How the U.S. Moves Hazardous Materials

A side-by-side comparison of transportation methods for critically needed materials

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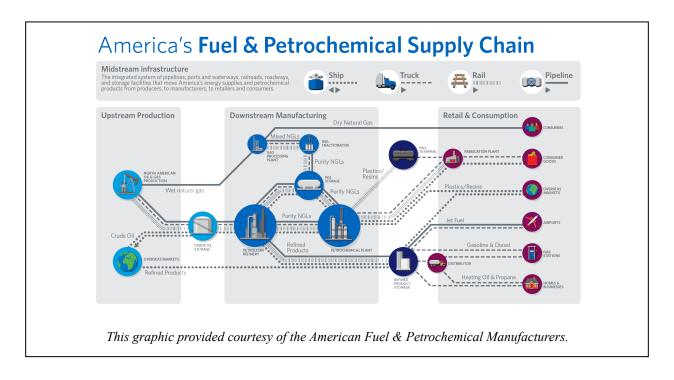
A side-by-side comparison of transportation methods for critically needed materials

Introduction

The U.S. consumes massive volumes of hazardous material in the form of natural gas and petroleum products, industrial chemicals, various gases, and other raw materials. While much of it is used to generate energy, these resources also go on to serve as cleaners, additives, or the building blocks of medicines, fabrics, plastics, and technological components. In fact, it is virtually impossible not to interact on a daily basis with a product using or derived from petroleum, natural gas, or other hazardous material.

Whether or not public policy favors transitioning to new forms of energy, given their importance for modern life beyond generating power, these hazardous materials *must* be transported. In order to get them where they are needed most effectively, there are several factors to explore. Policymakers must know the relative safety record and effectiveness, the relative carbon-intensity, the speed and efficiency of delivery, and the economic costs associated with their transportation.

The available transportation methods are pipelines, trains, trucks, and ships. This report surveys the safety and efficacy of each method for policymakers to better understand how to allocate resources and shape regulatory policy. This report does not rank the transportation methods but provides a side-by-side comparison for more informed decision making.



Pipelines

According to the U.S. Department of Transportation (DOT) and the Pipeline and Hazardous Materials Safety Administration (PHMSA), there are over 2.8 million miles of natural gas and petroleum pipelines across the country.¹ This total mileage includes all gathering, feeder, transmission, and distribution infrastructure for both gases and liquids. With so much infrastructure in place, understanding its overall impact on the economy, environment, and communities is critical.

Safety & Effectiveness

Product loaded into one end of a pipeline arrives at its destination 99.999 percent of the time.² This leak, spill, or accident rate below 0.001 percent makes pipeline the most effective in-land transportation method currently available anywhere in the world. Industry estimates place the effectiveness record for natural gas high as 99.999997 percent.³ Given the vast quantities moved through pipelines every year – 64 percent of all U.S. energy commodities⁴ – even this nearly perfect effective rate still means that incidents occur. The U.S. pipeline network transports over 28 billion cubic feet of natural gas⁵ and, over 16 billion barrels of crude and refined petroleum products each year.^{6, 7}

Additionally, few deaths and injuries are attributed to pipeline operation. As few as 1.7 fatalities per year are estimated to occur due to pipeline issues, accounting for operators, pipeline personnel, and the general public.⁸ The 10-year average across all pipelines and storage facilities is 13 fatalities, and among this number around half are the result of third-party excavation damage, not from pipeline operation or product handling.⁹

Climate Impact

In terms of carbon intensity, pipelines have two major sources of greenhouse gas emissions (GHGs).¹⁰ Pump or compressor stations along oil and natural gas pipelines generate emissions to maintain pressure inside the pipeline that allow fuel to flow efficiently. The other source of emissions are leaks from maintenance operations, excavation damage, or deficiencies in the pipeline itself. Methane leaks from pipelines are more serious than certain oil leaks, as methane acutely impacts ozone.¹¹ However, pipelines emit 61 to 77 percent less¹² GHG – at only half the overall air pollution and greenhouse gas costs – than the next most efficient on-land transportation method.¹³ Overall, significantly less direct emissions occur from pipeline transmission than other industry segments.¹⁴ It is also estimated that the majority of leaks occur at facilities rather than line pipe, making oil and petroleum products contained, recoverable, or subject to secondary safety and cleanup measures.¹⁵

