



**TRANSPORTATION RAIL INCIDENT
PREPAREDNESS & RESPONSE:
HIGH HAZARD FLAMMABLE LIQUID UNIT TRAIN (HHFT)
EMERGENCY RESPONSE SUPPLEMENTAL INFORMATION**

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SECTION I - INTRODUCTION

Changes in the North American energy sector have brought new challenges to the emergency response community, especially in many geographic areas where there has not historically been a large energy sector footprint. These changes have involved oil and gas exploration, production and manufacturing facilities, as well as the expansion of transportation modes, corridors and operations to meet the needs of the emerging marketplace.

This background paper will focus on flammable liquid unit trains, primarily those transporting crude oil and ethanol. The U.S. Department of Transportation – Pipeline and Hazardous Materials Safety Administration (DOT / PHMSA) defines High Hazard Flammable Liquid Trains (HHFT) as trains that have a continuous block of twenty (20) or more tank cars loaded with a flammable liquid or thirty-five (35) or more cars loaded with a flammable liquid dispersed through a train.

The objectives of this paper are to assist emergency planning and response personnel in preparing for HHFT incident scenarios. The information is based upon an analysis of previous HHFT incidents that have occurred, the lessons learned, and the input and experiences of emergency response peers representing the railroad and petroleum industries, emergency response contractors, and the public safety emergency response community. This paper was originally developed in 2016 and is viewed as a “living document” that will be updated as needed. See the Appendix D for the list of emergency response peers who have participated in this process.

The information provided in this paper is intended to supplement HHFT planning and training information already being used within the emergency response community. It is not meant to establish a standard of operations for any emergency response organization. The issues outlined in this paper focus upon “What do we know about HHFT emergency response and incident management operations that is considered to be either factual or has been validated through science or engineering?” and “What have we repeatedly observed at HHFT scenarios but has not yet been validated by either science or testing?”

A. Risk-Based Response

The application and use of a risk-based response (RBR) methodology is critical for incidents involving HHFT’s. As background, RBR is defined by *NFPA 472 – Standard for the Competence of Responders to HM/WMD Incidents* as a systematic process by which responders analyze a problem involving hazardous materials, assess the hazards, evaluate the potential consequences, and determine appropriate response actions based upon *facts, science, and the circumstances* of the incident. Knowledge of the behavior of both the container involved and its contents are critical elements in determining whether responders should and can intervene.

Most fire departments have a fundamental understanding and familiarity with flammable and combustible liquids, as they represent the most common class of hazardous materials encountered. The size, scope and complexity of the problems posed by a HHFT incident will challenge virtually all emergency response organizations, and have a direct influence upon the possible strategies and tactics that may be employed by the Incident Commander and



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Unified Command. Additional information on applying the concept of risk-based response to HHFT scenarios can be referenced in Section III.

SECTION II – LESSONS LEARNED

The HHFT lessons learned (i.e., facts and observations) outlined in this paper will be broken into the five categories: Planning, The Products, The Containers, Incident Management, and Tactical Considerations.

A. Planning Considerations

The following general observations can be made as it pertains to local-level planning for HHFT incidents.

- HHFT movements will be influenced by economics, market forces and political decisions. Even as new transmission pipelines are approved and constructed, the continued movement of both crude oil and ethanol HHFT's from their source to refineries and the marketplace is likely to continue.
- The number of tank cars involved in a HHFT derailment scenario will be dependent upon a number of factors, including train speed, train make-up and track configuration (e.g., curve, grade). These derailment scenarios can result in a combination of spills and fires with significant environmental impacts. Planning activities should incorporate petroleum spill scenarios both with and without fire.
- Pre-incident relationships between emergency responders and their railroad points-of-contact is a critical element in establishing the trust and credibility needed during a major response. By reviewing commodity flow studies, transportation corridor assessments and operational capability assessments, responders can determine and prioritize the overall risks posed by different scenarios to their community.
- The basic approach for managing HHFT incidents is not much different than other hazmat response scenarios – do not under-estimate the need or the value of basic HM-101 skills. Knowledge of the product, its container and the environment will be critical in evaluating response options using a risk-based response process. Response challenges will primarily focus on the location of the incident, the amount of product involved, the size of the initial problem, and the amount, type and nature of resources necessary for fire control, spill control, clean-up and recovery.
- As part of the planning process, be aware of the potential impacts a rail incident may have on surrounding infrastructure. For example, transportation corridors often run next to the rail corridor, while communication, water and sewer utilities and pipeline right-of-ways may run adjacent to or within the railroad right-of-way. During an incident, be aware of downed signal and communications lines, power lines, buried utilities and above ground switch heating systems.



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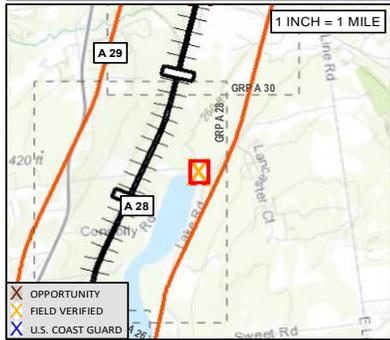
- Under DOT/PHMSA requirements and in consultation with the Federal Railroad Administration (FRA), railroads are required to develop comprehensive oil spill response plans (COSRPs) for rail accidents and incidents involving petroleum oil and HHFTs. These requirements include the following elements:
 - HHFT information sharing notifications to State Emergency Response Commissions (SERC) for emergency response planning.
 - Development of comprehensive oil spill response plans for routes that HHFT operate.
 - Utilization of the Incident Command System (ICS), including identification of the “Qualified Individual” (Incident Commander) for each response zone.
 - Defines “worst case discharge” as an incident with the potential to release 300,000 gallons or more of petroleum oil, or 15% of the amount of oil on the largest train consist carrying oil in a given response zone.
 - Spill response equipment and exercise procedures consistent with the US Coast Guard National Preparedness for Response Exercise Program (PREP) guidelines (see <https://homeport.uscg.mil>).
- Many carriers and response agencies create geographic response plans (GRP) with additional tactical guidance. See the following example below from the New York Department of Environmental Conservation.

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SITE SPECIFIC STRATEGY A28-A BALLSTON LAKE (NORTH), SARATOGA COUNTY



LOCATION	
Water Body Name	BALLSTON LAKE OUTLET
Water Body Type	CREEK
Parking/Staging Location	LIMITED - ROADSIDE ONLY
Booming GPS Location	42.956788, -73.847978
Address	59 OUTLET RD. BALLSTON LAKE, NY 12019
Distance From Track	1916 ft SE
NYSDEC Trailer Contact	CARL ZEILMAN: 518-885-2232



Strategy Type	Degree of Difficulty	Implementation	Considerations
COLLECTION BOOM - 250'	MODERATE - OIL SPILL RESPONSE ORGANIZATION (OSRO) IMPLEMENTATION SUGGESTED	4 PERSON CREW, 250' BOOM, ANCHORS, STAKES, STAKE HAMMER, BOAT, EMERGENCY RESPONSE TRAILER AND TRUCK, VACUUM TRUCK COLLECTION BOOM - INSTALL 150' BOOM UPSTREAM (SOUTH) OF OUTLET ROAD ANGLING TO DIRECT OIL TOWARD WESTERN BANK SECONDARY - INSTALL 100' BOOM DOWNSTREAM (NORTH) OF OUTLET ROAD AT CULVERT.	PPE/PFD SLIPS/TRIPS/FALLS BIOLOGICAL HAZARDS (TICKS, ETC.) TRAFFIC SLOW TO NO CURRENT OBSERVED BOAT REQUIRED ROPE GUN MAY BE REQUIRED

Additional Notes
SWAMP BORDERING MAIN CHANNEL. DRY HYDRANT LOCATED AT NORTHWEST END OF BRIDGE.

RESOURCES POTENTIALLY AT RISK	
Within 1/2 mile	Present?
Threatened and Endangered Species	No
NWI / State Wetlands	Yes
Water Intake	No
Special Management (State Parks / Public Parks)	No
Schools or Daycares	Yes
Tribal Lands and/or Resources	No
Cultural Resources	No
Hospital	No
Senior Living	No
Scenic Area	No

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Source: Photos obtained from OBG or Bing Imagery.

Credit: New York State Dept. of Environmental Conservation (DEC) and Gere/Ramboll

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B. The Products

Understanding Crude Oil

The following facts can be identified with respect to crude oils and ethanol as found in HHFT scenarios:

- The word “oil” in the product crude oil can incorrectly imply that this product has a high flash point (like motor oil) and therefore presents a low risk of ignition. This is NOT accurate – crude oil is a Hazard Class 3 flammable liquid and can present a significant risk of ignition, especially on a warm day.
- When removed from the ground, crude oil is often a mixture of oil, gas, water and impurities (e.g., sulfur). The viscosity of the crude oil and its composition will vary based upon the oil reservoir from which it is drawn, well site processing, and residence time in storage tanks. When transferred into a storage tank or a railroad tank car, it is often a mixture of crude oil and related constituents drawn from various locations and even different producing formations.

