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BULLETIN #	TITLE			DATE ISSUED
2015-08	Liquefied Propane Rail Car Trans-Loading			October 15, 2015
SUPERSEDES	RELEASED BY	APPROVED BY	SOURCE	SUPERSEDED BY
N/A	JBC	JWD	NFPA 58 (2008 Edition)	

Informational Bulletin 2015-08
Liquefied Propane Rail Car Trans-Loading

Rail car off loading into transport vehicles has become an increasingly popular way for propane marketers to supplement their winter supply demands. This informational bulletin may be used by fire chiefs and AHJ's as well as propane suppliers as a guideline to follow for future and current trans-loading operations in New Hampshire.

Trans-loading from a rail car to propane transport vehicles requires notification and safety procedures to be followed by qualified individuals who have been properly trained in all aspects of the transfer process. The full set of requirements can be found in the 2008 edition of the Liquefied Petroleum Gas Code (NFPA 58 LP-Gas Code).

- Notification of intent to transfer of LP-Gas directly from a rail car to a cargo tank shall be submitted to the local Authority Having Jurisdiction, who shall have the authority to require regular inspections. (2008 NFPA 58 4.3.3)
- Temporary installations (not to exceed 12 months) require notification to the Authority Having Jurisdiction. In many cases, local ordinances may require additional permits. (2008 NFPA 58 4.3.2)
- Operator and employees who transfer propane must be properly trained and qualified for their specific function. Individuals must have documented refresher training at least once every three years. (2008 NFPA 58 4.4)
- Odorization of LP-Gas is required when delivered to a bulk plant. Odorization is also required when shipments bypass the bulk plant and in any trans-loading operation. The NH State Fire Marshal's Office strongly recommends the use of "stain tube testing" as it is the most accurate way to determine the proper levels of odorant in the LP-Gas. (NFPA 58 4.2.3)
- When odorization testing is conducted, it must be documented in accordance with NFPA 58 4.2.3. Many AHJ's require the testing reports be reported to them on a regular basis, with any findings of rail cars with unacceptable odorant levels reported immediately. There should be a plan in place for these occurrences.
- Transfer operations must be in accordance with NFPA 58 Chapter 7 and must adhere to the specifics found 7.2.3.6 and 7.2.3.8.
- Cargo vehicles used in the transfer process must be in compliance with NFPA 58 Chapter 9.4.
- A security plan, operations & maintenance plan and fire safety plan in accordance with NFPA 58 Chapter 14.1 - 14.3.2.