



STATE OF NEW HAMPSHIRE DEPARTMENT OF SAFETY

John J. Barthelmes, Commissioner

Division of Fire Safety

Office of the State Fire Marshal

J. William Degnan, State Fire Marshal

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February 25, 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 New Hampshire Fire Marshal's Office on Docket No. 2013-0225 (HM- 218H)
rule identification no. (RIN2137-AF04)

Dear Sir or Madam;

After reviewing the above mentioned document, the New Hampshire Fire Marshal's Office agrees and supports the majority of proposed amendments, but have a concern regarding the odorization and non-odorization of LPG in containers being transported.

It seems 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.

If you have any questions or would like to discuss these recommendations please call me at 603-223-4289.

Sincerely,

J. William Degnan
J. William Degnan
New Hampshire State Fire Marshal

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