

November 22, 2011

The Honorable Deborah A. P. Hersman
Chairman
National Transportation Safety Board
490 L'Enfant Plaza, SW
Washington, DC 20594

Dear Chairman Hersman:

Thank you for your September 2, 2011 letter summarizing the NTSB investigation of a rollover accident that occurred on October 22, 2009, outside of Indianapolis IN. This particular incident involved a DOT Specification MC331 cargo tank motor vehicle carrying 9,000 gallons of liquefied petroleum gas. The accident resulted in injuries to the commercial truck driver and members of the general public and caused damage to a bridge overpass. In response to this accident, The Safety Board issued recommendations to the Pipeline and Hazardous Materials Administration (PHMSA). The recommendations along with PHMSA's responses are discussed below.

H-11-4

Work with the Federal Motor Carrier Safety Administration, as appropriate, to develop and disseminate guidance to assist hazardous materials carriers in implementing comprehensive cargo tank motor vehicle rollover prevention programs, including the active participation of drivers, dispatchers, and management through training, loading practices, delivery schedules, and acquisition of equipment.

Since receiving the NTSB letter, PHMSA has met with FMCSA to discuss strategies for developing and disseminating guidance as it relates to cargo tank rollovers. FMCSA, in partnership with PHMSA and the National Tank Truck Carriers (NTTC), developed the Cargo Tank Driver Rollover Prevention video as a training tool. This video was made available August 3, 2010 and has been accessible through FMCSA and PHMSA websites as well as through distribution of a DVD to motor carriers that were identified as transporting hazardous materials in cargo tank motor vehicles. Since going live, there have been approximately 60,000 viewings of the video from the Department websites. Additionally, NTTC recently provided an updated version of the video to including Spanish subtitles to accommodate the ever-growing population of Spanish-speaking commercial motor vehicle drivers.

PHMSA and FMCSA discussed the possibility of expanding the scope of the video to make it a more comprehensive training tool. FMCSA is currently reviewing the feasibility of this and other training and outreach options to aid drivers and companies in avoiding rollover accidents. In the meantime, PHMSA and FMCSA, in partnership with NTTC continue to promote use of

the video as a training tool, and FMCSA showcased the video on its website to celebrate the first anniversary of its release. Also, PHMSA will consider other strategies to aid development and dissemination of any further guidance such as having PHMSA's Hazardous Materials Safety Assistance Team (HMSAT) work with the Commercial Vehicle Safety Alliance's Training and Hazmat Committee to explore alternatives. PHMSA will continue to work with FMCSA throughout this process and will update NTSB accordingly.

H-11-5

Conduct a comprehensive analysis of all available accident data on U.S. Department of Transportation specification cargo tanks to identify cargo tank designs and the associated dynamic forces that pose a higher risk of failure and release of hazardous materials in accidents. Once such cargo tanks have been identified, study the dynamic forces acting on susceptible structures under varying accident conditions and develop performance standards to eliminate or mitigate these risks.

H-11-6

Once the performance standards in Safety Recommendation H-11-5 have been developed, require that all newly manufactured cargo tanks comply with the performance standards.

PHMSA shares NTSB's goal of identifying cargo tank designs that pose a higher risk of failure and the potential release of hazardous materials in an accident. PHMSA is the sponsor of the Hazardous Materials Cooperative Research Program (HMCRP) that is managed by the National Academies acting through the Transportation Research Board (TRB). One on-going HMCRP project, HM-07 - Accident Performance Data of Bulk Packages Used for Hazardous Materials Transportation, will help PHMSA respond to these recommendations. The objectives of this research are to: (1) recommend methodologies for collecting and analyzing performance data for U.S. DOT-specified hazardous materials bulk packages (e.g., portable tanks and cargo tank motor vehicles); and (2) identify and evaluate institutional barriers to data collection and recommendations for overcoming these barriers. The HMCRP project HM-07 is expected to be completed by late spring 2012. PHMSA will update NTSB on the progress of this research as it relates to the recommendations.

PHMSA appreciates the Safety Board's continued efforts to improve transportation safety with regard to rollover accidents involving hazardous materials. If you have questions, concerns, or comments, please feel free to contact me at 202-366-4433.

Regards,



Cynthia L. Quarterman