INFORMATION COLLECTION
SUPPORTING JUSTIFICATION
Railworthiness Directive, Notice No. 1
OMB No. 2130-NEW

Summary of Submission

- This submission is a new collection of information requesting **Emergency processing** and immediate approval by OMB for the collection of information associated with FRA's Railworthiness Directive Under 49 CFR 180.509 for Railroad Tank Cars Equipped with Certain McKenzie Valve & Machining LLC Valves, which is being issued on March 13, 2015, and published in the **Federal Register** on March 18, 2015. See 80 FR 14027.

- FRA is requesting **Emergency processing** upon publication of the required Federal Register Notice on **March 18, 2015,** see 80 FR 14238**,** because FRA cannot reasonably comply with normal clearance procedures on account of use of normal clearance procedures is reasonably likely to disrupt the collection of information. Additionally, in light of recent tank car accidents/incidents carrying crude oil and other hazardous materials, FRA believes safety is an issue. The Directive takes effect immediately upon issuance. FRA cannot wait the normal 90- to180-day period for routine Office of Management and Budget (OMB) review and approval. Under the Directive, tank car owners must take immediate action to identify, inspect, and repair the valves. Therefore, FRA is requesting OMB approval of this collection of information immediately.

- The total number of burden **requested** for this collection of information is **500 hours.**

- Total number of **responses requested** for this information collection is **400**.

- **The answer to question **number 12** itemizes the hourly burden associated with each requirement of this rule (See pp. 8-10).

1. Circumstances that make collection of the information necessary.

Recent FRA investigations identified several DOT Specification 111 railroad tank cars transporting hazardous materials and leaking small quantities of product.[a] One instance

[a] DOT Specification 111 tank cars are general purpose, nonpressure railroad tank cars commonly used to transport a variety of regulated hazardous materials, as well as nonregulated commodities. In 2011, through issuance of Casualty Prevention Circular 1232, the Association of American Railroads (AAR) adopted an industry standard intended to improve the crashworthiness of DOT Specification 111 tank cars used in crude oil and ethanol service. These cars, known as CPC 1232 cars, include a thicker shell, head protection, top fittings protection, and relief valves with a greater flow capacity as compared to baseline DOT Specification 111 cars. The leaking tank cars identified in this Directive include both a baseline DOT 111 Specification car and CPC-1232 cars.

occurred during the week of January 11, 2015 and involved a train of 100 tank cars loaded with crude oil being transported by BNSF Railway Company (BNSF) from Tioga, North Dakota, to a refinery in Anacortes, Washington. BNSF discovered 14 tank cars leaking crude oil en route. Upon discovery of the defective condition of these cars, BNSF removed the cars from the train (at Hauser, Idaho; Vancouver, Washington; and Auburn, Washington, respectively). When the train arrived at its final destination in Anacortes, the consignee, Tesoro Refining, discovered two additional cars leaking product. In all, BNSF and Tesoro identified 16 leaking tank cars from the original train consist.

On January 15, 2015, FRA inspected seven of the identified leaking tank cars that BNSF removed from the train in Vancouver. The FRA inspector observed crude oil on the sides of each of these cars, and upon inspection of each tank car's top fittings, found product leaking from the liquid line ball valves and around each valve's closure plug. FRA also found the standalone closure plugs in each of these valves loose. Further inspection revealed that the valve balls had visual signs of mechanical damage. The mechanical damage FRA observed indicated that the bottom face of the closure plug came in contact with the valve ball, consequentially preventing complete engagement of the closure plug.

A second instance involved a single tank car loaded with mineral spirits (a Class 3 flammable liquid) found leaking on January 15, 2015, in a BNSF yard in Denver, Colorado. FRA's preliminary investigation shows that the leak occurred en route through the liquid line valve.

UTLX owns all 17 of the cars found leaking as described above. Each of the leaking cars was configured with liquid line ball valves sold by UTLX's affiliate, McKenzie, and each valve was configured with a 3" standalone plug as a closure. FRA identified the leaking valves as 3" McKenzie UNNR threaded ball valves (McKenzie valves).

McKenzie provided FRA several valve configuration drawings indicating that the valve was a full port valve. This configuration requires a 3" x 2" reducer bushing with a 2" plug to prevent contact between the closure plug and the valve ball. McKenzie also informed FRA that it markets and sells the same design of valve in 1" and 2" models. For the 2" valve, McKenzie specified the use of a 1" plug and an appropriately sized reducer.