It is impossible to determine from which well site any one individual rail car load has originated. Shipments of crude oil are analyzed at the loading location and will have a certification of analysis for the mixture that is loaded on the train. While primarily used for refinery engineering purposes the certificate of analysis includes a characterization of the crude oil and its fractions, and can provide critical information on how the crude oil will behave in a water-borne spill scenario.

- Emergency responders must have a basic understanding of the physical properties (i.e., how it will behave) and chemical properties (i.e., how it will harm) of the materials involved. Considerations should include (a) whether the crude oil is a light or heavy crude oil (in terms of viscosity), and (b) if the crude is a sweet or sour crude oil. **Table 1** (see pages 8-9) provides an overview of the common types of crude oils currently being encountered in HHFT incidents.

The viscosity of petroleum liquids is often expressed in terms of American Petroleum Institute or API gravity, which is a measure of how heavy or how light a petroleum liquid is as compared to water. Water has an API gravity of 10: if the gravity is greater than 10 the petroleum product is lighter and will float on water; if less than 10 it is heavier and will sink. Crude oils are classified by the petroleum industry into the following general categories based upon their API gravity:

<u>Viscosity</u>	<u>API Gravity</u>
Light	> 31°
Medium	22 to 31°
Heavy	< 22°
Extra Heavy	< 10°

Sour crude oil is a crude oil containing a large amount of sulfur (greater than 0.5% hydrogen sulfide concentrations) and may pose a toxic inhalation hazard (Threshold Limit Value – Time Weighted Average



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(TLV/TWA) of 1 ppm and Immediately Dangerous to Life and Health (IDLH) exposure value of 100 ppm). Hydrogen sulfide levels can be an issue in a spill scenario, with higher concentrations typically been found within the container or directly outside of a tank car opening.

Shale crude oils tend to be a light sweet crude oil with a low viscosity, low flashpoint, and benzene content. Shale crudes may also have the possibility of producing significant amount of C₆H₁₄ - hexane in some locations. In contrast, oil sands crude oils (e.g., Alberta Tar Sands, bitumen) tend to be a heavier crude oil with an API gravity of approximately 8°. Canadian tar sand crudes also tend to be sour unless they have been partially refined before being loaded onto tank cars.

- In April 2020, the U.S. Department of Energy, DOT/PHMSA and Transport Canada published a research study by Sandia National Laboratories to investigate whether crude oils currently transported in North America, including those produced from tight formations, exhibit physical and chemical properties that are distinct from conventional crude oil, and how these properties associate with the combustion hazards that may be realized during transportation and handling. The oils tested spanned a range of vapor pressure and light ends content observed among both conventional and tight (i.e., non-conventional – Bakken, Texas Shale, etc.) crude oils. Key findings from the combustion experiments included the following:
 - The similarity of pool fire and fireball burn characteristics pertinent to thermal hazard distances of the three oils studied (i.e., Bakken, Texas Shale, Strategic Petroleum Reserve) indicate that vapor pressure is not a statistically significant factor in affecting these outcomes. The results from this work do not support creating a distinction for crude oils based on vapor pressure with regards to these combustion events.
 - Thermal hazard distances do not differ greatly between the three tested oils and should be treated equivalently by emergency responders.
 - When compared to combustion data from public literature on common liquid fuels (primarily commercial grade propane and butane), the results of this study are considered to be pertinent to crude oils and most hydrocarbon liquids that exceed the vapor pressures of the crude oils tested.
- Bitumen is a tar-like material that is extracted from tar sands. It is highly viscous and must be heated to make it flow. The majority of bitumen being extracted in North America originates in Alberta, Canada.

In order to transport bitumen, a diluent is usually added to decrease the viscosity and density of the crude oil. The most commonly used diluent is natural gas condensate (liquid byproduct of natural gas processing). Typically, these mixtures are 70% bitumen and 30% diluent, resulting in a API gravity of less than 22°.

Bitumen that is partially refined is known as syncrude, with the refining process generating a liquid that is similar to a medium-weight sweet crude oil. In Canada, diluents can also be found being transported under the UN 1993 placard with varying levels of both hydrogen sulfide and benzene.



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At a 2010 pipeline incident in Michigan involving bitumen, responders reported the presence of floating oil, submerged oil, and sunken oil. Incident experience has noted that the behavior of bitumen oils in water will ultimately depend upon the density of the oil, weathering, and the turbulence of the water.

- Responders will likely have environmental challenges for water-borne spill scenarios involving crude oil and ethanol, especially if the incident impacts a navigable waterway. Ethanol has a very low persistence and will evaporate or dissolve into the water column. In contrast, crude oil will weather and leave a very persistent heavy residue. These differences will require different spill response tactics.
- In analyzing previous incidents involving fire, crude oil and ethanol data points have essentially matched each other in terms of container behavior, container failures, and response experiences.

Air monitoring results at both incidents and test fires have shown that the products of combustion (i.e., soot and particulates) from crude oil and ethanol fires have not been significantly different than those seen at fires involving Class A materials.¹

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TABLE 1	LIGHT SWEET CRUDE OIL	DILBIT/SYNBIT (BITUMEN WITH DILUENT*)	BITUMEN (OIL SANDS)	DILUENT
TRANSPORTED AS HAZMAT	Yes - DOT Class 3, UN1267 (ERG Guide No. 128)	Yes - DOT Class 3, UN1267 (ERG Guide No. 128)	Maybe - DOT Class 9, UN3257 (ERG Guide No. 128) If shipped above 212 °F and below its flash point	Yes - DOT Class 3, UN1268 or UN 3295
FLASH POINT	Varies: -30° F - 104° F	Range: 0.4° F (dilbit) - 68° F (synbit)	330° F	<-30° to -4F° F
BOILING POINT	Varies: PGI = <95° F, PGII = >95° F	95° F - >500° F	554° F	100 - 118° F
REID VAPOR PRESSURE	8 - 14 psi	11 psi	4 psi	8 - 14 psi
VISCOSITY** IN CENTIPOISE (CPS) @ ~75 °F:	6-8 (Low - Flowable)	60-70 (Low - Flowable)	100,000-1,000,000 (very high - semi solid when cold)	6-8 (Low - Flowable)
API GRAVITY	Bakken 40° - 43°	Will vary based on amount of diluent; approximately 20°	Approximately 8°	
SPECIFIC GRAVITY	0.80 - 0.8 (Floats on water)	0.90-0.98 Initially (Floats then sinks as light ends volatilize)	0.95 - 1.05 (Will sink in Salt Water; Likely to sink in Fresh Water)	0.480-0.75 (Floats on water)
VAPOR DENSITY	1.0 - 3.9 (Heavier than Air)	>1 (Heavier than Air)	>1 (Heavier than Air)	1.0 - 3.9 (Heavier than Air)
HYDROGEN SULFIDE	0.00001% (potential to accumulate as H ₂ S in head space of vessels) If H ₂ S concentrations ≥ 0.5% or 5,000 ppm shipped as Sour Crude DOT Class 3, UN3494 (ERG Guide No. 131)	<0.1% (potential to accumulate as H ₂ S in head space of vessels)	Negligible (Monitor, contains bonded sulfur, generally not available as H ₂ S)	<0.5

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TABLE 1 (continued)	LIGHT SWEET CRUDE OIL	DILBIT/SYNBIT (BITUMEN WITH DILUENT*)	BITUMEN (OIL SANDS)	DILUENT
BENZENE	Generally <1.0%	0% - 5%	Negligible (Monitor, however it should not be a concern)	0% - 5%
EVAPORATION RATE (TEMPERATURE DEPENDENT)	>1 (High Evaporation Rate)	Diluent will evaporate quickly, Bitumen will not evaporate	None	>1 (High Evaporation Rate)
SOLUBILITY	Low to Moderate	Moderate	Extremely Low	Slightly Soluble
WEATHERING	Quickly	Diluent weathers fairly quickly, will then form Tar Balls	Very Slow - Like Asphalt	Quickly
RESIDUES	Films and Penetrates	Films and Penetrates - residue is very persistent	Heavy Surface contamination - very Persistent	Films and Penetrates
AIR MONITORING	LEL (combustible gas indicator), Benzene (direct read or tubes), H₂S (direct read or tubes)	LEL (combustible gas indicator), Benzene (direct read or tubes), H₂S (direct read or tubes)	LEL (combustible gas indicator), Benzene (direct read or tubes), H₂S (direct read or tubes)	LEL (combustible gas indicator), Benzene (direct read or tubes), H₂S (direct read or tubes)
RECOMMENDED PPE	<u>Clothing:</u> SFC/Fire Retardant Clothing (subject to task and air monitoring) <u>Respiratory Protection:</u> SCBA/APR/Nothing (subject to Task & benzene, H ₂ S & particulate concentrations)	<u>Clothing:</u> SFC/Fire Retardant Clothing (subject to task and air monitoring) <u>Respiratory Protection:</u> SCBA/APR/Nothing (subject to Task & benzene, H ₂ S & particulate concentrations)	<u>Clothing:</u> Thermal Protection (if hot)/ Fire Retardant Clothing (subject to task and air monitoring) <u>Respiratory Protection:</u> SCBA/APR/Nothing (subject to Task & benzene, H ₂ S & particulate concentrations)	<u>Clothing:</u> SFC Fire Retardant Clothing (subject to task and air monitoring) <u>Respiratory Protection:</u> SCBA/APR/Nothing (subject to Task & benzene, H ₂ S & particulate concentrations)
COMMUNITY, WORKER & RESPONDER SAFETY	Flammability, Benzene, LEL, H ₂ S	Flammability, Benzene, LEL, H ₂ S, PAH's (poly-aromatic hydrocarbons)	H ₂ S, PAH's (poly-aromatic hydrocarbons)	Flammability, Benzene, LEL, H ₂ S



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- **Crude Oil Firefighting.** Considerable research and experience exists on crude oil firefighting, especially as it pertains to crude oil storage tank firefighting and the behavioral concepts of frothover, slopover and boilover. Frothovers and slopovers can be a safety issue when applying extinguishing agents, especially in the later stages of a crude oil tank car fire. Application of foam and water in the later stages of a crude oil tank car fire can result in some of the tank car contents spewing out of tank car openings.

