



DEPARTMENT OF
TRANSPORTATION
DOCKET OPERATIONS

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NATIONAL ASSOCIATION OF STATE FIRE MARSHALS

March 5, 2015

U.S. Department of Transportation
Dockets Operations, M-30
Ground Floor, Room W12-140
1200 New Jersey Avenue, S.E.,
Washington, D.C. 20590-0001

Re: Comments from the National Association of State Fire Marshals on Docket No. 2013-0225 (HM- 218H) rule identification no. (RIN2137-AF04)

Dear Sir or Madam;

After reviewing the above mentioned document, the National Association of State Fire Marshals agrees and supports the majority of proposed amendments. However we do have specific concern regarding the odorization and non-odorization of LPG in containers being transported.

Based upon a reading of the proposed rule it appears that PHMSA is allowing tank cars and other containers to transport non-odorized LPG to those entities requiring non-odorized LPG. Specifically, the rules allow all transportation container markings to read non-odorized. How will first responders identify and differentiate these cars and/or containers?

Our concern is if a train derails and the car is marked non-odorized LPG, how will first responders identify a leak? Because the container is marked non-odorized LPG and will possibly contain odorized LPG, the first responders will smell the odor and will continue to check other tank cars because of the marking. The odorization amendment requires clarification to eliminate this type of confusion.

We would like to recommend that PHMSA consider improving the odorization threshold distinction and testing for all odorized containers along with required improved record keeping of the odorization and testing. This is intended to ensure that odorization remains active during the transportation phase of the LPG.

We believe with these changes we will better protect the emergency responders and citizens from hazardous materials.

Thank you for accepting these comments and for your strong consideration of our concern.

Sincerely,

Butch Browning, President
National Association of State Fire Marshals