



U.S. Department
of Transportation

**Federal Railroad
Administration**

Memorandum

Date: June 15, 1998

Reply to Att. of: MP&E 98-31

Subject: Safety Chains on Tank Cars

From: Edward R. English
Director, Office of Safety Assurance and Compliance

To: Regional Administrators, Deputy Regional Administrators,
Motive Power & Equipment Specialists and Inspectors

Operating platforms on tank cars without underframes are addressed in 49 CFR Part 231.21(j)(3) which states:

(3) *Location.*(i) Operating platform to be of sufficient length to provide access to all operating fittings. Ladder to be located on sides of car at center.

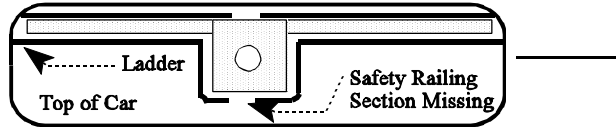
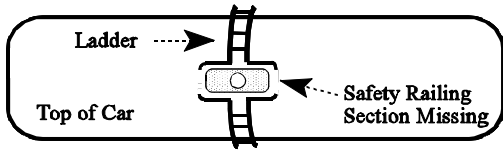
(ii) The safety railing shall enclose the operating platform, manway and fittings used in the loading and unloading of the tank. Railing shall be open only at the ladders where it shall extend in a vertical direction down to, and be securely attached to the platform. Maximum width of opening, twenty-four inches.

Additionally, there are tank cars constructed with top operating platforms which have end ladders at each end of the tank car, rather than side ladders, in accordance with Section 231.18, Cars of special construction.

Therefore, openings in the operating platform allowing access to the ladders do not require safety railing (safety chain) enclosure. All other openings of the operating platform require enclosure.

sketch attached

Not in Compliance



In Compliance

