

HAZARDOUS MATERIALS GUIDANCE

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Summary:

This Hazardous Materials Guidance (HMG) clarifies the train placement rules in Title 49 Code of Federal Regulations (CFR) § 174.85 as applied to certain TTX Company¹ (TTX) flatcars. Section 174.85 prohibits placing a placarded *rail car* transporting Division 1.1 or 1.2 materials, or a loaded, placarded *tank car*, next to either (1) an open-top car when any of the lading in the car protrudes beyond the car ends, or if the lading shifted, would protrude beyond the car ends; or (2) a loaded flat car, except closed trailer-on-flatcar/container-on-flatcar (TOFC/COFC) equipment, auto carriers, and other “specially equipped cars with tie down devices for securing vehicles.” See 49 CFR § 174.85(d) (Restrictions 3 and 4). This HMG identifies, by reporting mark, the TTX flatcars that, if used as designed, can be placed next to *rail cars* transporting Division 1.1 or 1.2 materials, or loaded, placarded *tank cars*, in compliance with § 174.85, and those that cannot.

Discussion:

Restrictions (3) and (4) in 49 CFR § 174.85(d) prohibit placing a *rail car* transporting Division 1.1 or 1.2 materials, or a loaded, placarded *tank car*, next to:

- an open-top car when any of the lading in the open top car protrudes beyond the car ends, or if the lading shifted, would protrude beyond the car ends; or
- a loaded flat car, except closed TOFC/COFC equipment, auto carriers, and other specially equipped cars with tie-down devices for securing vehicles.

TTX owns a fleet of approximately 95,000 flatcars and has a variety of specially equipped flatcars now in service. Most of TTX’s flatcars are used for TOFC/COFC service, but many are specially equipped flatcars which, if placed next to a *rail car* containing Division 1.1 or 1.2 materials, or a loaded, placarded *tank car*, will comply with restrictions (3) and (4) of § 174.85(d), but many are flatcars that do not meet the requirements of § 174.85(d) and thus, cannot be placed in a train next to a *rail car* containing Division 1.1 or 1.2 materials, or a loaded, placarded *tank car*.

¹ TTX was formerly known as Trailer Train Corporation.

TTX uses car reporting marks to designate features of its different car types. Figure 1 below is a table listing by reporting mark, the various types of TTX-owned flatcars and whether the cars, when used as designed, may be placed in a train next to a placarded *rail car* transporting Division 1.1 or 1.2 materials, or a loaded, placarded *tank car*, in compliance with § 174.85(d). For example, cars with reporting marks HTTX, ITTX, OTTX, and TTDX are open flatcars equipped with chain tie-downs for particular types of equipment. When used as designed, they may be placed in a train next to a *rail car* transporting Division 1.1 or 1.2 materials, or a loaded, placarded *tank car*, in compliance with 49 CFR § 174.85. Similarly, cars with reporting marks ETTX, TTBX, TTGX, TTQX, and TTSX are flatcars with auto racks; when used as designed, they too may be placed in a train next to a *rail car* transporting Division 1.1 or 1.2 materials, or a loaded, placarded *tank car*. Cars with the reporting marks PTTX, TTJX, TTPX, and TTZX are rigid bulkhead flatcars and these cars may be placed next to a *rail car* transporting Division 1.1 or 1.2 materials, or a loaded placarded *tank car*, in compliance with § 174.85, if they are not loaded above the top of the bulkhead with a shiftable load.

The flatcars pictured on the last page of this HMG bear the reporting mark FTTX. These are specially equipped flatcars for handling auto and truck frames, as pictured. These cars are not equipped with tie-downs for securing vehicles, but only parts of vehicles and as such, these cars do not meet the requirements of Restriction (4) of 49 CFR § 174.85(d). Thus, placing these cars in a train next to a *rail car* transporting a Division 1.1 or 1.2 material, or a loaded, placarded *tank car*, is a violation of the Hazardous Materials Regulations. **(Please see photo examples on last page.)**

INDEX OF TTX FLATCARS BY REPORTING MARKS
(Figure 1)

No.	Reporting Mark	General Description of Car	Can this car be placed next to a <i>rail car</i> transporting Division 1.1 or 1.2 materials, or a loaded, placarded <i>tank car</i> , if loaded properly and used as designed? Yes or No
1	ATTX	75 foot, all-purpose flatcar (center and side tie-downs)	Yes
2	BTTX	2-unit articulated standard level auto rack car	Yes
3	DTTX	Five platform articulated well type COFC cars capable of carrying double-stacked containers and single, 3-unit and 4-unit all purpose (COFC-TOFC) double stack, well cars	Yes
4	ETTX	Low-level flatcar equipped with totally enclosed tri-level auto rack (hydraulic draft gears)	Yes

No.	Reporting Mark	General Description of Car	Can this car be placed next to a <i>rail car</i> transporting Division 1.1 or 1.2 materials, or a loaded, placarded <i>tank car</i> , if loaded properly and used as designed? Yes or No
5	FTTX	Flatcar equipped with tie-down devices for loading automotive or truck frames	No
6	GTTX	Low-level and standard-level cars in transit for the application of auto rack	Yes
7	HTTX	Flatcar equipped with thirty-eight (38) heavy-duty chains, with snubbers and turnbuckles, each secured to movable and retractable tie-down winches in four (4) longitudinal channels for transporting large earth moving equipment.	Yes
8	ITTX	Flatcar equipped with special foldaway pedestals and thirty-two (32) tie-down winches with chains and bridge plates for transporting trailer tractors saddleback style	Yes
9	JTTX	Flatcar with miscellaneous devices applied by lessee for special service	Yes
10	KTTX	"Twin-45" standard-level flatcar with fixed hitches on ends of car for handling two (2) 45' trailers, (overhead loading only)	Yes
11	MTTX	60-foot flatcar with stake pockets for general service, or 85-foot flatcar with sixteen (16) stake pockets, eight (8) per side for transporting long pipe	Yes
12	NTTX	5-unit articulated COFC car for transporting containers (spine car)	Yes
13	OTTX	Flatcar equipped with thirty-six (36) chains, with snubbers each secured to movable and retractable tie-down winches in four (4) longitudinal channels, for transporting agricultural equipment	Yes
14	PTTX	Flatcar equipped with bulkheads, spaced 48 feet, 6 inches apart for transporting plywood, wallboard, etc.	Yes
15	QTTX	Heavy duty flat deck and depressed deck flatcar	Yes