FRA also requested that UTLX provide FRA drawings of the top fittings arrangements for these cars. However, unlike the drawings provided by McKenzie, the UTLX drawings provided by UTLX did not include a full port valve with a reducer bushing. Instead, consistent with the physical configuration of the tank cars FRA inspected, the drawings showed a full port threaded valve along with a 3" plug and chain.
On January 27, 2015, FRA conducted field testing of the McKenzie valves at UTLX's Altoona, PA, tank car repair facility. FRA tested new, 1", 2" and 3" McKenzie valves at the facility's valve shop. The field testing included two cycles of application and

removal of each valve's plug. FRA found that the 1" and 2" McKenzie valves showed no signs of contact between the valve ball when a 1" or 2" closure plug was installed and tightened. However, when a 3" closure plug was applied and tightened in the 3" McKenzie valve, the plug contacted and damaged the ball. The damage observed during this testing was consistent with the type of damage observed on the leaking UTLX tank cars described above.

FRA's field testing further found that the application of downward force on the valve ball applied by the 3" plug resulted in the over-compression, damage, and misalignment of the inboard seal, causing the valve to leak. FRA also observed that once a valve's ball is damaged, when the valve is subsequently opened, the damaged surface of the ball also damaged the valve's top seals by tearing the seals. This further compromises the valve's seal. Additionally, FRA understands that with repeated opening and closing (exemplifying in-service use), the valve's threads will degrade, necessitating further engagement of the threads during subsequent applications of the plug. This continual degradation of the threads will require increasingly more tightening of the plug, exacerbating the damage to the ball and seals. In summary, FRA found that normal application and tightening of the 3" plug in a 3" McKenzie valve destroys the valve seal integrity.

FRA conducted a follow-up investigation at the UTLX facility in Altoona to perform a leak test of the 3" McKenzie valve that was field tested and damaged on January 27. Although the designed leak-free working pressure of this valve is up to 500 pounds per square inch (psi), the leak test procedure requires that the valve hold a minimum pressure of 30 psi. The subject McKenzie valve failed to retain the minimum 30 psi of compressed air test pressure. The valve showed signs of a significant leak.

As required by Title 49 Code of Federal Regulations (CFR) 179.100-13 and 179.200-16 of the Federal hazardous materials regulations (49 CFR Parts 171–180; (HMR)), all valves applied to tanks cars must be of an approved design. The term "approved" is defined in 49 CFR 179.2 as "approved by the [AAR] Tank Car Committee."[b] McKenzie provided FRA with AAR's approval letters for the McKenzie valves. While McKenzie may have believed these approvals were sufficient, the AAR approvals provided demonstrate clear inconsistencies between the type of valve design that AAR approved versus the design of the valve actually being used and the design depicted on the valve configuration drawings both McKenzie and UTLX provided to FRA. AAR

[b] As background, the Tank Car Committee is composed of various railroad industry representatives, including railroads, tank car shipper and owner organizations, tank car builders, and chemical and industry associations. FRA and the DOT's Pipeline and Hazardous Materials Safety Administration also participate in the Tank Car Committee's processes as non-voting members. The Tank Car Committee has traditionally been the body with the expertise to develop tank car design, construction, and maintenance standards in this country. DOT sets minimum tank car specifications at 49 CFR part 179, and AAR approves designs meeting the requirements of part 179.

Approval E-077035 (October 26, 2007) is a renewal of previous AAR approvals,[c] and describes a 3" standard port threaded ball valve. The original approvals that AAR renewed described and referred to UTLX Drawing 72916, which depicts a 3" standard port threaded ball valve. In contrast, the 3" McKenzie valve at issue is a full port ball valve. A full port valve is different from a standard port valve.[d] The dimensions of the valve body that AAR approved is significantly longer than the bodies of the valves depicted on the McKenzie drawings and the bodies of the valves actually installed on the leaking tank cars. McKenzie also provided a copy of a September 29, 2008, application for approval of a 3" threaded full-port valve (AAR application number E-087016), but neither McKenzie nor AAR have provided evidence of that valve's subsequent approval. McKenzie provided information to FRA indicating that from 2009 through the present, it sold approximately 11,200 of the 3" valves to a variety of tank car owners and tank car facilities. McKenzie indicates that since 2012, its sales of these valves were predominantly to replace in-kind valves previously installed on existing tank cars.