Importantly, this analysis does not consider end-use emissions from burning the fuel, as that impact is a feature of the fuel itself and would be applied to all transportation methods. When considering the entire lifecycle of the infrastructure, from material sourcing and production to construction and operation, pipelines are the only transportation method that allows for environmental restoration above ground, whereas rail tracks and roadways are permanent fixtures. This is one advantage of new pipeline projects relative to adding capacity to rail or building new roads. Once trenching and construction are completed, land is restored allowing wildlife, grass, and brush to retake the area, with a minimal easement retained by the operator for future maintenance and inspections.

Efficiency

Pipelines are extremely efficient in transporting hazardous liquids and gases. In terms of energy cost, pipelines use the least amount of energy when transporting hazardous materials, but the speed of transportation varies over distance and by diameter. A smaller pipeline like the Overland Pass Pipeline can transport 140,000 barrels a day across 760 miles from Opal, Wyoming to Conway, Kansas.¹⁶ A larger pipeline like the 5,500-mile Colonial Pipeline can transport 3 million barrels per day between Texas and New York.¹⁷ Depending on the viscosity of petroleum being moved through the pipeline, speeds range from 3 to 8 miles per hour, which moving around the clock in a direct path would take "14-22 days to move oil from Houston to New York City."¹⁸

Ultimately, pipelines operate in virtually straight lines, with relatively direct service from point A to point B. For natural gas, this allows for higher speed and greater efficiency up to 30 miles per hour.¹⁹ Pipelines make the logistics of moving high volumes of natural gas or petroleum from place to place quick, efficient, and extremely safe, as pipelines can operate continuously and are monitored around the clock by pressure sensors, remote monitoring technology, and personnel.²⁰ Pipelines are ultimately not the fastest transportation method but are capable of moving the most volume with the greatest effectiveness.

Cost

The cost of transporting product through existing pipelines varies depending on distance travelled and the grade of the petroleum being transported.²¹ The average cost for all pipelines rounds up to around five dollars per barrel²² and two to four dollars per thousand cubic feet of natural gas.²³

Of note, while pipelines transport the most volume of hazardous liquids and gases, and do so with great safety and efficiency, they often rely on secondary transportation methods to get products to end users. Rail is a needed partner to take on additional production capacity, trucks often take short distribution routes, and ships are critical for imports and exports.

Rail

America's freight rail infrastructure consists of a 140,000-route-mile network, with nearly 100,000 additional miles of sidings, rail yards, and parallel tracks. According to the Federal Railroad Administration, "it is widely considered the largest, safest, and most cost-efficient freight system in the world." With fully integrated Positive Train Control (PTC) technology, rail is now a cutting-edge technological transportation industry utilizing computers and software to ensure safer delivery of all products.

Safety & Effectiveness

Hazardous products transported by rail tanker car arrive at the destination over 99.99 percent of the time without a release caused by a train accident.²⁴ The leak, spill, or accident rate below 0.01 percent makes rail the second safest in-land transportation method²⁵ with rail spilling the least volume of hazardous material of any in-land method.²⁶ Overall, in comparison to other forms of transportation, oil is spilled from railroad transports more frequently than pipelines, however rail loses significantly less oil from accidents in comparison to pipelines, given the larger volumes moved by pipe.²⁷ Rail effectively transports between 100 million and 200 million barrels of crude and petroleum products each year.^{28, 29}

Each year, an estimated 2.4 fatalities occur as a result of moving crude and other products by rail. In the last five years, a total of 25 fatalities occurred across all passenger and freight rail in the U.S., of which only three were a result of derailment and eight from collisions.³⁰ Fatalities attributed to the movement of crude are incredibly rare, and in the last 10 years, only one rail death has been attributable to hazardous material.³¹

