



National Transportation Safety Board

Washington, D. C. 20594

Safety Recommendation

Log I-90B

Date: October 24, 1988

In reply refer to: I-88-6

Ms. M. Cynthia Douglass
Administrator
Research and Special
Programs Administration
U.S. Department of Transportation
Washington, D.C. 20590

On September 8, 1987, a New Orleans Terminal (NOT) crew moved six tank cars of butadiene from the NOT's Oliver Yard in New Orleans, Louisiana, and at 7:35 p.m. placed them on track No. 3 of the CSX Transportation's (CSXT) Terminal Junction Interchange Yard (interchange yard) for delivery to the CSXT. About 1:50 a.m. on September 9, 1987, butadiene leaking from one of the tank cars was ignited and the resulting flames rising about 100 feet into the air engulfed both bridge spans of Interstate 10. The fire receded to the leaking tank car where it burned beneath the tank car until 1:55 p.m. on September 10, 1987. During the emergency, more than 200 city blocks were evacuated affecting 800 to 1,000 residents.¹

The Research and Special Programs Administration (RSPA) of the Department of Transportation (DOT) issued on March 16, 1984, an advance notice of proposed rulemaking (ANPRM) (Docket HM-126C, Notice No. 84-2) that sought comments on the need for improving the communication of accurate information on hazardous materials when they are involved in transportation incidents. This rulemaking questioned the adequacy of many present requirements including the reliance on CHEMTREC² for providing technical information on hazardous materials beyond that contained in emergency response guidelines. In response to this rulemaking notice, the Chemical Manufacturer's Association acknowledged that "in some cases, personnel at the scene of an incident need more information than is provided in the DOT's Emergency Response Guidebook (ERG)." It stated, "That is precisely why CHEMTREC was established and why DOT recommends a call to CHEMTREC for detailed information and assistance."

¹For more detailed information, read Hazardous Materials/Railroad Accident Report--Butadiene Release and Fire from GATX 55996 at the CSX Terminal Junction Interchange, New Orleans, Louisiana, September 8, 1987 (NTSB/HZM-88/01).

²CHEMTREC is a voluntary service established by the Chemical Manufacturer's Association to provide information to persons responding to chemical emergencies.

On July 11, 1984, the National Transportation Safety Board commented on the ANPRM advising that during the early minutes of an emergency, many critical decisions must be made about the adequacy of evacuation zones, whether or not to continue actions directed toward the hazardous materials incident, and what specialized actions and materials should be used in any continuing efforts. To aid in making these critical, early decisions, material-specific information is often necessary. The Safety Board also advised that CHEMTREC is unable to provide from its "Chem Cards" certain of the urgent information needed by emergency responders and that the greatest value of CHEMTREC is and will continue to be its ability to gain rapid access to product-specific technical specialists, to bridge communications among several response and private sector agencies, and to rapidly alert private sector and government hazardous materials response teams. The Safety Board encouraged RSPA to consider how and by what manner improved product-specific information can be made available immediately to responding emergency agencies.

On August 20, 1987, after reviewing comments to the ANPRM, the RSPA issued a notice of proposed rulemaking (NPRM) (Docket HM-126C, Notice No. 87-10) proposing, in part, a requirement that persons offering hazardous materials for transportation provide a 24-hour telephone number of a person having detailed knowledge, or having immediate access to a person with detailed knowledge, of the hazardous characteristics of the hazardous materials being shipped. As proposed, a telephone number such as CHEMTREC could be used on the shipping paper to satisfy this requirement if the shipper has previously provided CHEMTREC with information on the properties and hazards of the hazardous materials being shipped.

On September 22, 1987, the Safety Board commented on the NPRM advising, in part, that the Safety Board supported the proposed requirements for immediate emergency response information and emergency response telephone numbers on shipping papers. The Safety Board cited a previous accident report that involved the inability of local response personnel to immediately obtain product-specific information.³ In that report, the Safety Board stated:

The circumstance which separates any hazardous materials transportation accident from other accidents is the immediate need for specialized information, expertise, and equipment. No matter how extensive the Federal or State response network may be, it always will be the local emergency response network that must deal initially with the uncertainties of the threat. Local emergency response personnel must be able to assess quickly the threat posed to public safety by the materials involved and to acquire the appropriate resources to mitigate the threat.