Further, McKenzie informed FRA that as of January 26, 2015, the company has stopped selling the 3" valves as a result of the noted safety concerns. Overall, McKenzie and UTLX provided information leading FRA to conclude that approximately 6,000 DOT Specification railroad tank cars are equipped with the unapproved 3" McKenzie UNNR valves. In addition, McKenzie indicates that it has sold over 37,000 1" and 2" valves to a variety of tank car owners and tank car facilities.

To date, FRA has identified only a small number of relatively minor hazardous materials leaks directly attributable to the identified McKenzie valves. FRA believes that the number of leaks potentially attributable to the identified McKenzie valves used in tank car liquid lines could be much higher. Based on FRA's field testing, the 3" McKenzie valve appears to present an immediate safety issue in certain circumstances. While the 1" and 2" McKenzie valves do not appear to present similar concerns, based on the information that AAR, McKenzie, and UTLX have provided to date, it does not appear that any size of the McKenzie valves (i.e., the 1", 2" or 3" UNNR valves) are currently approved for use on railroad tank cars. Accordingly, use of such valves on tank cars is in violation of the HMR. To date, FRA is not aware of any non-accident releases or other releases from railroad tank cars involving the 1" or 2" McKenzie valves, but since the valves have not been approved by AAR they have not been shown to be safe for use on railroad tank cars.

[c] AAR Approval E-977030 (April 9, 1997). AAR Approval E-977030 was a renewal of AAR Approval E-897047 (June 21, 1989), which also referred to UTLX drawing 72916.

[d] The difference between a full port and standard port ball valve is the size of the ball's bore diameter as related to nominal pipe sizes, with the ball size being in proportion to the bore size diameter. The bore size in a full port valve is that of the same for its nominal pipe size, where the bore size in a standard port valve is that of the next smallest nominal pipe size. For example, the bore diameter for a 3" standard port ball valve is approximately 2.25", or one pipe size smaller, and for a full port ball valve, the bore diameter is approximately 3" in diameter (the actual size of the pipe).

McKenzie and UTLX have taken independent actions to address some of the safety concerns with the 3 inch valves. However, FRA believes those actions fail to adequately address the safety issue the valves present.

Based on the above discussion, and acting under the authority granted in 49 CFR 180.509(b)(4), FRA finds that the continued use of railroad tank cars equipped with the unapproved McKenzie UNNR threaded ball valves (including the 1", 2" and 3" UNNR valves) to transport hazardous materials by rail in the United States presents an unsafe operating condition. The use of such tank cars equipped with these valves could result in the release of hazardous materials. Further, the use of tank cars equipped with these McKenzie valves used to transport hazardous materials in the United States violates the requirements of the HMR. FRA is issuing this directive to ensure public safety, ensure compliance with the applicable Federal regulations governing the safe movement of hazardous materials by rail, and restore the railworthiness of all tank cars equipped with the above-described McKenzie valves.

2. How, by whom, and for what purpose the information is to be used.

This is a new collection of information. The proposed collection of information will be used by FRA to ensure that tank car owners comply with the requirements of this Safety Directive. Specifically, tank car owners must inspect and identify tank cars in their fleet equipped with any unapproved McKenzie UNNR threaded ball valves. Tank car owners are required to provide the reporting mark and number of each car equipped with any McKenzie valve and the type of valve each car is equipped with. FRA will review these reports to verify that tank car owners are carrying out the necessary inspections and identifying those tank cars with any prohibited McKenzie UNNR threaded ball valves.

Further, tank car owners are required to create and maintain for six (6) months from the effective date of this Directive a record of the inspection of each McKenzie valve. The record must include, at a minimum, the inspection date and location as well as the results of the inspection (i.e., whether the valve was removed or not). These records must be made available to FRA inspectors upon request. FRA inspectors will use these records to verify that tank car owners remove and replace any McKenzie UNNR threaded ball valves with approved valves before offering these cars into transportation.

The information collected will also be used by tank car owners to conduct immediate inspections of their tank cars to identify the railroad tank cars in their fleet equipped with any unapproved McKenzie UNNR threaded ball valves and remove them. Tank car owners are required to immediately inspect 3 inch McKenzie valves on each affected car. If any valve is configured with a 3 inch standalone plug, they must ensure that the car is not loaded and offered in transportation until that valve is replaced with an approved valve consistent with 49 CFR Part 179. Additionally, any tank car equipped with an unapproved 3 inch McKenzie valve is prohibited from being offered into transportation

(whether loaded or residue) after May 4, 2015. Moreover, tank car owners are required to immediately inspect the 1 inch and 2 inch McKenzie valves on each affected car. If any valve shows evidence of mechanical damage, tank car owners must ensure that the car is not loaded and offered into transportation until that valve is replaced with an approved valve consistent with 49 CFR Part 179. Even if a valve is not damaged, a tank car equipped with an unapproved 1 inch or 2 inch McKenzie valve is prohibited from being offered into transportation (whether loaded or residue) after June 2, 2015. Tank car owners will maintain the required record of the inspection of each McKenzie valve to confirm that these inspections have been completed and that their tank cars offered into transportation are done so under a safe operating condition.

