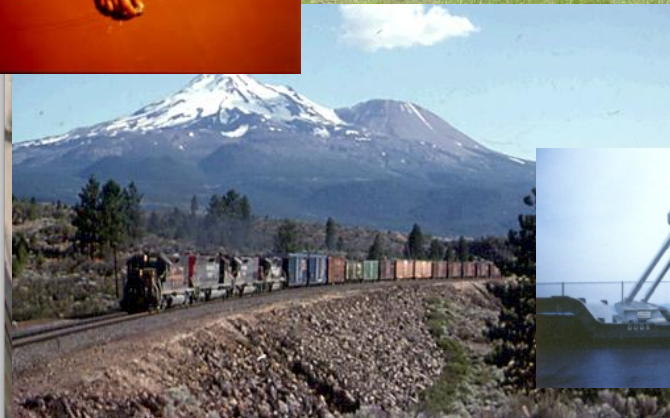




U.S. Department
of Transportation
**Federal Railroad
Administration**

FRA OFFICE OF SAFETY HAZARDOUS MATERIALS DIVISION



Kurt Eichenlaub
Railroad Safety Specialist
Hazardous Materials Division
August, 2018



U.S. Department
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ONE-TIME MOVEMENT APPROVALS



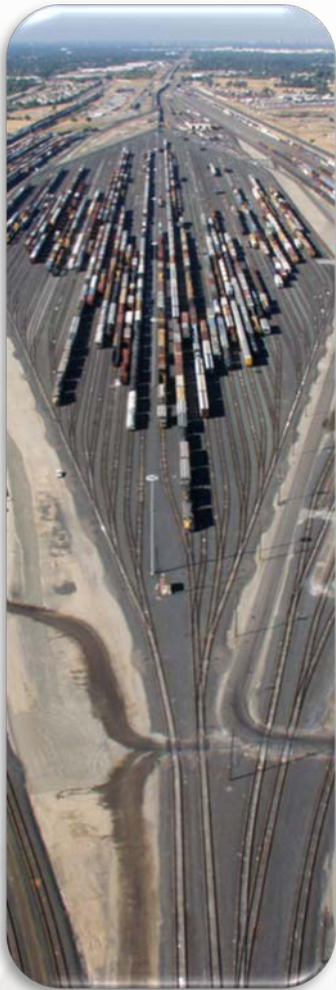


ONE-TIME MOVEMENT APPROVALS

1. What is an OTMA and why do I need one?
2. How do I determine what level of OTMA I need?
3. What is the process for obtaining an OTMA?
4. What are the requirements for moving a car under an OTMA?
5. OTMA examples



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WHAT IS AN OTMA AND WHY DO I NEED ONE?





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PROHIBITED MOVEMENT OF HAZMAT PACKAGES

49 CFR 171.2(g) “(g) No person may represent, mark, certify, sell, or **offer a packaging** or container as meeting the requirements of this subchapter governing its use in the transportation of a hazardous material in commerce unless the packaging or container is manufactured, fabricated, marked, maintained, reconditioned, repaired, and retested in accordance with the applicable requirements of this subchapter...**The requirements of this paragraph apply whether or not the packaging or container is used or to be used for the transportation of a hazardous material.**”



ONE-TIME MOVEMENT APPROVAL

49 CFR §174.50 "Nonconforming or leaking packages. Except as otherwise provided in this section, a bulk packaging that no longer conforms to this subchapter may not be forwarded by rail unless **repaired or approved for movement by the Associate Administrator for Safety, Federal Railroad Administration...**A leaking bulk package containing a hazardous material **may be moved without repair or approval only so far as necessary to reduce or to eliminate an immediate threat or harm to human health or to the environment when it is determined its movement would provide greater safety than allowing the package to remain in place."**



TWO PRIMARY BENEFITS OF OTMAS

- Facilitates the safe movement of a damaged or non-conforming hazmat rail car to a destination where appropriate permanent repair and qualification can be performed.
- Provides a centralized data warehouse of in-service failures on tank cars that can be used by the tank car industry and the FRA to identify systemic safety issues and establish appropriate qualification intervals and operating practices.



