January 29, 2007

Transportation Security Administration Supplementary Security Action Items for Rail Transportation of Toxic Inhalation Hazard Commodities

Dear Valued Customer:

The Transportation Security Administration (TSA) issued supplemental security action items (SSAI) on November 21, 2006 covering the rail transportation of Toxic Inhalation Hazard (TIH) commodities. A copy of the SSAI and a listing of TIH commodities by STCC are attached to this letter. While the action items are voluntary thus far, TSA expects the rail industry to comply with them, and Union Pacific has agreed to do so.

The SSAI apply to the handling of TIH to, from and via High Threat Urban Areas (HTUA), which effectively covers all UP TIH traffic. A listing of HTUAs on the UP rail system is attached. The SSAI are intended, among other things, to substantially reduce the amount of time TIH cars are on rail facilities within HTUAs, minimize unattended TIH cars, and provide for "positive and secure handoff" of TIH cars at points of origination, delivery and interchange. We anticipate that compliance with the SSAI is likely to have major impacts on rail handling of TIH commodities. Consequently, UP expects to implement the following measures very soon:

- TIH cars will no longer be held in rail yards or other railroad-controlled trackage in HTUAs awaiting space in a receiver's facility. HTUA receivers will be required to accept TIH cars upon arrival (i.e.,"spot on arrival").

- Outbound TIH cars will not be held in rail yards or other rail facilities in HTUAs awaiting billing. HTUA shippers will be required to provide billing before TIH cars will be pulled.

- TIH customers will be required to have personnel physically present whenever TIH cars are spotted or pulled from customer facilities in HTUAs.

TIH customers with facilities in HTUAs, or whose traffic is now stored or held in rail yards or other rail facilities in HTUAs, would be well advised to begin planning to adjust their facilities or operations in order to accommodate these measures. Further, UP will be implementing extensive surveillance and operating measures to comply with the SSAI for TIH traffic. These measures will likely be very costly and have an impact on transportation rates, and may present obstacles to serving certain customer locations.

You may already be aware that TSA and the Pipeline and Hazardous Materials Safety Administration (PHMSA) have also announced proposed rules which will mandate security measures for shippers, receivers and transporters of these commodities, as well as others like certain explosives and radioactive materials. The proposed rules were published in the Federal Register on December 21, 2006. Public comments are due to be filed on February 20. We will make our views known, but we do not know what the final rules will require or when they will be published. Meanwhile, Congressional leaders have announced that they will conduct extensive hearings on additional requirements for hazardous materials transportation because they believe that the proposed rules do not go far enough in providing security measures during transportation.

Finally, those of you in California or whose shipments originate in, are destined to or pass through California should be aware that the state has enacted legislation that imposes additional restrictions on rail transportation of hazardous materials. We have already initiated legal action in California to challenge those requirements that are inconsistent with federal law.

As you can tell, there are many initiatives underway in this area. Many of these will change the way we do business with you and with other railroads. We will stay in touch with you as this situation develops and as our analysis proceeds. Please feel free to contact me at (402-544-5405) or Bob Worrell (402-544-6032) if you have any questions or wish to discuss this matter.

Sincerely,

Diane K. Duren

Diane Duren
Vice President & General Manager - Chemicals

UNION PACIFIC RAILROAD
1400 Douglas Street, Omaha, Nebraska 68179

High Threat Urban Areas served by Union Pacific

1. Minneapolis/St. Paul, MN
2. Anaheim, CA
3. Baton Rouge, LA
4. Chicago, IL
5. Denver, CO
6. Dallas/Ft. Worth, TX
7. Houston, TX
8. Kansas City, MO
9. Las Vegas, NV
10. Los Angeles, CA
11. Memphis, TN
12. Milwaukee, WI
13. New Orleans, LA
14. Oklahoma City, OK
15. Omaha, NE
16. Phoenix, AZ
17. Portland, OR
18. Sacramento, CA
19. San Antonio, TX
20. Seattle, WA
21. San Francisco Bay Area, CA
22. St. Louis, MO

Toxic Inhalation Hazard (TIH) Commodity List
(AAR 2.3, 6.1, and Anhydrous Ammonia)
Carloads, 2003 Waybill Sample

