recommendations to DOT that the proposed revisions to the cargo tank specifications did not provide for the continued use of existing cargo tanks which might not be in conformance with the proposed regulations. Upon review

of this development with Mr. Long, the Secretary was requested to defer transmittal of the subject recommendations for consideration of "grandfather" provisions as needed at this meeting of the Committee.

After discussion, the Secretary was requested to develop the necessary grandfather clauses for application to the respective proposed revisions to the tank truck specifications contained in the subject recommendations and to proceed with transmittal of the modified recommendations to DOT as originally recommended.

(continued on agenda)

(c) TE-T-208.4 "Loading and Unloading of Tank Trucks"

It was reported at the September 22 meeting of the Subcommittee that the requirements promulgated under DOT Docket HM-65; Amendment 177-16 "Grounding and Bonding of Flammable Liquid Cargo Tanks" require electrical continuity from the cargo tank to the receiving tank when unloading by a suction-piping system through an open filling hole of the cargo tank. The requirement proposed in Docket HM-65; Notice 70-21 would have required under these same circumstances only that the suction-piping system extending through the open filling hole of the cargo tank must be bonded through the cargo tank. The Secretary was requested to review this change with DOT and transmit pertinent information to the Subcommittee.

(continued on agenda)

(d) TE-T-213 "Tank Truck Technical Council"

The Secretary summarized the July 22 meeting of the Tank Truck Technical Council as follows:

There have been some indications of defects in MC 330 and MC 331 cargo tanks made of quenched and tempered steels. The few tanks in which defects have been noticed in recent inspections were in ammonia service for both ammonia and propane services. The reports discussed covered a very limited sampling and it was not possible to draw any conclusions from the reports. Concerned organizations were requested to develop more information from their members and coordinate to see if there is an actual problem.

The proposed revisions to the Hazardous Materials Regulations presented under HM-86 were discussed briefly. The Council made no formal recommendations regarding the notice.

National LP-Gas Association and Compressed Gas Association representatives indicated that a jointly recommended procedure for visual inspection of MC 330 and MC 331 cargo tanks was being considered for presentation to DOT as a proposed revision to the regulations to authorize a visual inspection every five years in lieu of the present periodic hydrostatic retest.

Mr. Gray reported the ISO had completed a draft of proposed intermodal tanks specification in meetings held this past summer. The proposed specification which would provide for intermodal tanks of 10, 30 and 40 feet in length has been distributed to various countries for approval. It appears that the draft in the United States will be distributed to the ANSI MH-5 Committee on Freight Containers for approval by the end of the year. The Secretary was requested to distribute the ISO draft to the Committee for review and comment.

(continued on agenda)

(e) TE-C-247 "T&D Research and Development Subcommittee"

Mr. Curtis reviewed briefly the content and status of the proposed draft for Manual TC-18 "Recommendations for Transfer Terminal Facilities for Dry Bulk Chemicals and Plastics" and the proposed Loss and Damage Report being developed by the RD-16 Task Group. The Secretary was requested to distribute drafts of the proposed Manual TC-18 as soon as it is available for Committee review.

(continued on agenda)

(f) TE-T-248 "Canadian Regulations - Truck Shipments of Hazardous Chemicals"

Mr. Miller reported new size and weight restrictions for highway vehicles in Canada had become effective recently. The Secretary was requested to distribute the information provided by Mr. Miller to the Committee for its information.

(continued on agenda)

(g) TE-T-276.1 "Proposed DOT Specification 341 - Portable Tanks"

It was reported that DOT review of the proposed CGA MC 341 specification was still in progress.

After discussion, the Committee recommended that MCA make suitable contact with the Department of Transportation to promote progression of this proposed specification to the rule making process.

(continued on agenda)

(h) TE-T-288 "Proposed DOT Specifications MC 306, 307 and 312"

Mr. Curtis reviewed the background leading to the Secretary's August 20, 1971 letter to the Subcommittee regarding requests for consideration of development of a proposed design pressure requirement for MC 312 cargo tanks similar to that presently provided in the specifications for MC 306 and MC 307 cargo tanks. In their September 22 meeting, the Subcommittee approved a recommended revision to §178.343-1(c), distributed to the parent Committee by the Secretary's September 29, 1971 letter.

After discussion, the Subcommittee recommendation was approved as recommended. The Secretary was requested to transmit this proposal to DOT as a recommended revision to the Hazardous Materials Regulations.