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**HOW DO I DETERMINE WHAT
LEVEL OF OTMA I NEED?**



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HAZMAT GUIDANCE 127 (HMG-127)

There are three levels of OTMAs specified in the HMG-127 Guidance:

https://www.fra.dot.gov/eLib/details/L15988#p1_z5_gD

1. OTMA-1 * : Relatively higher risk movements
2. OTMA-2: Overloaded Tank Cars
3. OTMA-3: Relatively low risk movements

*OTMA-1 applications may be changed to OTMA-3 via “specialist discretion” if upon initial review no additional information is needed and the FRA HM specialist determines the movement to be low risk.



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CRITERIA FOR DETERMINING OTMA LEVEL

- Nature of the non-conforming condition(s)
- Nature of the commodity
- Quantity of commodity
- Pressure in the Tank
- Route/Distance to Destination
- The nature of the temporary repair (if any) and who performed the repair (loading operator, emergency response contractor, or certified mobile unit)



OTMA-3 STANDING APPROVAL

- Self-certification through eOTMA application and autogenerated approval confirmation.
- Limited to certain types of low risk defects, low risk material, and low risk quantities.
- Requires selection of a defective condition from the list provided in HMG-127.

(Note: misapplication of OTMA-3 can result in appropriate enforcement action, and could result in removal of OTMA-3 privileges)



OTMA-3 DEFECTIVE CONDITIONS

Applicability for movement under an OTMA-3:

- A Loaded bulk packages (regulated material only)
- B Clean bulk packaging (cleaning certificate required)
- C Residue bulk packages (regulated material only)
- D Bulk package containing (loaded or residue) a nonregulated material

OTMA-3 Defect Numbers and Descriptions

Service Equipment-Top Fittings

Defect No. 1 Following replacement of a valve or fitting, with a nondefective valve or fitting, or closure to prevent the release of material (e.g., replacement of a defective vacuum relief valve with a pipe plug, or a liquid or vapor valve with a blind flange). A pressure relief device may only be replaced in kind. Applicability: A, B, C, D

Defect No.2 For repair (other than removal of the fitting) performed on a connection that is subject to qualification/requalification. This includes, but is not limited to, replacement of hinged manway cover eye bolts, external "O" rings on safety relief valves, tightening securement fasteners that does not result in damage or deformation of the stud or bolt securing an operating valve stem packing gland nut (other than a top operated bottom outlet). Applicability: A, B, C, D



- Defect No.3 A bulk package/packaging with defective manway cover securement bolts where the number of defective manway cover securement bolts does not prevent achieving an adequate seal of the manway cover that would allow the cars to remain in compliance with 49 CFR § 173.24(b)(1) for the duration of the movement to the destination. Applicability: B, C, D
- Defect No.4 A bulk package/packaging with missing or damaged service equipment parts, provided the service equipment is free from leakage (e.g., missing magnetic gauging device rod, top or bottom valve handles, a quick-inspect port cable, or pipe-plug chain). Applicability: A, B, C, D
- Defect No.5 A bulk package/packaging requiring a leakage pressure test to verify the integrity of the completed repairs. Applicability: B, C, D
- Defect No.6 A clean bulk packaging without damage to the tank. Applicability-B
- Defect No.7 A general purpose bulk package/packaging (tank car) that has damage to the protective housing. Applicability: A, B, C, D



Service Equipment-Bottom Fittings

Defect No. 8

Defective bottom outlet valve, provided the material is contained by the application of the secondary closure. This does not include the flanged connection between the valve and tank, or any other damage inboard of the primary valve. Applicability: B, C, D

Defect No.9

A bulk package/packaging that has the primary bottom discontinuity closure intact, but has incurred damage to the secondary closure portion of the bottom discontinuity and/or bottom discontinuity protection.
Applicability: B, C, D

