



U.S. Department
of Transportation

**Federal Railroad
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

FRA-AIP 202502

REVIEW DATE: June 30, 2030

1. GRANTEE:

Trinity Industries Leasing Company
14221 North Dallas Parkway
Suite 1100
Dallas, Texas 75254

2. PURPOSE AND LIMITATION:

a. This approval authorizes the use of an Alternative Inspection and Test Program (AIP) as allowed by 49 CFR § 180.509(l) *Alternative inspection and test procedures*. This letter provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein. The most recent revision supersedes all previous revisions.

b. The damage-tolerance analysis or service reliability assessment performed in the development of this AIP only considered the hazards and risks associated with transportation in commerce.

c. This approval only applies to tank cars owned by the grantee.

d. This approval to use an AIP is non-transferrable.

3. REGULATIONS AFFECTED: 49 CFR §§ 180.509(f), 180.509(g).

4. BASIS: This approval is based on the July 21, 2023 application submitted by Trinity Industries Leasing Company (TILX) to the Federal Railroad Administration (FRA).

5. INSPECTION AND TEST PROCEDURES:

a. DEFINITIONS:

1. Service Reliability Assessment - the process,

using in-service data, to determine the time a tank car or component will continue to function as designed under specified conditions.

2. Damage-Tolerance Analysis - Determination of the probable locations and modes of damage due to manufacturing, fatigue, corrosion or accidental damage. The analysis must establish a period of time/load cycles during which it is demonstrated that widespread fatigue or corrosion damage will not occur in the tank car structure.

b. BENCHMARK TESTING: All TILX tank cars covered by this approval must have initial ultrasonic thickness test (UTT) measurements of the tank car tank¹ at time of manufacture. For tank cars lacking these measurements, they must be taken at time of next qualification.

c. DESIGN LEVEL OF RELIABILITY AND SAFETY: TILX must ensure that any allowable shell or head thickness reduction² does not decrease its design level of reliability and safety.

d. SENSITIVITY and RELIABILITY: For tank cars granted regulatory relief in § 6 below, TILX must determine the level of reliability and sensitivity for the proposed inspection method.

e. CONTROL: TILX must perform UTTs for a representative sample of the tank cars identified in § 6 below. The frequency of these tests must be based on the identified corrosion rate, utilization, and other factors to maintain the design level of reliability and safety, and shall not exceed the maximum interval prescribed in 49 CFR § 180.509(c). Test results shall be made available to FRA or a designated representative upon request. The sample size must be determined by following recognized industry sampling standards. UTT measurement procedures must account for cleanliness of the tank car tank. Cars in the sample fleet are provided no relief by this approval.

6. REGULATORY RELIEF:

¹ The shell, heads, tank shell and head weld joints, attachment welds, sumps, nozzles, flanges, and all other components welded thereto that are either in contact with the lading or contain the lading. See 49 CFR 180.503.

² See 49 CFR 180.509(f), Figure A.

a. For tank cars in UN3082 Methylene Diphenyl Diisocyanate (MDI) service, the initial performance interval of the tank car tank thickness testing is extended to 20 years from the date of construction, with subsequent inspections at 20-year intervals.

7. SPECIAL PROVISIONS:

a. A person who is not a holder of this AIP approval who receives a package covered by this AIP approval may reoffer it for transportation, provided no modification or change is made to the package or its contents and it is reoffered for transportation in conformance with this AIP approval and the HMR.

b. A current copy of this AIP approval must be maintained at each tank car facility where the qualification and maintenance of a tank car operating under this approval is performed.

c. Marking of each tank car is required and must meet the marking and labeling requirements of 49 CFR Part 172, Subpart D and Subpart E, respectively. Each tank car operating under this AIP must be identified by a stencil or decal placed above the tank specification number. The stencil must be at least 1 1/2-inches (38.1 mm) in height and display "FRA-AIP 202502." In addition, the car must display the initial qualification year (QUALIFIED) and the next qualification year (DUE), calculated from the Service Reliability Assessment. Marking must occur at time of next shopping by a tank car facility, not to exceed the maximum allowable interval given in 49 CFR § 180.509(c)(3) or the maximum allowable interval permitted by an applicable AIP.

d. If a tank car operating under this approval is removed from the AIP, then all AIP markings must be removed.

8. COMPLIANCE: Failure to comply with any of the requirements herein may result in suspension or revocation of this approval and penalties prescribed by the Federal hazardous materials transportation laws, 49 U.S.C. § 5101 *et seq.*

a. The grantee must comply with all terms and conditions prescribed in this approval and the HMR, 49 CFR Parts 171-180.

b. Each "Hazmat employee," as defined in 49 CFR § 171.8, who performs a function subject to this approval must receive function-specific training on the requirements and conditions of this AIP in addition to the training required

by §§ 172.700 through 172.704. Hazmat employees to receive training include, but are not limited to, tank car facility management, tank car facility quality assurance personnel, tank car facility personnel that perform UTT measurements, tank car facility personnel that perform quality assurance functions, and tank car owner personnel that perform fleet management functions.

c. No person may use or apply this AIP, including display of its number, when this approval has lapsed or is otherwise no longer in effect.

9. REPORTING REQUIREMENTS:

a. TILX must notify the Associate Administrator for Railroad Safety, Chief Safety Officer, in writing no later than 30 days after notification of any incident involving a tank car operating under the terms of this AIP.

b. TILX must report instances of corrosion damage or tank failure not considered in the damage-tolerance analysis or service reliability assessment on any car subject to this approval to FRA, Manager, Tank Car Safety Programs, within five days of being notified of such occurrence.

c. TILX must maintain a listing of tank cars operating under this approval by reporting mark and number and include the status of the required markings. TILX must report this listing to FRA, Manager, Tank Car Safety Programs, every 5 years, or upon request.

d. TILX must report CONTROL results (see paragraph 5(e) above) to FRA, Manager, Tank Car Safety Programs, every 5 years, or upon request.

10. LIMITATIONS:

a. If a tank car operating under this approval is transferred from TILX to another tank car owner then the tank car will no longer be subject to the relief granted under this approval and all the above required stenciling must be removed. The qualification due date must be changed to reflect the new tank car owner's qualification interval in accordance with the new Tank Car Owner's qualification and maintenance program. If the new due date is in the past, qualification is due immediately.

11. CANCELLATION:

FRA may rescind this approval for failure to comply with

any of its terms or if the relief granted decreases the design level of reliability and safety.

Issued in Washington, D.C.:



August 15, 2025

Karl Alexy
Associate Administrator for Railroad Safety
Chief Safety Officer

Address all inquiries via e-mail to: Randy M Keltz Jr., Manager,
Tank Car Safety Programs, Office of Railroad Safety, Federal
Railroad Administration at Randy.Keltz@dot.gov

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REVISION HISTORY		
REV	DATE	DESCRIPTION
	08/2025	Original approval