


HAZARDOUS MATERIALS GUIDANCE

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Summary:

The purpose of this Hazardous Materials Guidance (HMG) document is to describe the Federal Railroad Administration's (FRA) policy addressing tank car "spray-on" thermal protection systems.

Discussion:

Very few U.S. Department of Transportation (DOT) specification 112T and 114T tank cars remain in service and, with the increasing age of such cars, shippers and car owners are advised to inspect the cars for thinning, missing, or damaged spray-on thermal protection. FRA inspectors have reported finding cars with large sections of the spray-on thermal protection system missing, and on one occasion, the thermal protection was not of the proper thickness. Tank cars found with thinning, missing, or damaged spray-on thermal protection are not in compliance with Title 49 Code of Federal Regulations (CFR) parts 173 and 179 and must be removed from service until repaired.

Inspectors are reminded to cite §§ 173.31(a)(1) and 179.18, when tank cars are found with thinning, missing, or damaged spray-on thermal protection systems. Specification 112T and 114T cars found with bubbles in their spray-on thermal protection systems (but with their thermal protection systems otherwise intact) should not be cited. However, the car owner and/or shipper should be advised that the bubble(s) may at some point fail and expose the tank to fire in the event of a derailment. It is recommended that cars with bubble(s) be repaired.