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April 18, 1995

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Hasmukh C. Shah, Ph.D.
Manager, Vinyl Chloride Panel
Chemical Manufacturers Association
2501 M Street, N.W.
Washington, D.C. 20037

Re: Letter to AAR Requesting that AAR Institute a
Proceeding to Consider Standard for Rail Tank Cars in
VCM Service.

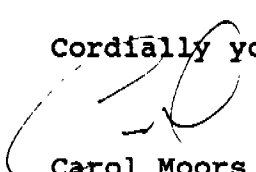
Dear Has:

Attached please find a second draft of the letter to the
Association of American Railroads requesting the AAR to institute
a proceeding to consider a standard for rail tank cars in vinyl
chloride service.

This letter has been slightly revised based on the comments
received to the first draft at the recent Vinyl Chloride Panel
meeting. I have received no other comments since the meeting.

You should probably check with Frank to verify when the Tank
Car Committee needs to receive this request to consider it at the
upcoming summer meeting. If you have any questions, please give
me a call.

Cordially yours,


Carol Moors Toth

cc: Peter de la Cruz

CMA 110321

DRAFT

FOR DISCUSSION AND REVIEW ONLY
NOT FOR RELEASE

August 26, 1994

Mr. Paul Kinnecom
Association of American Railroads
Manager of Freight and Tank Car Design
50 F Street, N.W.
Washington, D.C. 20001

Dear Mr. Kinnecom:

A task force comprised of the members CMA Vinyl Chloride Panel's Vinyl Chloride Transportation Network (VCNet) has been reviewing the growing importance attached to the emergency response capabilities of tank cars. There was a docket, T94.10-84, that requested the Tank Car Committee to take the initiative of encouraging the use of cover plates that will accept emergency response equipment for all new car construction. This docket was closed, with no action taken, because of insufficient response from the various shipper groups.

We feel it is timely to reopen this docket. The importance of providing for emergency response has changed for many shippers. Member companies have made commitments to implemented Responsible Care Codes of Management Practices. This dictates that the number and consequences of non-accident releases be reduced. Steps that can be taken would be for spacing of valves and fittings on cover plates for new cars be designed to accept emergency response cover cans. The illustration of the standard 18" manway cover plate in Appendix E (E8.1) should conform to the recommendation of Figure 3.1 or 3.2 of the CGA's Pamphlet P-10. The 20" manway arrangement should conform to Figure 2.1 of the CGA's Pamphlet P-10. The gaging device mounting shown on Figure E9.7 will have to be supplemented to show a mounting with 4 3/4" holes on a 3 1/4" bolt circle and also a 2" NPT mounting.

The AAR is to be commended for its efforts to encourage railroad safety. This request is consistent with that objective.

Yours truly,