In contrast, the risk of a boilover at a crude oil derailment scenario remains subject to debate. Questions exist on whether the findings seen in crude oil storage tank firefighting can be directly extrapolated to HHFT scenarios. As background, in order for a boilover to occur in a storage tank scenario, three criteria are needed:

- The oil must have a range of light ends and heavy ends capable of generating a heat wave;
- The roof must be off of the tank (i.e., full surface fire); and
- A water bottom (i.e., water at the bottom of the tank) necessary for the conversion of the water to steam (1,700:1).

As the oil burns, the light ends burn off and a heat wave consisting of the heavier oil elements is created. When this heat wave reaches the water bottom, the water rapidly flashes over to steam at an expansion ratio of 1,700:1 and forces the ejection of the crude oil upward and out of the tank.

While always possible, the conditions needed for a boilover appear to lower the probability of a boilover occurring in a tank car derailment scenario as compared to a crude oil storage tank scenario. We are not aware of a boilover event occurring at any of the crude oil HHFT incidents that have been reviewed.

A key factor in assessing the probability of a boilover is the amount of water in the container. Based upon observations at a number of refineries, shale oil tank cars are typically arriving at refineries with <1% water. Mechanical agitation from the transportation of crude oil in a tank car keeps the water content in suspension. In addition, crudes in rail transport do not have the same residence time for the water to accumulate at the bottom of a moving tank car as it does in a static fixed storage tank. It is difficult to achieve all of the conditions needed for a boilover to occur in this scenario. However, the indiscriminate application of large water streams into a pile of burning tank cars that result in water getting inside of a tank car may increase the risk of a boilover later in the incident.

General Observations. The following observations have been noted with respect to crude oils and ethanol as found in HHFT scenarios:

- Incidents involving crude oil products with varying percentages of dissolved gases have not generated significant emergency response issues in terms of fire behavior once ignition occurs. Dissolved gases and light ends may facilitate easier ignition of the released product when the initial tank car stress / breach / release events take place. There does not appear to be significant differences in fire behavior once ignition occurs. Once light ends burn off, a heavier, more viscous crude oil product will often remain.

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- Cooling water requirements are equally as important as foam usage when mitigating HHFT scenarios. Class B foam operations can only be used after a tank car has been properly cooled and is being managed with a tank car-specific tactical plan.
- In non-fire spill scenarios, vapor concentrations have been confirmed via air monitoring. Air monitoring at non-fire events has also shown that the light ends will boil off within several hours. Obtaining the Certificate of Analysis (or comparable information) from the shipper may provide key information on the crude oil viscosity and make-up for assessing potential spill behavior in water.
- Incident experience has shown that very seldom does the fire completely consume all of the product within a tank car. Responders have noted that once the light ends have burned off and the intensity of a crude oil tank car fire levels off to a steady state fire, the heavier ends continue to burn similar to a “smudge pot.”

Understanding Ethanol

- When shipped as a freight rail commodity, ethanol can be either straight or “neat” ethyl alcohol, or denatured fuel ethanol which has been denatured with 2-5% unleaded gasoline to make the liquid unfit for drinking. Among its properties are the following:
 - In its pure form, ethanol does not produce visible smoke and has a hard-to-see blue flame.
 - In a denatured form, there is little to no smoke with a slight orange visible flame.
 - Recommended to use a thermal imaging camera to identify whether a flame is truly present or not.
- **Table 2** outlines the physical and chemical properties of ethanol products that may be found in HHFT trains.

TABLE 2	DENATURED FUEL ETHANOL
TRANSPORTED AS HAZMAT	Yes - DOT Class 3, UN 1170 – Ethyl Alcohol UN 1987 – Denatured Fuel Ethanol – US UN 3475 – Denatured Fuel Ethanol - Canada (ERG Guide No. 127)
FLASH POINT	Varies: -5° F
BOILING POINT	Varies: PGII = 165-175° F.
REID VAPOR PRESSURE	2.3 psi
VISCOSITY** IN CENTIPOISE (CPS) @ ~60 °F:	1.19
API GRAVITY	46° - 49°

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TABLE 2 (Continued)	DENATURED FUEL ETHANOL
SPECIFIC GRAVITY	0.79 (Floats on water)
VAPOR DENSITY	1.59 (Heavier than Air)
BENZENE	Generally ≤1.0%
EVAPORATION RATE (TEMPERATURE DEPENDENT)	>1 (High Evaporation Rate)
SOLUBILITY	High
AIR MONITORING	LEL (combustible gas indicator), Benzene (direct read or tubes)
RECOMMENDED PPE	<u>Clothing</u> : SFC/Fire Retardant Clothing (subject to task and air monitoring) <u>Respiratory Protection</u> : SCBA/APR/Nothing (subject to task & benzene & particulate concentrations)
COMMUNITY, WORKER & RESPONDER SAFETY	Flammability, Benzene, LEL

C. THE CONTAINERS

Flammable liquids, including crude oil and ethanol, have been transported in DOT-111 or CPC-1232 tank cars. The CPC-1232 tank car is a DOT-111 tank car modified with head shields, top fitting protection, and bottom handle protection. These non-pressure tank cars (also called general service or low-pressure tank cars) are built to transport low-vapor pressure commodities, including regulated (hazardous materials / dangerous goods), as well as non-regulated commodities. Key construction features of these containers include:

- May be single shell or jacketed containers, with a tank shell thickness of 7/16 to 1/2 inches. If equipped, the jacket is typically 11 gauge – 1/8-inch thick steel.
- Capacity of 33,000 gallons (125,000 liters)
- Weight of approximately 286,000 lbs. (130,000 kilograms).
- Top fittings and bottom outlet valve.

On May 8, 2015, the US DOT/PHMSA issued a final rule (HM-251) that provided risk-based regulations pertaining to HHFT operations and new tank car standards for HHFT's. As specified in the final rule, during the period of 2017 through 2025 DOT-111 and CPC-1232 tank cars used for the shipment of flammable liquids in HHFT service will either be (a) removed from service; (b) retrofitted to meet a new DOT-117R standard; or (c) replaced by the new

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DOT-117 tank car. New tank cars constructed after October 1, 2015 must meet the DOT-117 design or performance criteria.

On December 4, 2015, the Fixing America’s Surface Transportation (FAST) Act was signed into law and revised the May 8, 2015 rulemaking to now apply to all flammable liquids transported by rail. See **Table 3** for a comparison of the U.S. FAST Act Phase Out Schedule and **Table 4** for the Transport Canada Phase Out Schedule. It is important to recognize that legacy DOT-111 and CPC-1232 tank cars will continue to be used for another 5+ years.

Table 3			
U.S. FAST Act Phase Out Schedule			
Material	JACKETED OR NON-JACKETED TANK CARS	DOT-111 NOT AUTHORIZED ON OR AFTER:	DOT-111 CPC-1232 NOT AUTHORIZED ON OR AFTER:
Unrefined Petroleum Products – Class 3, PG I (e.g., Crude Oil)	Non-Jacketed	January 1, 2018	April 1, 2020
	Jacketed	March 1, 2018	May 1, 2025
Class 3, PG I (Flammable Liquid), other than Unrefined Petroleum Products	Non-Jacketed	May 1, 2025	May 1, 2025
	Jacketed	May 1, 2025	May 1, 2025
Unrefined Petroleum Product – Class 3, PG II or PG III (Flammable Liquid)	Non-Jacketed	January 1, 2018	April 1, 2020
	Jacketed	March 1, 2018	May 1, 2025
Ethanol	Non-Jacketed	May 1, 2023	July 1, 2023
	Jacketed	May 1, 2023	May 1, 2025
Class 3, PG II or PG III (Flammable Liquid) other than Unrefined Petroleum Products or Ethanol (see above)	Non-Jacketed	May 1, 2029	May 1, 2029
	Jacketed	May 1, 2029	May 1, 2029