Commodity	HazMat STCC	Commercial STCC
WASTE ALLYL ALCOHOL	4821019	
WASTE TOXIC LIQUID, CORROSIVE, INORGANIC, N.O.S.	4821261	
WASTE HEXACHLOROCYCLO- PENTADIENE	4821722	
WASTE SULFURIC ACID, FUMING	4830030	
ISOBUTYL ISOCYANATE	4907409	2899991
ETHYL ISOCYANATE	4907434	2899991
ISOPROPYL ISOCYANATE	4909306	2899991
METHOXYMETHYL ISOCYANATE	4909307	2899991
METHACRYLONITRILE, STABILIZED	4910370	2899991
PENTABORANE	4916138	2899991
TETRANITROMETHANE	4918180	2899991
BROMINE PENTAFLUORIDE	4918505	2899991
BROMINE TRIFLUORIDE	4918507	2899991
ALLYLAMINE	4921004	2818009
METHYL PHOSPHONOUS DICHLORIDE	4921008	2899991
CHLOROACETONITRILE	4921009	2899991
CYCLOHEXYL ISOCYANATE	4921010	2899991
TOXIC LIQUIDS, FLAMMABLE, ORGANIC, N.O.S.	4921015	2818830
PHOSPHORUS TRICHLORIDE	4921016	2819415
ALLYL ALCOHOL	4921019	2818410
ETHYL CHLOROFORMATE	4921020	2818037
TOXIC LIQUIDS, FLAMMABLE,ORGANIC, N.O.S.	4921021	2818296
HYDROCYANIC ACID, AQUEOUS SOLUTIONS	4921028	2819434
TRIMETHYLACETYL CHLORIDE	4921063	2899991
TOXIC LIQUIDS, FLAMMABLE, ORGANIC, N.O.S.	4921064	2879964
DIMETHYLHYDRAZINE, UNSYMMETRICAL	4921202	2818023
SEC-BUTYL CHLOROFORMATE	4921207	2899991
ISOBUTYL CHLOROFORMATE	4921211	2899991
TRIMETHOXYSILANE	4921213	2899991
PHENYL ISOCYANATE	4921216	2815151
TOXIC LIQUID, INORGANIC, N.O.S.	4921234	2899991
TOXIC LIQUID, CORROSIVE, INORGANIC, N.O.S.	4921237	2899991
HYDROGEN CYANIDE, SOLUTION IN ALCOHOL	4921239	2819434
METHANESULFONYL CHLORIDE	4921245	2899991
CROTONALDEHYDE, STABILIZED	4921248	2818123
DIMETHYLHYDRAZINE, SYMETRICAL	4921251	2818023
ISOPROPYL CHLOROFORMATE	4921252	2899991
DIKETENE, STABILIZED	4921254	2899991
METHYL ORTHOSILICATE	4921255	2899991
TOXIC LIQUIDS, WATER-REACTIVE, N.O.S.	4921256	2899991