(removed from agenda)

(i) TE-T-296.0 "Review of Part 173 - Hazardous Materials Regulations"

The Subcommittee reviewed in their September 22 meeting a suggestion that it undertake review of the provisions and authorizations for the use of cargo and portable tanks in Part 173 of the Hazardous Materials Regulations to determine what cancellations, if any, were needed and what areas in the regulations could be otherwise improved.

After discussion, the Subcommittee concluded that although provisions for specific commodities in Part 173 might need review from time to time, the provisions for the use of cargo and portable tanks generally appeared to be reasonably current and that such a massive review should be deferred. The Subcommittee's recommendation was accepted and the docket was closed.

(removed from agenda)

(j) TE-T-298 "Grounding of Containers"

Since the recommendations developed under this docket regarding bonding of cargo tanks have now been progressed as amendments to the Hazardous Materials Regulations, this docket was considered no longer necessary on the agenda and was closed.

(removed from agenda)

(k) TE-C-324.4 "DOT Guide for Shippers of Hazardous Materials"

After discussion it was concluded that the subject DOT guides did not present any particular problem to the extent that further review was necessary within MCA. Consequently the docket was closed.

(removed from agenda)

(l) TE-P-327.0 "Intermodal Container Standards"

Mr. Clark advised that comments received regarding the IMCO Code for portable tanks discussed in his June 9, 1971 letter formed the basis of MCA views presented to W. K. Byrd, DOT, the U. S. Delegate to the Committee of Experts on the Transport of Dangerous Goods. The MCA views were among those considered by Mr. Byrd in the development of the United States' position paper reviewed at the August 1971 meeting of this UN Committee. That Committee ultimately developed a draft of proposed requirements for portable tanks based on the IMCO Code. It appears that the U. S. comments and proposal received rather good reception.

Mr. Clark reviewed his September 21, 1971 letter to the Committee regarding filling densities for portable tanks proposed for inclusion in the UN provisions for the construction, testing and use of portable tanks. In review of the proposals presented in his letter, Mr. Clark suggested that the members also include consideration of what effect the proposed filling densities would have if applied to tank cars and tank trucks. Members of the Committee were requested to complete review of Mr. Clark's letter and submit their comments and suggestions to him by November 15 so that the MCA response to Mr. Byrd may be developed and released.

(continued on agenda)

(m) TE-P-327.1 "Proposed Portable Bin Specification - 56 Series"

It was reported that DOT is reviewing the comments received on the proposed rule making presented recently under Docket HM-56. It appears that an amendment to this proceeding will probably be issued in the next several months.

(continued on agenda)

(n) TE-T-336 "Bottom Unloading of Corrosive Liquids Cargo Tanks"

Mr. Curtis reported a task group of C. A. Angle, chairman, W. T. Skolnicki, and S. L. Watts has been requested to review the recommendations developed at the April 1971 meeting of the Committee under the subject docket and to consider development of recommendations to resolve the several problems presented.

(continued on agenda)

4. TE-C-350 "Report of Marine Transportation Subcommittee -  
M. M. Anderson, Chairman(a) TE-M-104.1 "Federal Legislation - Licensing of Personnel"

It was reported two bills had been introduced into Congress regarding licensing of personnel. The first bill would require that a licensed officer be on the bridge of a towboat while under way on navigable waterways. This bill has passed the Congress and was supported by MCA.

The second bill would have required licensed engineers in the engine room of towboats operating on navigable waterways. This bill was not passed and it is not anticipated that action will be resumed in this session of Congress.

Mr. Clark commented that additional studies are under way to determine if additional changes are needed and the requirements for personnel on towboats.

(continued on agenda)

(b) TE-M-104.2 "Safety of Ports, Harbors, Waterfront Areas  
and Navigable Waters of the United States"

A new bill introduced by Senator Muskie is under consideration. It appears that it would provide for research programs, standards for discharge of hazardous commodities onto navigable waterways and provisions for penalties and

financial responsibility. The bill is being followed by the Water Resources Committee in MCA. It is probable that the bill will be formally introduced into Congress the early part of November.

(continued on agenda)

(c) TE-M-105.0 "46 CFR Parts 150-153 (Subchapter O)"

- (1) It was noted that Subchapter O would consist of Part 150 "General," Part 151 "Barges" and Part 152 "Portable Tanks" and Part 153 "Manned Vessels." Part 152 has not yet been drafted.
- (2) Subcommittee members have been requested to review Part 151 and determine if the provisions contained therein will require additional consideration for completeness in content, particularly to include additional products.