Climate Impact

The carbon intensity of rail is impacted by many factors, including freight load, car type, distance traveled, and time to deliver a product. Freight rail relies primarily on diesel-powered locomotives, which like other vehicle engines utilizes internal combustion to burn fuel and generate power. While creating emissions to power the train, on average, rail is able to move a ton of freight over 480 miles on a single gallon of fuel³² making it very fuel efficient. Still, the total amount of GHGs released by railroad transporters of crude was found to be almost twice as much as pipelines.³³ Total carbon intensity is still dependent on scale: small-scale transportation of less than 50,000 barrels a day is extremely carbon efficient by rail (more so than pipeline), while larger scale rail operations produce up to four times more GHG emissions than pipeline when moving crude longer distances.³⁴

Crude oil is not the only hazardous material moved by freight rail. In fact, rail moves many additional products and hazardous materials that pipelines do not or cannot move, including explosives, flammable gases and liquids, corrosives, chemical inputs, and certain radioactive material.^{35, 36} Accounting for the additional payloads, the crude-transport carbon intensity of rail is relatively low. The total emissions per ton-mile of freight for rail is 0.048 pounds of CO₂, which is lower than any other freight method.³⁷ While producing a total of 38 million metric tons

of GHGs, rail moved 1,729,638 million ton-miles in 2018.³⁸ When considering the carbon intensity to move hazardous materials by rail, the crude-specific transportation GHG emission are only a share of that total rail impact.

Efficiency

The overall effectiveness and speed advantages of railroad transport comes down to the flexibility of rail transport to adapt to changes in the oil and gas markets.³⁹ If a steep drop or increase in the price of oil or gas occurs, railroads can easily account for increased market demand in specific regions of the country very quickly.⁴⁰ Railroads are also more cost-effective when pipeline infrastructure is not available for utilization, as the existing rail network in North America is much more extensive than the pipeline transmission network.⁴¹ Trains can also switch tracks and complete different routes than pipelines, which are fixed in the ground.

Trains can travel very quickly and are able to transport crude oil faster than pipelines. Depending on the type of hazardous material, number of carloads, and surrounding population density, trains can travel up to 50 mile per hour and can move from North Dakota to the Gulf Coast within a week.^{42, 43} Trains may have to stop or utilize siding or rail yards to allow other trains to pass or react to track blockages or deficiencies. These add time costs to delivery, even when the ultimate destination is a straight line.

Cost

Overall costs for shipping oil and gas by rail fluctuate depending on the market. However, even during times when production has outstripped capacity, transporting oil and gas via rail remains twice as expensive as pipeline transportation.⁴⁴ The average cost to move crude by rail is estimated at between \$10 and \$15 per barrel, but is variable.⁴⁵ Additionally, choosing to transport oil by rail means that producers may have to compete for rail space with other commodities and products being shipped by rail and a higher number of high-hazard rail cars means a slower travel speed.⁴⁶

Truck

An estimated 100,000 tank trucks and trailers deliver oil, gas, and other hazardous materials around the country on a daily basis. These specialized trucks differ from other tractor trailers, box trucks, or flatbeds for intermodal payloads, and instead carry specialized tanks. They primarily undertake short routes to move products between facilities or distribute fuel to gas station, fulfilling a vital role in the supply chain that pipelines and rail lack the flexibility to accomplish. Despite largely fulfilling shorter routes, tank trucks deliver around 9 billion barrels each year of diesel, gasoline, aviation fuel, and chemicals.⁴⁷

Safety & Effectiveness

The U.S. Department of Transportation has not traditionally tracked data regarding trucks transporting oil and gas.⁴⁸ However, one report from PHMSA shows that trucks carrying crude were estimated to safely transport 99.99 percent of product.⁴⁹ While spills are much more common for trucks during on-loading and offloading and in vehicle accidents, the quantity lost is far lower.