On April 11, 1988, the RSPA advised the Safety Board of the NPRM it had published on August 20, 1987, and explained that it proposed requiring:

that a person offering hazardous materials for transportation (originating shipper) provide a 24-hour telephone number of a person having detailed knowledge, or having immediate access to a person with detailed knowledge, of the hazardous characteristics of the

³Hazardous Materials Accident Report--*Overtturn of a Tractor-Semitrailer Transporting Torpedoes, Denver, Colorado, August 1, 1984* (NTSB/HZM-85/02).

material being shipped. This person must have the knowledge and ability to communicate and assist in the mitigation of an incident to a much greater degree than the immediate information carried on a vehicle or placed in a facility. As proposed, the shipper will have the option of using his name and number or using a telephone number such as that of CHEMTREC to satisfy this requirement if the shipper has previously provided CHEMTREC with information on the properties and hazards of the materials being shipped. This option will provide the shipper with flexibility in selecting a name and number which will ensure 24-hour availability of knowledgeable assistance.

CHEMTREC assisted emergency responders during the New Orleans accident by providing general emergency response information, by providing basic information on the properties of butadiene, by advising that the early product identification likely was in error, and by assisting in the identification of the shipper and consignee. Although CHEMTREC was able to locate a person knowledgeable of product-specific information on butadiene, this could not be accomplished timely because CHEMTREC did not have a telephone number for Mitsui & Company (USA) Inc. CHEMTREC does and can continue to provide several important services to assist communities, the chemical industry, and the transportation industry; however, it is not now able to provide promptly the product-specific information often needed during the early minutes after a release of hazardous materials.

As proposed, the RSPA rule for providing on the shipping paper a 24-hour emergency telephone number does not state that the use of the CHEMTREC number would satisfy the requirement; however, the RSPA states in its discussion of the rule that the use of the CHEMTREC number would satisfy the requirement if the shipper had provided CHEMTREC with information on the properties and hazards of the materials being shipped. The RSPA establishes no criteria or standards to identify the types, format, or detail of the information which must be provided to CHEMTREC and it does not require that CHEMTREC be provided an emergency telephone number for each shipper submitting information to CHEMTREC.

The Safety Board agrees with the proposed rule and encourages the RSPA to progress expeditiously this proposal to a final rule. The Safety Board believes that if the CHEMTREC telephone number is permitted on shipping papers to satisfy the intent of the 24-hour emergency telephone number requirement, then the RSPA must define the types, format, and detail of information required to be filed with CHEMTREC and that CHEMTREC be provided with a 24-hour telephone number for the shipper.

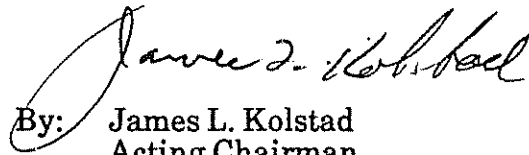
Therefore, the National Transportation Safety Board recommends that the Research and Special Programs Administration:

Define explicitly in the final rule of Docket HM-126C the information that must be provided to CHEMTREC before a shipper of hazardous materials can list on its shipping documents the CHEMTREC emergency telephone number in lieu of its 24-hour emergency telephone number. (Class II, Priority Action) (I-88-6)

Also as a result of its investigation, the Safety Board issued Safety Recommendations I-88-3 and -4 and R-88-55 to the city of New Orleans, R-88-56 and -57 to the Norfolk Southern, I-88-5 to the New Orleans Public Service, Inc., R-88-58 through -64 to the Federal Railroad Administration, R-88-65 to the General

American Transportation Corporation, R-88-66 and -67 to the Mitsui & Company (USA) Inc., R-88-68 to the GATX Terminals Corporation, R-88-69 to the National League of Cities, and R-88-70 to the National Governors' Association.

KOLSTAD, Acting Chairman, and BURNETT, NALL, and DICKINSON, Members, concurred in this recommendation. LAUBER, Member, did not participate.


By: James L. Kolstad
Acting Chairman