Hazardous Materials Notice

Federal Railroad Administration, Office of Safety, Hazardous Materials Division
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Page: 1 of 5	Key Words: Train placement, special equipped cars, tie-down, vehicles
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Summary:

The purpose of this Hazardous Materials Notice is to clarify the train placement rules in 49 CFR § 174.85 that allow "specially equipped cars with tie-down devices for securing vehicles" to be entrained next to placarded rail cars transporting Division 1.1 and 1.2 materials and loaded, placarded tank cars.

Discussion:

The interpretation of the train placement regulations has become an issue due to the various TTX Company (formerly known as Trailer Train Corporation) specially-equipped flatcars that are now in service.

TTX Company owns a fleet of approximately 95,000 flatcars for assorted service requirements. While most TTX Company cars are used for TOFC/COFC service, there are many specially-equipped type flatcars which, if placed next to loaded placarded tank cars, will not comply with the train placement requirements of 49 CFR § 174.85.

The provisions of § 174.85(d), Restrictions (3) and (4), specify the requirements for placing hazardous materials (HM) tank cars next to flat cars with shiftable loads. The regulation states:

> (d) Position of rail cars in a train. In the following table:
>
> 3. A placarded car may not be placed next to an open-top car when any of the lading in the open car protrudes beyond the car ends, or if the lading shifted, would protrude beyond the car ends...
>
> 4. A placarded car may not be placed next to a loaded flat car, except closed TOFC/COFC equipment, auto carriers, and other specially equipped cars with tie-down devices for securing vehicles. Permanent bulk head flat cars are considered the same as open top cars.

This notice includes a table explaining the various types of TTX owned equipment. This car owner uses the reporting marks to designate features of a particular car type. For instance, cars with reporting marks HTTX, ITTX, OTTX, and TTDX are open flatcars equipped with chain tie-downs for particular types of equipment. When used as designed, they may be entrained next to a loaded placarded tank car in compliance with § 174.85. Similarly, cars with reporting marks ETTX, TTBX, TTGX, TTQX, and TTSX are flat cars with autoracks; when used as designed, they, too, may be placed in a train next to a loaded placarded tank car. Cars with the reporting marks PTTX, TTJX, TTPX, and TTZX are rigid bulkhead flatcars. They are not in violation if placed next to a loaded placarded tank car provided they are not loaded above the top of the bulkhead with a shiftable load.

The flatcars pictured on the last page bear the reporting mark FTTX. These are specially-equipped flatcars for handling auto and truck frames, as pictured. These cars are not equipped with tie-downs for securing *vehicles*, but only parts of vehicles. They do not meet the requirements of § 174.85(d), Restriction (4), and placing them in a train next to a loaded placarded tank car is a violation of the HMR (the hazardous materials regulations).

INDEX BY REPORTING MARKS
(Figure 1)

No.	Reporting Mark	General Description of Car
1	ATTX	75 foot, all purpose flatcar (Center and side tie-downs)
2	BTTX	2-unit articulated standard level autorack car
3	DTTX	Five platform articulated well type COFC cars capable of carrying double-stacked containers and single, 3-unit and 4-unit all purpose (COFC-TOFC) double stack, well cars
4	ETTX	Low-level flatcar equipped with totally enclosed tri-level auto rack. (hydraulic draft gears)
5	FTTX	Flatcar equipped with tie-down devices for loading automotive or truck frames
6	GTTX	Low-level and standard-level cars in transit for the application of autorack
7	HTTX	Flatcar equipped with thirty-eight (38) heavy-duty chains, with snubbers and turnbuckles, each secured to movable and retractable tie-down winches in four (4) longitudinal channels for transporting large earth moving equipment.
8	ITTX	Flatcar equipped with special foldaway pedestals and thirty-two (32) tie-down winches with chains and bridge plates for transporting trailer tractors saddleback style
9	JTTX	Flatcar with miscellaneous devices applied by lessee for special service
10	KTTX	"Twin-45" standard-level flatcar with fixed hitches on ends of car for handling two (2) 45' trailers, (overhead loading only)