Notably, trucks travel far lesser distances with hazardous material, as they are primarily a distribution or short-route option, whereas pipelines and rail are used for long haul transmission. The shorter distance reduces the potential for an incident but takes place in a much more dynamic setting. That makes transport by truck less safe than rail and pipeline, as accidents occur from a variety of sources, including outdated infrastructure, traffic, driver error, driving collisions, mismatched truck designs, and unpredictable weather and road conditions.⁵⁰ Truck transports also have the highest number of injury or deaths per method of transportation, with an estimated 10.2 fatalities per year.^{51, 52} In the last 10 years, 93 highway deaths have been attributable to hazardous materials.⁵³ Road-based casualties are usually compounded by other traffic risks and lead to direct human impact given road congestion in urban settings, which may be contrasted with leak or spill incidents by rail or pipe along remote transmission routes.

Climate Impact

Carbon intensity from the road transportation sector already accounts for the fastest growing source of GHGs. Commercial vehicles most often utilize internal combustion engines, primarily burning diesel fuel. The average tanker truck in the U.S. emits 161.8 grams of CO₂ per ton-mile and weighs six tons.⁵⁵ For the distance from the Bakken oil fields in North Dakota to the refineries in Houston, Texas of 1,369 miles, a single truck would emit 1.33 metric tons of CO₂ in a single one-way journey.⁵⁶ This calculation does not take into account potential accidents, delays on the road, or time spent loading and unloading product, where there is potential for additional emissions.

While leaks and spills are more common with trucks, they primarily take place at the on-loading or offloading stage, where there is little environmental impact and the quantity lost is minimal. When incidents occur on the road or in a vehicle collision, it may result in leaked material, fires, explosions, and greater emissions from traffic and emergency responses.

Efficiency

The effectiveness and speed of trucking crude oil and gas is limited both by the trucks capacity and factors including traffic patterns and the distance needed to travel. Most tank trucks can only transport 200-250 barrels of oil.⁵⁷ This makes the cost of transporting crude or gas medium and long distances costly, both for fuel costs and the time it takes to navigate from a source to a refinery.⁵⁸ Transporting crude from North Dakota to Texas in a truck would take a shorter amount of time than rail or pipeline, but could carry only a small amount of product and cost far more per barrel.⁵⁹ Trucks are the fastest method of transport, able to reach or exceed speeds of 55 miles per hour on the Interstate Highway System, and therefore make very efficient short distribution deliveries. While pipelines offer 300,000 miles of transmission routes, and rail has a fixed 140,000-mile track network, trucks can utilize nearly all of America's four million miles of roadways to make deliveries and reroute as needed.

Cost

Trucking oil and gas is "usually cost-prohibitive" for transmission routes, and most companies avoid trucking oil and gas except for very short journeys to distribute product to consumers.⁶⁰ It costs an estimated \$20 per barrel of crude moved by truck, which is twice as much as by rail, and an estimated four times as expensive as pipelines.⁶¹ This is mainly due to inability to reach economies of scale with limited tank sizes, the price of diesel, and relatively low fuel efficiency of trucks.

Overall, the primary function of tanker trucks has been limited to distributing refined crude to gas stations, distribution centers, or individual service locations. Trucks are a vital transportation form and in no danger of being replaced, as no alternative distribution method exists to rival it. Trucks are the most versatile, capable of rerouting and reaching destinations across a wide geographic area, not restricted to pipeline or rail track infrastructure.

Ships and Barges

Maritime vessels have the ability to transport large amounts of cargo across the world's oceans and global markets. While their utilization is mainly kept to strictly international travel, tanker ships serve a crucial role in global trade, with maritime trade and shipping making up over 80 percent of global trade by volume.⁶² Tankers are normally used to transport massive amounts of fuel, chemicals, and other raw materials to different foreign markets or to different ports across a single country. Within the nation's 12,000 miles of waterways, nearly 4,000 barges also offer safe and fuel-efficient means of transporting hazardous materials including crude, natural gas liquids, and ethanol.