Defect No. 10

Securing an operating valve stem packing gland nut.
Applicability: A, B, C,D



Interior Coating/Lining

Defect No. 11 A bulk package/packaging with a defective interior lining or coating that has not resulted in damage to the tank (bulk packages/packaging with a defective coating or lining installed for product purity is not subject to these safety measures). Applicability: B, C, D

Heater Coils

Defect No. 12 A bulk package/packaging with a defective interior heater coil.
Applicability: B

Defect No. 13 A bulk package/packaging with a defective exterior heater coil provided the defect does not introduce a flow path into the product space or otherwise compromise the integrity of the tank. Applicability: A, B, C, D

Jacket/Insulation

Defect No. 14 A bulk package/packaging that has incurred damage solely to its jacket, such that the jacket is no longer "weather-tight," provided there is no damage to the tank. Applicability: A, B, C, D

Derailment Damage

Defect No. 15 A bulk package/packaging with damage resulting from a collision or derailment, which is loaded onto or into another rail car conveyance such as a flatcar or gondola car. Applicability: B, C



OTMA-2 OVERLOADS

- Approval for overloaded tank cars
 - Generally not issued for tank cars overloaded by volume (49 CFR 173.24b).
 - Requires Verification that the car is not overloaded by volume. Thus, to be processed efficiently we need specific information from the loader (specific gravity of material at loading temperature and reference temperature, innage/outage tables, capacity of the tank in gallons, scale tickets, etc.)



OTMA-1 TRADITIONAL

- Applies to all other non-conforming conditions not specified by HMG-127 as OTMA-3 or OTMA-2.
- All damage to the tank shell or heads, unless loaded on a flatcar.
- All non-conforming cars with load or residue of Inhalation Hazard material.
- Most scenarios that require a temporary repair of leaking service equipment or that affect the transport worthiness of the car.



OTMA-3 VIA SPECIALIST DISCRETION

- An OTMA-1 application that upon initial review by a HM Specialist may be changed to an OTMA-3:
 - Is complete. No additional information is required.
 - All possible precautions have been taken (i.e., temporary repairs, emptying, depressurizing, etc.) for safe transportation.
 - No additional conditions for movement are necessary.



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WHAT IS THE PROCESS FOR REQUESTING AND OTMA?



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MOVEMENT APPROVAL WEBSITE

Browser address bar: <https://www.fra.dot.gov/Page/P0516>

Browser tabs: Movement Approvals | Fed... x HMG-127 One-Time Move...

Browser menu: File Edit View Favorites Tools Help

United States Department of Transportation



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- About FRA
- Railroad Safety
- Rail Network Development
- Research & Development
- Legislation & Regulations
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- FRA eLibrary

Railroad Safety

Divisions

Hazardous Materials

- Overview
- Tank Car Safety
- Movement Approvals**
- Hazmat Training and Outreach
- Industry Response to Safety Advisory 2013-06
- LNG Tenders / Locomotives
- Railworthiness Directive, Notice No. 1 - McKenzie Valves
- Contact Us

Home Page // Railroad Safety // Divisions // Hazardous Materials // Movement Approvals

Movement Approvals

FRA has the enforcement authority and responsibility to ensure the safe transportation of hazardous materials. Movement approvals are required for certain types of hazardous material shipments, such as a one time shipment of hazardous material carrying tank cars for repair and other non-conforming packagings designed, marked or otherwise represented for the transportation of hazardous material. On January 31, 2012, FRA issued HMG-127 and implemented a 4-tier approval process for such movements. HMG-127 was revised on March 27, 2012, resulting in a 3-tier approval process. The most recent version of HM-127 was issued October 7, 2014 and should be followed when applying for a one-time movement approval in accordance with 49 CFR § 174.50.

