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March 23, 2015

Submitted via regulations.gov
Standards and Rulemaking Division
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Re: PHMSA-2013-0225 (HM-218H)

To whom it may concern:

The Compressed Gas Association (CGA), founded in 1913, is dedicated to the development and promotion of safety standards and safe practices in the industrial, medical, and food gases industry. CGA represents over 120 member companies in all facets of the industry— manufacturers, distributors, suppliers, and transporters of gases, cryogenic liquids, and related products and services. Through a committee system, CGA develops technical specifications, safety standards, and training and educational materials, and works with government agencies to formulate responsible regulations and standards and to promote compliance with these regulations and standards.

CGA respectfully submits the following comments in response to the Pipeline and Hazardous Materials Safety Administration (PHMSA), U.S. Department of Transportation (DOT), Notice of Proposed Rulemaking (NPRM) HM-218H, *Hazardous Materials: Miscellaneous Amendments (RRR)*, published in the Federal Register on January 23, 2015.

P-1605: Petition to Incorporate CGA G-1.6-2011, 7th Edition into 49 CFR

On November 2, 2012, CGA submitted a petition to PHMSA to have CGA G-1.6-2011, *Standard for Mobile Acetylene Trailer Systems*, 7th Edition (G-1.6-2011) incorporated by reference into 49 CFR. The previous edition of G-1.6 was revised in response to recommendations made in the National Transportation Safety Board (NTSB) Special Investigation Report NTSB/SIR-09/01, as a direct result of three mobile acetylene trailer (MAT) accidents that occurred in 2007. Subsequently, this petition request was given a petition number of P-1605 and was assessed by PHMSA to merit a rulemaking and would be included in a future rulemaking in accordance with §106.105.

CGA continues to support the incorporation by reference of G-1.6-2011 which includes requirements for loading of cylinders on a MAT.

Subsection 5.2 of G-1.6-2011 specifically requires:

- Cylinders shall be secured in a vertical position on the trailer in a manner that meets the cargo securement system requirements of 49 CFR 393.102;
- Cylinder valves shall be closed during transit; and
- Positive acetylene pressure not in excess of 15 psig (103 kPa) should be maintained in cylinder leads and manifolds during transit.
 - If trailer piping and fittings are pressurized to greater than 15 psig (103 kPa) during transit, they shall be protected from multi-directional forces that are likely to occur during highway accidents, including rollovers.

Further, subsection 4.3 of G-1.6-2011 requires “Manifolded cylinder valves shall be provided with valve protection meeting the requirements of DOT Hazardous Materials Regulations (see 49 CFR Parts 100-185) [1]. Valve protection shall be retrofitted to existing trailers on or before April 1, 2012.”

Comments on proposed inclusion of CGA TB-25, Design Considerations for Tube Trailers as a requirement for acetylene trailers

In the above noted NPRM, PHMSA requested “specific comment on the inclusion of CGA Technical Bulletin TB-25 to address the structural integrity requirements” of MATs. CGA believes that the use of TB-25 to impose structural integrity requirements on MATs is an incorrect application of this publication.

TB-25 was written to define basic design considerations for new tube trailers, specifically NTSB recommendations H-02-23 and H-02-24 resulting from the Ramona, Oklahoma, tube trailer accident, and was never intended to address the design of MATs (see NTSB HZM-02/02, *Hazardous Materials Accident Report: Release and Ignition of Hydrogen Following Collision of a Tractor-Semitrailer with Horizontally Mounted Cylinders and a Pickup Truck near Ramona Oklahoma*). TB-25 addresses tubes that are mounted horizontally on a trailer chassis whereas acetylene cylinders are required to be mounted vertically with individual valve protection. In addition, while tubes are permanently mounted onto a trailer chassis, acetylene cylinders are not permanently attached to the trailer to allow for periodic resolventing as required by regulations.

Conclusions

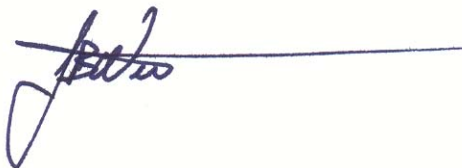
CGA believes G-1.6-2011 addresses all the recommendations of NTSB resulting from their accident investigations and provides appropriate design requirements for MATs. CGA respectfully requests that G-1.6-2011 be incorporated into 49 CFR. Additionally, given that TB-25 was specifically written to address tube trailer design and was never intended to address the design of MATs, CGA respectfully requests that TB-25 not be included as a regulatory requirement to be applied to the design of MATs.

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CGA supports PHMSA's proposed rulemakings to incorporate CGA publications by reference into the Hazardous Materials Regulations (HMR). It is CGA's firm belief that the publications incorporated strengthen the HMR and thereby improve safety in transportation, in the workplace, and to the general public. CGA commends PHMSA's efforts to continuously improve the HMR and appreciates the opportunity to submit these comments on HM-218H. If there are any remaining concerns PHMSA believes require further attention, CGA stands ready and willing to work with PHMSA to resolve these concerns.

Please contact me if you need further information or clarification on these comments.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "JB Wert", is written over a horizontal line.

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