11	MTTX	60 foot flatcar with stake pockets for general service, or 85 foot flatcar with sixteen (16) stake pockets, eight (8) per side for transporting long pipe
12	NTTX	5-unit articulated COFC car for transporting containers (spine car)
13	OTTX	Flatcar equipped with thirty-six (36) chains, with snubbers each secured to movable and retractable tie-down winches in four (4) longitudinal channels, for transporting agricultural equipment
14	PTTX	Flatcar equipped with bulkheads, spaced 48 feet, 6 inches apart for transporting plywood, wallboard, etc.
15	QTTX	Heavy duty flat deck and depressed deck flatcar
16	RTTX	"Twin-45/Triple-28" - standard-level flatcar with fixed hitches on ends of car and retractable hitch at center of car for handling two 45' or three 28' trailers. Overhead loading only (standard draft gears) 2-unit RTTX car - same as above except 2-units semi-permanently connected with a drawbar
17	STTX	"Twin-45" standard level flatcar for handling two (2) 45' trailers equipped with sliding bridge plates for circus style loading
18	TTAX	All purpose spine car for TOFC/COFC service
19	TTBX	Flatcar equipped with bi-level autorack. Rack can be either open or shielded on the sides, but does not have roof or doors
20	TTCX	Flatcar equipped with container pedestals for COFC service (hydraulic draft gears)
21	TTDX	Flatcar equipped with sixteen (16) tie-down winches with chains and bridge plates for transporting military vehicles
22	TTEX	2-unit TOFC car for hauling 4-45' or 3-57' trailers (sill above cars only) or up to 3-57' trailers (flush deck cars only) overhead loading only
23	TTFX	Four platform TOFC car capable of carrying four 45' trailers overhead loading only
24	TTGX	Flatcar equipped with totally enclosed bi-level autorack
25	TTHX	60 foot flatcar equipped with eighteen (18) heavy-duty chains anchored to stake pocket castings
26	TTJX	68 foot 100 ton flatcar equipped with twenty-two (22) screw type tie-down devices and stake pockets. Some cars are finger rack, rebar, coil, or shape and plate cars
27	Reserved	
28	TTLX	Five platform articulated TOFC car capable of carrying one trailer per platform 40' to 48' long and up to 102" wide with front mounted refrigeration unit. Overhead loading only, Same as UTTX cars
29	TTMX	68 foot 100 ton flatcar equipped with stake pockets and lading strap anchors for general service

30	TTOX	Single platform TOFC car with single axle trucks capable of carrying one trailer 40' to 48' long and up to 102" wide with nose mounted refrigeration unit overhead loading only
31	TTPX	68 foot 100 ton flatcar equipped with bulkheads, spaced to 60'6" to 62'0" apart, and thirty-four (34) transverse tie-down anchors with chains, used for transporting plywood, wallboard, etc.
32	TTQX	Low-level flatcar equipped with totally enclosed autorack. Autorack height - 20'2". (hydraulic draft gears)
33	TTRX	3 unit articulated flatcar
34	TTSX	Flatcar equipped with coverless enclosed bi-level autorack (hydraulic draft gears)
35	TTWX	"Twin-45" standard level flatcar equipped with foldaway container pedestals and hitches for TOFC and/or COFC service (hydraulic draft gears)
36	TTX	Flatcar equipped with two (2) hitches for TOFC service
37	TTZX	100 and 110 ton bulkhead car equipped with center partition and winch type tie-down system for carrying lumber products. 110 ton cars equipped with stake pockets
38	UTTX	Five platform articulated TOFC car capable of carrying one trailer per platform 40' to 48' long and up to 102" wide with front mounted refrigeration unit. Overhead loading only, Same as TTLX cars
39	VTTX	Flatcar equipped with fixed container pedestals for COFC service only
40	WTTX	"Twin-45" standard level flatcar equipped with two (2) hitches for TOFC service
41	ZTTX	Flatcar equipped with thirty (30) stake pockets for transporting long poles and pipes

Figure 2 - Tank car with truck frames on FTTX flat car.

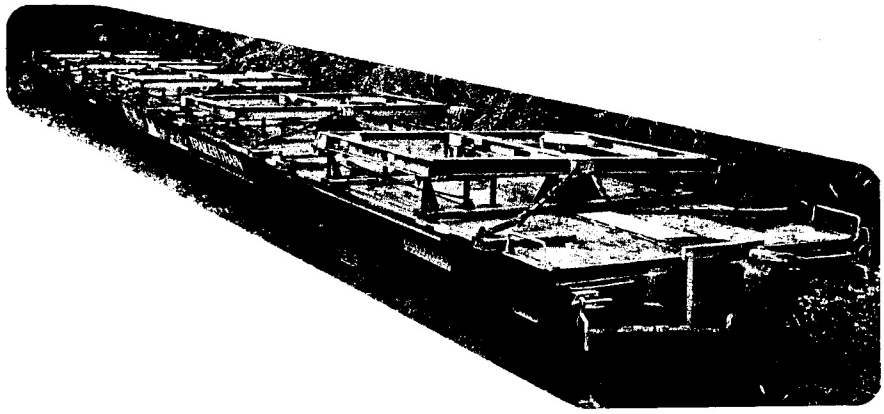

Figure 3 - empty FTTX flatcars with securement panel and chains