



NA Rail Logistics
Managing “Bad Order” Chlorine Tank Cars

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Agenda

- Bad Order and Non-Conforming
- Identifying the condition
- Support
- Can the Tank Car be offered for Transportation?
 - Repair/Replacement Required
 - Preparation – Time, Material, & Resources
 - AAR (Association of American Railroads) Certified Repair or Replacement
- Movement Approval Needed?
 - FRA approval required to move
 - Service Equipment (angle valve, PRD) – Hazardous Material OTMA
 - Safety Appliances (brakes, ladders, end platforms, etc.) – MP&E (Motive Power & Equipment) Movement Approval
- Render Safe for Transportation – Purge and Clean?

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Was it Bad Ordered or Non-Conformance?

- **Why was the tank car “bad ordered”?**
- Damage to the tank car?
 - Derailment
 - Sideswipe
 - Damage to safety appliances
- Did a leak occur?
 - Angle Valve
 - Pressure Relief Device
 - Unloading piping/connection
- Get Olin involved immediately upon identification of an issue with the tank car

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Can the Tank Car be Offered for Transportation?

- Did a leak (or suspected leak) occur on the service equipment? May require:
 - Additional troubleshooting
 - AAR Certified repair or replacement
 - AAR Certified leak testing
 - Use of 3rd Party Mobile Repair Units or other contractors
- Preparation for Repair
 - Resources
 - Most repair/replacement of service equipment on a chlorine car requires that the car be unloaded and placed under vacuum.
 - This may require additional movement or holding at unloading rack.
 - Time Consuming – Entire process can take 30-45 days to complete
 - Materials – Replacement valve(s), fasteners, gaskets, etc.

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Can the Tank Car be Offered for Transportation?

- Movement Approval Needed
 - Service Equipment (angle valve, PRD) – Hazardous Material One Time Movement Approval (OTMA)
 - Non-conforming Loaded or Residue TIH requires OTMA-1 for movement.
 - FRA may approve OTMA-1 but typically railroads will not move approve or accept in interchange.
 - Safety Appliances – MP&E Movement Approval – Time consuming to get approved.
- Purge and Clean
 - If unable to render safe for transportation, the final option is to Purge and Clean the tank car in place.
 - Adds additional time and resources needed to complete
 - Use of High Hazard Emergency Response Contractor to conduct all work.

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- Questions