Table 4		
Transport Canada Phase Out Schedule		
Cut-Off Date	FLAMMABLE LIQUID / PACKING GROUP	TC/DOT-111 REMOVED FROM SERVICE
November 1, 2016	Crude Oil, PG I, II, and III	Non-CPC-1232, Non-Jacketed “Legacy tank cars”
November 1, 2016	Crude Oil, PG I, II, and III	Non-CPC-1232, Jacketed “Legacy tank cars”
April 1, 2020	Crude Oil, PG I, II, and III	CPC-1232, Non-Jacketed
May 1, 2023	Ethanol, PG II	Non-CPC-1232, Non-Jacketed; Non- CPC-1232, Jacketed
July 1, 2023	Ethanol, PG II	CPC-1232, Non-Jacketed

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Cut-Off Date	FLAMMABLE LIQUID / PACKING GROUP	TC/DOT-111 REMOVED FROM SERVICE
May 1, 2025	Crude Oil and Ethanol, PG I, II, and III	CPC-1232, Jacketed*
May 1, 2025	All other Flammable Liquids, PG I, II and III	Non-CPC, Non-Jacketed; non-CPC, Jacketed; CPC-1232, Non-Jacketed; CPC-1232, Jacketed*



DOT/TC-117J100W Tank Car for Flammable Liquid Service

From a risk-based response perspective, the new DOT-117 tank cars will have most of the same construction features currently found on pressure tank cars used for the transportation of liquefied gases (e.g., LPG, anhydrous ammonia, etc.). These features will include the full-height ½-inch thick head shields, 1/8-inch jacketing, thermal protection, increased shell thickness (DOT-117), top fitting protection, and either removal or redesign of the bottom outlet handle.

In addition to the regulatory requirements noted above, some shippers and tank car owners are upgrading their crude oil tank car fleet with the addition of the DOT-120 pressure tank car being modified for the loading and off-loading of crude oil. Key construction features of the “new build” DOT-117 versus the DOT-120 are shown on the following page on **Table 5**.

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Table 5		
Construction Features – New Build DOT-117 vs. DOT-120		
Features	DOT-117 Built to Non-pressure Tank Car Standards	DOT-120 Built to Pressure Tank Car Standards
Specification	DOT/TC-117A100W	DOT-120J200W
Material of Construction	Carbon Steel	Insulated Steel or Aluminum
Min. Tank Shell Thickness	9/16-inch	9/16 inch
Head Shields	Full-Height Head Shield 1/2-inch	Full-Height Head Shields
Tank Head Thickness	9/16-inch	19/32-inch
Tank Jacket	Yes	Yes
Thermal Protection System	Provided via Insulation OR High-Flow Pressure Relief Valve	Provided via Insulation AND High-Flow Pressure Relief Valve
Manway	Protected Manway	Protected Manway
Bottom Outlet Valve	Upgraded Bottom Outlet Valve Handle	Upgraded Bottom Outlet Valve Handle
Tank Test Pressure	100 psig	100 - 500 psig

Tank car manufacturers have built a number of specification DOT-120J200W tank cars for the transportation of flammable liquids. These tank cars are similar in appearance to Class-117 tank cars, except the hinged and bolted manway cover is contained within a protective housing. See photos of the DOT-120 tank car below.



DOT-120 Tank Car for Flammable Liquid Service. Note the protective housings.



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The following facts can be noted with respect to the behavior of the railroad tank cars in a HHFT scenario:

- *Tank cars equipped with jacketing and thermal protection have performed better than the non-jacketed DOT-111 and non-jacketed CPC-1232 (i.e., Interim DOT-111) tank cars in derailment scenarios involving fire.*

Observations show that the number of tank cars that breach or fail is dependent on the type of tank car involved (e.g., DOT / TC specification, jacketed vs. non-jacketed tank car), train speed, location and the configuration of the derailment (i.e., in-line vs. accordion style). Tank cars that pile up generally sustain greater numbers of car-to-car impacts that result in breaches, or will be susceptible to cascading thermal failures from pool fires. When not involved in fire, tank cars that roll over in-line are often less susceptible to a container breach, but may leak from damaged valves and fittings. If the tank car PRD is buried or blocked, it will be unable to relieve pressure at its full rated capacity. Also, if the tank car is lying on its side and the PRD is relieving liquid product, it is not relieving pressure at its full capacity.

- *While jacketing and thermal protection are positive factors when dealing with thermal stressors on the DOT-117 tank car, they may complicate the damage assessment process and the effectiveness of container cooling streams. Tactical considerations may include the following:*
 - Tank car damage, including stressors and potential breach behaviors, may not be easily visible.
 - Thermal protection may reduce the effectiveness of cooling streams on the tank car, as water may not reach the internal tank shell.
 - Cooling streams may have the unintended consequence of spreading the flammable liquid over a larger area, thereby increasing exposure impacts and environmental damage.
 - Thermal imaging cameras can be an effective tool in determining liquid levels within the tank car.
- *After the initial mechanical stress associated with a derailment, crude oil and ethanol tank cars may breach based upon a combination of (a) thermal stress from an external fire impinging on the tank car shell, (b) the heat-induced weakening and thinning of the tank car shell metal, and (c) the tank car internal pressure. The hazards posed by the release of flammable liquids include flash fires, pool fires, fireballs from container failure (i.e., radiant heat exposures) and any associated shock wave.*

For example, all of the crude oil tank cars involved in the Mount Carbon, WV derailment were CPC-1232 tank cars with no thermal protection. During the derailment sequence, two tank cars were initially punctured releasing more than 50,000 gallons of crude oil. Of the 27 tank cars that derailed, 19 cars became involved in the pileup and post-accident pool fire. The pool fire caused thermal tank shell failures on 13 tank cars that otherwise survived the initial accident.²

Also of critical importance to responders is the timing of the tank shell failures. Emergency responders at the Mount Carbon, WV incident reported the first thermal failure about 25 minutes after the accident. Within the



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initial 65 minutes of the incident, at least four tank car failures with large fireball eruptions occurred. The 13th and last thermal failure occurred more than 10 hours after the accident.³

- *The size of the area potentially impacted by both the fireball and radiant heat as a result of a tank car failure are key elements in a risk-based response process, especially in determining protective action options and distances.* A review of research literature by the Sandia National Laboratory for U.S. DOT / PHMSA showed that a 100-ton release of a flammable liquid (approximately equivalent to a 30,000-gallon tank car) with a density similar to kerosene or gas oil would produce a fireball diameter of approximately 200 meters (656 feet) and a duration of about 10 – 20 seconds.⁴

Observations that can be made with respect to the behavior of the railroad tank cars in a HHFT scenario include:

- *Derailments resulting in a liquid pool fire scenario can lead to the failure of valve and manway gaskets, which leads to additional tank car leaks and associated issues during derailment clean-up and recovery operations.*
- *Tank cars that have been breached and involved in fire will usually contain some residual product that will continue to produce internal vapors (i.e., typically a vapor rich environment).* There have been instances where tank cars being moved during clean-up and recovery operations have allowed air to enter the tank resulting in a flash fire / jet fire from the container breach and/or an open manway. Responders should expect vapor flash fires at any time and in any direction, especially during wreck clearing and clean-up operations.
- *Heat induced tears (HIT) have been observed on tank cars containing both crude oil and ethanol. These tears may initially appear as a “blister” on the upper side of the tank shell. When HIT’s occur, the majority of the thermal energy is released upwards as compared to moving outward a significant distance. At this time no relationship between the activation of a pressure relief device and the blistering of the tank car shell has been observed.* While the majority of heat induced tears (HIT) have occurred during the initial 1-6 hours of an incident, tank car failures can occur at any time. Heat induced tearing has occurred within 20 minutes of the derailment and as long as 10+ hours following the initial derailment.
- *There can be significant differences in product behavior (e.g., physical properties, internal pressure), tank car design and construction, and breach-release behaviors between pressure tank cars such as the DOT-105 and DOT-112/114 tank cars, and non-pressure tank cars such as the DOT-111 and CPC-1232. There has been no evidence of runaway linear cracking or separation as historically observed with pressure tank car failures occurring in unit train scenarios involving crude oil.*

Based upon Federal Railroad Administration (FRA) reports, the following container behavior observations have been noted:^{5,6}

- Container separation has occurred at derailments involving ethanol tank cars in Arcadia, OH and Plevna, MT. A separation occurs when a thermal tear propagates circumferentially from each end of the tear and results in the tank car completely or nearly fragmenting into multiple pieces.



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- The FRA report also noted that some of the “explosions” at these derailments may be the result of either a rapid massive vapor release in a matter of seconds which can cause a blast wave the effects of which are limited to relatively short distances or the misrepresentation of the fire ball type of burning as an “explosion.”

As used within the fire service and defined by the National Fire Protection Association (NFPA), a BLEVE is a major container failure, into two or more pieces, at a moment in time when the contained liquid is at a temperature well above its boiling point at normal atmospheric pressure. DOT-111 and CPC-1232 tank cars transporting crude oil do not appear to be susceptible to the separation / fragmentation of the tank car, similar to that seen with pressure tank cars. However, as noted above, separation of ethanol tank cars has been documented at two incidents.