Commodity	HazMat STCC	Commercial STCC
TOXIC LIQUID, CORROSIVE, INORGANIC, N.O.S.	4921261	2819989
TOXIC LIQUIDS, CORROSIVE, ORGANIC, N.O.S.	4921262	2899991
TOXIC LIQUIDS, CORROSIVE, ORGANIC, N.O.S.	4921263	2879937
TOXIC LIQUID, CORROSIVE, INORGANIC, N.O.S.	4921264	2819962
TOXIC LIQUIDS, CORROSIVE, ORGANIC, N.O.S.	4921270	2899991
TOXIC LIQUIDS, FLAMMABLE, ORGANIC, N.O.S.	4921271	2899991
TOXIC LIQUIDS, ORGANIC, N.O.S.	4921272	2899991
TOXIC LIQUIDS, OXIDIZING, N.O.S.	4921273	2899991
METHYLDICHLOROARSINE	4921275	2899991
TOXIC LIQUID, CORROSIVE, INORGANIC, N.O.S.	4921278	2819962
METHYL IODIDE	4921304	2899991
ACETONE CYANOHYDRIN, STABILIZED	4921401	2818915
2-CHLOROETHANAL	4921402	2899991
ETHYLDICHLOROARSINE	4921404	2899991
DIMETHYL SULFATE	4921405	2818131
PHENYL MERCAPTAN	4921413	2818930
CHLOROPICRIN	4921414	2818830
ETHYLENE CHLOROHYDRIN	4921420	2818138
METHYL BROMIDE AND ETHYLENE DIBROMIDE MIXTURES, LIQUID	4921438	2879934
PERCHLOROMETHYLMERCAPTAN	4921473	2899991
METHYL ISOTHIOCYANATE	4921487	2818063
2-METHYL-2-HEPTANETHIOL	4921495	2899991
ETHYLENE DIBROMIDE	4921497	2818184
CHLOROACETONE, STABILIZED	4921558	2818104
PHENYLCARBYLAMINE CHLORIDE	4921587	2899991
METHYL PHOSPHONIC DICHLORIDE	4921695	2899991
HEXACHLOROCYCLOPENTADIENE	4921722	2818331
BROMOACETONE	4921727	2818168
N-BUTYL CHLOROFORMATE	4921730	2899991
3,5-DICHLORO-2,4,6- TRIFLUOROPYRIDINE	4921741	2899991
ETHYL PHOSPHONOUS DICHLORIDE, ANHYDROUS	4921742	2899991
ETHYL PHOSPHORODICHLORIDATE	4921744	2899991
ETHYL PHOSPHONOTHIOIC DICHLORIDE, ANHYDROUS	4921745	2899991
CHLOROPIVALOYL CHLORIDE	4921746	2899991
N-PROPYL CHLOROFORMATE	4921756	2899991
ALLYL CHLOROFORMATE	4923113	2899991
CHLOROACETYL CHLORIDE	4923117	2815210
ARSENIC TRICHLORIDE	4923209	2899991
THIOPHOSGENE	4923298	2899991
TOXIC LIQUIDS, FLAMMABLE, ORGANIC, N.O.S.	4927001	2899991
TOXIC, LIQUIDS, ORGANIC, N.O.S.	4927002	2899991
TOXIC LIQUIDS, OXIDIZING, N.O.S.	4927003	2899991
IRON PENTACARBONYL	4927004	2899991

Commodity	HazMat STCC	Commercial STCC
TOXIC LIQUIDS, CORROSIVE, ORGANIC, N.O.S.	4927005	2899991
ETHYLENEIMINE, STABILIZED	4927006	2899991
ACROLEIN, STABILIZED	4927007	2818101
METHYL CHLOROFORMATE	4927008	2818454
METHYL ISOCYANATE	4927009	2818288
NICKEL CARBONYL	4927010	2819535
METHYLHYDRAZINE	4927011	2899991
METHYL CHLOROMETHYL ETHER	4927012	2899991
HYDROGEN CYANIDE, STABILIZED	4927014	2819434
TOXIC BY INHALATION LIQUID, N.O.S.	4927018	2899991
TOXIC BY INHALATION LIQUID, FLAMMABLE, N.O.S.	4927019	2899991
TOXIC LIQUID, INORGANIC, N.O.S.	4927020	2899991
TOXIC LIQUID, CORROSIVE, INORGANIC, N.O.S.	4927021	2899991
METHYL VINYL KETONE, STABILIZED	4927022	2818057
TOXIC BY INHALATION LIQUID, WATER-REACTIVE, N.O.S.	4927023	2899991
TOXIC BY INHALATION LIQUID, OXIDIZING, N.O.S.	4927024	2899991
N-PROPYL ISOCYANATE	4927025	2899991
TERT-BUTYL ISOCYANATE	4927026	2899991
N-BUTYL ISOCYANATE	4927027	2815207
TOXIC BY INHALATION LIQUID, CORROSIVE, N.O.S.	4927028	2899991
TOXIC LIQUIDS, WATER-REACTIVE, N.O.S.	4927030	2899991
TOXIC BY INHALATION LIQUID, N.O.S.	4927095	2899991
TOXIC BY INHALATION LIQUID, FLAMMABLE, N.O.S.	4927096	2899991
TOXIC BY INHALATION LIQUID, WATER-REACTIVE, N.O.S.	4927097	2899991
TOXIC BY INHALATION LIQUID, OXIDIZING, N.O.S.	4927098	2899991
TOXIC BY INHALATION LIQUID, CORROSIVE, N.O.S.	4927099	2899991
HYDROGEN FLUORIDE, ANHYDROUS	4930024	2819484
SULFURIC ACID, FUMING	4930030	2819340
SULFUR TRIOXIDE, STABILIZED	4930050	2819325
CHLOROSULFONIC ACID	4930204	2819422
SULFURYL CHLORIDE	4930260	2819961
NITRIC ACID, RED FUMING	4931201	2819215
BORON TRIBROMIDE	4932010	2899991
PHOSPHORUS OXYCHLORIDE	4932352	2819416
TITANIUM TETRACHLORIDE	4932385	2819971
ETHYL CHLOROTHIOFORMATE	4933327	2899991
TRICHLOROACETYL CHLORIDE	4935231	2899991
BROMINE	4936110	2819919
SULFUR TRIOXIDE, STABILIZED	4936565	2819315
COMMPRESSED GAS, TOXIC, FLAMMABLE, CORROSIVE, N.O.S.	4920102	2818890
COMPRESSED GAS, TOXIC OXIDIZING, CORROSIVE, N.O.S.	4920103	2818890
COMPRESSED GAS, TOXIC, OXIDIZING, N.O.S.	4920104	2818890
LIQUEFIED GAS, TOXIC, CORROSIVE, N.O.S.	4920105	2818890

