



U.S. Department
of Transportation
Federal Railroad Administration

West Building
1200 New Jersey Avenue S.E.
Washington, D.C. 20590

FRA-AIP 200409-B

REVIEW DATE: January 1, 2026

1. GRANTEE:

GATX Corporation
233 S. Wacker Drive
Chicago, Illinois 60606-7147

2. PURPOSE AND LIMITATION:

a. This approval authorizes the use of an alternative inspection and test procedure (AIP) as allowed by 49 CFR §180.509(l) *Alternative inspection and test procedures*. This letter provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein. The most recent revision supersedes all previous revisions.

b. The damage tolerance analysis or service reliability assessment performed in the development of this AAIP only considered the hazards and risks associated with the transportation in commerce.

c. This approval to use an AIP is non-transferrable.

3. REGULATIONS AFFECTED: 49 CFR §§ 180.509(d), 180.509(e), 180.509(f), 180.509(h), 180.509(k).

4. BASIS: This approval is based on the application of GATX Corporation dated September 2, 2004 submitted in accordance with § 180.509(l). This letter supersedes the previous approvals dated July 8, 2005 and September 13, 2006 and any modifications to those approvals.

5. INSPECTION AND TEST PROCEDURES:a. DEFINITIONS:

1. Service Reliability Assessment - the process, using in-service data, to determine the time a tank car or component will continue to function as designed under specified conditions.

2. Tank Car Owner - the person to whom a rail car's reporting marks are assigned, as listed in the Universal Machine Language Equipment Register (UMLER).

3. Damage-Tolerance Analysis - determination of the probable locations and modes of damage due to manufacturing, fatigue, corrosion or accidental damage. The analysis must establish a period of time/load cycles during which it is demonstrated that widespread fatigue or corrosion damage will not occur in the tank car structure.

b. BENCHMARK TESTING: All new GATX tank cars added to this program must, at the time of manufacture, have External and Internal Visual Inspection, Ultrasonic Thickness Testing (UTT) measurements, Structural Integrity Filet Weld inspections, and Safety Systems inspections. For the existing fleet of tank cars lacking these measurements, GATX must develop a sampling plan and take External and Internal Visual Inspection, UTT measurements, Structural Integrity Filet Weld inspections, and Safety Systems inspections. The sample size must be determined by following recognized industry sampling standards.

c. DESIGN LEVEL OF RELIABILITY AND SAFETY: GATX shall ensure that any visually detected tank car external and internal damage, tank thickness reductions, structural integrity flaws, safety system defects and service equipment defects do not decrease its design level of reliability and safety.

d. SENSITIVITY and RELIABILITY: For tank cars operating under this AIP, GATX must develop and execute a sensitivity and reliability (POD) study to determine the level of reliability, sensitivity and minimum detectable flaw size for each nondestructive method used to qualify each element

of the qualification to maintain the design level of reliability and safety.

e. CONTROL: GATX must perform External and Internal Visual Inspection, UTT measurements, Structural Integrity Filet Weld inspections, and Safety Systems inspections on a representative sample of the fleet covered by this AIP approval. The frequency must be based on the identified corrosion rate, utilization, and other factors to maintain the design level of reliability and safety and must be made available to the Federal Railroad Administration (FRA) or a designated representative upon request. The sample size must be determined by following recognized industry sampling standards.

6. REGULATORY RELIEF:

a. The interval for the initial performance of the external and internal visual inspection is extended to 15 years from the date of construction, with subsequent inspections at 10-year intervals.

b. The interval for the initial performance of the structural integrity inspection of filet welds is extended to 15 years from the date of construction, with subsequent inspections at 10-year intervals.

c. The interval for the initial performance of the tank car thickness testing inspection is extended to 15 years from the date of construction, with subsequent inspections at 10-year intervals.

d. The interval for the initial performance of the safety systems inspection including thermal protection systems, insulation systems, discontinuity protection and head puncture resistance systems is extended to 15 years from the date of construction, with subsequent inspections at 10-year intervals.

e. The interval for the initial performance of the service equipment inspection for GATX owned service equipment is extended to 15 years from the date of construction, with subsequent inspections at 10-year intervals.

7. SPECIAL PROVISIONS:

a. A person who is not a holder of this AIP approval who receives a package covered by this AIP approval may reoffer it for transportation provided no modification or change is made to the package or its contents and it is reoffered for transportation in conformance with this AIP approval and the HMR.

b. A current copy of this AIP approval must be maintained at each facility where the package is maintained and/or repaired.

c. Marking of each tank car is required and must meet the marking and labeling requirements of 49 CFR Part 172, Subpart D. The car must be identified by a stencil or decal placed above the tank specification number. The stencil must have at least 1 1/2-in high (38.1 mm) letters and numbers and display "FRA-AIP 200401". Additionally, the car must have the initial qualification year (QUALIFIED) and the next qualification year (DUE). This interval must be developed from the Service Reliability Assessment. Marking must occur at time of next shopping by a tank car facility, not to exceed the maximum allowable interval given in 49 CFR 180.509(c)(3) or the maximum allowable interval permitted by an applicable AIP.

d. If a tank car operating under this approval is removed from the AIP or it exceeds the original qualification intervals, all AIP markings must be removed.

8. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this approval and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq.

a. The grantee must comply with all terms and conditions prescribed in this approval and the HMR, 49 CFR Parts 171-180.

b. Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this approval must receive training on the requirements and conditions of this AIP in addition to the training required by 49 CFR Part 172, Subpart H.

c. No person may use or apply this AIP, including display of its number, when this approval has lapsed or is otherwise no longer in effect.

9. REPORTING REQUIREMENTS:

a. GATX must notify the Associate Administrator for Railroad Safety, Chief Safety Officer, in writing no later than 30 days after notification of any incident involving a Tank Car conducted under terms of this AIP.

b. GATX must report instances of corrosion damage or tank failure not considered in the damage tolerance analysis or service reliability assessment on any car subject to this approval to FRA within five days of being notified of such occurrence.

c. GATX must maintain a list of tank cars by reporting mark and number operating under this approval to include the status of the above required marking and will report this listing to FRA every 5 years or upon request.

d. GATX must report CONTROL results (see paragraph 5(d) above) to FRA every 5 years or upon request.

10. LIMITATIONS:

a. If a tank car operating under this approval is transferred from GATX to another Tank Car Owner, then the tank car will no longer be subject to the relief granted under this approval and all the above required stenciling must be removed. The qualification due date must be changed to reflect the new Tank Car Owner's Qualification Interval in accordance with the new Tank Car Owner's qualification and maintenance program. If the new due date is in the past, the qualification is due immediately.

11. CANCELLATION:

FRA may rescind this approval for failure to comply with its terms.

Issued in Washington, D.C.:



March 4, 2021

Karl Alexy
Associate Administrator for Railroad Safety
Chief Safety Officer

Address all inquiries to: Randy M Keltz Jr., Manager, Tank Car Safety Programs, Federal Railroad Administration, U.S. Department of Transportation, randy.keltz@dot.gov.

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REVISION HISTORY		
REV	DATE	DESCRIPTION
	2004	Original approval
A	2005	Amended approval to allow all new W1 and W3 cars to be added to the approval.
B	03/2021	Updated to new format; added benchmark testing requirements; added control requirements; Section 5(b) changed to clarify maximum interval allowed to include other AIPs; this revision incorporates approval GATX AIP 200507