- *There appears to be variations in the configuration of DOT-117R tank cars, as well as the performance of DOT-117R versus DOT-117J tank cars in a derailment scenario. Several HHFT derailments have occurred over the last two years where DOT-117R tank cars have not performed at the same level as a “new build” DOT-117J tank car (i.e., mechanical and physical damage).*
- *The term “equilibrium” is used at various places within this paper to describe the point in which the fire problem is no longer expanding and has achieved a “steady state” of fire and container behavior. It usually takes place after most of the light ends have burned off and the intensity of the fire is no longer increasing. The following fire behavior and incident characteristics would be indicative of the state of “equilibrium:”*
 1. The fire is confined to a specific area with little probability of growth in either size or intensity.
 2. There is low probability of additional heat induced tears or container breaches caused by fire impingement directly upon tank cars.
 3. There are no current pressure relief device (PRD) activations indicating continued heating of tank cars.

D. INCIDENT MANAGEMENT

Experience has demonstrated that HHFT incidents are large, complex and lengthy response scenarios that will generate numerous response issues beyond those normally seen by most local-level response agencies. In addition to the hazmat issues associated with the response problem, there will be a number of other secondary response issues that will require attention by Incident Command / Unified Command. These will include public protective actions, logistics and resource management, situational awareness, information management, public affairs, and infrastructure restoration. Expanding the ICS organization early to include command and general staff positions will be critical in both recognizing and managing these issues.

Among the key incident management lessons that have been learned are the following:



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- *The application and use of risk-based response processes will be critical to the safe and successful management of the incident.* All initial decisions should be driven by a risk-based size-up process, based upon product / container(s) behavior, incident location and exposures, and incident potential. A review of firefighter injury and fatality reports since 1970 shows that the greatest risk of responder injuries at hazardous materials emergencies will be First Responder – Operations level personnel operating during Hour 1 of the response.⁷
- *In contrast to most fire service emergencies which are terminated in a matter of hours or within a single operational period, major environmental incidents such as HHFT derailments are long duration events that may potentially extend over several days.* Smaller public safety response organizations may be overwhelmed by the multitude of governmental agencies and related organizations that will ultimately appear on-scene.
- *Unified command will be critical for the successful management of the incident.* Keep in mind that the configuration of unified command during the first operational period will likely look a lot different in subsequent operational periods as the incident transitions and incident objectives change. Initial unified command will primarily consist of local response agencies who routinely work together at the local level (e.g., fire, LE, EMS and an initial railroad representative). As the incident expands and other agencies arrive on-scene, unified command will evolve to the organizational structure outlined in the National Response Framework or Canadian equivalent for oil and hazardous materials scenarios (i.e., Emergency Support Function (ESF- 10). Under ESF-10, unified command will likely consist of the following:
 - Local On-Scene Coordinator (most likely the Fire Department during emergency response operations)
 - State On-Scene Coordinator (usually designated state environmental agency)
 - Federal On-Scene Coordinator (U.S. Environmental Protection Agency (EPA) or U.S. Coast Guard (USCG), based upon the location of the incident and its proximity to navigable waterways.
 - Responsible Party or RP (e.g., railroad carrier, shipper)
 - For incidents on tribal lands of Federal recognized Indian tribes, a representative from the Indian tribe should be invited to participate.
- *Given the number of “interested” parties that may show up at the incident, the establishment of a Liaison Officer to serve as the “gate” into the incident management organization will be critical.* Within NIMS these external agencies / services can be provided through Assisting Agencies, Coordinating Agencies or Technical Specialists.
 - *Assisting Agencies* provide personnel, services or other resources to the agency with direct responsibility for incident management. Examples include health and environmental agencies for sampling and monitoring operations.
 - *Cooperating Agencies* supply assistance other than direct operational functions or resources to the incident management effort. Examples include Fish & Wildlife representatives, utilities, etc.
 - *Technical Specialists* are individuals who can provide the Incident Commander with technical expertise on a specific issue or topic. These would include hazmat product and container specialists from the shipper, consignee or carrier, fire control and spill control specialists, etc.



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- *As the size, scope and complexity of the incident increase, Incident Management Teams (IMT's) at the regional, state and federal levels can serve as an excellent resource to support unified command activities. In addition, Class 1 railroads may have an IMT capability that is provided through either their personnel or contractors.*

E. TACTICAL CONSIDERATIONS

1. **Class B Firefighting Foam Operations.** An HHFT incident is a low frequency, high consequence scenario that will likely be the largest flammable liquid incident encountered by most response agencies. Challenges will include the location of the incident, the overall size and scope of the problem, the rapid growth of the fire and spill problem, and the level of resources available at the beginning of the incident. An objective assessment of most fire department Class B fire capabilities would likely show the following:
 - Flammable liquids are the most common class of hazardous materials encountered by the fire service.
 - Most fire department Class B fire operational capabilities are focused towards smaller flammable liquid scenarios involving vehicles and spills of 100 gallons and smaller.
 - Gasoline tank truck emergencies (8,000 to 10,000-gallon capacity) are generally the largest flammable liquid scenario encountered. In most instances, defensive-based strategies to protect exposures and allow the fire to burn itself out are employed.
 - Few municipal fire departments have the operational capability during the initial operational period to deal with large bulk flammable liquid scenarios, such as those found in petroleum storage tank emergencies or HHFT derailment scenarios.
 - Industrial fire departments, such as those found in the petroleum and petrochemical industries, have Class B agent operational capabilities to acquire, deliver and sustain large Class B foam operations (2,500 gpm and higher) for large flammable liquid scenarios.
 - Flammable liquid firefighting involving Class B foam operations requires foam concentrate and water supplies commensurate with the size of the spill / fire based on appropriate application rates. Additional water supplies will likely be required for exposure protection and/or cooling before foam application operations can commence. The application of cooling water streams must be coordinated with foam operations to ensure that foam application / foam blanket is effective.
 - With few exceptions, most railroad corridors do not have large flow hydrant-based water supplies immediately available. In addition, the use of static or natural water sources, such as streams and rivers, may not be easily and safely accessible.
 - A review of previous HHFT incidents shows that the majority of firefighting operations after the initial response period have been conducted by emergency response contractors contracted by the Responsible Party (RP), with public fire departments in a supporting role.

The intent of presenting this assessment is to convey that sustaining large water and flow foam operations while balancing spill control operations at HHFT scenarios will be a significant operational challenge for many public fire departments. This will be a low frequency / high consequence scenario that will pose significant risks to emergency responders if offensive strategies are employed. In light of these risks, some jurisdictions



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have developed tactical pre-plans based upon local risk exposures to assess their ability to safely initiate offensive or defensive operations. A critical element of this process is the identification of “go / no go” areas where tactical response operations may not be possible based upon incident location, topography and scene access.

Formulas for calculating Class B foam concentrate requirements are referenced from *NFPA 11 – Standard for Low-, Medium-, and High Expansion Foam*, and are based upon either spill scenarios (i.e., less than 2-inches product depth) or product storage in depth scenarios. In contrast, flammable liquid spills along a railroad right-of-way or which extend into adjoining structures and exposures are a hybrid, multi-dimensional scenario that can consist of surface spills, pooled product, and product absorbed into the rail bed, soil, etc. As a result, foam calculations based upon NFPA 11 parameters on the area of involvement may not be accurate for HHFT scenarios. Non-traditional use and application of Class B foams may be warranted based upon incident requirements (as compared to spill or product in-depth applications). These non-traditional use and applications should be coordinated through the Incident Commander / Unified Commanders and the Railroad Technical Specialists / Hazardous Materials Officers as part of the IAP process.

A review of previous HHFT incidents shows that potential foam operations can fall into two different operational environments: (1) offensive operations to rapidly control or extinguish the fire in the early phases of the incident timeline, and (2) final extinguishment of the fire in the later phases of the incident timeline after the size and intensity of the fire have greatly diminished (i.e., equilibrium has occurred). Observations include the following:

- No HHFT scenarios have been controlled or extinguished in the early phases of the incident.
- Fire extension into adjoining structures and exposures in close proximity to the rail corridor will influence strategies, tactics and resource requirements.
- The actual quantity of Class B foam concentrate supplies used for the control and extinguishment of HHFT incidents in the later phases of the incident timeline have been substantially less than the “area-based” planning values based upon the NFPA 11 parameters.
- Once “equilibrium” has been achieved and tank car metals cooled, individual tank cars with breaches and internal fires have been extinguished using as little as 8 gallons of Class B foam concentrate per tank car.
- The use of Class B firefighting foams in combination with dry chemical extinguishing agents (e.g., Purple K or potassium bicarbonate) will be critical tools in the controlling and extinguishing pressure fed fire scenarios.

Responders are also encouraged to reference the NFPA Research Foundation Report on “Foam Application for High Hazard Flammable Train (HHFT) Fires (August 2017)” which provides additional background information on foam application at HHFT incidents. The report, which focused upon twelve (12) representative HHFT incidents, concluded the following:

- Cooling water requirements are equally as important as foam usage when mitigating these types of incidents.



