



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

The Administrator

400 Seventh Street, S.W.
Washington, D.C. 20590

JAN - 6 2003

The Honorable Carol J. Carmody
Acting Chairman
National Transportation Safety Board
Washington, DC 20594

Dear Madam Chairman:

Thank you for your September 26 letter concerning safety recommendations H-02-23 through H-02-25 issued to the Research and Special Programs Administration (RSPA). The recommendations were issued following the National Transportation Safety Board's (NTSB) investigation of a tube trailer incident in Ramona, Oklahoma, on May 1, 2001. In the incident, certain horizontally mounted cylinders on a semitrailer along with their valves, piping and fittings were damaged, causing the release of hydrogen gas. The hydrogen gas ignited, burning the rear of the semitrailer. Two people were killed in the accident; residents of five homes in the surrounding area were evacuated and the affected highway was closed in excess of 12 hours.

The recommendations state:

H-02-23

Modify 49 Code of Federal Regulations 173.301 to clearly require that valves, piping, and fittings for cylinders that are horizontally mounted and used to transport hazardous materials are protected from multidirectional forces that are likely to occur during accidents, including rollovers.

H-02-24

Require that cylinders that transport hazardous materials and are horizontally mounted on a semitrailer be protected from impact with the roadway or terrain to reduce the likelihood of their being fractured and ejected during a rollover accident.

H-02-25

Revise the information about hydrogen in the North American Emergency Response Guidebook so that it specifically identifies the unique chemical and flammability properties of hydrogen.



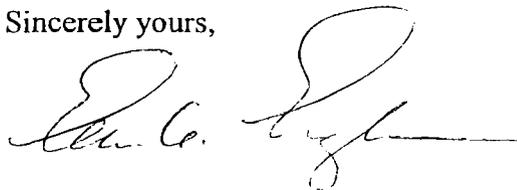
RSPA agrees with the thrust of your recommendations. Prior to the issuance of your letter and final report we took proactive measures to contact both the Federal Motor Carrier Safety Administration (FMCSA) and the Compressed Gas Association (CGA) to discuss possible action plans and tasks to address the issues surrounding the incident.

As a result of those discussions, CGA has established a special task force under their Docket 02-19, Development of Performance Standards for Tube Trailers. Their work will be monitored and reviewed for possible incorporation in the Hazardous Materials Regulations. We also understand that FMCSA is considering appropriate expansion of its enforcement program to include tube trailer manufacturers and assemblers. The changes suggested to the North American Emergency Response Guidebook (NAERG) will be considered for inclusion in the 2004 Edition.

We recognize that the work required to address the concerns of the NTSB will require a multi-year effort, culminating in rulemaking. We are committed to continuing our consultation and cooperation as we resolve the issues identified in these safety recommendations, and will keep you informed of our progress.

We request that you classify recommendations H-02-23 through H-02-25 as "Open-Acceptable Action." Thank you for consideration of our request. If you have any questions, please contact me or Ms. Patricia Klinger, Director of External Communications, at (202) 366-4831.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Ellen G. Engleman".

Ellen G. Engleman