TCC DOCKET T5.32-14 – Review Tank Car Requirements in AAR Office & Field Manual
DATE: 8/13/19
STATUS: Proposal to TCC

Task Force Representation:

<table>
<thead>
<tr>
<th>Name</th>
<th>Company</th>
<th>Name</th>
<th>Company</th>
</tr>
</thead>
<tbody>
<tr>
<td>B. Siebold</td>
<td>BNSF Railway (TF Chair)</td>
<td>D. Smook</td>
<td>Midwest Railcar Repair</td>
</tr>
<tr>
<td>L. Golden</td>
<td>GATX Corp</td>
<td>T. Chambers</td>
<td>The Greenbrier Companies</td>
</tr>
<tr>
<td>M. Forister</td>
<td>AAR</td>
<td>J. Smith</td>
<td>Transco Railway Products</td>
</tr>
<tr>
<td>L. Loman</td>
<td>AllTranstek</td>
<td>J. Shultz</td>
<td>Union Tank Car Company</td>
</tr>
<tr>
<td>L. Culligan</td>
<td>American Railcar Industries</td>
<td>J. Perez</td>
<td>Union Tank Car Company</td>
</tr>
<tr>
<td>R. Morgan</td>
<td>Greenbrier Rail Services</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Task Force Charges:

<table>
<thead>
<tr>
<th>Number</th>
<th>TF Charge</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Review January 2014 decision to change Rule 88.</td>
</tr>
<tr>
<td>2.</td>
<td>Review Rule 81.</td>
</tr>
<tr>
<td>3.</td>
<td>Review any other section within AAR Field and Office Manual related to tank cars.</td>
</tr>
<tr>
<td>4.</td>
<td>Interface / liaison on TCC matters that affect or involve to CRB/ARB committee.</td>
</tr>
</tbody>
</table>

Background / Justification:

The following proposal is in support of T5.32, Charge #1 which was established by the TCC to resolve conflicting requirements between Interchange Rule 88 and M-1002. The task force took the approach that the Field / Office Manual Rule 88 language should be written to apply to ALL rail cars; and any supplemental items that are specific to tank cars will be spelled out in M-1002, Appendix D.

We reviewed three key components for Rule 88: 1) what are the triggers for an 88.b.2 inspection; 2) once triggered, what is the scope of the 88.b.2 inspection; and 3) who can perform the inspection and repairs.

We also revisited several historical circulars to understand the lineage of the Rule 88 requirements:

C-8168, C-8405, CPC-1094, CPC-1097, O&M Circular No. 1

Our proposal is being advanced at this time with the understanding that EEC is reviewing Rule 88 concurrently and that a window of opportunity exists to align / support that effort. We also recognize that time is of the essence if these changes are to be considered for a January 1, 2020 implementation.

8/13/19 – with TF quorum, ARI motioned to advance the T5.32 proposal herein, UTLX seconded, none opposed.
1. **Proposal: AAR Field Manual – Appendix A**
   - *Extract definition of “Heavy Repairs” from current Field Manual Rule 88.B.2.a language and create definition in Appendix A.*
   - *Added “inspections and switching charges” as exclusions to clarify intent and application.*
   - *Provides clarity to activity code B25 description, scope, and purpose (see proposals 7 & 8).*

   **Current Text** –
   (Blank)

   **Proposed Text** –

   **Heavy Repairs** – those exceeding 85 direct labor hours on any car including painting and interior lining / coating. Purging, cleaning, water testing, inspections and switching charges do not apply toward 85 labor hours.

---

2. **Proposal: Field Manual Rule 88.B.1.c**
   - *Add “modified” to match current Minimum Mechanical Chart (23)(c) and consider adding “IGRL” so that Office Manual Rule 88.C activities (other than New) are defined under activity code B26 and all 88.C work requires an M-1003 facility (see C-8168).*
   - *Consider removing “New” in the Field Manual as the scope and purpose for Rule 88 compliance is already covered by activity codes A19 (Manufacturer of Tank Cars) and A20 (Manufacturer of Freight Cars).*

   **Current Text** –

   **B. From Owner**

   This section specifies the minimum mechanical requirements for all cars released into interchange service or offered at interchange from owner, unless otherwise noted:

   1. **At Any Time**
      
      c. New, rebuilt, or ILS cars

      (1) New, rebuilt, or ILS cars must be manufactured or rebuilt in a facility that has received a quality assurance certification as required in AAR Specification M-1003.

      (2) Cars must be equipped with reflective sheeting applied according to AAR MSRP S-910.

