



July 5, 2016

The Honorable Christopher A. Hart  
Chairman  
National Transportation Safety Board  
490 L'Enfant Plaza, SW  
Washington, DC 20594

Dear Chairman Hart:

This letter provides an update regarding Safety Recommendations H-09-1 and H-09-2. These recommendations were issued to the Pipeline and Hazardous Materials Safety Administration (PHMSA) as a result of the National Transportation Safety Board's (NTSB) special investigation report of three accidents involving highway vehicles transporting bulk quantities of acetylene gas that occurred between July 25 and October 20, 2007, and the review of reports of a 2008 overturn accident of another acetylene gas transport vehicle.

#### **H-09-1**

*Modify 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-09-2**

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

On June 2, 2016, PHMSA published a Final Rule, "Hazardous Materials: Miscellaneous Amendments," in the *Federal Register* (81 FR 35483) incorporating by reference Compressed Gas Association (CGA) publication G-1.6, *Standards for Mobile Acetylene Trailer Systems* (7<sup>th</sup> ed.)(2011), and requiring under 49 CFR 173.301 that mobile acetylene trailers be maintained, operated, and transported in accordance with this industry standard. We believe this action is commensurate with the efforts put forth by PHMSA, the CGA and industry to develop a safety standard for the transport and handling of mobile acetylene cylinders. The requirements adopted under this rulemaking will: (1) reduce the likelihood of ejection of cylinders during a highway accident; and (2) protect valves, piping, and fittings from impact forces that may occur during a highway accident. Additionally, CGA G-1.6 addresses

The Honorable Christopher A. Hart

assurance that unloading procedures are performed correctly and in sequence by instructing operators to implement standard operating procedures to perform loading or unloading in the specified sequence to minimize the risk of decomposition or flashback.

In its comment to the rulemaking, the NTSB states that CGA G-1.6, does not address fully the accident impact protection from multidirectional forces, cylinder securement, or use of equipment to ensure correct sequencing of unloading operations. We acknowledge the NTSB's concerns, however the recommendations presented in the comment were beyond the scope of the rulemaking. PHMSA, along with CGA representatives, plan to meet with the NTSB to discuss a possible course of action (e.g., modifying further CGA G-1.6) to reconcile the NTSB's ongoing concerns with PHMSA efforts to address these Safety Recommendations.

If we can be of further assistance, please contact Dirk Der Kinderen, NTSB Program Manager for the Office of Hazardous Materials Safety by phone at 202-366-8553.

Sincerely,

A handwritten signature in black ink that reads "Marie Therese Dominguez". The signature is written in a cursive style with a large, stylized 'M' and 'D'.

Marie Therese Dominguez