The Subcommittee has reviewed the Coast Guard requirements and their recommendations for implementation of requirements on restricted gaging devices (46 CFR 151.15) which require the tank to be vented independently of the gaging hatch prior to opening of the hatch.

It was noted that an updated list of commodities covered by Subchapter O was issued in May 1971. A member advised that their company experience indicates that the Coast Guard is going to require a water tight electrical system on caustic soda barges. It appears that this may be a general requirement for all barges to provide personnel protection from electrical shorts and faults.

- (3) It was reported that Part 153 will probably be issued as a proposal in December with sixty (60) days for reply. Mr. Anderson advised that a meeting of the Subcommittee will be called to review these proposals for development of a recommended MCA response.

The following dockets have been assigned to simplify future discussion of the respective parts of Subchapter O.

|            |                                     |
|------------|-------------------------------------|
| TE-M-105.5 | - Subchapter O - Part 150 - General |
| TE-M-105.6 | - Subchapter O - Part 151 - Barges  |
| TE-M-105.7 | - Subchapter O - Part 152 -         |
|            | Portable Tanks                      |
| TE-M-105.8 | - Subchapter O - Part 153 -         |
|            | Manned Vessels                      |

(d) TE-M-105.4 "Procedures for Handling New Products  
(Subchapter O)"

It was reported that if new products can be evaluated relatively easily, the Coast Guard anticipates being able to move expeditiously on approval of such proposals. However, if the new product is not easily evaluated or if the Coast Guard has some problem with obtaining sufficient information on a new product, approval will be delayed. As approved, all products will be listed under the public notice procedures.

After discussion, the Subcommittee's recommendation that this docket be removed from the agenda was accepted, because (1) the Coast Guard does not appear to be moving toward utilization of industry assistance in review of new products and (2) since the Coast Guard procedure for new products for inclusion in Subchapter O now appears to be established. The docket was closed.

(removed from agenda)

(e) TE-M-106 "Code of Operating Practices"

Mr. Anderson reported there had been no recent developments under this docket. After brief discussion, the docket was closed.

(removed from agenda)

(f) TE-M-109 "Specifications for Portable Containers"

It was noted in the Subcommittee that the IMCO proposal on portable tanks is not altogether compatible with the approach of the U. S. Regulations with regard to these containers. Of particular concern is total confinement versus the use of safety relief valves.

It was reported that W. K. Byrd was chairman of the UN Committee of Experts on the Transport of Dangerous Goods' Task Group on Transportable Tanks. At their last meeting, that task group decided that the IMCO proposal would be their basis for a working paper. Mr. Byrd submitted the U. S. position paper (See TE-P-327.0 of these minutes) for consideration at the August 1971 meeting of the UN Committee. The U. S. paper proposes revision to the IMCO draft to achieve a compromise position which could be supported by the United States. Several chemical companies provided input into the U. S. position paper and it appears that it is compatible in most areas with the ISO proposal on portable

tanks. However, in the course of TEC discussion of this matter, a member reported that he had been advised informally by the Coast Guard that they will probably adopt the IMCO Code substantially as is. Staff will follow this matter and advise the Committee of any significant developments.

The Transportable Tanks Subcommittee of the Chemical Transportation Industry Advisory Committee (CTIAC - formerly the Chemical Transportation Advisory Panel) is working on specific requirements for transportable tanks and developing an assignment list of various chemicals according to tank type. The CTIAC proposal is not altogether the same proposal as the U. S. position paper reported earlier. The list has been narrowed to those commodities presently moving in portable tanks or which could be conceivably so moved in the near future.

Mr. Clark commented that a revised list had been received recently from the Coast Guard and that review of the list was under way. Mr. Clark's October 22, 1971 letter was addressed to transportation contacts in each of the MCA member companies enclosing a list of chemicals that each company was believed to manufacture and offer for transportation by bulk. Information was requested regarding chemical characteristics and properties related to safe storage, handling and transportation of the subject commodities in a marine environment. Responses to this request will be compiled and a consensus response presented to a special task group of the CTIAC for their information.

The Transportable Tanks Subcommittee of CTIAC is also considering need for trained crews for handling emergencies involving portable tanks containing hazardous materials. The Marine Transportation Subcommittee, in their July 29, 1971 meeting, concluded after some discussion that it was preferred to provide the officer on board the vessel with cargo information cards. The Subcommittee concluded that it was not practical to maintain crews trained to handle specific emergencies involving each of the wide variety chemicals transported in portable tanks. It was practical, however, to have crews trained in general emergency procedures which could then be applied with the guidance of the information on the cargo information cards.

