

Regulations.gov will undergo system upgrades and as a result the site will be unavailable Saturday, March 28, from 6:30am through 8am (ET).



Riki Ott - Comment

This is a Comment on the **Pipeline and Hazardous Materials Safety Administration** (PHMSA) Proposed Rule: **Hazardous Materials; Amendments**

For related information, [Open Docket Folder](#) 

Comments Not Accepted

ID: PHMSA-2013-0225-0040

Tracking Number: 1jz-8hvx-iw82

Document Information

Date Posted:

Mar 25, 2015

RIN:

2137-AF04

[Show More Details](#) 

Submitter Information

Submitter Name:

Riki Ott

Comment

I am deeply concerned that PHMSA's current standards are nowhere near safe enough for transport of Unconventional Oil and Gas crude by rail, specifically, Bakken crude and other volatile crude produced by the modern "fracking" techniques.

The newer style, supposedly more robust and safer DOT1232 cars are just as vulnerable to puncture and explosion as the old unsafe DOT-111 cars. In February 2015 27 DOT-1232 tank cars derailed near Mount Carbon, West Virginia. The train was traveling 33 mph, well below the 50 mph speed limit. Still 14 of these newer "safer" tank cars ruptured and exploded. Hundreds of people were forced to evacuate their homes in the bitter cold. Similarly, the bomb train derailment near Galena, Illinois, had the improved cars. Of the eight that derailed, two ruptured and exploded.

In 2014, PHMSA reported 117 oil spills and 535 hazardous spills and vapor releases from DOT-111 tank cars in the U.S. It's time to put the brakes on shipping UOG frack crude-by-rail. Now. It has proven beyond a doubt to be more deadly and costly than we can afford.

We might reconsider moving crude oil by rail only AFTER there are regulations in place to:

Provide more robust tank cars than the already obsolete DOT-1232;

Require that volatile oil will ONLY be shipped in the as-yet-nonexistent safer than DOT-1232 cars;

Degassify the oil BEFORE SHIPPING;

Have shippers or railroads escrow or post bonds of \$50 billion to cover potential accidents (imagine a Lac-Megantic accident scaled up by 100 or 1,000 as a worst case scenario);

Mandate and provide funding for more safety inspections of the railroads;

Mandate NO GO Zones near highly populated areas and within 2 miles of rivers and lakes.

Don't ignore us. We are the ones who have to live with the consequences of your decisions. If you can't afford to adequately ensure safe passage this dangerous crude, then stop shipping it.