Safety & Effectiveness

Tanker ship transport has the lowest number of accidents per million barrels of oil transported.⁶³ Overall safety has improved dramatically over the last three decades. Roughly 60 percent of the world's oil travels by tanker ship and since 1970 there has been a 98 percent reduction in the oil spilled from tankers worldwide.⁶⁴ Over the past decade, over 99.9997 percent of oil delivered to the U.S. reached its destination without an accident.⁶⁵ Advancements in maritime technology have streamlined the number of contingency options for tankers should an incident arise and increased safety standards and training time for tanker crews have resulted in a massive downturn in accidents.⁶⁶

Within the navigable waters of the U.S., barges also boast an impressive safety record, transporting a greater volume than rail with no significant releases in the last 10 years.⁶⁷ Barges alone transport around 200 million barrels of crude oil around the U.S. each year. From 1995 to 2015, only three major incidents occurred by barge, which together released around 100,000 barrels total. In a typical year, barges release less than 5,000 barrels of oil, leading to an estimated 99.99975 percent effective rate for crude.⁶⁸ In the last 10 years, there have been no reported leaks of ethanol or natural gas liquids by barge.⁶⁹

Climate Impact

Tanker ships make up a still-increasing share of world shipping emissions. The largest class of container and oil ships have increased their base operating speeds within the last decade, resulting in higher levels of emissions.⁷⁰ The total carbon intensity of these massive ships as a class of ship "actually decreased (became more efficient), but the largest of these already massive ships became more intensive (less efficient)."⁷¹ The burning of "bunker fuel"⁷² (high hydrocarbon fuel) for large tanker ships is unique to the shipping industry and is polluting enough to put the net emissions from international shipping on par with some standalone country emissions.⁷³ Currently, the single largest determinant of the amount of emissions from a ship is speed; if ships travel at a slower pace with their large cargoes, less partially burned pollutants like black carbon are emitted.⁷⁴

In contrast, barges traveling in-land waterways are incredibly carbon-efficient, producing less carbon monoxide, nitrous oxide, and particulate matter than rail or trucks.⁷⁵ In emissions per ton-

mile of freight moved, water transport produces 0.080 pounds of CO₂, second only to rail.⁷⁶ When rare leaks or spills do occur, they happen in incredibly sensitive environments, whereas trucks, trains, and pipelines often spill in more containable settings or less ecologically vulnerable areas.

Efficiency

One obvious drawback of tankers is that they are not available for most inland transport. With the exception of major rivers or Great Lakes, these are limited to coastal routes or large ports situated in import-export markets that can handle large ships. For those areas that have significant waterways, tankers have the capacity to carry tens of millions of gallons of oil and even smaller barges have significantly more carrying capacity than trucks or railroad cars.⁷⁷ Tankers provide the massive capacity and speed to deliver large quantities of crude and gas over long distances, but can be impeded by inclement weather, frozen waterways, or backlogs in major ports that can delay shipments.⁷⁸

Barges are limited by the availability of waterways, restricting the routes and dynamism of deliveries to navigable rivers, streams, and canals. They can, however, move quickly on the water and do not often encounter congestion like rail and roadways. With a capacity of up to 90,000 barrels, river barges move at four to five miles per hour.⁷⁹

Cost

Due to the scale of tanker ships, measuring costs is solely based on the cost per barrel of oil. Relative to other forms of long-distance oil and gas transportation, tankers are extremely costeffective.⁸⁰ Lower oil prices internationally mean that shipping rates for tankers will be similarly affected; potentially opening the door to other means of transportation to compensate for the loss in profit for bulk shipments of crude.⁸¹ Overall, in comparison to long-distance pipelines or railroad journeys, tanker ships offer a cheaper, more cost-effective, and more flexible way to ship massive quantities of oil internationally.⁸²

The cost to move oil and other liquids by water depends on certain factors, including starting and end points, though not necessarily distance. The Merchant Marine Act of 1920, also known as the Jones Act, requires ships entering consecutive U.S. ports to meet certain U.S.-made and U.S.-crewed standards. This leads to higher costs. For oil shipped within the U.S., the price may be \$5 to \$6 per barrel, while shipping oil from the U.S. to Canada or using a foreign vessel may cost \$2 per barrel.⁸³ Barges do vary by distance, but at an estimated \$5 to \$7, is cheaper than rail and more expensive than pipeline.

