



CIAC Submission on the
30-Day Public Consultation on Updated Transport Canada
Standard TP14877

Submission to Transport Canada
April 28, 2017



CHEMISTRY INDUSTRY
ASSOCIATION OF CANADA



Responsible Care®
Our commitment to sustainability.

Introduction

The Chemistry Industry Association of Canada (CIAC) is pleased to have the opportunity to submit its comments and recommendations on the *30-Day Public Consultation on Updated Transport Canada Standard TP14877*.

CIAC is the voice of Canada's \$53 billion chemistry sector. We represent the interests of Canada's leading chemistry companies – from petrochemical, inorganic and specialty chemical producers, to bio-based manufacturers and chemistry-related technology and R&D companies. Canada's chemistry industry employs 87,500 Canadians directly, and supports another 525,000 jobs in the Canadian economy.

CIAC members produce goods that are needed everywhere; they are essential to Canada's economy and our quality of life. Among them, hundreds of dangerous goods are also manufactured and shipped across Canada daily.

Safety is a top priority for Canada's chemistry industry, both at plant sites and along transportation routes. During the past 25 years, CIAC members have invested hundreds of millions of dollars in transportation-related research and upgrades; and have set the gold standard for transportation safety through the TRANSCAER® (Transportation Community Awareness and Emergency Response) and TEAP® III (Transportation Emergency Assistance Program) initiatives. Canada's chemistry industry goes above and beyond what is required by Canadian laws related to the transportation of chemical products, including dangerous goods.

As part of our commitment to Responsible Care® – the Association's United Nations recognized sustainability initiative - CIAC verifies that each of its members and transportation partners is meeting Responsible Care's stringent safety standards, by requiring independent, public verifications of these companies every three years. Verification reports are publicly available at www.canadianchemistry.ca/responsiblecare.

Comments on the *30-Day Public Consultation on Updated Transport Canada Standard TP14877*

CIAC is supportive of Transport Canada's efforts to update the TP14877 Standard. Of key importance to CIAC are the efforts made toward increased harmonization, clarification, and continuous improvements that support public safety. After reviewing the proposed amendments in the *Containers for Transport of Dangerous Goods by Rail - Final Draft TP14877 2016* (published on March 31, 2017) following are CIAC's comments.

8.3 General Requirements Applicable to TC Class 111 Tank Car Tanks, TC Class 117 Tank Car Tanks and TC Pressure Tank Car Tanks

CIAC supports the inclusion of stainless steel as an option for the construction of the TC 117 tank car.

10.5.1.3 Tank Car for Dangerous Goods Toxic by Inhalation

CIAC supports the extension of the former 20 year "interim tank car" timeframe to 50 years to harmonize with the United States. Additionally, CIAC supports the efforts to harmonize the phase out of non-normalized steel tank cars for TIH service with that of the United States. CIAC finds the proposed 2 year phase out period following the publication of the standard acceptable.

10.5.3 Dangerous Goods in Packing Groups I or II

CIAC would like to highlight the misalignment of tank car requirements for new DOT 111's between the United States and Canada for Packing Group I or II material besides TIH and Class 3 flammable liquids. However, CIAC is supportive of the amendments to the required "built after" date to reflect potential compliance issues stemming from the June 2015 Corrigendum.

10.5.7 Combustible Liquids

CIAC is supportive of the efforts to clarify that combustible liquids are not subject to clause 10.5.6. However, it is recommended that additional clarity be added by outlining the tank car specifications that can be used.

11.2 Written Notifications

CIAC suggests that the language in paragraphs a and b be updated to more clearly align with the United States 49 CFR, particularly surrounding the expectations for overloaded railcars.

APPENDIX E - Special Provision 85

CIAC is supportive of the addition of this special provision which states that the tank car does not need to be grounded during loading and unloading as long as fire safety measures have been taken to prevent the exposure of the dangerous goods to fire hazards, including sources of ignition, intense heat and flammable materials.

Conclusion

CIAC is supportive of Transport Canada's efforts to update the TP14877 Standard. Of key significance are the efforts made toward increased harmonization, clarification, and continuous improvements that support public safety. CIAC is appreciative of the opportunity to have participated in the consultative committee in updating the standard and looks forward to opportunities to engage in the final stages of the consultation process.

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