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July 11, 2017

Mr. Paul Stancil  
National Transportation Safety Board  
490 L'Enfant Plaza East, SW  
Washington, DC 20594

Subject: Docket DCA16SH002 – Comments on Final IIC Factual Report

Mr. Stancil:

AllTranstek/Rescar recommend the removal of the references to ACF Bulletin TC-200 (Rev A) from the IIC Factual Report, because the Bulletin does not apply to pressure tank cars and therefore creates a misleading factual basis. Although the IIC Factual Report correctly notes in several references that ACF Bulletin TC-200 (Rev A) only applies to general service tank cars, and that the FRA Safety Advisory 2006-04, Notice No. 2 recommended that car owners concentrate on retrofitting the general service tank cars first, including the Bulletin in the Report gives an impression that TC-200 (Rev A) could be used to retrofit pressure tank cars and this is inaccurate. The manufacturer (ACF) expressly states:

- 1) "This bulletin applies to unmodified general service tank cars ...", and
- 2) "American Railcar Leasing (ARL) should be consulted prior to retrofitting any multi-compartment cars, electric heater cars, pressure cars, or underframes previously modified from original construction."

Under 49 CFR 179.3, approvals for alteration of tank cars must be secured from the AAR Tank Car Committee and a certificate of construction approved. The AAR Tank Car Committee does so through the process specified in the C-III MSRP M-1002. When approving an alteration (*e.g.*, TC-200 (Rev A)), the AAR approves the design and process for altering the car, or cars, as listed on the application. After completing the alteration, the tank car facility or car owner signs the application certifying that the tank car has been altered per the approved drawings and procedures. This certification of construction can then be used to alter other similarly constructed tank cars. If any other tank car is altered using the certificate of construction, and cited in the Tank Car Integrated Database, it must be done so per the approved drawings and procedures. In the case of TC-200 (Rev A), it is our understanding that, as of this date, the AAR has never approved its use for retrofitting pressure tank cars and, therefore, tank car owners would not be able to use the TC-200 (Rev A) certificate number for alteration of their pressure tank cars. Consequently, we are concerned that the IIC Factual Report could be misinterpreted, to mean that FRA Safety Advisory 2006-04, Notice No. 2 was intended to recommend the application

of the TC-200 (Rev A) retrofit first to the general purpose car fleet and then to the pressure car fleet. Without further AAR action, TC-200 (Rev A) cannot be utilized for alteration of pressure tank cars.

Further, AllTranstek/Rescar recommend that, if NTSB believes there is a need for a drawing in the IIC Factual Report to depict the locations of the reinforcement pad longitudinal fillet weld terminations, the Report should refer to the attachment weld drawing (2-C-2118) that was used to construct the car, instead of a figure from Bulletin TC-200 (Rev A), because of the inclusion of a different “no weld zone” in the toe area that does not apply to tank cars built to AXLX 1702’s specifications and therefore the current drawing in the Report could also cause factual confusion.

Based on the foregoing, AllTranstek/Rescar request that this letter be submitted to and made a part of NTSB Docket DCA16SH002.

Sincerely,

A rectangular grey box redacting the signature of Lawrence J. Loman. The box is positioned over the handwritten signature, which is partially visible as scribbles above and below the box.

Lawrence J. Loman