The Transportable Tanks Subcommittee is also taking a look at determining what products do not require the protection offered by safety relief valves. They are currently

considering a system based on boiling point of the product with some thought being given to a system based on product vapor pressure. The proposal, if released, will be circulated to the Marine Transportation Subcommittee for review and comment.

(continued on agenda)

(g) TE-M-110 "Port Security Regulations"

- (1) It was reported in the July 29, 1971 meeting of the Subcommittee that cargo information cards for all products in Subchapter O and D were required as of June 1, 1971. MCA developed cards for the Subchapter D products utilizing THI generic cards (CIC-82 to CIC-86). The generic classes used were based on NFPA 325-M data. It appears there are still some Subchapter O products for which cards have not yet been filed and released. The Secretary was requested to determine the status of these cards.

The Subcommittee also discussed procedures for developing cargo information cards for new products. It was concluded that for Subchapter D products, the generic card approach should be used; products under Subchapter O should generally have cards based upon the THI program if a suitable designation is available.

(2) Manning Requirements (33 CFR 126.15)

The Coast Guard inspection for personnel manning during transfer has been spotty but is increasing. Some port captains have interpreted the Coast Guard requirements as requiring one man on shore and one man on a barge for each barge hooked up for transfer, while others are basing requirements more upon an individual approach to each operation. The Committee accepted the Subcommittee recommendation that the CTIAC be requested to consider development of uniform interpretation of the manning requirements of these regulations.

(continued on agenda)

(h) TE-M-111 "Compatibility Guide (Adjacent Bulk Loadings)"

It was reported in the July 29 meeting of the Subcommittee that the compatibility guide issued in May 1970 by the Coast Guard does not recognize the MCA recommendations, resulting in some problems to member companies. The Coast Guard has indicated that major changes in the guide are being developed.

It appears the MCA comments will be accepted and that a proposal might be published by the end of the year. A draft of the revised proposed guide will be distributed to the Subcommittee for review as soon as it is available.

(continued on agenda)

(i) TE-M-112 "Water Pollution Control Regulations"

The Coast Guard has circulated a proposed draft of regulations to control oil pollution on navigable waterways. The Coast Guard held meetings the week of July 19 with oil shippers and carriers, concluding with a meeting on July 23 with terminal operators. Messrs. Clark and Butterbaugh attended the July 23 meeting. The Coast Guard has deferred publication of the proposed revisions to evaluate comments on this series of meetings.

The Subcommittee recognized that even though these regulations may cover only oil at the present time, the provisions established here will undoubtedly be extended to chemicals because of the 1970 Water Pollution Control Act. Mr. Anderson commented that the Subcommittee will need to meet in the relatively near future to evaluate the proposed provisions for oil and develop a recommended MCA position. The Secretary was requested to distribute the proposed regulations to the Subcommittee when they are available.

It appears that the Coast Guard is obtaining assistance from certain companies for the development of test requirements for certification of tankerman under Subchapter O. The Coast Guard has not yet requested assistance from MCA. Mr. Clark was requested by the Subcommittee to review this matter with the Coast Guard to offer assistance of MCA in the development of these tests.

(continued on agenda)

5. TE-R-128 "AAR Committee on Tank Cars"

Mr. Long noted that several items recommended for review by MCA by the AAR Committee on Tank Cars' Subcommittee on Specifications in their May 3-5, 1971 meeting have been received and MCA review initiated. Several other similar requests from that Subcommittee have not been received to date.

The Secretary reported that Mr. Long has been appointed a member of the Committee on Tank Cars by the General Committee of the AAR Mechanical Division, succeeding Mr. Anderson as MCA's representative.

Mr. Long commented that the next meeting of the Committee on Tank Cars has been scheduled for November 10-11 in Chicago, Illinois; it will be preceded by a meeting of the Subcommittee on Specifications on November 9.

(continued on agenda)

6. TE-C-337 "Tank Car Research Committee"

At the invitation of Mr. Long, Mr. Heller, also chairman of the Tank Car Research Committee, reviewed briefly recent developments in reports released by the RPI-AAR Tank Car Safety Research and Test Project.