Conclusion

The U.S. consumes over 6.63 billion barrels of petroleum⁸⁴ and 30.5 trillion cubic feet of natural gas⁸⁵ each year in addition to other hazardous liquids and gases used directly or as derivative inputs for necessary products. The nation, communities, and individuals need these resources to be productive, and in many cases, to survive. That means that public policy must allow these resources to be developed and transported. The methods of transport demands attention.

Rather than focus on the energy density, economic value, or climate impact of the fuels and resources themselves, we must focus on safe and effective ways to move them. This is not a question of wind and solar versus pipelines and fossil fuels, rather it is a question of how to get critically needed raw materials to fulfill energy, manufacturing, pharmaceutical, and even agricultural needs.

The four available methods of transporting these gases and liquids are pipelines, rail, trucks, and ships. Each of these are necessary and important for moving resources. In many instances, rather than competitors or substitutes, these often serve as compliments. Where substitution is feasible, knowing the relative differences in safety and effectiveness, climate impact, efficiency, and cost is important.

The key takeaway from this survey is that high volumes of oil, gas, chemicals, and other resources are needed by the U.S. population, and every year, enormous quantities are safely moved around the country. Underneath our feet, alongside our communities, sharing our roadways, and along the water, energy resources are moving every day. No method of transportation is perfect, although all four have over 99.99 percent safety and effectiveness, where leaks and spills are rare. Moreover, due to advances in innovative technology and best practices, all four methods of transportation are safer and more efficient than they have ever been. Incorporating technological assistance and remote monitoring within pipelines, locomotives, vehicles, and water vessels has led to safer environments and fewer casualties.

Based on the available data, policymakers should have no concerns about utilizing pipelines and approving new constructions to increase pipeline capacity. The minimal climate impact and efficiency of rail make it a needed compliment for additional oil and gas capacity as well as other hazardous materials and freight. Trucks are needed for distribution routes and added flexibility. Tanker ships are vital for international and costal transports, and barges carry high volumes efficiently through the nation's waterways.

As legislators, policymakers, and industry continue to focus on improving safety and minimizing the climate impact of our transportation sector, they should recognize the vast improvements made in the last decades. Future marginal safety, climate, and efficiency gains will be important, and incorporating new and innovative technologies will be critical to achieve it.

Citations

¹ Pipeline and Hazardous Materials Safety Administration. (2020, January 28). *Pipeline Mileage and Facilities*. PHMSA. Retrieved from https://www.phmsa.dot.gov/data-and-statistics/pipeline/pipeline-mileage-and-facilities.

² Pipeline and Hazardous Materials Safety Administration & Office of Hazardous Materials Safety. (2018, October). Report on Shipping Crude Oil by Truck, Rail, and Pipeline. United States Department of Transportation. Retrieved from https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/docs/news/70826/report-congress-shipping-crude-oil-truck-rail-and-pipeline-32019.pdf.

³ Interstate Natural Gas Association of America. Safety. Retrieved from https://www.ingaa.org/Safety.aspx.

⁴ Pipeline and Hazardous Materials Safety Administration. (2021, June). *Utility Menu*. Pipeline and Hazardous Materials Safety Administration. Retrieved from https://www.phmsa.dot.gov/.

⁵ U.S. Energy Information Administration. (2020, December 3). U.S. Energy Information Administration - EIA - Independent Statistics and Analysis. Natural gas pipelines - U.S. Energy Information Administration (EIA). Retrieved from https://www.eia.gov/energyexplained/natural-gas/natural-gas pipelines.php#:~:text=The%20U.S. %20natural%20gas%20pipeline,and%20storage%20facilities%20with%20consumers.

⁶ U.S. Department of Transportation. (2021, March 22). *Crude Oil and Petroleum Products Transported in the United States by Mode*. Crude Oil and Petroleum Products Transported in the United States by Mode | Bureau of Transportation Statistics. Retrieved from https://www.bts.gov/content/crude-oil-and-petroleum-products-transported-united-states-mode.