[eOTMA: Web Based Application for One-Time Movement Approval](#)

Contact Us

Federal Railroad Administration
RRS-12 Mail Stop 25
1200 New Jersey Ave,
SE Washington, DC 20590

202-366-2535
202-493-6478

hmassist@dot.gov

[More...](#)

eLibrary

[Approval Application for Nonconforming Packages](#)

[FRA Policy With Respect to Overweight Tank Cars](#)

[HMG-127 - One Time Movement Approvals](#)



Information Necessary to Obtain Federal Railroad Administration Movement Approval

[Collection of this information is authorized under OMB Control Nos. 2137-0557 and 2137-0559.]

[Cover Letter](#) | **Electronic OTMA Application (Rel. v3.0)** | [Electronic Submissions Instructions](#)

Action: Submit a New Application

Date of Application:	<input type="text" value="07/24/2018"/>	Approval Number: TBD
<input type="checkbox"/> Check here if you have submitted an application in the past		
Company Name: *	<input type="text" value="FRA Chemical"/>	
Mailing Address: *	<input type="text" value="1200 New Jersey Avenue, SE"/>	
City: *	<input type="text" value="Washington"/>	State: * <input type="text" value="District of Co"/> Zip: * <input type="text" value="20590"/>
<input type="checkbox"/> Click here if foreign address		
Company Fax (facsimile) #:	<input type="text"/>	
Company Contact: *	<input type="text" value="Kurt Eichenlaub"/>	
Title / Position: *	<input type="text" value="HM Specialist"/>	
Contact Telephone # *	<input type="text" value="(202) 493-6050"/> Ext. <input type="text"/>	Contact Email Address: * <input type="text" value="kurt.eichenlaub@dot.gov"/>
<input type="checkbox"/> Is the Tank Car Owner the same as the Company and Contact information entered in the previous section?		
Tank Car Owner: *	<input type="text" value="FRA Tank"/>	
Contact Name: *	<input type="text" value="Ernie Sirotek"/>	
Contact Telephone # *	<input type="text" value="(916) 409-9359"/> Ext. <input type="text"/>	Contact Email Address: * <input type="text" value="ernie.sirotek@dot.gov"/>
Reporting Mark & Number: *	<input type="text" value="FRAX"/> - <input type="text" value="12345"/>	<input type="checkbox"/> Check here if this movement applies to multiple tank car.
Type of Rail Car/Bulk Package: *	<input type="text" value="Tank Car"/>	
DOT tank car/bulk package specification (if other, specify): *	<input type="text" value="DOT117J100W1"/>	
<input type="checkbox"/> Special Permit Packaging? If so, enter the special permit number (e.g., SP-00001)		

Complete Hazardous Materials Description: Is the packaging * Full Residue Cleaned and Empty

Note: If "Cleaned and Empty" is selected, the cleaning certificate must be attached.

DOT Proper Shipping Name: *

Technical Name (Chemical Name):

Click here to enter a Non-Hazardous Materials description

DOT Hazard Class: * Subsidiary Hazard Class:

UN/NA Identification #: * P.G. Number: *

Where did this shipment originate?

Facility: *

City: * State: * Click here if foreign address

Original Shipper Point of Contact

Name: * Phone #: * Email Address: *

Present Location of Car

Check here if address and contact information is the same as shipment origination provided in the previous section

Facility or Carrier: *

City: * State: * Click here if foreign address

Present Location Point of Contact

Name: * Phone #: * Email Address: *

Planned Destination 1 of this move

Facility: *

City: * State: * Click here if foreign address

Planned Destination 1 Point of Contact

Name: * Phone #: * Email Address: *

Total mileage from *present location to destination 1*: * miles

Planned rail route: *

What is the defective condition? *

OTMA-1 OTMA-2 OTMA-3

Railroad Notifications:

(Select railroads to receive email copy of approval)