The fire exposure tests on fifth scale and full scale tanks to be conducted jointly by the Test Project and Federal Railroad Administration this coming winter at White Sands Proving Grounds, New Mexico were discussed. The series of tests being developed by the RPI-AAR Project to determine the flow capacity of safety relief valves in both vapor and liquid phase exposures was also reviewed. It appears that the RPI-AAR Test Project may ask for comments on the procedure for the proposed safety relief valve flow tests. The Committee requested an opportunity to review this proposed test program if it is made available.

A member reported that copies of the RPI-AAR Test Project contract study for the Federal Railroad Administration on head shields are available from the FRA.

After discussion, ON MOTION, duly made and seconded, the Committee APPROVED a recommendation that MCA transmit a letter to RPI-AAR Tank Car Safety Research and Test Project requesting that an opportunity be given for review and comment in MCA of final reports developed by the Project incorporating conclusions of recommended revisions to the specifications for tank cars on the Hazardous Materials Regulations prior to the release of such reports.

Mr. Curtis and Mr. Anderson were recorded as opposed to the foregoing recommendation.

(continued on agenda)

7. TE-C-209 "Tank Car and Hopper Car Mileage Compensation"

Mr. Clark commented there were still two unresolved issues in I & S 8406 and 8407. The first issue involves updating reproduction costs, a factor in determining mileage allowance levels, to reflect increases due to inflation. This issue was

included in a guideline which the ICC now claims is not enforceable and which, without an explicit ICC decision, the railroads appear unwilling to adopt.

The second issue involves raising the \$25,000 upper value limit arbitrarily set by the ICC for determining mileage allowance levels. Present typical costs of tank cars are approaching this upper limit; in addition, there are more than 2,000 cars now in service with purchase prices ranging from \$25,000 to \$160,000. The present maximum value limit of \$25,000 thus depresses the real value base and consequent mileage allowances provided for such cars.

The T&D Committee has recommended that MCA petition ICC to have both these situations corrected. The MCA Board of Directors has authorized another assessment based on tank cars in chemical service to provide the funds necessary to present and support the MCA petition. Assessment of member companies is presently under way.

(continued on agenda)

8. TE-C-211 "Packaging and Transportation Liaison Group"

Mr. Long reported there had been no recent activity in this group for report to the Committee.

(continued on agenda)

9. TE-C-223 "Personnel"

The Committee recommended R. R. Roch, International Minerals and Chemical Corporation; J. C. Graves, Celanese Corporation; G. A. Thompson, Shell Chemical Company; and G. B. Knox, Hercules Incorporated to the MCA Board of Directors for appointment to membership on the Committee.

The Committee deferred consideration of the remaining nomination pending indication of interest in Committee activities on the part of the nominee.

10. TE-C-324 "DOT - Hazardous Materials Regulations"

There was brief discussion of the following DOT Notices: HM-89, HM-90, HM-91 and HM-92.

(continued on agenda)

11. The Policy Advisory Subcommittee was requested (1) to review the commodity data form formerly utilized in the Committee when considering new projects with regard to the possibility of including shipping experience in the information requested and (2) consideration of reinstituting use of this form.

12. Secretary's Report

- (a) The Secretary noted that F. L. Byrom, Koppers Company, has been re-appointed the Board liaison representative to the Committee.
- (b) Since the last meeting of the Committee, the Safety and Fire Protection Committee has released drafts of the following Chemical Safety Data Sheets for review and comment:

SD-27 - Phosphorus Trichloride  
SD-98 - Allyl Chloride  
SD-99 - Isopropyl Alcohol  
SD-56 - Vinyl Chloride

The following new or revised Chemical Safety Data Sheets have been published since the April 19-21, 1971 meeting of the Committee.

SD-18 - Ethylene Dichloride  
SD-38 - Ethylene Oxide  
SD-24 - Perchloroethylene  
SD-97 - Diethylamine

13. OSHA Standards

In response to several requests from Committee members for report on status of MCA review of the regulations promulgated under the Occupational Safety and Health Act by the Department of Labor, the Secretary reported that the primary area in MCA for review of these regulations has been assigned to the Safety and Fire Protection Committee and the Occupational Health Committee, as appropriate. If the occasion develops where either of these committees need expertise beyond their resources, they will call upon the other committees of the Association for assistance as needed in accordance with usual MCA practice.