   **Proposed Text** –

   **B. From Owner**

   This section specifies the minimum mechanical requirements for all cars released into interchange service or offered at interchange from owner, unless otherwise noted:

   1. **At Any Time**
      
      c. Rebuilt, modified, increased gross rail load, or ILS cars

      (1) All facilities engaged in performing Office Manual Rule 88.C activity, must have a Quality Assurance Certification in accordance with AAR Specification M-1003.

      (2) Cars must be equipped with reflective sheeting applied according to AAR MSRP S-910.
3. Proposal: Field Manual Rule 88.B.2.a

- Relocated definition of Heavy Repairs to Appendix A
- Added Office Manual Rule 88.C activities (except new) to be triggers for a Rule 88.B.2 inspection on any railcar.
- Deleted last sentence regarding revocation of facility certification based on AAR Law / QAC approved updates to administrative processes of M-1003, Chapter 3 (see circular C-13343).

Current Text –

B. From Owner

This section specifies the minimum mechanical requirements for all cars released into interchange service or offered at interchange from owner, unless otherwise noted:

2. Inspection and Repair
   
a. All cars, other than tank cars, released into service after rebuilding or heavy repair must comply with the requirements of this section. Heavy repairs are defined for this rule as repairs exceeding 85 hours, including painting and lining. Purging, cleaning and water testing are not considered repairs in this rule. Tank cars must meet the requirements of Note 5. Failure to comply with Rule 88.B.2 may result in the revocation of AAR-M-1003 facility QA certification.

Proposed Text –

B. From Owner

This section specifies the minimum mechanical requirements for all cars released into interchange service or offered at interchange from owner, unless otherwise noted:

2. Inspection and Repair
   
a. All cars at time of rebuild, modification, increased gross rail load, ILS or Heavy Repairs (as defined in Appendix A) must comply with the requirements of this section. Tank cars are also subject to the requirements of Note 5.


- Relocate tank car jackets to M-1002, Appendix D.
- Clarified “Center Sill” versus “Draft Sill” and listed specific areas within a draft sill to inspect (aligns with current shop practices).
- Redirect repairs (as a result of the thorough inspection) to the corresponding Rule where necessary.
- Make reference to Rule 88 Notes (improves readability)
- Consider deleting requirement (a) under item (8) Trucks account redundancy with Rule 46, A.2.a. This aligns with our edited lead statement of, “repairs to the corresponding Rule must be made where necessary”.
- Consider deleting requirement (a) under item (10) Hand brakes; or relocate as an A1 or A2 defect under Rule 13 and/or S-486. This aligns with our edited lead statement of, “repairs to the corresponding Rule must be made where necessary”.
- Consider deleting the specific item (11) Doors in Rule 88 as it does not apply to all cars (same logic used for tank car jackets). Requirement can be relocated as an A1 or A2 defect under Rule 77 to support the General Information that is already stipulated under Rule 77, E.7 and E.8.

Current Text –

B. From Owner

This section specifies the minimum mechanical requirements for all cars released into interchange service or offered at interchange from owner, unless otherwise noted:
2. Inspection and Repair

b. A thorough inspection must be performed and repairs where necessary must be made to the following:
   (1) Body bolsters and center plates
   (2) Center sills
   (3) Crossbearers
   (4) Crossties
   (5) Draft systems and components
   (6) End sills
   (7) Side sills
   (8) Trucks
       a. When wedge rise exceeds the limits indicated in Rule 46, Figures A-1, A-2, A-3, B-1, C-1, and D-1 or manufacturer’s recommendations, it must be corrected by installation of new AAR approved stabilizer parts, or the trucks must be repaired in accordance with the procedures outlined in AAR Specification M-214, or truck designer’s recommendations.
   (9) Tank car jackets
   (10) Hand brakes
       a. Drive shaft or drive shaft bearing wear in excess of 3/32 inch requires removal of hand brake. This wear can be measured using a 3/32 inch hex wrench. If a 1/2 inch length of the wrench can be inserted between drive shaft and bearing, remove hand brake.
   (11) Doors
       a. Geared type plug door operating levers must have an anti-spin device installed if not already equipped.
       b. Lever type plug door operating levers must have an antikickback device installed if not already equipped.