<input checked="" type="checkbox"/> BNSF Railway (BNSF)	<input checked="" type="checkbox"/> CSX Transportation (CSX)
<input type="checkbox"/> Canadian National Railway (CN)	<input type="checkbox"/> Interimage (II)
<input type="checkbox"/> Canadian Pacific Railway (CP)	<input type="checkbox"/> Kansas City Southern (KCS)
<input type="checkbox"/> Conrail (CR)	<input checked="" type="checkbox"/> Norfolk Southern (NS)

OTMA-3 Defect Category: *

Service Equipment-Top Fittings

OTMA-3 Criteria: *

Defect No. 1: Following replacement of a valve or fitting, with a nondefective valve or fitting, or closure to prevent the release of material (e.g., replacement of a defective vacuum relief valve with a pipe plug, or a liquid or vapor valve with a blind flange). A pressure relief device may only be replaced in kind.

Defect No. 2: For repair (other than removal of the fitting) performed on a connection that is subject to qualification/requalification. This includes, but is not limited to, replacement of hinged manway cover eye bolts, external "O" rings on safety relief valves, tightening of securement fasteners that does not result in damage or deformation of the stud or bolt securing an operating valve stem packing gland nut (other than a top operated bottom outlet).

Defect No. 3: A bulk package/packaging with defective manway cover securement bolts where the number of defective manway cover securement bolts does not prevent achieving an adequate seal of the man way cover that would allow the cars to remain in compliance with 49 CFR § 173.24(b)(I) for the duration of the movement to the destination.

Defect No. 4: A bulk package/packaging with missing or damaged service equipment parts, provided the service equipment is free from leakage (e.g., missing magnetic gauging device rod, top or bottom valve handles, a quick-inspect port cable, or pipe-plug chain).

Defect No. 5: A bulk package/packaging requiring a leakage pressure test to verify the integrity of the completed repairs.

Defect No. 6: A clean bulk packaging without damage to the head or shell.

Defect No. 7: A general purpose bulk package/packaging that has damage to the protective housing.

Rail Worthiness Directive (RWD)

OTMA-3 Applicability: *

C - Residue bulk packages

Defective Conditions: *

Selected Defective Conditions:

OTMA-3 Applicability: *

C - Residue bulk packages

Defective Conditions: *

- Service Equipment Connection - Flanged
- Service Equipment Connection - Threaded
- Top Fitting - Air Inlet Valve
- Top Fitting - Gauging Device
- Top Fitting - Pressure Plate/Fittings Plate
- Top Fitting - Pressure Relief Device
- Top Fitting - Sample Valve
- Top Fitting - Vacuum Relief Valve
- Top Fitting - Vapor Valve

Add >>

<< Remove

Selected Defective Conditions:

- Top Fitting - Liquid Product Valve

Provide a detailed explanation of the defective condition:

During preload inspection the B-End liquid valve was found to be leaking product in the closed position.

Explain, with supporting documentation, the measures you are taking to ensure the safe movement of this car: *

The valve was removed and replaced with a blind flange|. The car is empty and only contains residual product.

***** Note: Attach with this application a copy of the original shipping paper. *****

Browse...


Add Another Attachment

I acknowledge that failure to accurately represent the defective condition of the tank car, failure to disclose additional defective conditions, or failure to comply with the conditions and limitations set forth in One-Time Movement Approval Procedures (HMG-127) is considered non-compliance with 49 CFR § 174.50, and appropriate enforcement action may be taken.

INCOMPLETE OR INACCURATE INFORMATION WILL RESULT IN DELAY PROCESSING!

Enter verification: *

I'm not a robot



reCAPTCHA
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Reset Form

Submit

Save PDF Copy



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WHAT ARE THE REQUIREMENTS FOR MOVING A CAR UNDER AN OTMA?



