

## INTERESTED PARTIES FOR HAZARDOUS MATERIALS TRANSPORTATION

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February 12, 2025

The Honorable Sean Duffy  
Secretary of Transportation  
U.S. Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590

Dear Secretary Duffy:

On behalf of the Interested Parties for Hazardous Materials Transportation (“Interested Parties”)<sup>1</sup>, we are writing today in support of efforts to enhance the efficiency and effectiveness of government while also ensuring the continued safe and efficient transportation of hazardous materials. In particular, we seek to highlight the critical functions of personnel who oversee the safe transport of hazardous materials within the Department of Transportation, particularly at the Pipeline and Hazardous Materials Safety Administration (PHMSA).

Our coalition represents a large and diverse group of industries that manufacture, ship, and transport millions of tons of hazardous materials annually by all modes of transport. We work closely with the hazardous materials professionals at PHMSA, Federal Motor Carrier Safety Administration (FMCSA), Federal Railroad Administration (FRA), and Federal Aviation Administration (FAA) at the local, state, national, and international level. Many of these federal employees have decades of hazardous materials experience and specialize knowledge of how our industries operate and the importance of safely and efficiently shipping and transporting hazardous materials in accordance with the U.S. hazardous materials regulations (HMR) and international dangerous goods regulations.

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<sup>1</sup> The Interested Parties is a volunteer-run coalition of organizations that share an interest in legislative and regulatory issues related to the safe and secure domestic and international transportation of hazardous materials. Interested Parties members include associations representing hazardous materials shippers, carriers, packaging manufacturers and other related groups. The following IP members have approved these comments: Agricultural Retailers Association; American Chemistry Council; American Coatings Association; American Fuel and Petrochemical Manufacturers; American Pyrotechnics Association; American Short Line & Regional Railroad Association; American Petroleum Institute; Commercial Vehicle Safety Alliance; Compressed Gas Association; Council on the Safe Transportation of Hazardous Articles; Dangerous Goods Advisory Council; The Fertilizer Institute; Energy Marketers of America; Gases and Welding Distributors Association; Industrial Packaging Alliance of North America; Institute of Makers of Explosives; International Vessel Operators Dangerous Goods Association; Medical Device Transport Council; Alliance for Chemical Distribution; National Private Truck Council; National Tank Truck Carriers; National Energy & Fuels Institute; The National Industrial Transportation League; PRBA – The Rechargeable Battery Association; Radiopharmaceutical Shippers & Carriers Conference; Railway Supply Institute; Reusable Industrial Packaging Association; Sporting Arms Ammunition Manufacturers Institute; The Sulphur Institute.

PHMSA plays an outsized role in the world of hazardous materials transportation because of its multi-modal authority to write and enforce the HMR, issue Special Permits and Approvals and participate in international organizations that are responsible for writing and publishing the international dangerous goods transport regulations (e.g., UN Model Regulations on the Transport of Dangerous Goods, International Maritime Dangerous Goods Code).<sup>2</sup> Several of our coalition members are official Observers at the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods and participate in meetings of the International Civil Aviation Organization Dangerous Goods Panel and International Maritime Organization Sub-Committee on Carriage of Cargoes and Containers. Over the years, we have seen first-hand the leadership role that PHMSA hazardous materials professionals play at these meetings and how other countries often defer to the United States' expertise on a range of hazardous materials issues, as presented by PHMSA. As you know, a PHMSA employee presently chairs the UN Sub-Committee of Experts on the Transport of Dangerous Goods and is recognized globally as a leader in this field. We believe it is important to bring to your attention the fact that harmonized international regulations are necessary to ensure the smooth flow of billions of dollars of regulated commodities to, from and within the U.S. annually, including chemicals, radiopharmaceuticals, paints and coatings, batteries and a wide range of other materials.

Given the complexities and risks associated with hazardous materials transportation, we believe a robust and qualified staff of hazardous materials professionals at these federal agencies is necessary, particularly on those rare occasions when there are incidents involving hazardous materials in transportation. The day-to-day interactions with members of our coalition and other professionals who work in the hazardous materials industry is necessary to ensure the safety of the thousands of daily shipments of hazardous materials are transported each day. The critical role of PHMSA's professional staff is also evident during domestic natural disasters and emergencies, such as the 2024 Hurricane Helene response, when, working with other federal agencies and hazardous materials professionals in the private sector, PHMSA authorized movements of needed materials through the issuance of Special Permits and "Enforcement Discretion" Notices to provide timely, but limited, relief from the HMR to facilitate the movement and delivery of hazardous materials used to support disaster relief efforts.

Members of the Interested Parties and the Department of Transportation share the same goal – ensuring hazardous materials are safely shipped and transported in order to protect the health and safety of the public and professionals who work in this industry. We seek to ensure that a reduction of federal employees who work on issues associated with the safe transport of hazardous materials does not result in unintended consequences that could result in negative impacts on transportation safety or response efforts.

Thank you for considering our views and recommendations on these critical issues impacting members of our coalition and the safe transport of hazardous materials. We look forward to

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<sup>2</sup> The international transport regulations use the term "dangerous goods" to refer to products the U.S. regulates as "hazardous materials."

working with you and your staff and would welcome the opportunity to meet with your staff to further discuss these issues.

Respectfully submitted,

A handwritten signature in black ink that reads "Paul Rankin". The signature is written in a cursive style with a prominent initial "P".

Paul W. Rankin, Chair  
prankin@ripaus.com