Commodity	HazMat STCC	Commercial STCC
SELENIUM HEXAFLUORIDE	4920106	2818890
DIBORANE	4920107	2818890
LIQUEFIED GAS, TOXIC, FLAMMABLE, CORROSIVE, N.O.S.	4920108	2818890
LIQUEFIED GAS, TOXIC, OXIDIZING, CORROSIVE, N.O.S.	4920110	2818890
LIQUEFIED GAS, TOXIC, OXIDIZING, N.O.S.	4920111	2818890
NITRIC OXIDE, COMPRESSED	4920112	2813975
NITRIC OXIDE AND DINITROGEN TETROXIDE MIXTURES	4920113	2818890
INSECTICIDE GASES, TOXIC FLAMMABLE, N.O.S.	4920115	2818890
INSECTICIDE GASES, TOXIC FLAMMABLE, N.O.S.	4920116	2818890
COMPRESSED GAS, TOXIC OXIDIZING, CORROSIVE, N.O.S.	4920117	2818890
COMPRESSED GAS, TOXIC, OXIDIZING, CORROSIVE, N.O.S.	4920118	2818890
HYDROGEN SELENIDE ANHYDROUS	4920122	2818890
ARSINE	4920135	2818890
PHOSPHINE	4920160	2818890
LIQUEFIED GAS, TOXIC, FLAMMABLE, N.O.S.	4920164	2818890
COMPRESSED GAS, TOXIC, FLAMMABLE, N.O.S.	4920165	2818890
STIBINE	4920167	2818890
OXYGEN DIFLUORIDE, COMPRESSED	4920173	2818890
DINITROGEN TETROXIDE	4920174	2818890
NITROGEN TRIOXIDE	4920175	2818890
CYANOGEN CHLORIDE, STABILIZED	4920178	2818890
FLUORINE, COMPRESSED	4920180	2818890
COMPRESSED GAS, TOXIC, N.O.S.	4920181	2818890
PHOSPHORUS PENTAFLUORIDE	4920183	2818890
PHOSGENE	4920184	2818820
SULFUR TETRAFLUORIDE	4920187	2818890
TELLURIUM HEXAFLUORIDE	4920188	2818890
CHLORINE PENTAFLUORIDE	4920189	2818890
LIQUEFIED GAS, TOXIC, N.O.S.	4920195	2818890
ETHYLENE OXIDE AND CARBON DIOXIDE MIXTURE	4920196	2818890
COMPRESSED GAS, TOXIC CORROSIVE, N.O.S.	4920301	2818890
INSECTICIDE GASES, TOXIC FLAMMABLE, N.O.S.	4920302	2818890
COMMPRESSED GAS, TOXIC, FLAMMABLE, CORROSIVE, N.O.S.	4920303	2818890
COMMPRESSED GAS, TOXIC, FLAMMABLE, CORROSIVE, N.O.S.	4920304	2818890
COMMPRESSED GAS, TOXIC, FLAMMABLE, CORROSIVE, N.O.S.	4920305	2818890
COMPRESSED GAS, TOXIC, OXIDIZING, CORROSIVE, N.O.S.	4920306	2818890
COMPRESSED GAS, TOXIC, OXIDIZING, CORROSIVE, N.O.S.	4920307	2818890
COMPRESSED GAS, TOXIC, OXIDIZING, CORROSIVE, N.O.S.	4920308	2818890
COMPRESSED GAS, TOXIC, OXIDIZING, N.O.S.	4920309	2818890
COMPRESSED GAS, TOXIC, OXIDIZING, N.O.S.	4920310	2818890
LIQUEFIED GAS, TOXIC, CORROSIVE, N.O.S.	4920311	2818890
LIQUEFIED GAS, TOXIC, OXIDIZING, CORROSIVE, N.O.S.	4920312	2818890
LIQUEFIED GAS, TOXIC, CORROSIVE, N.O.S.	4920313	2818890