⁷ American Geosciences Institute. (2019, June 18). *Transportation of Oil, Gas, and Refined Products*. American Geosciences Institute. Retrieved from https://www.americangeosciences.org/geoscience-currents/transportation-oil-gas-and-refinedproducts#:~:text=Introduction,refineries%2C%20and%20finally%20to%20consumers.

⁸ Hansen, M., & Dursteler, E. (2017, January). *Pipelines, Rail, & Trucks. Economic, environmental, and safety impacts of transporting oil and gas in the U.S.* Strata Policy. Retrieved from https://www.strata.org/pdf/2017/pipelines-info.pdf.

⁹ Pipeline and Hazardous Materials Safety Administration. (2021, June 28). *PHMSA Pipeline Incidents: (2001-2020)*. United States Department of Transportation. Retrieved from https://portal.phmsa.dot.gov/analytics/saw.dll?Portalpages.

¹⁰ About Pipelines. (2018, October 4). *Climate Change*. About Pipelines. Retrieved from https://www.aboutpipelines.com/en/environmental-protection/climate-change/.

¹¹ Derouin, S. (2021, April 8). *This source of greenhouse gas emissions might surprise you*. Greenbiz. Retrieved from https://www.greenbiz.com/article/source-greenhouse-gas-emissions-might-surprise-you.

¹² Nimana, B., Verma, A., Di Lullo, G., Rahman, M. M., Canter, C. E., Olateju, B., Zhang, H., & Kumar, A. (2016). Life Cycle Analysis of Bitumen Transportation to Refineries by Rail and Pipeline. *Environmental Science & Technology*, *51*(1), 680–691. https://doi.org/10.1021/acs.est.6b02889.

¹³ King, A. (2017, October 3). When Shipping Petroleum, Air Pollution and Greenhouse Gas Emissions Costs More Than Accidents. Wilton E. Scott Institute for Energy Innovation. Retrieved from https://www.cmu.edu/energy/news-multimedia/2017/petroleum-shipping-costs.html.

¹⁴ Greenhouse Gas Reporting Program. (2020, September 26). *GHGRP Petroleum and Natural Gas Systems*. Environmental Protection Agency. Retrieved from https://www.epa.gov/ghgreporting/ghgrp-petroleum-and-natural-gas-systems.

¹⁵ Green, Kenneth P., T. Jackson. (2015, August). *Safety in the Transport of Oil and Gas: Pipelines or Rail? The Fraser Institute*. Retrieved from https://www.fraserinstitute.org/sites/default/files/safety-in-the-transportation-of-oil-and-gas-pipelines-or-rail-rev2.pdf.

¹⁶ Cox, K. (2021, January). *Overland Pass Pipeline*. Williams Overland Pass Pipeline Overview. Retrieved from https://www.pipelinesafetyinfo.com/user/file/Kansas%20(KPA)/Williams Overland Pass Pipeline.pdf.

¹⁷ Bair, J. (2021, March 11). Bloomberg.com. Retrieved from https://www.bloomberg.com/news/articles/2021-05-11/n-y-must-wait-on-5-mph-gasoline-flow-once-pipeline-is-reopened.

¹⁸ Allegro Energy Group. (2001, December). *How Pipelines Make the Oil Market Work – Their Networks, Operation and Regulation*. Institute for Agriculture and Trade Policy. Retrieved from https://www.iatp.org/sites/default/files/451 2 31375.pdf.

¹⁹ *How Does the Natural Gas Delivery System Work?*. American Gas Association. Retrieved from https://www.aga.org/natural-gas/delivery/how-does-the-natural-gas-delivery-system-work-/

#:~:text=Natural%20gas%20moves%20through%20the,receipt%20point%20in%20the%20Northeast.

²⁰ Reasons Why Pipeline Transport Is A Safer and Better Option. Oilman Magazine. (2018, October 11). Retrieved from https://oilmanmagazine.com/reasons-why-pipeline-transport-is-a-safer-and-better-option/.

