

P. G. Kinnecom Executive Director - Tank Car Safety

August 8, 2001

CASUALTY PREVENTION CIRCULAR

(CPC-1122)

SUBJECT:

Top Ten Best Practices for Rail Shippers

T100-01

TO MEMBERS AND PRIVATE CAR OWNERS:

Attached hereto is a document entitled "Top Ten Best Practices for Rail Shippers". This document was developed by an inter-industry task force from Region 1 of the American Chemistry Council's Responsible Care Program. This task force is made up of partner companies from the rail and chemical industries and was tasked with developing guidelines for the proper rail transportation of hazardous materials. Each industry segment (highway, rail, fixed facility) was tasked with developing recommended practices that would reduce non-accident releases, improve emergency response communication, and reduce the probability of incidents and accidents in hazardous materials transportation. These "Best Practices" were presented to the AAR Hazardous Materials (BOE) Committee, who agreed that these guidelines should be distributed as an AAR Circular Letter.

The document was developed primarily to address hazardous materials in tank cars; however, the recommendations should also be considered for other shipments, as may be applicable.

Sincerely,

P. G. Kinnecom

TOP TEN BEST PRACTICES FOR RAIL SHIPPERS

- Develop and implement a securement policy which includes pre-loading inspections, post-loading inspections and corresponding safety checklists.
 - Special attention should be given to ensure that no overloading of railcars occurs, especially hazardous materials.
- 2. Perform extra inspections of valves and manways for tightness (one of the leading causes of leaks/spills in rail transportation incidents).
 - a) After loading, leak-test the car by applying at least 10 psig of pressure over the maximum estimated transportation pressure. All valves, packing gland nuts, closures and flanges should be checked using leak detection solution or ultrasonic instrument. After completing the leak test, pressure should be released or reduced.
 - b) If a pressure test is impractical or unsafe, the car should be held and re-inspected after twenty-four (24) hours, and valves and fittings tightened as needed to ensure proper securement.
- 3. Review shipping papers to ensure the proper information is provided.
 - a) Promote Electronic Data Interchange (EDI) for all shipments.
- 4. Ensure that proper placarding is maintained for all railcars.
 - a) Shippers should eliminate using paper placards whenever possible.
- 5. For Canadian shipments, ensure that the Emergency Response Plan is correct and updated for plant sites and transportation related releases.
 - a) Ensure that the Emergency Response Plan is exercised annually (drill).
 - b) Shippers must show proper ERP number and associated telephone number on dangerous goods subject to the EDP requirements of Transport Canada.
 - c) Ensure that emergency contacts and telephone numbers for the railroad and plant site are correct and updated regularly.
- 6. Key training programs should be implemented to:
 - a) ensure that all railroad personnel who enter a plant site are properly trained and/or receive orientation (especially for emergency actions).
 - b) establish, document, communicate and implement a company-wide tank car securement training program.
 - c) establish, document, train and implement a procedure for tank car customers to report poor securement, hard-to-operate valves and other fitting problems.
 - d) establish, document, train and implement company-wide preventive maintenance practices for tank cars.
- 7. Ensure that all rail crossings within the plant site are properly marked with warning signs.
- 8. Ensure rail lines are clear, switches are aligned properly, and car brakes are released before moving cars.
- Have plant personnel closely observe rail crews when they are operating within a plant site to assure plant and rail safety are being maintained.
- 10. Have a documented routine process for providing feedback to the rail carrier.