Commodity	HazMat STCC	Commercial STCC
LIQUEFIED GAS, TOXIC, FLAMMABLE, CORROSIVE, N.O.S.	4920314	2818890
LIQUEFIED GAS, TOXIC, CORROSIVE, N.O.S.	4920315	2818890
LIQUEFIED GAS, TOXIC, FLAMMABLE, CORROSIVE, N.O.S.	4920316	2818890
LIQUEFIED GAS, TOXIC, OXIDIZING, N.O.S.	4920317	2818890
LIQUEFIED GAS, TOXIC, FLAMMABLE, CORROSIVE, N.O.S.	4920318	2818890
LIQUEFIED GAS, TOXIC, OXIDIZING, N.O.S.	4920319	2818890
LIQUEFIED GAS, TOXIC, OXIDIZING, CORROSIVE, N.O.S.	4920320	2818890
LIQUEFIED GAS, TOXIC, OXIDIZING, N.O.S.	4920321	2818890
INSECTICIDE GASES, TOXIC, FLAMMABLE, N.O.S.	4920322	2818890
INSECTICIDE GASES, TOXIC, FLAMMABLE, N.O.S.	4920323	2818890
COMPRESSED GAS, TOXIC CORROSIVE, N.O.S.	4920324	2818890
COMPRESSED GAS, TOXIC, OXIDIZING, CORROSIVE, N.O.S.	4920325	2818890
COMPRESSED GAS, TOXIC, CORROSIVE, N.O.S.	4920331	2818890
COMPRESSED GAS, TOXIC, OXIDIZING, N.O.S.	4920337	2818890
ETHYLENE OXIDE AND CARBON DIOXIDE MIXTURE	4920342	2818890
CARBON MONOXIDE AND HYDROGEN MIXTURE, COMPRESSED	4920343	2818890
OIL GAS, COMPRESSED	4920344	2818890
TRIFLUOROCHLOROETHYLENE, STABILIZED	4920346	2813964
TRIFLUOROACETYL CHLORIDE	4920347	2818890
HYDROGEN IODIDE, ANHYDROUS	4920348	2818890
BORON TRICHLORIDE	4920349	2899991
CARBONYL SULFIDE	4920351	2818890
CHLORINE TRIFLUORIDE	4920352	2899991
ETHYLENE OXIDE	4920353	2818239
GERMANE	4920354	2818890
METHYL MERCAPTAN	4920355	2813950
PERCHLORYL FLUORIDE	4920356	2818890
SILICON TETRAFLUORIDE	4920357	2818890
AMMONIA, ANHYDROUS	4920359	2819815
AMMONIA SOLUTIONS	4920360	2819815
LIQUEFIED GAS, TOXIC, N.O.S.	4920368	2818890
LIQUEFIED GAS, TOXIC, N.O.S.	4920369	2818890
TUNGSTEN HEXAFLUORIDE	4920371	2818890
COMPRESSED GAS, TOXIC, N.O.S.	4920373	2818890
COMPRESSED GAS, TOXIC, N.O.S.	4920375	2818890
COMPRESSED GAS, TOXIC, FLAMMABLE, N.O.S.	4920378	2818890
COMPRESSED GAS, TOXIC FLAMMABLE, N.O.S.	4920379	2818890
LIQUEFIED GAS, TOXIC, FLAMMABLE, N.O.S.	4920380	2818890
LIQUEFIED GAS, TOXIC FLAMMABLE, N.O.S.	4920381	2818890
LIQUEFIED GAS, TOXIC, FLAMMABLE, N.O.S.	4920382	2818890
LIQUEFIED GAS, TOXIC, N.O.S.	4920383	2818840
CHLOROPICRIN AND METHYL CHLORIDE MIXTURES	4920392	2879951
METHYLCHLOROSILANE	4920394	2899991

