



# National Transportation Safety Board

Washington, DC 20594

Office of the Chairman

October 14, 2016

The Honorable Marie Therese Dominguez  
Administrator  
Pipeline and Hazardous Materials  
Safety Administration  
Washington, DC 20590

Dear Administrator Dominguez:

Thank you for your July 5, 2016, letter to the National Transportation Safety Board (NTSB) regarding Safety Recommendations H-09-001 and -002. We issued these recommendations to the Pipeline and Hazardous Materials Safety Administration on March 5, 2009, as a result of our special investigation report on three accidents involving highway vehicles transporting bulk quantities of acetylene gas that occurred between July 25 and October 20, 2007, and after reviewing reports of a 2008 overturn accident of another vehicle.

## H-09-001

Modify [Title] 49 *Code of Federal Regulations* 173.301 to clearly require (1) that cylinders be securely mounted on mobile acetylene trailers and other trailers with manifolded cylinders to reduce the likelihood of cylinders being ejected during an accident and (2) that the cylinder valves, piping, and fittings be protected from multidirectional impact forces that are likely to occur during highway accidents, including rollovers.

## H-09-002

Require fail-safe equipment that ensures that operators of mobile acetylene trailers can perform unloading procedures only correctly and in sequence.

We note that, on June 2, 2016, you published a final rule incorporating, by reference, the Compressed Gas Association's (CGA's) Pamphlet G-1.6, *Standards for Mobile Acetylene Trailer Systems* (7th edition, 2011), to require that mobile acetylene trailers be maintained, operated, and transported in accordance with that document. As you acknowledged, this rule does not address our recommendations regarding cylinder securement or vehicle accident impact and rollover protection requirements. Also, neither the CGA standard nor your rule require engineering controls to ensure that operators can perform an unloading procedure only correctly and in the proper sequence.

We appreciate your offer to continue the dialogue on this issue at a meeting where our staffs and CGA representatives can explore a collaborative solution to further improve mobile acetylene trailer safety. Although your final rule did not address our ongoing concerns, your willingness to continue working with us constitutes an acceptable alternate method of implementing these recommendations. Pending completion of these efforts, Safety Recommendations H-09-001 and -002 are classified “Open—Acceptable Alternate Response.”

An NTSB staff member will be contacting your agency shortly to set up a meeting. If you have any questions, please do not hesitate to contact Dr. Robert Dodd, Chief, Safety Recommendations Division, at (202) 314-6541.

Sincerely,

cc: Ms. Deirdre Breithaupt  
OST NTSB Liaison  
Office of the Under Secretary for  
Transportation Policy