James P. Grady
Assistant Vice President -
Technical Services

ASSOCIATION OF AMERICAN RAILROADS

Wednesday, May 21, 2014

C-12162

Circular Letter

Subject:Solicitation for Comments: Proposed Changes to Section 2 Figure 124 PIPE, STEEL, 26 IN. O.D. UNIFORM OR MIXED LENGTHS AND DIAMETERS-GONDOLAS, Section 2 - OPEN TOP LOADING RULES MANUAL (OTLR)

To:MEMBERS AND PRIVATE CAR OWNERS **File Number:LR 4.1.72**

The Open Top Loading Rules (OTLR) Committee has identified a needed change for AAR Rules in the loading of Section 2 Figure 124, STEEL PIPE, 26 IN. O.D. AND LESS, UNIFORM OR MIXED LENGTHS AND DIAMETERS-GONDOLAS.

It has now been determined that this effort has gone as far as it can without input from manufacturers, shippers and suppliers. Therefore, the OTLR Committee has prepared a restriction to the allowable longitudinal void above the car ends at origin. The proposed changes to Figure 124 and the Solicitation of Comments Form are attached. The OTLRC is soliciting comments from the steel shipping industry to help properly define and finalize the figure for inclusion in the next revision of Section 2 of the OTLR Manuals.

Original Section 2 Figure 124 Title

> PIPE, STEEL, 26 IN. O.D. OR LESS, UNIFORM OR MIXED LENGTHS AND DIAMETERS-GONDOLAS

Proposed changes (actual changes **bolded**):

> PIPE, STEEL, 26 IN. O.D. OR LESS, UNIFORM OR MIXED LENGTHS AND DIAMETERS —GONDOLAS **(MUST HAVE 4FT. VOID AT EACH END ON MATERIAL LOADED ABOVE CAR ENDS AT ORIGIN)**

Notes and Additional Requirements:

> **9. All pipe loaded above the car sides must be 8 ft less in length than the inside length of car and centered at origin. On gondola cars equipped with end bulkheads higher than the car sides, pipe may be full length of car provided they do not exceed the height of the bulkheads.**

These proposed changes are the result of the OTLRC and steel Industry suppliers working together to develop additional loading figures to address the excessive longitudinal shifts that are associated with this particular loading figure. The additional loading figures approved are:

> Figure 124-A PIPE, STEEL, COATED OR UNCOATED, 24 IN. O.D. OR LESS, 40 FT. TO 61 FT. LONG – GONDOLAS

Figure 124-B PIPE, STEEL, 26 IN. OD OR LESS, MAXIMUM 48 FT. MIXED DIAMETERS, SECURED WITH NON-METALLIC STRAPPING—52 FT. GONDOLAS

Figure 124-C PIPE, STEEL, 26 IN. MAXIMUM DIAMETER, UNIFORM OR MIXED LENGTHS AND DIAMETERS, SECURED WITH NON-METALLIC STRAPPING—GONDOLAS

Therefore, in accordance with the requirements of AAR Rule 123, comments are herein solicited and should be sent with any additional attachments to: Mr. Mike Sandoval, Manager-AAR Loading Rules and Damage Prevention, TTCI, P.O. Box 11130, 55500 DOT Road, Pueblo CO 81001 or email to: mike_sandoval@aar.com. Comments may also be placed directly on the attached figure for clarity and submitted.

All comments received within 30 days from the date of this Circular Letter will be considered by the OTLR Committee prior to any action on the implementation of Section 2 , Figure 124. The AAR has a long standing practice of seeking comments on changes and additions to rules or standards that may affect stakeholders. All are encouraged to voice their opinions with comments to Mr. Sandoval.

Sincerely,
James P. Grady
Assistant Vice President - Technical Services
202-639-2141 202-639-2930 Email:jgrady@aar.org

Safety and Operations
Association of American Railroads
425 Third Street, SW, Suite 1000, Washington D.C. 20024

Attachments
section2part2.fig 124.20140306.pdf
form 1a-solicitation for comment section2 fig 124 20140317 distributed.pdf