August 21, 1995

Mr. Paul G. Kinnecom
Manager, Freight & Tank Car Design
Association of American Railroads
50 F Street, N.W.
Washington, D.C. 20001-1564

Re: Request for Instituting Proceeding to Consider Standard for Rail Tank Cars in VCM Service

Dear Mr. Kinnecom:

Attached please find a letter revising CMA's July 7, 1995 letter on this issue. This second revised letter amends the proposed standard for manway cover plates (Section III of the letter) currently being considered by the Vinyl Chloride Panel to specify that all new tank cars for use in VCM service should have a minimum twenty inch manway cover. The standard currently states that the cover should be twenty inches. The Panel believes that this amendment will provide VCM shippers and car manufacturers with more flexibility in terms of car design, while not adversely affecting the effectiveness of the emergency capping kit.

Sincerely,

Has Shah

Hasmukh Shah, Ph.D.
Manager, Vinyl Chloride Panel

Attachment

cc w/attachment:

O.C. Baker
Larry Brawn
Curt Cooper
William Finn
Robert A. Mathews
Lanny Near
Jerry Portis
Dennis Richmond

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Dear Mr. Kinnecom:

The Chemical Manufacturers Association's (CMA) Vinyl Chloride Panel (the Panel) respectfully requests that the Tank Car Committee of the Association of American Railroads docket for its July, 1995 meeting a proposal to standardize manway cover plates used on newly constructed rail tank cars handling Vinyl Chloride Monomer (VCM). Adoption of such a standard would help to ensure that all newly constructed rail tank cars in VCM service are capable of accepting an emergency capping kit.

Emergency capping kits are utilized to contain leaks from manways on rail cars. At present, the VC Panel is only aware of one commercially available kit, which is manufactured by Midland Manufacturing, Inc. This kit currently is not capable of fitting all rail tank cars in VCM service. There may be other manufacturers of transfer kits that the Vinyl Chloride Panel is not aware of. The Panel urges AAR to consider whether other manufacturers exist prior to adoption of any standard.

I. Historical Background

In the last decade there has been an increased emphasis on safely and responsibly transporting, storing and handling hazardous materials such as VCM.[1/] As part of this effort, CMA member companies have adopted programs to implement the Responsible Care® Distribution Code of Management Practices,

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1/ VCM is regulated by the Department of Transportation as a flammable gas (hazard class 2.1) and it is regulated by the Environmental Protection Agency as a hazardous substance with a reportable quantity of one pound.

which, among other goals, seek to reduce the number and consequences of non-accident releases.

To ensure the safety of transport personnel and the general public, it is critical that steps be taken to eliminate the possibility of a leak that cannot be promptly contained. VCM shippers are committed to supporting the development of a standard for rail tank cars that would eliminate the problem of ill-fitting capping kits.

II. Current VCM Shipping Environment

Based on a survey of VCM shippers conducted by the Panel over the last year, there are about 2100 rail cars in the VCM fleet. Most of these consist of three different types of tank cars -- DOT Spec. 105J300W, 112J340W and 112T340W. At least 21% of the fleet does not accept the current kit; we do not have information for approximately 35% of the fleet. The current emergency capping kit is satisfactory for the remaining part of the fleet.

The current VCM cars have either 18" or 20" manways and are equipped with ball or gate valves. The available emergency capping kit is designed to fit 20 inch manways with gate valves. This kit does not properly fit the manways of the cars in the VCM fleet that use some types of ball valves. After minor adjustments, this kit fits some, but not all, 18 inch manways, depending on the types of valves used. For some cars, valves are easily replaced so that the kit will adequately fit. For other cars, it is necessary to replace the entire pressure head of the manway because there is inadequate spacing to accommodate new valves.

To remedy this problem, the Panel believes that the manways for newly constructed rail tank cars in VCM service should be standardized to be compatible with commercially available emergency capping kits.

III. Proposed Standard

Based on the foregoing information, the Vinyl Chloride Panel urges the Tank Car Committee to docket the following proposed standard for consideration:

All new tank cars for use in VCM service should have a minimum 20 inch manway cover having a 25 inch bolt circle for attaching to the manway nozzle. Existing cars with 20 inch manway nozzles should use the same arrangement as new cars.

The fitting arrangement for new DOT 105A and 112/114 cars should conform to the following recommendations:

1) Large Capacity Safety Valve should be located on the transverse centerline approximately on liquid/vapor valve circle oriented so that bolt holes are 45 degrees from transverse centerline. This valve must not exceed the limiting outline of 7 3/8 X 7 3/8 inches.

2) Small Capacity Safety Valve should be located on the transverse centerline approximately on the liquid/vapor valve circle. The valve must not exceed 7 X 7 5/16 inch limiting outline.

3) Liquid/Vapor Valve limiting dimensions should not exceed 7 inches (with plugs and handles removed) and valve circle must not be less than 7 1/4 inch radius.

4) Gaging device should be located approximately centered on manway cover.

5) The sampling device and the thermowell should be located in such a manner that they will readily accept an emergency capping kit.

* * *

We appreciate your consideration of this proposed standard and look forward to working with the Committee on this issue. If you have any questions regarding this request, please give me a call at 202/887-1192.

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CHEMICAL MANUFACTURERS ASSOCIATION

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CMA 023895

2501 M Street, NW, Washington, DC 20037 Telephone 202-887-1100 Fax 202-887-1237

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