



Transportation Trades Department, AFL-CIO

September 2, 2025

Mr. Benjamin D. Kochman
Acting Administrator
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue SE
Washington DC, 20590

**RE: Hazardous Materials: Reducing Undue Paperwork Burdens to Domestic Carriers
Docket No. PHMSA-2025-0092**

Mr. Kochman:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to the Pipeline and Hazardous Materials Safety Administration (PHMSA) notice of proposed rulemaking (NPRM) to revise the Hazardous Materials Regulations (HMR) to provide domestic carriers the option to maintain electronic copies of emergency response information rather than requiring a hard copy printed on paper. TTD consists of 39 affiliate unions representing millions of workers across every mode of transportation, including the freight rail workers and first responders that will be directly impacted by this proposal.¹ For the reasons below, we respectfully request that the PHMSA modify this proposed rule. Additionally, we endorse the comments filed in this docket by our affiliates, the Brotherhood of Locomotive Engineers and Trainmen (BLET), the International Association of Fire Fighters (IAFF), and the Transportation Division of the International Association of Sheet Metal, Air, Rail, and Transportation Workers (SMART-TD).

Background

The PHMSA is proposing to revise 49 CFR Part 172.602 “Emergency response information,” which outlines the requirements for emergency response information that must accompany hazardous materials during transportation. This section mandates that the emergency response information include details such as the basic description of the hazardous material, immediate health risks, and emergency procedures. This information is also required to be accessible in the event of a hazardous materials incident.

Specifically, the PHMSA proposes to allow for emergency response information to be saved and presented in an electronic format rather than relying solely on printed copies. While TTD does not

¹ Attached is a complete list of the unions affiliated with TTD.

object to the use of electronic emergency response information, the PHMSA must continue to require the use of hard-copy emergency response information, as well. Additionally, any changes to the requirements for hazardous materials communication should be accompanied by additional training for first responders.

Electronic and Hardcopy Emergency Response Information

In 2022, the PHMSA requested input from the public regarding hazardous materials communication.² Specifically, the PHMSA sought feedback on the use of electronic hazard communications as an alternative to physical hazard communication (e.g. shipping papers, train consists, dangerous goods manifests, notifications to the pilot in command, and emergency response information, as well as associated administrative documentation including DOT Special Permits, approvals, and registrations). Both TTD and our affiliate, the International Association of Fire Fighters (IAFF), submitted comments encouraging the PHMSA to continue requiring the use of physical hazard communication while allowing electronic hazard communication in instances where it would not pose a safety risk.

It is critical that the currently required hard copy of hazardous material emergency response information is maintained. Many trains travel along extremely rural routes where cellular coverage is often limited. Electronic communication technology alone is not mature enough to replace the need for printed communication completely, whether it be due to lack of internet access in remote areas or because the access and control of electronic communication is not sufficient to meet the needs of operators and first responders. Electronic forms of emergency response information can be a useful supplement to the required hard copy, but it is not an appropriate sole replacement given known limiting factors. For these reasons, TTD and our affiliates support permitting the use of electronic emergency response information *in addition to* maintaining a hard copy aboard occupied locomotives.

We appreciate the opportunity to comment on this matter and look forward to working with the PHMSA in the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Regan', enclosed within a circular scribble.

Greg Regan
President

² <https://www.regulations.gov/docket/PHMSA-2022-0043>