



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

JUN 15 2004

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

Chief Ernest Mitchell  
President  
International Association of Fire Chiefs  
4025 Fair Ridge Drive  
Fairfax, VA 22033-2868

Ref. No. 04-0132

Dear Chief Mitchell:

This responds to your May 7, 2004 letter addressed to the Honorable Thomas J. Ridge, Secretary, U.S. Department of Homeland Security (DHS), with a copy to the Secretary of Transportation Norman Y. Mineta, expressing your strong support for maintaining the use of the current hazard warning placards for shipments of hazardous materials until a replacement system has been demonstrated to be effective and the fire service has been trained in its use. Your letter was referred to me for response.

As you know, in response to concerns that placards could be used by terrorists or criminals to identify potential targets, the Research and Special Programs Administration (RSPA) on January 15, 2003, completed a study of the role placards play for transportation safety and security. The study took into account the views of all stakeholders, including IAFC, through working group meetings. The study concluded that the existing placarding system should be retained, but that we should continue to review the use of alternatives to placards in specific high-risk situations, as well as for broad application. In considering potential changes to the placarding requirements as part of its continuing review, the study further concluded that we should consider the impact on costs, training and international trade that could result from changes in the current placarding requirements. (The study can be found on our website at <http://hazmat.dot.gov/pubtrain/003RedactedPlacardingReportSSI.pdf>.)

In addition, the DHS is conducting a study to examine alternative methods for communicating the hazards of hazardous materials transported in rail tank cars. The study will identify 10 alternatives to placarding for communicating hazards and will include operational testing of the alternatives identified. The evaluation of the alternatives will include: (1) technical considerations, such as the speed and accuracy of the systems and the interoperability of the systems with those currently in use by the emergency response community; (2) international transportation issues, such as the impact on international rail transportation between the United States and Canada and Mexico; (3) the costs associated with the alternatives, including installation, start-up, and system maintenance costs, as well as cost of training the users, showing particular consideration of small urban and rural volunteer first responders; and (4) the speed with



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which the alternatives can be implemented, including the time required to train first responders to use the new technology. DHS expects to complete the study by the end of 2004.

Effective hazard communication is critical to the ability of emergency response personnel to handle transportation accidents involving hazardous materials. Let me assure you that DOT will propose no change to the current placarding system without careful consideration of all the potential impacts, especially the potential impacts on emergency response and those responsible for planning for and responding to hazardous materials transportation accidents.

Thank you for your letter. Please feel free to contact me if you have questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Frits Wybenga". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Frits Wybenga  
Deputy Associate Administrator  
Office of Hazardous Materials Safety



# International Association of Fire Chiefs

4025 Fair Ridge Drive • Fairfax, VA 22033-2868

Telephone: (703) 273-0911

Fax: (703) 273-9363

Internet: www.iafc.org

7 May 2004

Honorable Thomas J. Ridge  
Secretary, U.S. Department of Homeland Security  
U.S. Department of Homeland Security  
Washington, DC 20528

Via facsimile: 202.282.8401

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\$172.500  
\$172.800

Security/Placarding  
Plans  
04-013

Dear Secretary Ridge,

Over the last year, the International Association of Fire Chiefs (IAFC) has heard persistent rumors that the Department of Homeland Security (DHS) intends to remove hazardous materials placards from rail cars for security reasons. In our business, we understand that often, where there's smoke, there's fire. The IAFC supports the current placarding system and works closely with the Research and Special Programs Administration (RSPA) of the Department of Transportation to administer that system. While we appreciate the security risks associated with hazardous materials transportation, we oppose the termination of the current placarding system until a replacement system has been demonstrated to be effective and the fire service has been fully trained in its use.

There are nearly one million shipments of hazardous materials each day in the United States. While the overwhelming majority of these shipments reach their destination safely, some spill or catch fire. It is imperative that emergency responders be able to quickly and accurately identify these materials in order to safely clean up the hazard and protect themselves, local citizens, nearby property, and the environment. This is an everyday safety issue for America's fire service. For nearly two decades the fire service has trained on handling hazardous materials incidents with the *North American Emergency Response Guide (ERG)* which depends on placards for identification of the substances involved. Firefighters and other emergency responders do not have universal access to sophisticated electronic and software programs to identify hazardous materials. Most fire departments, especially small and rural departments which are mostly volunteer, still rely on visual placards for their own safety and the protection of the citizenry.

Secretary Ridge, public safety rests on the actions and knowledge of emergency first responders. The current placard system is completely ingrained in our response mechanism. Without it, first responders and the public we are sworn to protect will be endangered. Because of the importance of this issue, I request a response to this letter so the IAFC can inform America's fire service of the exact status of this crucial issue. This is not an issue that can be appropriately decided by administrative fiat.

Please call me if you require additional information on this extremely important issue. I look forward to hearing from you.

Very truly yours,

Chief Ernest Mitchell  
President

/mws

cc: Norman Y. Mineta, Secretary of Transportation

*Providing leadership for the fire and emergency services since 1873*

*Member, International Technical Committee for the Prevention and Exinction of Fire/Comité Technique International De Prevention Et D'Extinction Du Feu (CTIF)*