

From: **Conner, Paul** <Paul.Conner@gbrx.com>

Date: Tue, Jun 9, 2026 at 2:34 PM

Subject: Request for Letter of Justification

To: infocntr@dot.gov <infocntr@dot.gov>

Cc: Rader, James <James.Rader@gbrx.com>, Miller, Ben <Ben.Miller@gbrx.com>, Isselmann, Jack <Jack.Isselmann@gbrx.com>

Good afternoon,

I am writing to gain better insight into the need to perform a leakage pressure test after replacing a manway eyebolt due to wear, rather than leakage.

In reviewing 49 C.F.R. § 180.509, there are three components: (a) *General Requirements*; (b) *Conditions Requiring Qualification of Tank Cars*; and (c) *Frequency of Inspections and Tests*. Under paragraph (b), commonly referred to as unscheduled maintenance, it requires “an appropriate inspection and test according to the type of defect and type of maintenance performed.” The federal regulations do not specify the type of inspection or test, and the choice is often based on the car owner’s judgment. In some cases, the railroad industry’s interchange rules may dictate the types of inspections and tests (e.g., those required after repairing the tank shell).

Upon reviewing the structure of Subpart F of part 180, it appears that §180.509 (j), referenced by paragraph (c), is not the appropriate one because this is a repair event rather than a scheduled maintenance event. Further, since replacing an eyebolt is a “repair,” the applicable section is 180.513, *Repairs, Alterations, Conversions, and Qualifications*. Section 180.513 (d) requires a leakage pressure test after repair, replacement, or qualification of tank car service equipment. Because a manway cover and its eyebolts constitute a “closure” rather than “service equipment,” one could conclude that no leakage pressure test is required.

Historically, the Federal Railroad Administration interpreted the need for a leakage pressure test only when there was evidence of a leak before an eyebolt repair. That is, because there was evidence of a leak before the eyebolt’s replacement, it was necessary to leak-test the connection after its replacement to ensure a leak-free condition.

Our understanding is that neither §180.509(j) nor §180.513(d) contemplated eyebolt repairs. The Greenbrier Companies is seeking justification for conducting a leakage pressure test after replacing a worn or defective eyebolt when there was no evidence of leakage prior to replacement.

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