

Upon occasion more often than not we find that we are not playing the rail car marking game on a level playing field with our competitors, being local sign shops or car repair facilities. We find that we are quoting against non-compliant and non-certified products. Our position is to help educate our competitors as well as our customers regarding the appropriate rules that govern the marking regulations such as Sections "L" and "C" of the AAR Recommended Standards and Practices. Can you please give us a ruling and guidance regarding this.

Respectfully,

Trans-Tech, LLC

To be regulatory compliant when marking DOT tank cars, one must comply with the following DOT regulations and AAR requirements.

Failure to mark cars with the appropriate AAR approved adhesive backed films can result in civil penalty violations of the Federal Regulations.

- All DOT tank cars must be marked in accordance with 49 CFR 179.22, this states the following.

**§179.22 Marking.** In addition to any other marking requirement in this subchapter, the following marking requirements apply:

(a) Each tank car must be marked according to the requirements in appendix C of the AAR Specifications for Tank Cars (IBR, see §171.7 of this subchapter).

- 49 CFR 179.22 then references the applicable section of the AAR MSRP – Specifications for Tank Cars, Appendix C.

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**APPENDIX C**

**MARKING OF TANK CARS**

**1.0 INTRODUCTION**

**1.1 Scope**

This appendix describes AAR requirements for marking of tank cars, including stenciling and stamping. It supplements the general requirements of the *Manual of Standards and Recommended Practices*, Section L, Standard S-910.

- This appendix then references AAR MSRP Section L Standard S-910.

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**LETTERING AND MARKING OF CARS**

**Standard  
S-910**

**Adopted: 1901; Revised: 1994, 2002**

**1.0 GENERAL**

**1.1 Letters and Figures**

The definition of stencil, as used herein, means letters and figures applied with paint or an equivalent decal that has adhesive backing in accordance with *MSRP* Specification M-947. For all sizes and types of letters, the following will govern.

- AAR Standard S-910 then references AAR Specification M-947. Specification M-947 list all the requirements for adhesive backed marking films including an appendix (Appendix C) that list all the AAR approved adhesive backed marking films. These are only marking films that may be used for required markings on DOT tank cars.

**AAR Manual of Standards and Recommended Practices  
Lettering and Marking of Cars**

APPENDIX C

M-947

**APPENDIX C  
APPROVED ADHESIVE-BACKED FILM**

**1.0 INTRODUCTION**

Table C.1 contains a list of approved adhesive-backed films.

**Table C.1 Approved adhesive-backed films**

Product	Manufacturer
3M Controltac No. 180-10 (Backing)	3M Center, St. Paul, MN 55144
3M Scotchcal 3690 (Marking)	3M Center, St. Paul, MN 55144
3M Scotchcal Film Series 7725	3M Commercial Graphics Division, 5909 Fairmont Drive, Plano, TX 75093
3M Scotchcal Railroad Film Series 8000/VS0008	3M Center, St. Paul, MN 55144
A-D R-100 and V-5720 series (Reflective Materials)	Avery Dennison, Graphics Division, 8364 Cheryl Drive, Scottsdale, AZ 85258
Avery XL 1000 Series	Avery Dennison, 250 Chester St., Painesville, OH 44077
Calon II Series 2100	Arlon, Inc., P.O. Box 5260, Santa Ana, CA 92704-0260
Dura Mark DMF 670, Rexcal 4000 Series	Dura Mark, 341 Eddy Road, Cleveland, OH 44108
MACal 9800 CT series	MACTac Graphic Products Division, Morgan Adhesives Company, 4560 Darrow Road, Stow, OH 44224-1898
Meyercord 52P Series, 72A, 87V	Meyercord, 365 East North Ave., Carol Stream, IL 60188
Meyercord RF800, RF802, RF812 (Reflective Materials)	Meyercord, 365 East North Ave., Carol Stream, IL 60188

The approved material list is also available on the AAR's web site at the following URL , for both marking films and reflective materials.

[https://www.aar.com/standards/aar\\_standards/approvals/reflective\\_material.pdf](https://www.aar.com/standards/aar_standards/approvals/reflective_material.pdf)

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Federal Railroad Administration

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