3. Extent of automated information collection.

FRA highly endorses and strongly encourages the use of the latest information technology, wherever feasible, by the railroad industry to reduce burden. FRA expects that all the required records will be kept electronically and believes all the required reports will be provided electronically to FRA by tank car owners. Since this Directive takes effect, immediately 100% percent of responses are electronic.

4. Efforts to identify duplication.

The proposed collection of information is new and pertains to a critical Safety Directive that FRA is issuing regarding tank cars equipped with any unapproved McKenzie UNNR threaded ball valves Therefore, the information collected is unique and not currently available.

This information to our knowledge is not duplicated anywhere.

5. Efforts to minimize the burden on small businesses.

There are approximately 100 tank car owners that will be affected by this Safety Directive. This Safety Directive will primarily affect the Union Tank Car Company. A couple of small businesses/entities may be affected by this Directive. The Union Tank Car Company is not a small business/small entity. Thus, FRA firmly asserts that the proposed collection of information will not have a significant impact on a substantial number of small entities.

6. Impact of less frequent collection of information.

If this information were not collected or collected less frequently, rail safety throughout the United States could be significantly jeopardized by tank cars carrying hazardous materials – such as crude oil and ethanol, among others – that released such materials. Such releases could result in accidents/incidents with corresponding injuries, fatalities, and property damage. Specifically, without the requirements of this Safety Directive,

tank car owners might not inspect and identify tank cars in their fleet equipped with any unapproved McKenzie UNNR threaded ball valves. Recent FRA investigations identified several railroad tank cars transporting hazardous materials and leaking small quantities of product from the cars' liquid lines. FRA's investigation revealed that the liquid lines of the leaking tank cars were equipped with a certain type of 3 inch ball valve marketed and sold by McKenzie Valve & Machining LLC (McKenzie), an affiliate company of Union Tank Car Company (UTLX). FRA further found certain closure plugs installed on the 3 inch valves cause mechanical damage to the valves, which leads to the destruction of the valves' seal integrity and that the 3 inch valves, as well as similarly-designed 1 inch and 2" inch valves provided by this manufacturer, are not approved for use on tank cars.

Under the proposed information collection requirements of this Safety Directive, tank car owners must provide the reporting mark and number of each car equipped with any McKenzie valve and the type of valve each car is equipped with to FRA. Without these required reports, FRA would have no way to verify that tank car owners are carrying out the necessary inspections and are identifying those tank cars with any prohibited McKenzie UNNR threaded ball valves.

Further, tank car owners are required to create and maintain for six (6) months from the effective date of this Directive a record of the inspection of each McKenzie valve. The record must include, at a minimum, the inspection date and location as well as the results of the inspection (i.e., whether the valve was removed or not). These records must be made available to FRA inspectors upon request. Without these required records, FRA inspectors would be unable to verify and be assured that tank car owners remove and replace any McKenzie UNNR threaded ball valves with approved valves before offering these cars into transportation. Without such removal and replacement of these McKenzie UNNR threaded ball valves, the operational safety of trains with tank cars carrying dangerous hazardous materials might be at risk.

In sum, the proposed collection of information is essential and assists FRA in its primary mission of promoting and enhancing rail safety throughout the United States by allowing to FRA to enforce this Railworthiness Safety Directive.

7. Special circumstances.

All information collection requirements relating to the Railworthiness Directive Notice No. 1 are in compliance with this section.

8. Compliance with 5 CFR 1320.8.

FRA's Railworthiness Directive Under 49 CFR 180.509 for Railroad Tank Cars

Equipped with Certain McKenzie Valve & Machining LLC Valves is being issued on March 13, 2015, and published in the **Federal Register** on March 18, 2015. See 80 FR 14027. The required Notice requesting OMB Emergency Processing is also being published in the **Federal Register** on March 18, 2015. See 80 FR 14238.

