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 ensuring 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.

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**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 non-accident 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.