No.	Reporting Mark	General Description of Car	Can this car be placed next to a <i>rail car</i> transporting Division 1.1 or 1.2 materials, or a loaded, placarded <i>tank car</i> , if loaded properly and used as designed? Yes or No
16	RTTX	"Twin-45/Triple-28" - standard-level flatcar with fixed hitches on ends of car and retractable hitch at center of car for handling two 45' or three 28' trailers. <u>Overhead loading only</u> (standard draft gears) 2-unit RTTX car - same as above except 2-units semi-permanently connected with a drawbar	Yes
17	STTX	"Twin-45" standard level flatcar for handling two (2) 45' trailers equipped with sliding bridge plates for circus style loading	Yes
18	TTAX	All-purpose spine car for TOFC/COFC service	Yes
19	TTBX	Flatcar equipped with bi-level auto rack. Rack can be either open or shielded on the sides, but does not have roof or doors	Yes
20	TTCX	Flatcar equipped with container pedestals for COFC service (hydraulic draft gears)	Yes
21	TTDX	Flatcar equipped with sixteen (16) tie-down winches with chains and bridge plates for transporting military	Yes
22	TTEX	2-unit TOFC car for hauling 4-45' or 3-57' trailers (sill above cars only) or up to 3-57' trailers	Yes
23	TTFX	Four platform TOFC car capable of carrying four 45' trailers <u>overhead loading only</u>	Yes
24	TTGX	Flatcar equipped with totally enclosed bi-level auto rack	Yes
25	TTHX	60-foot flatcar equipped with eighteen (18) heavy-duty chains anchored to stake pocket castings	Yes
26	TTJX	68-foot, 100-ton flatcar equipped with twenty-two (22) screw type tie-down devices and stake pockets. Some cars are finger rack, rebar, coil, or shape and plate cars	Yes

No.	Reporting Mark	General Description of Car	Can this car be placed next to a <i>rail car</i> transporting Division 1.1 or 1.2 materials, or a loaded, placarded <i>tank car</i> , if loaded properly and used as designed? Yes or No
27	TTLX	Five platform articulated TOFC car capable of carrying one trailer per platform 40' to 48' long and up to 102" wide with front mounted refrigeration unit. <u>Overhead loading only</u> . Same as UTTX cars	Yes
28	TTMX	68-foot 100-ton flatcar equipped with stake pockets and lading strap anchors for general service	Yes
29	TTOX	Single platform TOFC car with single axle trucks capable of carrying one trailer 40' to 48' long and up to 102" wide with nose mounted refrigeration unit <u>overhead loading only</u>	Yes
30	TTPX	68-foot, 100-ton flatcar equipped with bulkheads, spaced to 60'6" to 62'0" apart, and thirty-four (34) transverse tie-down anchors with chains, used for transporting plywood, wallboard, etc.	Yes
31	TTQX	Low-level flatcar equipped with totally enclosed auto rack. Auto rack height - 20'2". (hydraulic draft gears)	Yes
32	TTRX	3 unit articulated flatcar	Yes
33	TTSX	Flatcar equipped with coverless enclosed bi-level auto rack (hydraulic draft gears)	Yes
34	TTWX	"Twin-45" standard level flatcar equipped with foldaway container pedestals and hitches for TOFC and/or COFC service (hydraulic draft gears)	Yes
35	TTX	Flatcar equipped with two (2) hitches for TOFC service	Yes
36	TTZX	100- and 110-ton bulkhead car equipped with center partition and winch type tie-down system for carrying lumber products. 110-ton cars equipped with stake pockets	Yes

No.	Reporting Mark	General Description of Car	Can this car be placed next to a <i>rail car</i> transporting Division 1.1 or 1.2 materials, or a loaded, placarded <i>tank car</i> , if loaded properly and used as designed? Yes or No
37	UTTX	Five platform articulated TOFC car capable of carrying one trailer per platform 40' to 48' long and up to 102" wide with front-mounted refrigeration unit. <u>Overhead loading only</u> . Same as TTLX cars	Yes
38	VTTX	Flatcar equipped with fixed container pedestals for COFC service only	Yes
39	WTTX	"Twin-45" standard level flatcar equipped with two (2) hitches for TOFC service	Yes
40	ZTTX	Flatcar equipped with thirty (30) stake pockets for transporting long poles and pipes	Yes

**PHOTOGRAPHIC EXAMPLES OF TTX FLAT CARS THAT ARE VIOLATIONS
WHEN PLACED NEXT TO A LOADED, PLACARDED TANK CAR OR OTHER RAIL
CAR CONTAINING DIVISION 1.1 OR 1.2 MATERIALS**



Automobile frames and railroad wheel sets on flat cars cannot be next to a loaded placarded tank car or cars carrying 1.1 or 1.2 division materials

