



Railroad Workers United

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The Rank & File in Action!

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RWU Statement to Pipelines & Hazardous Materials Safety Administration in Regard to Proposal to Ship LNG by Rail

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Docket Management System
U.S. Department of Transportation
West Building, Ground Floor, Room W12-140, Routing Symbol M-30 1200
New Jersey Avenue SE, Washington, DC 20590

August 6th, 2019

Comment Re: PHMSA-2019-0100, Draft Environmental Assessment for a Special Permit Request for Liquefied Natural Gas by Rail

To William S. Schoonover, Associate Administrator of Hazardous Materials Safety, and Pipeline and Hazardous Materials Safety Administration:

Railroad Workers United (RWU) urges you to deny the special permit requested by Energy Transport Solutions, LLC to ship large quantities of Liquefied Natural Gas (LNG) using unit trains of DOT-113C120W tank cars. Rail shipments of LNG would pose dramatic health, safety, and environmental risks to railroad workers and communities across the United States. LNG train derailments could cause fires and explosions, property damage, mass injuries and fatalities - impacts that are largely ignored in PHMSA's cursory, 23-page analysis.

As an organization of working rank & file railroad workers from all crafts and all carriers, Railroad Workers United is deeply concerned about the casual attitude towards shipping LNG by rail. Over the course of the last six years or so we have witnessed the danger inherent in shipping Bakken crude oil by rail with limited oversight and regulation, a danger that continues to this day.

It is obvious that the proposal to ship LNG by rail likewise is inherently dangerous for train crews, trackside communities and the public at large if it is not moved in a safe manner. Most of the oil trains which have crashed over the last six years or so - resulting in spills, fires, and explosions - were in fact made up of DOT-113C120W tank cars, ones of the type that apparently are being proposed now for LNG trains. Therefore, before any LNG is moved in unit trains across the U.S., Railroad Workers United recommends the following regulation:

- LNG shall not be moved by rail unless it is moved in tank cars that have been crash tested to withstand puncturing. Many of the rail cars currently in service are not capable of safely transporting LNG and should not be used in this capacity.
- Electrically Controlled Pneumatic (ECP) braking should be employed on all unit trains of LNG as a means of possibly preventing a disaster, and/or mitigating the extent of the disaster in the event of a derailment/crash.

- The longer and heavier the train, the greater the propensity for it to derail, and having derailed, the greater chance of disaster. We recommend all such dangerous trains be limited to no more than 50 cars.
- All such trains must have a minimum of at least two persons in the cab of the locomotive to ensure safe movement and delivery of the product, and to mitigate against disaster throughout its routing, should there be a mishap.
- Prior to departure from the originating terminal, all such trains must undergo a thorough and proper inspection by host railroad employees who are properly trained and certified to do the work.
- Prior to movement on the mainline, such trains should have an advance “high-rail” escort service to ensure that the track ahead is clear and in proper condition for the safe passage of the train.
- After a string of oil train derailments, fires and explosions, crude oil train speed was limited to 40 mph in urban areas. Unit trains of LNG should likewise be so restricted.

Only once these safety features at a minimum are adopted would RWU be comfortable in supporting the proposed shipment of LNG by rail.

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