Commodity	HazMat STCC	Commercial STCC
CYANOGEN	4920395	2818890
COMPRESSED GAS, TOXIC, FLAMMABLE, N.O.S.	4920396	2818890
DICHLOROSILANE	4920398	2818890
CARBON MONOXIDE, COMPRESSED	4920399	2813932
HYDROGEN BROMIDE, ANHYDROUS	4920502	2813920
HYDROGEN CHLORIDE, ANHYDROUS	4920503	2813922
HYDROGEN CHLORIDE, REFRIGERATED LIQUID	4920504	2813922
COMPRESSED GAS, TOXIC, N.O.S.	4920505	2818890
SULFUR DIOXIDE	4920508	2819997
NITROSYL CHLORIDE	4920509	2818890
GAS IDENTIFICATION SET	4920510	2818890
CARBON MONOXIDE, REFRIGERATED LIQUID	4920511	2813932
HYDROGEN SULFIDE	4920513	2813946
HEXAETHYL TETRAPHOSPHATE AND COMPRESSED GAS MIXTURES	4920515	2818890
CHLOROPICRIN AND METHYL BROMIDE MIXTURES	4920516	2813914
COMPRESSED GAS, TOXIC, N.O.S.	4920517	2818840
METHYL BROMIDE	4920518	2813914
BORON TRIFLUORIDE	4920522	2819972
CHLORINE	4920523	2812815
COMPRESSED GAS, TOXIC, N.O.S.	4920525	2818845
SULFURYL FLUORIDE	4920526	2818890
COAL GAS, COMPRESSED	4920527	2912130
HEXAFLUOROACETONE	4920528	2818890
ORGANIC PHOSPHATE, MIXED WITH COMPRESSED GAS	4920530	2818890
LIQUEFIED GAS, TOXIC, N.O.S.	4920531	2818845
GAS SAMPLE, NON-PRESSURIZED, TOXIC, FLAMMABLE, N.O.S.	4920534	2818890
PARATHION AND COMPRESSED GAS MIXTURE	4920535	2818890
GAS SAMPLE, NON-PRESSURIZED, TOXIC, N.O.S.	4920536	2818890
CHLOROPICRIN AND METHYL BROMIDE MIXTURES	4920547	2818890
INSECTICIDE GASES, TOXIC, N.O.S.	4920550	2879936
COMPRESSED GAS, TOXIC, N.O.S.	4920556	2899991
CARBONYL FLUORIDE	4920559	2818890
COMPRESSED GAS, TOXIC, N.O.S.	4920570	2818890
LIQUEFIED GAS, TOXIC, N.O.S.	4920571	2818890
BROMINE CHLORIDE	4920715	2818008
AMMONIA, ANHYDROUS	4904210	2819815
AMMONIA SOLUTION	4904211	2819815
AMMONIA, ANHYDROUS	4904879	3533945

U.S. Department of Homeland Security
U.S. Department of Transportation

RECOMMENDED SECURITY ACTION ITEMS FOR THE RAIL TRANSPORTATION OF TOXIC INHALATION HAZARD MATERIALS

SUPPLEMENT NO. 1, ISSUED NOVEMBER 21, 2006

This document contains recommended security action items for the rail transportation of materials poisonous by inhalation, commonly referred to as Toxic Inhalation Hazard (TIH)[1] materials. Adoption of these measures is voluntary. Movement of large quantities of TIH materials by rail in proximity to population centers warrants special consideration and attention. These materials have the potential of causing significant numbers of fatalities and injuries if intentionally released in an urban environment.

The supplemental security action items contained in this document are the result of cooperative work between government and industry to craft meaningful and executable actions that will provide for the reduction in the security risk associated with the rail transportation of TIH materials. These action items are an addition to the original 24 action items that were issued on June 23, 2006.

The three action items contained herein represent the next step in enhancing the security of rail shipments of TIH. These three items especially item number 1, the provision calling for the preparation of site-specific plans for high threat urban areas build upon rather than replace the original 24 action items.