Proposed Text –

B. From Owner

This section specifies the minimum mechanical requirements for all cars released into interchange service or offered at interchange from owner, unless otherwise noted:

2. Inspection and Repair

b. A thorough inspection must be performed and repairs to the corresponding Rule must be made where necessary to the following:
   (1) Body bolsters and center plates (See Note 2)
   (2) Center sills (between body bolsters)
   (3) Crossbearers
   (4) Crossties
   (5) Draft systems and components (See Note 1)
   (6) End sills
   (7) Side sills
   (8) Trucks (See Note 2)
   (9) Draft sills (outboard of body bolsters)
       a. Includes draft lugs (front, rear, and attachment welds to sill), key slot, carrier plates, bottom cover plates, coupler carrier, and striker assembly.
   (10) Hand brakes

5. Proposal: Field Manual Rule 88.B.2.c

- Make clear that this paragraph is the basis for the description, scope, and purpose of activity code B25 (reference C-8405).
- Office Manual Rule 88C work and the corresponding activity code B26 is not associated to 85 labor hours (see proposal #2 above), but applies to Section B.2 for Rebuild, Modifications, IGRL, and ILS.
B. From Owner

This section specifies the minimum mechanical requirements for all cars released into interchange service or offered at interchange from owner, unless otherwise noted:

2. Inspection and Repair

   c. All facilities engaged in the repair of freight cars requiring 85 or more hours labor, must have a Quality Assurance Certification in accordance with AAR Specification M-1003.

      (1) Facilities requesting quality assurance certification in accordance with AAR Specification M-1003 for the following repairs to freight cars must have previously passed a mechanical technical inspection by the MID before quality assurance certification will be granted.

         a. Repairs to freight cars involving over 85 hours labor.

Proposed Text –

B. From Owner

This section specifies the minimum mechanical requirements for all cars released into interchange service or offered at interchange from owner, unless otherwise noted:

2. Inspection and Repair

   c. All facilities engaged in performing work to section B.2 of this rule, must have a Quality Assurance Certification in accordance with AAR Specification M-1003.

      (1) Facilities requesting quality assurance certification in accordance with AAR Specification M-1003 must have previously passed a mechanical technical inspection by the MID before quality assurance certification will be granted.

6. Proposal: Rule 88.B.2 Notes

   - Clarify Note 1 to align with current shop practices and changed R&R to “renewal” based on our edited lead statement of, “repairs to the corresponding Rule must be made where necessary”.
   - Editorial to Note 5 (remove Table D3)

Current Text –

NOTE: 1 R&R of friction draft gears is required to accomplish a thorough inspection of the draft gear pocket unless other inspection techniques are used. R&R of friction draft gears, end-of-car cushioning units and center-of-car cushioning units is not required unless defective per Rules 21 or 59, Section A or as required above.

NOTE: 5 All tank cars must be inspected and repaired in accordance with MSRP M-1002, Appendix D, Table D3, Required Tank Car Qualifications / Inspections.

Proposed Text –

NOTE: 1 R & R of draft system and components is required to accomplish a thorough inspection of the draft sill, and the draft system and components; unless other remote inspection techniques are used. Renewal of friction draft gears, end-of-car cushioning units and center-of-car cushioning units is not required unless defective per Rules 21 or 59.

NOTE: 5 All tank cars must be inspected and repaired in accordance with MSRP M-1002, Appendix D.

- Editorial alignment based on proposals 2 and 5 above.
- For consistency and proper use of an existing Field Manual definition, incorporated “Repair Shop (Facility)/Repair Track” into both Activity Code descriptions.

Current Text –

<table>
<thead>
<tr>
<th>Item</th>
<th>Inspection Type (Private, Contract, Member, and Non-Member RR)</th>
</tr>
</thead>
</table>
| 5    | Technical Certification/Recertification Inspections in Conjunction with QA Audits  
|      | • …..  
|      | • Repairs to Freight Cars Involving over 85 Hours Labor  
|      | • Freight Car Facility Performing Office Manual Rule 88.C work |

Proposed Text –

<table>
<thead>
<tr>
<th>Item</th>
<th>Inspection Type (Private, Contract, Member, and Non-Member RR)</th>
</tr>
</thead>
</table>
| 5    | Technical Certification/Recertification Inspections in Conjunction with QA Audits  
|      | • …..  
|      | • Repair Shop (Facility)/Repair Track Engaged in Heavy Repairs  
|      | • Repair Shop (Facility)/Repair Track Engaged in Office Manual Rule 88.C Activity |

8. Proposal: MSRP Section J, Specification M-1003 – Appendix A

- Editorial alignment based on proposals 2, 5 and 7 above.
- For consistency and proper use of an existing Field Manual definition, incorporated “Repair Shop (Facility)/Repair Track” into both Activity Code descriptions.

Current Text –

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>Code</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>B25</td>
<td>Freight Car Repair Facility Engaged in Repairs Involving over 85 Hours Labor and/or Wreck Damage</td>
<td>88</td>
<td>9/11/95</td>
</tr>
</tbody>
</table>

Proposed Text –

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>Code</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>B25</td>
<td>Repair Shop (Facility)/Repair Track Engaged in Heavy Repairs</td>
<td>88</td>
<td>9/11/95</td>
</tr>
</tbody>
</table>