



## **HAZARDOUS MATERIALS SAFETY TIP**

Occasionally, a railroad is faced with moving non-conforming bulk packages/packaging to a safe location for repair or disposal. The Federal Railroad Administration provides details in the Hazardous Materials Guidance 127 (HMG-127) for One-Time Movement Approvals (OTMA) of non-conforming packages. Examples of this are tank cars with jacket damage that results in a non-weather-tight condition, through-shell cracks, cracks in the underframe, defective valves/fittings, or overloaded by weight. Packaging also refers to covered hopper cars, gondolas, and portable tanks.

### **ONE-TIME MOVEMENT APPROVAL PROCESS**

The Federal Railroad Administration (FRA) has the authority to issue one-time movement approvals (OTMA) for bulk packages/packaging that no longer conform to the Hazardous Materials Regulations (HMR; Title 49 Code of Federal Regulations (CFR) Parts 171-180).

**APPLICABILITY:** The requests for movement approvals vary from jacket damage that result in a non-weather-tight condition to those with through-shell cracks that result in the release of a hazardous material. As a practical matter, the safety risks associated with the movement of a bulk package/packaging with a small dent in its jacket are significantly different than those associated with a leaking bulk package/packaging loaded with a hazardous material, and those situations must be dealt with differently.

**HMG-127:** Specific procedures outlined in the FRA's Hazardous Materials Guidance number HMG-127 should be followed when applying for a one-time movement approval in accordance with 49 CFR §174.50.

**ACTIVE LEAKS:** Approvals for bulk packaging that are actively leaking will generally not be issued. However, the packaging may be moved "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."

**OTMA CATEGORIES:** HMG-127 outlines three categories of OTMAs:

1. **OTMA-1:** Traditional process with written request for tank shell breaches and cracks, or defective valves/fittings not qualified for movement under OTMA-3
2. **OTMA-2:** FRA approval with e-mail authorizing movement This applies to railcars found to be overloaded by weight.
3. **OTMA-3:** Standing movement approval applies to bulk packages/packaging that meet specific criteria outlined in HMG-127

The general requirements and limitations of each OTMA category are described in detail in HMG-127. <https://railroads.dot.gov/elibrary/hmg-127-one-time-movement-approval-procedures-0>