[1] Under the Hazardous Materials Regulations (49 CFR 171-180), TIH materials are gases or liquids that are known or presumed on the basis of tests to be so toxic to humans as to pose a hazard to health in the event of a release during transportation. See 49 CFR 171.8, 173.115, and 173.132.

I. Introduction

The Department of Homeland Security and the Department of Transportation are concerned about the risk posed by the transportation by rail of bulk Toxic Inhalation Hazard materials (TIH) in High Threat Urban Areas. Our intention is to work with the freight rail industry to develop and implement security initiatives that will measurably reduce the risk and enhance the security of bulk Toxic Inhalation Hazards moved by rail in High Threat Urban Areas (HTUA). DHS and DOT have identified four areas to be addressed:

- The establishment of secure storage areas for rail cars carrying Toxic Inhalation Hazard (TIH) materials;
- The expedited movement of trains transporting rail cars carrying TIH materials;
- The positive and secure handoff of TIH rail cars at points of carrier interchange and at points of origination and delivery; and,
- The minimization of unattended* loaded tank cars carrying TIH materials

II. Risk Definition

All railroad freight carriers operating in High Threat Urban Areas will develop annexes to their security plans that are site specific to that High Threat Urban Area as defined by the Department of Homeland Security Urban Area Security Initiative (UASI) geographic areas.

The security plans will be risk-based and will include metrics that reflect population density and the amount of TIH materials transported by rail and the length of time that these shipments are in High Threat Urban Areas. The plans will be classified appropriately to protect sensitive information.

TSA will provide the rail carriers with a list of urban areas previously identified.

The goal of this initiative is to measurably reduce the risk of the transportation by rail of bulk TIH materials through high threat urban areas. Railroads will strive to reduce risk by 25 percent in the first year. TSA will work with the railroads on goals for succeeding years. Risk will be defined as a function of population density, number of TIH shipments, and the length of time TIH cars are unattended* and unsecured.

* Unattended Cars for the purpose of this document are those rail cars that are in a train or on railroad-controlled leads or tracks with no crew on board, no personnel active in the area, or no electronic monitoring. "Personnel" includes railroad employees or agents, law enforcement officers, private security guards, and rail customer employees.

III. Data Base

The risk reduction will be measured by the time TIH cars are held in yards, terminals, on railroad-controlled leased tracks and the time that TIH trains are stopped or standing within a HTUA. Railroads will strive to provide TSA baseline data within 60 days.

IV. Action Plans to Reduce Risk

Supplemental Security Action Item No. 1
Rail carriers with operations in High Threat Urban Areas (HTUA) will develop site-specific security plans that address the security of the transportation in bulk of TIH material in loaded rail cars ("TIH cars") in HTUA. The site-specific security plan should include specific and detailed measures to enhance the security of TIH cars in the carrier's custody. These plans should be completed within 90 days of the issuance date of the guidelines.

The site-security plan will address the following objectives for railroad operations within the HTUA:

1) Reduce the number of hours TIH cars are held in yards, terminals, and on railroad-controlled leased track in HTUA.

2) Minimize the occurrence of unattended* TIH cars in HTUA.

3) Reduce potential exposure to surrounding people, property and environment in HTUA. Special emphasis should be placed on reducing potential exposure to hospitals, high-occupancy buildings, schools, and public venues.

4) Reduce the occurrence of standing TIH trains in HTUA.

5) Provide a procedure for the protection or surveillance of unattended TIH trains in HTUA

6) Ensure compliance with CFR 49 Part 174.14 (48 hour rule).

7) Develop site-specific procedures for the positive and secure handoff of TIH cars at points of origin, destination, and interchange in high threat urban areas.

Supplemental Security Action Item No. 2
Rail carriers will not operate trains carrying TIH within a specified distance of public venues with National Special Security Events in progress and as requested by the appropriate agency responsible for overall event security coordination.

Supplemental Security Action Item No. 3
Rail carriers will, in the security planning process, identify and select areas throughout the carrier's system where cars containing TIH can be moved and held when threat conditions warrant. Risk and exposure to the general public are factors to be considered in the selection process. The rail carrier will provide this information to the government upon request.

V. Verification

The Transportation Security Administration and the Federal Railroad Administration will work cooperatively to evaluate the degree of implementation of these security action items through data analysis and inspection, and may take appropriate actions to encourage carriers to achieve risk reduction.