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- During ten (10) of the representative incidents, effective foam usage only occurred during the equilibrium phase (see following section on HHFT Incident Timeline). During 50% of these incidents, less than 100 gallons of foam concentrate was used. During the remaining 50%, approximately 300 gallons of foam concentrate was used. On average, approximately 50% of the foam discharged during the equilibrium phase was applied directly into the burning cars (on average 14 gallons of foam concentrate per car) to suppress and extinguish the fires within the car. The remainder was used to extinguish pool / spill fires and to seal fuel vapors during overhaul.
 - The foam values used from incident data were compared to the analytical values (i.e., area method) calculated using NFPA 11. The NFPA 11 values were typically about five-times greater than that actually used during the incident. It was noted that the experience of first responders in dealing with large volume flammable liquid scenarios also influences these results. Inexperienced first responders tend to use foam ineffectively and can prolong the overall duration of the incident.
 - During the ten (10) incidents documented in the NFPA report, approximately 300 gallons of foam concentrate or less was sufficient to suppress and extinguish these fires. This quantity may need to be adjusted based upon the level of training and experience of first responders with large volume flammable liquid scenarios.
 - Foam can only be used after railcars have been properly cooled and after a tank car can be responded to with an individual tactical plan. Parallel to foam application, the use of cooling water serves as a vital preemptive step to any offensive response.
2. **Spill Control Operations.** Most emergency response agencies do not have a robust spill control capability, especially if waterways are involved. Most spill control resources (both land and water-based) at HHFT incidents have been provided by Oil Spill Response Organizations (OSRO's) and emergency response contractors retained by the Responsible Party. Geographic response plans (see pages 3 and 4) will be key factors to identify vulnerable locations, access points, required spill control resources, booming anchor points, and product recovery points.

First responder spill control priorities will primarily be focused towards defensive strategies and tactics to accomplish the following priorities:

- Determine where the surrounding topography and where the spill problem is going so that spill response operations can get ahead of the release.
- Based upon the nature of the container breach and release, keep the size of the spill as small as possible. This may require "giving up" some ground in order to get ahead of the spill flow.
- Keep the spill out of adjoining or exposed waterways.
- If the spill enters a waterway, identify and protect downstream water sources, water intakes, environmentally sensitive areas and critical infrastructures.
- Be aware of underground infrastructures that may allow the product to move away from the derailment location. For example, in Mosier, OR an underground sanitary sewer line was breached, which allowed crude oil to flow into the sewer line and impact a nearby waste-water treatment facility.



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Responders should recognize the potential environmental impacts from the use of Class B firefighting foams, especially when dealing with exposure to potential water supplies. A number of states have passed environmental regulations pertaining to the fluorogenic compounds (Perfluorooctanoic Acid (PFOA), Perfluoro-Octane-Sulfonate (PFOS) and Polyfluoroalkyl substances (PFAS)) in firefighting foams.

The International Association of Fire Chiefs (IAFC) has issued the following recommendations to reduce the impact of PFOS and/or PFAS on first responders and the environment:

- Eliminate stockpiles of legacy AFFF foams.
- Eliminate the use of modern or legacy foam in training situations.
- Transition from C-8 long chain AFFF to the C-6 short-chained AFFF foams.

Additional information on the use of fluorine-free firefighting foams for flammable liquid protection can be referenced from the NFPA Research Foundation report on “Evaluation of the Fire Protection Effectiveness of Fluorine Free Firefighting Foams” (January 2020), as well as foam manufacturer technical data.

3. **Risk-Based Tactical Considerations.** The following observations can be made with respect to tactical considerations at a HHFT scenario:

- Cooling tank cars adjacent to the fire can decrease the possibility of a tank car breach, such as a heat induced tear.
 - Cooling water should first be directed at the point of flame impingement, then on the vapor space of tank cars adjacent to the fire exposure from radiant heat.
 - Cars that have already breached do not have to be cooled.
 - Do NOT spray cooling water directly into a crude oil tank car if breached. This may lead to a slopover, frothover or longer term, potentially a boilover.
 - If they can be safely established, remote unmanned monitors are recommended, especially for extended cooling operations.
 - Tank car thermal insulation can both protect the container from thermal stress and limit the effectiveness of cooling streams.
 - In areas with limited water supplies, it may be necessary to re-use cooling water by collecting water run-off and drafting from a pit or basin.
- Clues and signs that could indicate that the incident is likely to rapidly grow or cascade, include:
 - Running or unconfined spill fires and releases. Spills may flow into storm drains and other underground structures creating secondary spills and fires. In addition, the use of large water streams for cooling may also spread the fire to unintentional areas.
 - Direct flame impingement on tank cars from either a pool fire or torch fire.
 - Presence of heat induced blisters appearing on the tank car shell.
 - Activation of pressure relief devices (PRD).



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- Fire area has grown since emergency responders have arrived on-scene.

Any tank car that is subject to flame impingement and venting from a PRD is susceptible to container failure and the generation of a large fireball.

- Based upon a review of 25+ HHFT incidents, once rapid growth of the fire occurs and PRD's begin to activate offensive strategies cannot be safely implemented until the fire problem achieves a "state of equilibrium," which is often 8+ hours into the incident. The following fire behavior and incident characteristics would be indicative of a "state of equilibrium:"
 - The fire is confined to a specific area with little probability of growth.
 - There is low probability of additional heat induced tears or container breaches.
 - There are no current PRD activations indicating continued heating of tank cars.
 - The fire is primarily a two-dimensional fire versus a pressure-fed three-dimensional fire.
- Based upon previous incidents, the following factors can serve as an initial operational baseline for determining if the fire scenario can be controlled:
 - Is the fire confined to a specific area with little likelihood of growth?
 - Is there a low probability of additional heat induced tears or container breaches?
 - Is the fire primarily a two-dimensional fire versus a large number of pressure-fed three-dimensional fires?
 - Are sufficient water supplies available for container cooling BEFORE foam operations are initiated? These cooling operations will be critical to the operational success of post-equilibrium fire attack operations.
 - Are sufficient Class B foam supplies, appliances and personnel competent in foam operations available? Once initiated, can the required foam operations be sustained?

4. **Post-Equilibrium Fire Operations.** Before offensive operations can be initiated after the state of equilibrium is achieved, the involved tank cars will likely have to be cooled. Responders should use thermal imagers or look for steam coming off the tank car shell to assess the product temperature. Product temperatures as high as 450° F. (232° C) have been observed in previous derailments. Assessment of the product temperature will be complicated if the tank car is jacketed.

Key elements of offensive strategies that have been successfully employed at HHFT scenarios **after equilibrium** include (1) adopting a "divide and conquer" approach whereby involved tank cars are addressed one at a time; (2) tank cars being cooled to ensure the ability of Class B foams to seal against hot metal surfaces; (3) foam handlines being used to apply foam into breached tank cars; and (4) dry chemical agents, such as Purple K, being used to control any three-dimensional fires.



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SECTION 3 - RISK-BASED RESPONSE: THE HHFT INCIDENT TIMELINE

Incident size-up initiates the process of assessing the hazards and evaluating the potential risks at a HHFT scenario. As part of a risk-based response process, understanding the behavior of the container involved, its contents, the location of the incident and surrounding exposures are critical elements in determining whether responders should and can safely intervene.

To assist emergency responders in this process, an HHFT Incident Timeline was developed as a training tool (see pages 27 - 30). The timeline is designed to show the relationship between (a) the behavior of the tank car(s) and their contents; (b) key incident management benchmarks, and (c) strategic response options. An incident timeline can be an effective training tool. While specific timeline elements will vary based upon incident dynamics, local / regional timelines and operational capabilities, the timeline provides a visual tool that “helps to connect the dots” for incident action planning considerations.

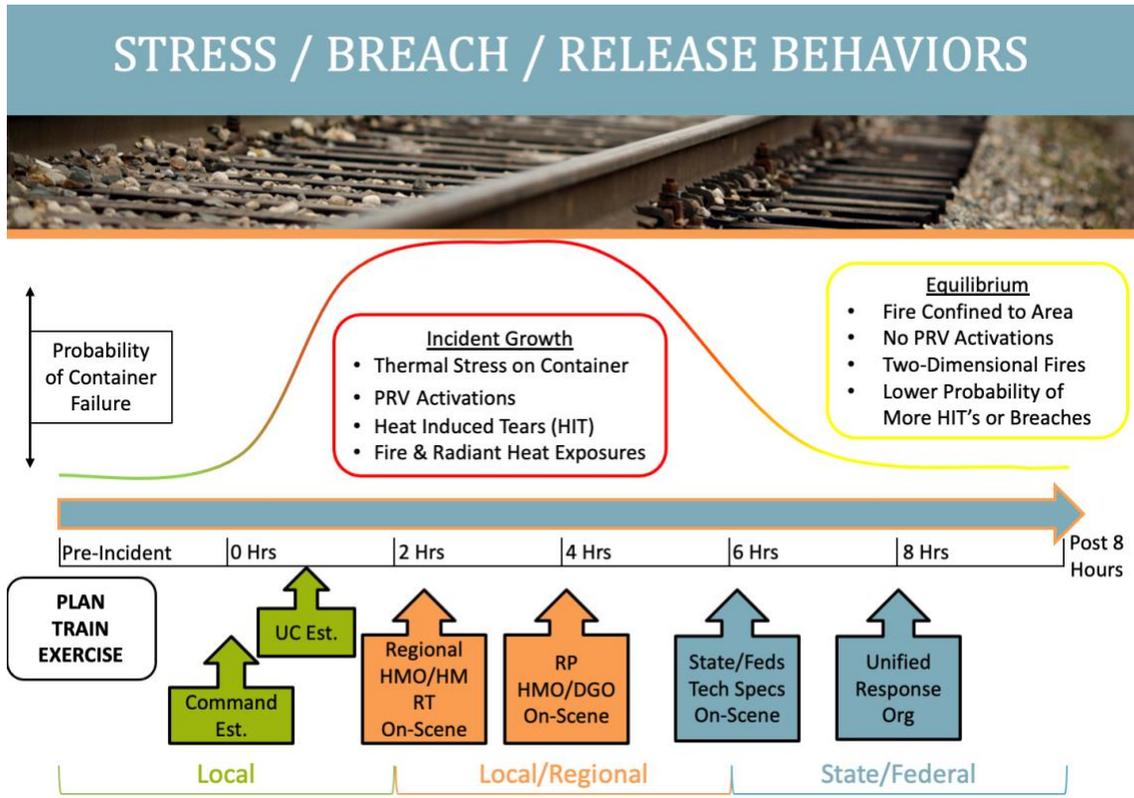
The Incident Timeline consists of multiple screens. Key points of each screen include the following:

