



Horne, T.
26-0047

Fwd: 49 CFR § 173.31(g)(3) Interpretation

1 message

INFOCNTR (PHMSA) <infocntr.infocntr@dot.gov>

Fri, Apr 10, 2026 at 11:53 AM

To: "Baker, Yul (PHMSA)" <yul.baker@dot.gov>, Hazmat Interps <hazmatinterps@dot.gov>

Good morning,

Please see the below interpretation request.

Let us know if you need anything,

Janaye

----- Forwarded message -----

From: **Zachary Leingang** <zacharyleingang@savageco.com>

Date: Thu, Apr 9, 2026 at 6:15 PM

Subject: 49 CFR § 173.31(g)(3) Interpretation

To: **INFOCNTR.INFOCNTR@dot.gov** <INFOCNTR.INFOCNTR@dot.gov>

Cc: **frapa@dot.gov** <frapa@dot.gov>, **HMASSIST@dot.gov** <HMASSIST@dot.gov>, **infocntr@dot.gov** <infocntr@dot.gov>

To Whom it May Concern,

We are writing to request a formal interpretation of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171–180), specifically regarding the wheel blocking and hand brake requirements of § 173.31(g)(3) as they apply to multiple coupled tank cars placed for loading or unloading.

BACKGROUND

Our facility receives and handles molten sulfur (Hazard Class 9, UN2448) transported in railroad tank cars. During our operations, we regularly have a cut of multiple tank cars in this specific case, nine (9) coupled tank cars placed on a siding for venting and unloading operations. Our current practice is to set hand brakes on the two end cars of the cut, perform securement test and place wheel chocks on the end cars only, with the intent that blocking the ends of the coupled cut prevents movement of the entire set of cars in both directions.

QUESTION

The requirements of 49 CFR § 173.31(g)(3) state:

"At least one wheel on the tank car must be blocked against motion in both directions, and the hand brakes must be set. If multiple tank cars are coupled together, sufficient hand brakes must be set and wheels blocked to prevent motion in both directions."

For a single tank car, the regulation is clear — one wheel blocked, hand brake set, on that individual car.

For multiple coupled tank cars, the regulation uses the word "sufficient" without defining what constitutes sufficient blocking in practical terms.

We respectfully request a formal interpretation to the following specific question, when multiple hazmat tank cars are coupled together and placed for loading or unloading, does compliance with the wheel blocking requirement of § 173.31(g)(3) require:

(a) At least one wheel chock placed on each individual tank car in the cut; or

(b) Wheel chocks placed only on the end cars of the coupled cut, on the basis that blocking the ends of a coupled set of cars prevents movement of the entire cut in both directions?

We note that no published letter of interpretation on PHMSA's website appears to address this specific question. The closest published interpretation (Reference No. 22-0138, January 2023) addresses the use of a mechanical rail car indexer as a substitute for wheel blocking but does not address the per-car versus per-cut question described above. A formal interpretation on this point would allow our facility to ensure full compliance with the HMR and provide clear, citable guidance for our hazmat employee training and operating procedures.

Thank you for your time and consideration.

Respectfully,

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