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Doug Ower Comment

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

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Comment

I am deeply concerned that PHMSA does not have safe enough standards for transport of crude oil by rail.

Improving standards of railcars alone will not help the problem. Newer style DOT111 appear to be just as vulnerable. Trains derail and all railcars fail including the newer version.

We need to seriously consider a ban on transport of oil by rail because it is too costly and hazardous to people, wildlife, soil, and waterways when a train derails. In 2014, PHMSA reported 117 oil spills and 535 hazardous spills and vapor releases from Dot111 tank cars in the U.S.

If a ban on transporting oil by rail is not implemented at a minimum the following should be considered:

Mandate that crude oil be degasified.

Make more safety inspections of the railcars and railways.

Avoid highly populated areas and areas with rivers and lakes nearby.

Require slower speeds for trains transporting crude oil.

Reduce maximum number of railcars allowed on trains transporting crude oil.

Increase safety standards for railcars that are more stringent than the DOT111 cars.