1. Stress / Breach / Release Behaviors

- The timeline focuses upon the first operational period.
- The curve represents the probability of container failures, which leads to a cascading and growing response scenario.
- The properties of the commodities being transported along with the speed of the train and the energy associated with the initial derailment will directly influence the initial container breach, spill / release behavior and ignition potential. After the initial mechanical stress caused by the derailment forces, subsequent container stress / breach / release behaviors will be thermal or fire focused.
- Incident growth will generally follow a process of (a) thermal stress from the initial fire upon the tank cars (level of thermal stress will be influenced by the presence and integrity of thermal blanket protection); (b) activation of tank car pressure relief devices; (c) continued thermal stress on adjoining tank cars from a combination of both pool fires and pressure-fed fires from PRD's; (d) increasing probability of container failures through heat induced tears; and (e) subsequent fire and radiant heat exposures on surrounding exposures when explosive release events occur.
- Fires will continue to burn off the available flammable liquid fuel until such time that it achieves a level of “equilibrium” and is no longer growing in size or scope. **An analysis of historical incidents shows that equilibrium at a major incident may not occur for approximately 8-12 hours.** There is a lower probability of additional heat induced tears or tank car breaches once equilibrium is achieved.
- “Equilibrium” benchmarks would include the fire being confined to a specific area and no longer increasing in size or scope; no PRD activations, and the fire scenario primarily being a two-dimensional scenario, with any three-dimensional pressure-fed fires decreasing in intensity.

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2. Incident Management Benchmarks

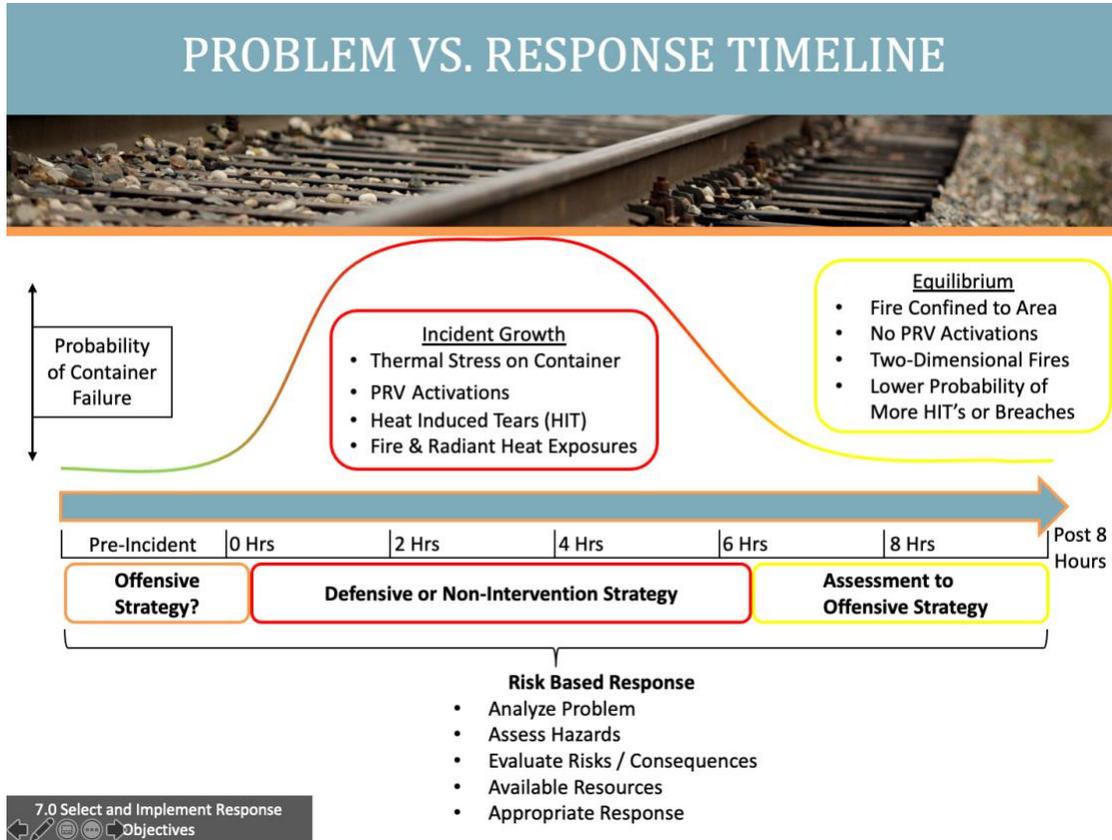
- Lessons learned from previous incidents clearly shows that communities that engage in pre-incident planning, training and exercise activities with fellow stakeholders establish the foundation for a safe and effective response. The importance of establishing relationships among all of the key players before the incident cannot be over-emphasized.
- While the exact timeline will vary based upon local / regional resources and response times, key incident management benchmarks within hour 1 will include (a) conducting an incident size-up, identification of critical incident factors, and development of initial incident objectives; (b) establishment of command and an Incident Command Post (ICP) and (c) establishment of a unified command organization. Unified command at this phase of an incident will be local-centric and focus upon the integration of fire / rescue, law enforcement and EMS resources. Railroad personnel will primarily function in a liaison role during this initial window.
- Arrival of resources that can provide technical assistance to Incident Command / Unified Command (IC/UC) within the first several hours of the incident. Based upon local / regional capabilities and response times, this technical assistance may be provided through any combination of Technical Specialists, Hazardous Materials Officers, Hazardous Materials Response Teams (HMRT) or Hazardous Materials / Dangerous Goods Officers from the Responsible Party (RP).

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- Arrival of additional governmental and RP representatives, as well as contractors working on behalf of the RP. Based upon incident location and response times, these elements will likely arrive on-scene in the latter half of the first operational period.
- Once all of the players are on-scene, unified command will evolve to an organizational structure that may challenge the organizational skills of many response agencies. Unified Command will likely consist of:
 - Local On-Scene Coordinator (most likely the Fire Department during emergency response operations)
 - State On-Scene Coordinator (usually designated state environmental agency)
 - Federal On-Scene Coordinator (U.S. Environmental Protection Agency - EPA) or U.S. Coast Guard - USCG), based upon the location of the incident and its proximity to navigable waterways.
 - Responsible Party or RP (e.g., railroad carrier, shipper)
 - For incidents on tribal lands of Federal recognized Indian tribes, a representative from the Indian tribe should be invited to participate.

Other local, state, federal and non-governmental organizations (i.e., assisting and cooperating agencies) will work through their respective On-Scene Coordinator or the Liaison Officer to bring their issues to the table.





