NTTC
NATIONAL TANK TRUCK CARRIERS

December 1, 2010

The Honorable Deborah Hersman
National Transportation Safety Board
490 L'Enfant Plaza SW
Washington, DC 20594

Dear Chairman Hersman:

I am writing to request that the National Transportation Safety Board reopen its investigation into the October 9, 1997 tank truck accident and fire and to withdraw report PB98-916202 pending further investigation. As you know, the so-called "wetlines" issue has returned at the U.S. Department of Transportation in the form of a Notice of Proposed Rulemaking currently at the Office of Management and Budget. The continued use of this flawed report as the "poster child" incident for advocating removal of product from loading lines on gasoline trailers does a disservice to the gasoline transportation industry and to those charged with regulating that industry.

I fully accept that the investigators of this accident and those who wrote the report believed that the information they presented was correct. Subsequent investigations into accidents involving automobiles driving into loading lines have produced information that might not have been available in 1997. I am asking that the report be reviewed based on that subsequent information.

YONKERS INCIDENT: NTTC has never denied that wetlines incidents have occurred, sometimes with loss of life and with property damage. While the Yonkers Accidents has become the Poster Wetlines event, it most likely was not a wetlines accident. The following comment was included in a previous wetlines regulations docket from Roy Clark of Baltimore Cargo Tank Services. Mr. Clark is an experienced tank repair professional who is widely respected in government and industry circles. His company installed the Cargo Tank Concepts purging systems on several Sunoco trailers.

The October 9, 1997 incident in Yonkers, New York.
(a). Something more than just the gasoline from the trailer's piping had to fuel the fire. On page 6690 near the bottom of column three, the statement reads "The fire was then fed by gasoline from the cargo tank's compartments." For gasoline to be coming from the tank's compartments something other than damaged wetlines must have happened:
(i). The tank's shell was breached.
(ii). The internal self-closing stop valve(s) failed or were damaged.
(iii). Something (from the accident) opened the internal self-closing stop valve(s), releasing gasoline from the inside the compartment into the damaged piping which then leaked out. Both manual (cable) and air operated internal self-closing stop valves can be unintentionally operated. In most cases, a compartment's piping is damaged, but the internal self-closing stop valve' shear section and external body are left intact. The stem levers on both air and manually operated internal self-closing stop valves can be actuated by almost anything in an accident, including the automobile, mangled piping and bracing. Manually operated internal self-closing stop valves can open just by putting pressure on their cables. These cables are hung unprotected under the cargo tank and sometimes attached to the product piping.

As part of its filing on the HM213B, National Tank Truck Carriers included information developed by the engineering firm CED Accident Analysis Inc. of Annapolis, Maryland.

Part of that firm's findings stated: CED-AAI calculations showing that a vehicle impacting the side of a cargo tanker that has five external product pipes would easily fail all five pipes and only reduce the vehicle's speed by about 1 mph. This means that a vehicle traveling into the side of a cargo tanker at 25 mph will fail the external piping and still be traveling at 24 mph when the vehicle strikes the tankers's aluminum shell. A cargo tanker's aluminum shell is typically supported by two aluminum "L" shaped beams that are welded on either side along the bottom of the shell. A vehicle that impacts the aluminum "L" shaped beam from the side will flatten the beam with only a small reduction in the vehicle impact energy. Having flattened the "L" shaped beam, the vehicle's remaining energy acts to dent, rip, tear and otherwise damage the tankers aluminum shell.

Page two of the NTSB report on the Yonkers accident states:

"The witness estimated the Premier's speed to be between 40 and 45 mph. He stated that the car continued toward the truck without making any attempt to avoid it. He said he did not see the car's brake lights go on 'until a second before' the car struck the truck.

There is no doubt that product from the loading lines was involved in the fire. However, at the speed the car struck the truck, that product would have been spilled when the tanker was damaged by impact, even if it had not been in the line, but in the compartment.

National Tank Truck Carriers does share in both the National Transportation Safety Board's and you own personal passion for safe transportation by tank truck. That is one reason for our eagerness to be involved in the cargo tank rollover hearing held in August. However, we respectfully disagree with the NTSB's continued call for removal of gasoline from loading lines on cargo tanks and suggest that its recommendations are based on flawed conclusions such as those found in the report on the Yonkers incident.

Thank you very much for your consideration of this request.

Sincerely,

John Conley

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cc: Pipeline Hazardous Materials Safety Administration