FRA is requesting **Emergency processing** because FRA cannot reasonably comply with normal clearance procedures on account of use of normal clearance procedures is reasonably likely to disrupt the collection of information. Additionally, in light of recent tank car accidents/incidents carrying crude oil, ethanol, and other hazardous materials, FRA believes rail safety is an overriding issue. The Directive takes effect immediately upon issuance. FRA cannot wait the normal 90- to180-day period for routine Office of Management and Budget (OMB) review and approval. Under the Directive, tank car owners must take immediate action to identify, inspect, and repair the valves. Therefore, FRA is requesting OMB approval of this collection of information immediately.

Upon OMB approval of its emergency clearance request, FRA will follow the normal clearance procedures for the information collection associated with this Railworthiness Directive.

9. Payments or gifts to respondents.

There are no monetary payments or gifts made to respondents regarding the proposed information collection requirements resulting from this emergency order.

10. Assurance of confidentiality.

No assurances of confidentiality were made by FRA.

Information collected is not of a private nature.

11. Justification for any questions of a sensitive nature.

There are no questions of a sensitive or private nature involving the proposed collection of information associated with FRA's Railworthiness Directive Notice No. 1.

12. Estimate of burden hours for information collected.

Note: FRA estimates that approximately 15,000 tank cars will be affected by this Directive. Further, FRA estimates the respondent universe to be 100 tank car owners.

Railroad Worthiness Directive, No. 1 – Provisions:

I. Upon the effective date of this Directive, any railroad tank car equipped with an unapproved McKenzie UNNR threaded ball valve (McKenzie valve) is prohibited from being loaded with any hazardous material described in 49 CFR 172.101 and offered into transportation until the requirements listed below are met. Tank car owners[e] of tank cars equipped with McKenzie valves must:

(1) Identify the railroad tank cars in their fleet equipped with any McKenzie valves;

(2) Provide to FRA: (a) the reporting mark and number of each car equipped with any McKenzie valve; and (b) the type of valve each car is equipped with;

(3) Create and maintain for a minimum of 6 months from the effective date of this directive a record of the inspection of each McKenzie valve. The record must include, at a minimum, the inspection date and location, as well as the results of the inspection (i.e., whether the valve was removed or not). The record must be made available to FRA for inspection upon request.

(4) Immediately inspect 3" McKenzie valves on each affected car. If any valve is configured with a 3" standalone plug, ensure that the car is not loaded and offered in transportation until that valve is replaced with an approved valve consistent with 49 CFR Part 179. In addition, any tank car equipped with an unapproved 3" McKenzie valve is prohibited from being offered into transportation (whether loaded or residue) after May 4, 2015.

(5) Immediately inspect the 1" and 2" McKenzie valves on each affected car. If any valve shows evidence of mechanical damage, ensure that the car is not loaded and offered into transportation until that valve is replaced with an approved valve consistent with 49 CFR Part 179. Even if a valve is not damaged, a tank car equipped with an unapproved 1" or 2" McKenzie valve is prohibited from being offered into transportation (whether loaded or residue) after June 2, 2015.

(6) Ensure that each unapproved McKenzie valve is removed and replaced by an entity permitted to perform such work in accordance with 49 CFR Part 179.

(7) Ensure that the valve application is properly qualified as required by Subpart F of 49 CFR 180.

FRA estimates that approximately 15,000 railroad tank cars equipped with McKenzie valves that will be by affected by this directive. It is estimated that tank car owners will complete approximately 200 identifications/reports with the stipulated information and provide the necessary data to FRA under the above requirement. It is estimated that it

[e] The term "tank car owners" is as defined in 49 CFR 180.503.

will take approximately two (2) hours to identify each railroad tank car and complete the necessary report with the required information. Total annual burden for this requirement is 400 hours.

	Respondent Universe: 100 Tank Car Owners
Burden time per response:	2 hours
Frequency of Response:	On occasion
Annual number of Responses:	200 identifications/reports
Annual Burden:	400 hours
Calculation:	200 identifications/ reports x 2 hrs. = 400 hours

Additionally, FRA estimates that approximately 200 records will be completed by tank car owners under the above requirement. It is estimated that it will take approximately 30 minutes to perform the inspection and complete the record. Total annual burden for this requirement is 100 hours.

	Respondent Universe: 100 Tank Car Owners
Burden time per response:	30 minutes
Frequency of Response:	On occasion
Annual number of Responses:	200 records
Annual Burden:	100 hours
Calculation:	200 records x 30 min = 100 hours

Total annual burden for this entire information collection is 500 hours.

