



# National Transportation Safety Board

Washington, D.C. 20594

Office of the Chairman

December 9, 1998

Honorable Kelley S. Coyner  
Administrator  
Research and Special Programs Administration  
Washington, D.C. 20590

Dear Ms. Coyner:

Thank you for your August 20, 1998, letter about Safety Recommendations I-92-1 and -2. The National Transportation Safety Board issued the recommendations as a result of its investigation of the December 11, 1990, collisions and fire on Interstate 75 near Calhoun, Tennessee.

Safety Recommendation I-92-1 asked the Research and Special Programs Administration (RSPA) to require that attachments to all U.S. Department of Transportation (DOT)-authorized hazardous materials packagings be designed to minimize the risk of puncturing other hazardous materials packagings during an accident situation.

The Safety Board notes that RSPA intends to address this recommendation in the Notice of Proposed Rulemaking, Docket HM-220, "Requirements for Cylinders." However, this recommendation addresses attachments on all DOT-authorized packagings. In 1990, the Safety Board investigated an accident in Collier County, Florida, in which a cylinder containing poison gas was punctured by a steel plate attached to another cylinder. As a result of that investigation, the Safety Board issued Safety Recommendation I-90-7 on March 23, 1990, urging RSPA to:

Require that attachments to cylinders be designed to reduce to a minimum the risk of puncturing other cylinders during transportation.

In 1992, Safety Recommendation I-90-7 was superseded by I-92-1 because the December 11, 1990, accident in Calhoun, Tennessee, demonstrated that the potential for punctures from appurtenances extends to other types of hazardous materials containers, such as portable tanks. Therefore, the Board believes that RSPA should expand its proposed rulemaking to require that attachments to all DOT-authorized hazardous materials packagings be designed to minimize the risk of puncturing other packagings during an accident situation. The Safety Board is disappointed that RSPA's current response does not address all DOT-authorized hazardous materials packagings, and that no regulatory action has been taken on this recommendation since 1993. We urge RSPA to aggressively pursue regulatory action. Pending publication of a final rule to address this issue, Safety Recommendation I-92-1 is classified "Open—Unacceptable Response."



Safety Recommendation I-92-2 asked RSPA to revise requirements for pressure-relief venting on U.S. DOT-specification 57 portable tanks used to transport dicumyl peroxide and other products with similar rapid decomposition characteristics to ensure that the pressure-relief systems prevent overpressure rupture of tanks from a rapid product decomposition reaction.

The Safety Board notes that RSPA, in cooperation with the Organic Peroxide Producers Association, is developing a method of determining the minimum vent size for organic peroxides. But we are again disappointed that no regulatory action has been taken on this recommendation since 1993. The Safety Board again urges RSPA to aggressively pursue regulatory action. Pending revision of the requirements for pressure-relief venting of U.S. DOT-specification 57 portable tanks, Safety Recommendation I-92-2 is classified "Open—Unacceptable Response."

Sincerely,



Jim Hall  
Chairman

cc: Mr. Robert Clarke, Safety and Health Team Leader  
Office of Transportation Policy Development