



HAZARDOUS MATERIALS SAFETY TIP

ONE-TIME MOVEMENT APPROVAL PROCESS

The Federal Railroad Administration (FRA) has the authority to issue a one-time movement authority (OTMA) for bulk packages/package 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 results 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/package with a small dent in its jacket are significantly different than those associated with a leaking bulk package/package 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 (Rev.5 10/2024) should be followed when applying for a one-time movement approval in accordance with 49 CFR §174.50. Note that additional actions are required for OTMAs where the rail car will be moved between the U.S. and Canada, or between the U.S. and Mexico.

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:

OTMA-1: Applies to any non-conforming bulk packages/package or leaking tank cars, gondolas, hoppers, and portable tanks that do not meet the criteria for movement as an OTMA-2 or an OTMA-3. This includes tank car breaches and cracks, or defective valves and fittings. OTMA-1 applications require the following to be included during submission. Lack of documentation and/or supporting documentation may result in the denial of the application.

- Written approval from each rail carrier included in the OTMA application
- Any other information requested from FRA-HM including photos, reports and additional information regarding the defective condition and corrective actions taken to ensure the safe movement of the package/package.

OTMA-2: An FRA approval with email authorizing movement. This applies to railcars found to be overloaded by weight. Specifically, bulk packages including tank cars, gondolas, hoppers, and portable tanks that are found to be overloaded by greater than 1 percent of the total gross rail load (GRL) rounded up to the next 100 pounds on a weight-in-motion scale; or any bulk package containing hazardous material that is overloaded by greater than 1,000 pounds of the allowable total GRL on a static scale that is moving in transportation.

OTMA-2 applications require the following to be included during submission:

- Written approval from each carrier included in the OTMA application
- Scale ticket or email verification from the carrier stating the amount the package is overloaded in gross weight on rail (GWR)
- Shipping papers (Bill of Lading)
- OTMA approval is **not granted** for packages overloaded by volume as the overage must be unloaded before moving the package in transportation.

OTMA-3: A *standing approval* that does not require written approval or an FRA approval number to move the car once the OTMA-3 application has been submitted via the OTMA ePortal. All OTMA-3 standing approvals are reviewed and subject to denial.

Bulk Package Requirements: Bulk packages/packaging must be stenciled, decaled, or tagged with the following message:

- *“Home shop for repairs, do not load”; “Moving for dismantling, do not load”; or other words to convey a similar meaning, as appropriate.*

Shipping Papers For all shipping papers transmitted or provided to each rail carrier involved in the movement of the nonconforming shipment, each person implementing this OTMA-3 category will be required to include:

- A description of the nonconformance
- The words “Moving per 174.50: OTMA-3”
- The identity of the destination facility
- Records must be retained as directed by 49 CFR §172.201

OTMA-3 Ineligibility

- Bulk packages/packaging that contain poisonous by inhalation (PIH) material, either loaded or residue, such as Anhydrous Ammonia, Chlorine, or Methyl Mercaptan
- A bulk package/packaging involved in a non-accident release (NAR)

The general requirements and limitations of each OTMA category are described in detail in HMG-127 (Rev.5 10/2024).