GENERAL REQUIREMENTS

- Notifications
- Shipping Paper Notations
- Marking/Labeling
- Root Cause (Appendix A to HMG-127 provides format)
- Additional requirements specified in the written approval (OTMA-1)



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NOTIFICATIONS

- Tank Car Owner
- Railroads
- Destination facility





SHIPPING PAPER NOTATIONS

The offeror must include a notation in association with the basic shipping description on the shipping paper:

"Moving per 174.50: OTMA-1"

"Moving per 174.50: OTMA-2"

"Moving per 174.50: OTMA-3"



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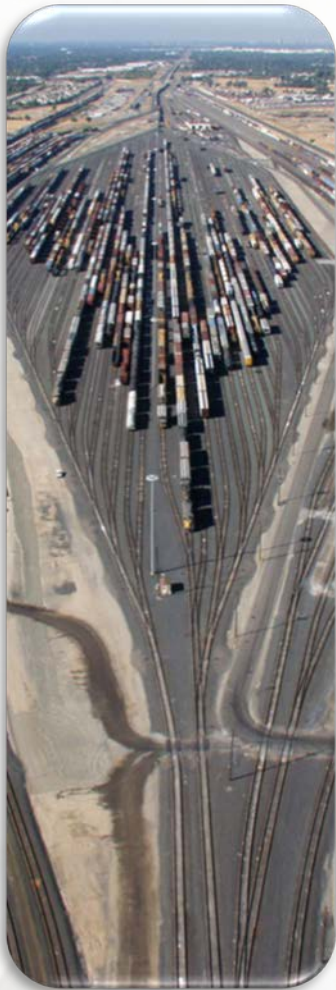
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MARKING/LABELING





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WHAT IS THE PROCESS FOR REQUESTING AND OTMA?



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1200 New Jersey Ave., SE
Washington, D.C. 20590

FRA-170609275

EXPIRATION DATE: July 31, 2017

OTMA-1

1. **GRANTEE:** DOT Inc.
1200 New Jersey Ave, SE
Washington, DC 20590
2. **PURPOSE:** This approval authorizes the one-time movement of a DOT specification tank car that meets all DOT requirements except there is a small crack in the shell of the car located where the A-end braking system bracket is welded directly to the tank shell. The bracket weld is broken and product seeped out of the crack. The car has been cleaned and purged. The car will be moving to a certified facility for evaluation and repair. This approval addresses non-conformities under the Hazardous Materials Regulations only and provides no relief from any regulation other than as specifically stated.
3. **REGULATIONS AFFECTED:** 49 CFR §171.2(g); §173.22(a)(2)(i) and (ii); §173.24(d)(1); §173.29(a); §173.31(a) & (d); and §179.100-13(a) [as to the disclosed condition]. This approval provides no relief from the regulatory requirement that a hazardous material package offered for transportation retain its contents during transportation.
4. **BASIS:** This authorization is based on the Grantee's written application dated June 23, 2017, and additional documents, submitted in accordance with 49 CFR §174.50.
5. **HAZARDOUS MATERIALS** (49 CFR 172.101):

Hazardous Materials Description			
Identification Number	Proper Shipping Name	Hazard Class/Division	PG
N/A	N/A		

6. **REPORTING MARK, NUMBER AND SPECIFICATION(S):**
FRAXQ208850 is a DOT 111A100W1 specification tank car.
7. **ROUTING, MOVEMENT and OPERATIONAL CONTROLS:**



U.S. Department of Transportation
Federal Railroad Administration
1200 New Jersey Ave., SE
Washington, D.C. 20590

Confirmation Number: AA000000000
Application was updated on: 07/26/2018

Detailed information pertaining to this application:

Reporting Mark/Number: FRAX-40196
Company Name: FRA
Company Contact: KURT EICHENLAUB
Title/Position: FIELD MAINTENANCE COORDINATOR
Contact Telephone # (000) 000-0000
Contact Email Address: Kurt.eichenlaub@dot.gov
DOT tank car/bulk package specification: 112J400W
Complete Hazardous Materials Description: Is the packaging Full
DOT Proper Shipping Name: ISOBUTYLENE
Technical Name (Chemical Name):
Non-Hazardous Materials description: N/A
DOT Hazard Class: 2.1
UN/NA Identification # UN1055
P.G. Number: N/A
Present Location of Car: BROOKLAWN, Louisiana
Planned Destination 1 of this move: BATON ROUGE, Louisiana
Destination 1 Planned rail route: KCS
Planned Destination 2 of this move: N/A
Destination 2 Planned rail route: N/A
Planned Destination 3 of this move: N/A
Destination 3 Planned rail route: N/A
Total mileage of this movement: 6 miles
OTMA-3 Defect Category: OTMA-3
OTMA-3 Defect No. 14
OTMA-3 Criteria: Defect No. 14: A bulk package/packaging that has incurred damage solely to its jacket, such that the jacket is no longer "weather-tight," provided there is no damage to the tank shell or tank head.
OTMA-3 Applicability: A - Loaded bulk packages
Defective Conditions Items: Jacket Damage - Holes (Corrosion)
Defective Conditions Explanation: HOLES IN JACKET, CORROSION ON STUB SILL



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OTMA-1 SPECIALIST DISCRETION

- An OTMA may be changed from an OTMA-1 to an OTMA-3 by specialist discretion. In this case you will receive an OTMA-3 approval that includes:



U.S. Department of Transportation
Federal Railroad Administration
1200 New Jersey Ave., SE
Washington, D.C. 20590

Approval Number: FRA-XXXXXXXX|* **AUTHORIZED BY SPECIALIST DISCRETION** *



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OTMA-2

FRA-XXXXXXXX- OTMA-2 for FRAX 28821 – Overloaded by

Weight

July 26, 2018

GRANTEE: FRA Inc.

Kurt,

I have reviewed your One-Time Movement Approval (OTMA) application for FRAX 28821, a load of UN 2315, Polychlorinated Biphenyls, Liquid, 9, PG III, RQ (Polychlorinated Biphenyls) Marine Pollutant, overloaded by 5,700 pounds and have determined it may move under the provisions of OTMA-2. Movement of the car is authorized from its current location at the BNSF Railway's (BNSF) rail yard in Tulsa, OK on to the consignee, XXXXXXXX in LaPorte, TX, routed direct on the BNSF traveling for a total distance of approximately 578 miles.

Please ensure all shipping papers are marked with the required annotations, i.e., the movement approval number assigned, the notation "**Moving per 174.50: OTMA-2 – Overloaded by Weight – FRA-XXXXXXXX, DO NOT HUMP and CUT OFF IN MOTION**" and ensure that file copies of this approval are maintained. However, due to the fact the car is reported as being overloaded by weight the "HOME SHOP FOR REPAIRS –DO NOT LOAD" stenciling requirement is waived.

Be advised, it is the shipper's responsibility to ensure the car is not overloaded by volume and the car complies with the provisions of §173.24b(a)(1).

Although the FRA has authorized this move the move is contingent on the carriers' agreement and stipulations.

A root cause report is required. No later than 60 days from the date of issuance of this approval the FRA Inc. shall ensure that a root cause report is submitted to the FRA that identifies the root cause on how the car came to overloaded by weight and all actions taken by the Grantee to prevent a recurrence. This report may be provided to the FRA via e-mail at HMASSIST@DOT.GOV with the FRA Movement Approval authorization # - FRA-XXXXXXXX referenced in the subject line of the e-mail.

Nothing in this approval limits the Federal Railroad Administration from pursuing enforcement, including the collection of civil penalties, for any violations which pre-date this approval.

Jeffrey S. Moore

Hazardous Materials Specialist

For,

Robert C. Lauby

Associate Administrator for Railroad Safety/Chief Safety Officer



OTMA RESOURCES

- FRA OTMA Approval Web Page:
<https://www.fra.dot.gov/Page/P0516>
- FRA eOTMA Application:
<https://safetydata.fra.dot.gov/otma/>
- OTMA Procedures (HMG-127 Revision 4)
https://www.fra.dot.gov/eLib/details/L15988#p1_z5_gD
- OTMA Program Email Address: HMASSIST@DOT.GOV



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Questions?