Where sufficient and significant interest exists in MCA, these committees have the organizational capability to set up the necessary review. Current procedure is if the change is needed in the referenced standard, then the change will be progressed with the sponsoring organization. However, if the change is needed because of the manner in which the standard was adopted,

then the changes will be progressed through the proper channels in the Department of Labor. Several such reviews are already in progress.

MCA recently addressed a request to G. C. Guenther, Assistant Secretary of Labor, recommending that appropriate liaison be established between MCA and the Department of Labor and asking that a labor contact be nominated. After consideration and in response to the request, Mr. Guenther nominated Mr. J. J. LaRocca as a liaison representative between MCA and the Department. Several conversations between Mr. LaRocca and MCA representatives have already occurred in the development of this liaison opportunity.

14. Inter-Association Review Committee on Safety Relief Devices

At the request of Mr. Long, Mr. Heller, as chairman of the Inter-Industry Review Committee on Safety Relief Devices, reviewed the background leading to the establishment of this ad hoc committee and the current status of the review of the Cornell Aeronautical Laboratory study on Safety Relief Devices. The Inter-Association Review Committee has been conducting a study of existing fire test data in efforts to develop either correlation for the existing relief valve flow capacity equation or develop a new flow capacity equation. A final report of the Committee's studies is in draft and will be released to the represented trade associations in the very near future for their respective consideration and presentation to DOT in discussion of the Cornell Aeronautical Laboratory report.

The Secretary has attended the three meetings that have been held of this committee. He also reported that good response was received from the Engineering Advisory and the Transportation Equipment Committees to his July 2, 1971 letter presenting the then proposed Inter-Association Review Committee on Safety Relief Devices for review and comment. The responses generally recommended that MCA participate in the committee's activities, but that decision of financial participation on the part of MCA to assist in defraying expenses of technical consultants be deferred until the need arises and more details are available. To date, the Committee has not found it necessary to engage technical consultants for assistance in progressing the considerations of this Committee. Thus the question of financial participation on the part of MCA has not been presented or progressed for final decision.

The Secretary assigned Docket TE-R-101.11 "Inter-Association Review Committee on Safety Relief Devices" for the purposes of recording MCA's activities in this Committee.

15. CHEMTREC

Mr. Zercher discussed recent activities in the MCA Chemical Transportation Emergency Information Center (CHEMTREC) which became operational September 5, 1971. To date, more than 30 calls have been received on actual accidents and incidents involving everything from leaking drums to derailed tank cars.

It was noted that the toll free number of the Center (800-424-9300) was limited to the continental United States and that the number for calls placed within the District of Columbia (202-483-7616) was also available for calls originating in Canada.

16. ON MOTION, duly made and seconded, the Committee unanimously recognized that this was the last meeting of one of our most faithful and valued members, W. F. Rash, and wished him the best of health, happiness and good fortune for many years to come.

17. The Secretary was requested to convey the sympathy of the Committee to C. T. Graves on the passing of his wife on October 17, 1971.

18. D. M. Long reviewed the Association policy discouraging hospitality functions in connection with Committee meetings. Recognizing the undesirability of hospitality arrangements from non-member company representatives, the Committee was apprised that steps are being implemented to assure their discontinuance.

19. On October 26, Mr. Harvison presented a film made available to NTTC by Trailmobile, Inc., reporting on studies they had conducted in scale model tanks of surge in baffled and unbaffled transport tanks.

Mr. Zercher also presented on October 26 a series of slides available through The Chlorine Institute describing the procedures for using the chlorine emergency kits for tank cars and tank trucks.

20. Future Meetings

Rail Subcommittee - March 15, 1972, MCA Conference Room  
Washington, D. C.

Truck and Portable Tank Subcommittee - March 22, 1972  
MCA Conference Room, Washington, D. C.

Transportation Equipment Committee - April 24-26, 1972  
Shanango Inn, Sharon, Pennsylvania

(in conjunction with an invitation to visit the tank  
car manufacturing repair facilities of General  
American Transportation Corporation).

Transportation Equipment Committee - October 9-11, 1972  
Le Chateau Champlain, Montreal, Quebec  
Canada

Marine Transportation Subcommittee will meet at the call  
of the chairman because of several pending proposals not  
yet released which will require expeditious consideration  
for development of recommended MCA response.

This meeting of the Committee adjourned at 12 noon October 27.

*W. H. Butterbaugh*

W. H. Butterbaugh, Secretary

Minutes Subject to Approval:

November 22, 1971

WHB:cm

cc: Mr. F. L. Byrom  
Mr. R. D. Lambert