

Representing Industry Positions TSI Participation in AAR TCC

TSI is one of six organizations representing rail tank car shippers with a vote on the Association of American Railroads (AAR) Tank Car Committee (TCC). Participation at this level affords TSI, as representative of the sulphur industry, a direct voice in assuring that rail tank car standards and specifications are appropriate for sulphur and sulphur compounds.

Assessment

• TSI has opportunities to expand visibility and contacts, address issues, and guide appropriate changes to rail tank car requirements.

Development

 TSI monitors for proposed actions that could increase costs without providing measurable benefits. TSI presents sulphur industry positions during Executive Sessions.

Distribution

 Regular AAR activity reports provided to TSI member companies via working group contacts. TSI continues to monitor for issues and advise on appropriate action.

Value to Member

- TSI's "Molten Sulphur Rail Tank Car Guidance" document (for allowing safe residue levels) avoids up to US\$10,000 per violation.
- Supporting continued use of bottom outlets on molten sulphur rail cars.
- Addressing unusual, high molten sulphur nonaccident release data."

Value to Industry

• Similar to value to members, but lagging notice of compliance dates, thus subject to enforcement actions and up to US\$10,000 per violation.