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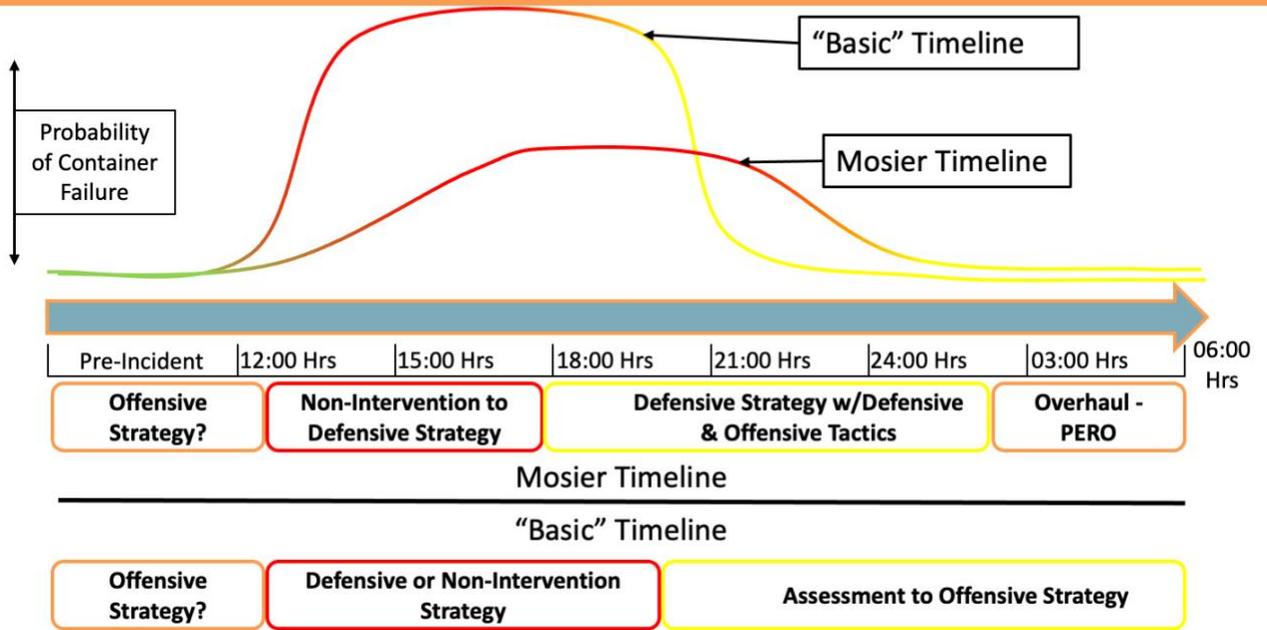
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3. Strategic Response Options

- Once responders understand the relationship between the fire growth curve and the incident timeline, the strategic level options available to control the problem can be better assessed.
- The slope and duration of the incident curve will be influenced by a number of factors, including the type of tank car (e.g., DOT-111A vs. CPC-1232 vs. DOT-117R vs. DOT-117), accident and mechanical damage to the tank car during the derailment, integrity of the thermal insulation, type of thermal stress (pool fire vs. pressure jet fire). See the Mosier (OR) vs. “Basic” Timeline on page 30 as an example.
- In order to safely and successfully control a HHFT fire scenario, the following criteria must be considered:
 - What is the likely outcome without intervention?
 - What is the status and growth pattern of the fire? Is the fire relatively small and not rapidly growing? Or is the incident rapidly expanding in both its size and scope?
 - What is the probability of heat induced tears or container breaches occurring and preventing responders from safely approaching the incident close enough to apply foam and water streams? Once there is significant thermal stress on tank cars, PRD’s start to activate and additional tank car breaches occur, the ability of emergency responders to influence the outcome is not likely.
 - Are sufficient water supplies and water movement capabilities available to support all exposure cooling and fire extinguishment operations? Depending upon the location, this may include both hydrant supplies and water tender / tanker shuttles. In areas with limited water supplies, it may be necessary to re-use cooling water by collecting water run-off and drafting from a pit or basin.
 - Are sufficient Class B foam supplies and appliances available to support the required flow and concentrate requirements?
 - Are emergency response personnel trained and competent in large volume foam operations, and can they implement and sustain large volume foam operations in a time-constrained scenario?
- Based upon an analysis of approximately 25 HHFT incidents, there is a very limited window of opportunity in the early stages of an incident for implementing offensive fire control strategies. There is a higher probability that response options will be limited to defensive strategies (e.g., exposure protection) to minimize the spread of the problem or non-intervention strategies (i.e., no actions) until equilibrium is achieved. Using a risk-based response process will be critical for this re-assessment process.
- Once the equilibrium phase is achieved, responders may choose to switch to an offensive fire control strategy.

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MOSIER VS. "BASIC" TIMELINE





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SECTION IV - SUMMARY

Changes in the North American energy sector and the increased utilization of High Hazard Flammable Liquid Trains (HHFT) have brought new challenges to the emergency response community. The objectives of this paper are to assist emergency planning and response personnel in preparing for incidents involving an HHFT within their community. The information provided is based upon an analysis of approximately twenty-five HHFT incidents that have occurred, the lessons learned, and the input and experiences of emergency response peers representing the railroad and petroleum industries, emergency response contractors, and the public safety emergency response community.

This paper is viewed as a living document, and will be updated to reflect new information, research and lessons learned from future incidents. The information provided is intended to supplement HHFT planning and training information already being used within the emergency response community. It is not meant to establish a standard of operations for any emergency response organization. The issues outlined in this paper focus upon “What do we know about HHFT emergency response and incident management operations that is considered to be either factual or has been validated through science or engineering?” and “What have we repeatedly observed at HHFT scenarios but has not yet been validated by either science or testing?”



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APPENDIX A - TERMS AND DEFINITIONS

API (American Petroleum Institute) Gravity. The density measure used for petroleum liquids. API gravity is inversely related to specific gravity – the higher the API gravity, the lower the specific gravity. Temperature will affect API gravity and it should always be corrected to 60°F (16°C). API gravity can be calculated using the formula - API Gravity = 141.5 / Specific Gravity – 131.5.

Boiling Liquid, Expanding Vapor Explosion (BLEVE). A major container failure, into two or more pieces, at a moment in time when the contained liquid is at a temperature well above its boiling point at normal atmospheric pressure (NFPA).

Boilover. The expulsion of crude oil (or certain other liquids) from a burning tank. The light fractions of the crude oil burn off producing a heat wave in the residue, which on reaching a water strata, may result in the expulsion of a portion of the contents of the tank in the form of a froth.

Certificate of Analysis. The characterization of the crude oil and its fractions produced by the product shipper. While primarily used for refinery engineering purposes, it can also provide critical information on how the crude oil will behave in a water-borne spill scenario.

Crude Oil. A mixture of oil, gas, water and other impurities, such as metallic compounds and sulfur. Its color can range from yellow to black. This mixture includes various petroleum fractions with a wide range of boiling points. The exact composition of this produced fluid varies depending upon from where in the world the crude oil was produced.

Equilibrium. Describes the point at which a HHFT flammable liquid fire is no longer expanding and has achieved a “steady state” of fire and container behavior. Fire behavior and incident characteristics indicative indicators of equilibrium are (1) the fire is confined to a specific area with little probability of growth in either size or intensity; (2) there is low probability of additional heat induced tears or container breaches caused by fire impingement directly upon tank cars; and (3) there are no current pressure relief device (PRD) activations indicating continued heating of tank cars.

Frothover. Can occur when water already present inside a tank comes in contact with a hot viscous oil which is being loaded

Heat Induced Tear (HIT). Also referred to as a thermal tear, a longitudinal failure that occurs in the portion of the tank car shell surrounding the vapor space of the tank following exposure to pool fire conditions. Thermal tears have been measured from 2 feet to 16 feet in length.

High Hazard Flammable Liquid Train (HHFT). A train that has a continuous block of twenty (20) or more tank cars loaded with a flammable liquid (i.e., unit train), or thirty-five (35) or more cars loaded with a flammable liquid dispersed through a train (i.e., manifest train with other cargo-type cars interspersed).



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Natural Gas Liquids (NGL). Heavier hydrocarbon products, such as pentane, hexane and heavier gasoline-range molecules, that may be found with natural gas found in production fields. NGL's are to prevent them from condensing in the pipeline and interfering with the natural gas flow.

Pool Fire. A fire burning above a horizontal pool of vaporizing flammable liquid fuel under conditions where there is little movement of the fuel.

Risk Based Response. A systematic process by which responders analyze a problem involving hazardous materials, assess the hazards, evaluate the potential consequences, and determine appropriate response actions based upon facts, science, and the circumstances of the incident (NFPA 472).

Sloppover. Can result when a water stream is applied to the hot surface of a burning oil, provided that the oil is viscous and its temperature exceeds the boiling point of water. It can also occur when the heat wave contacts a small amount of water stratified within a crude oil. As with a boilover, when the heat wave contacts the water, the water converts to steam and causes the product to "slop over" the top of the tank.

Sour Crude Oil. Crude oil with a high concentration of hydrogen sulfide.

Sweet Crude Oil. Crude oil with a low concentration of hydrogen sulfide.

Three Dimensional Fires. A liquid fuel fire that flows freely from a vertical height, such as a stream of flowing product discharging into a pool fire. It cannot be extinguished using Class B foam as a vertical blanket or seal cannot be achieved and usually requires the combined use of dry chemical (e.g., potassium bicarbonate or Purple K) and Class B foam agents for extinguishment.

Tight Oils. Oils produced from relatively impermeable reservoir rock that must be stimulated by hydraulic fracturing to increase permeability to a level that supports oil production. Examples include Bakken crude and Texas shale. May also be referred to as shale oils or unconventional crude oils.

Unit Train. A train in which all cars carry the same commodity and are shipped from the same origin to the same destination, without being split up or stored en-route.

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APPENDIX B - ENDNOTES

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APPENDIX D -LIST OF EMERGENCY RESPONSE PEERS

The following emergency responders actively participated in the initial development and / or updating of this background paper:

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- Brad Byczynski, Global Response Manager – Intelligence, Security and Crisis Management, British Petroleum (BP)
- K. Wade Collins, Response Programs – Special Operations, Virginia Department of Emergency Management (retired) and Director, Fire Safe Safety Services
- Charles “Chip” Day, Specialized Response Solutions
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