13. Estimate of total annual costs to respondents.

Besides the burden hours listed in the answer to question number 12 above, tank car owners will incur a cost to replace the unapproved McKenzie valves with approved valves. The estimated cost to replace each of the 200 unapproved valves reported and recorded by tank car owners is $200.

Total Cost = **$40,000** (Calculation: 200 approved valves x $200 p/replacement valve)

14. Estimate of Cost to Federal Government.

FRA estimates that one staffer at the GS-13 will spend approximately 40 hours working on overseeing the reports submitted by tank car owners. Thus, a cost of $4,094 will be incurred by FRA.

Calculation:

40 hours x $102.34 = **$4,093.60 or $4,094 (rounded)**

Note: The hourly labor rate of $102.34 is derived from 2015 OPM Federal Salary Table (salary of GS-13-5 in Washington, DC burdened by 75% overhead costs).

15. Explanation of program changes and adjustments.

These are new information collection requirements. By definition, this entire submission is a **program change**. As stated in the Summary provided on page 1 of this document, the total number of hours that FRA is requesting by OMB for this Emergency Processing submission is **500 hours** and the total number of **responses** requested is **400**.

Further, as noted in the Summary on page 1, upon OMB's Emergency Clearance for 180 days, FRA will initiate necessary steps to obtain regular Clearance of this proposed information collection.

The cost of **$40,000** to respondents is also a **program change**.

16. Publication of results of data collection.

FRA does not have any plans to publish the results of this collection of information.

17. Approval for not displaying the expiration date for OMB approval.

Once OMB approval is received, FRA will publish the approval number for these information collection requirements in the Federal Register, and will take necessary steps to obtain a regular OMB Clearance.

18. Exception to certification statement.

No exceptions are taken at this time.

Meeting Department of Transportation (DOT) Strategic Goals

This information collection supports the top DOT strategic goal, namely transportation safety. Specifically, this collection of information seeks to improve safety by imposing requirements that will facilitate and expedite the removal of unapproved McKenzie UNNR threaded ball valves and replace them with approved valves on all affected tank cars.

Without this proposed collection of information, rail safety throughout the United States could be significantly jeopardized by tank cars carrying hazardous materials – such as crude oil and ethanol, among others – that released such materials. Such releases could result in accidents/incidents with corresponding injuries, fatalities, and property damage. Specifically, without the requirements of this Safety Directive, tank car owners might not inspect and identify tank cars in their fleet equipped with any unapproved McKenzie UNNR threaded ball valves. Recent FRA investigations identified several railroad tank cars transporting hazardous materials and leaking small quantities of product from the cars' liquid lines. FRA's investigation revealed that the liquid lines of the leaking tank cars were equipped with a certain type of 3 inch ball valve marketed and sold by McKenzie Valve & Machining LLC (McKenzie), an affiliate company of Union Tank Car Company (UTLX). FRA further found certain closure plugs installed on the 3 inch valves cause mechanical damage to the valves, which leads to the destruction of the valves' seal integrity and that the 3 inch valves, as well as similarly-designed 1 inch and 2" inch valves provided by this manufacturer, are not approved for use on tank cars.

Under the proposed information collection requirements of this Safety Directive, tank car owners must provide the reporting mark and number of each car equipped with any McKenzie valve and the type of valve each car is equipped with to FRA. Without these required reports, FRA would have no way to verify that tank car owners are carrying out the necessary inspections and are identifying those tank cars with any prohibited McKenzie UNNR threaded ball valves.

Further, tank car owners are required to create and maintain for six (6) months from the effective date of this Directive a record of the inspection of each McKenzie valve. The record must include, at a minimum, the inspection date and location as well as the results of the inspection (i.e., whether the valve was removed or not). These records must be made available to FRA inspectors upon request. Without these required records, FRA inspectors would be unable to verify and be assured that tank car owners remove and replace any McKenzie UNNR threaded ball valves with approved valves before offering these cars into transportation. Without such removal and replacement of these unapproved McKenzie UNNR threaded ball valves, the operational safety of trains with

tank cars carrying dangerous hazardous materials might be at risk.

In sum, the proposed collection of information is essential and assists FRA in its primary mission of promoting and enhancing rail safety throughout the United States by allowing to FRA to enforce this Railworthiness Safety Directive. Further, this collection of information also assists DOT in its primary mission of transportation safety.

In this information collection and indeed in all its other information collection activities, FRA seeks to do its utmost to fulfill DOT Strategic Goals and to be an integral part of One DOT.