



International Association of Fire Chiefs

4025 Fair Ridge Drive • Fairfax, VA 22033-2868

Telephone: (703) 273-0911

Fax: (703) 273-9363

Internet: www.ichiefs.org

April 1, 2003

Ms. Elaine Dezenski, Acting Director
Maritime, Land and Cargo Policy
Transportation Security Administration
1123N, TSA Headquarters
701 South 12th Street
Arlington, VA 22202

Dear Ms. Dezenski:

The issue of removing hazardous materials placards from rail cars for security reasons has been under discussion since September 2001. Representatives of the International Association of Fire Chiefs (IAFC) have attended many meetings at the U.S. Department of Transportation and other federal agencies, with the railroad association and other venues on the subject. Our position is consistent and has not wavered.

We oppose the termination or diminution of our current placarding system, in whole or in part, until such time as a replacement system has been demonstrated to be effective and the fire service has been fully trained in its use.

The IAFC and America's fire service strongly supports the current placarding system as managed by the Research and Special Programs Administration (RSPA) of the U.S. Department of Transportation.

We do not live in a risk-free society and must think in terms of probabilities versus possibilities. There are nearly one million hazardous materials shipments each day. Every day, some of these shipments cause a problem (tip over, leak, spill, catch fire) that requires a fire department response. The possibility of a hazmat incident in the normal course of commerce is great; whereas, the probability of a terrorist incident where the perpetrator uses hazardous materials as the main ingredients is low.

For nearly two decades, the fire service has trained on handling hazardous materials incidents with the North American Emergency Response Guide (ERG) which depends on placards for identification of the substances involved. Firefighters and other emergency responders do not have universal access to sophisticated electronic and software programs to identify hazardous materials.

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Member, International Technical Committee for the Prevention and Extinction of Fire/Comité Technique International De Prevention Et D'Extinction Du Feu (CTIF)

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While the IAFC supports Operation Respond, Inc., and notes its progress in getting the software into the hands of jurisdictions, it is not a viable option at this time and will not be a viable option in the near future.

The truth is that most fire departments, especially small and rural volunteer departments, still rely on visual placards for their own safety and the protection of their communities, and will do so for the foreseeable future under current operations, training, and funding levels.

As you know, in addition to RSPA, the U.S. Department of Labor plays an important role. OSHA, under 29 CFR Part 1910, the Hazardous Waste Operations and Emergency Response Regulation (HAZWOPER), requires all employees and contractors involved in hazmat operations, which includes firefighters, to be certified at the awareness level and to undergo annual recurrent training. This training is based on the RSPA placarding system, which is the only one that firefighters and emergency first responders know.

In transportation accidents, the truck driver or train crew might not be helpful in identifying the cargo. The trucker could be killed or badly injured. The train crew might be at one end or one side of the train, while the first-in fire crew could be at the other end or side. Also, the manifest or "consist" of the train can be inaccurate. So, even if a firefighter has the crew with the manifest to look at, one is not assured that the exact contents of particular railcar or trailer is known.

That said, the IAFC believes that there are measures that can be discussed that may enhance security and still maintain the integrity of the community safety system provided by the current placarding system. The IAFC's position remains fully committed to the current placarding system, but we would be interested in discussing the security and safety implications for implementation and training for potential changes such as:

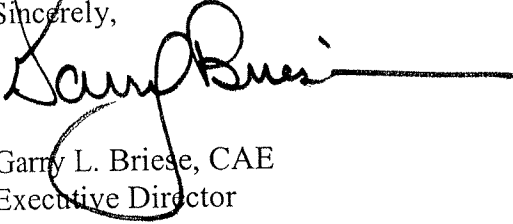
- Removal of English chemical names (6" letters)
- Changing the unique required paint pattern for specific hazmat tank cars
- Temporarily removing specific placards during high hazard terrorist alerts (but, this requires specific demonstration and confirmation of an alternative, positive, 100% effective tracking system for these high hazard chemicals)

While we are aware and deeply concerned about the security issues we are now facing, we urge TSA and DHS to fully engage us before any final decisions are made about changes to the current placarding system. If a decision is going to be made to modify the current system, no matter what our position or objection, let us have the opportunity to identify the risks and benefits for each change to the safety and security of the communities we protect.

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The IAFC urges TSA to carefully consider the IAFC's position. Public security and safety rests on the actions and knowledge of emergency first responders. The current placarding system is completely ingrained in our response mechanism. Without it, first responders and the public we are sworn to protect will be endangered.

Sincerely,



Garry L. Briese, CAE
Executive Director

Cc: IAFC Board of Directors

Kevin O. Shanley, Senior Policy Analyst
National Governor's Association

Joanna W. Liberman, Senior Policy Analyst
National League of Cities

Larry Naake, Executive Director
National Association of Counties

Robert A. McGuire, Associate
Administrator for HazMat Safety
Research and Special Programs
Administration, U.S. Department of
Transportation

Alan I. Roberts, President
Dangerous Goods Advisory Council