²¹ Tortoise Investments. (2016, May 13). *Transporting Oil: Why Pipelines Still Rule*. Forbes. Retrieved from https://www.forbes.com/sites/tortoiseinvest/2016/05/13/transporting-oil-why-pipelines-still-rule/?sh=1a44120f12dc.

²² Supra note 8.

²³ Energy Information Administration. U.S. Natural Gas Pipeline and Distribution Use Price. Retrieved from https:// www.eia.gov/dnav/ng/hist/na1480 nus 3a.htm.

²⁴ Safety. (2021, April 28). Crude Oil by Rail. Association of American Railroads. Retrieved from https://www.aar.org/article/ crude-oil-by-rail. | See also, note 2.

²⁵ Ingraham, C. (2019, April 26). *It's a lot riskier to move oil by train instead of pipeline*. The Washington Post. Retrieved from https://www.washingtonpost.com/news/wonk/wp/2015/02/20/its-a-lot-riskier-to-move-oil-by-train-instead-of-pipeline/.

²⁶ Supra note 8.

²⁷ Lydersen, K. (2017, September 28). *Crude oil by rail or pipeline? New studies explore the question*. Energy News Network. Retrieved from https://energynews.us/2017/09/28/crude-oil-by-rail-or-pipeline-new-studies-explore-the-question/.

²⁸ U.S. Energy Information Administration. (2021, May 28). Crude Oil Movements by Rail. Retrieved from https://www.eia.gov/ dnav/pet/pet move railNA a EPC0 RAIL mbbl a.htm.

²⁹ What Railroads Haul: Crude Oil. (2020, July). Association of American Railroads. Retrieved from https://www.aar.org/wp-content/uploads/2020/07/AAR-Crude-Oil-Fact-Sheet.pdf.

³⁰ Bureau of Transportation Statistics. (2021, March 22). *Train Fatalities, Injuries, and Accidents by Type of Accident*. United States Department of Transportation. Retrieved from https://www.bts.gov/content/train-fatalities-injuries-and-accidents-type-accidenta.

³¹ Bureau of Transportation Statistics. (2021, March 22). *Hazardous Materials Fatalities, Injuries, Accidents, and Property Damage Data*. United States Department of Transportation. Retrieved from https://www.bts.gov/content/hazardous-materials-fatalities-injuries-accidents-and-property-damage-data.

³² Freight Rail: Moving Miles Ahead on Sustainability. (2021, March). Association of American Railroads. Retrieved from https://www.aar.org/article/freight-rail-moving-miles-ahead-on-sustainability/.

³³ Clay, K., Jha, A., Muller, N., & Walsh, R. (2017, September). *The External Costs of Transporting Petroleum Products by Pipelines and Rail: Evidence From Shipments of Crude Oil from North Dakota*. Retrieved from nber.org.

³⁴ Nimana, B., Verma, A., Di Lullo, G., Rahman, M. M., Canter, C. E., Olateju, B., Zhang, H., & Kumar, A. (2016). Life Cycle Analysis of Bitumen Transportation to Refineries by Rail and Pipeline. *Environmental Science & Technology*, *51*(1), 680–691. https://doi.org/10.1021/acs.est.6b02889.

³⁵ CSX Rail. *Hazardous Commodities by U.S. DOT Classification*. CSX.com. Retrieved from https://www.csx.com/index.cfm/ about-us/safety/hazardous-materials1/hazardous-commodities-by-u-s-dot-classification/.

³⁶ U.S. Department of Transportation. (2017, November 29). *Hazardous Materials by Rail Liability Study Report to Congress*. Secretary of Transportation. Retrieved from https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/docs/news/57011/report-congress-hazardous-materials-rail-liability-study-nov-2017 1.pdf.

³⁷ Laska, A. (2021, June 7). *Freight Rail's Role in a Net-Zero Economy*. Third Way. Retrieved from https://thirdway.imgix.net/pdfs/freight-rails-role-in-a-net-zero-economy.pdf.

³⁸ Id.

³⁹ Frittelli, J., Andrews, A., Parfomak, P. W., Pirog, R., Ramseur, J., & Ratner, M. (2014, December 4). U.S. Transportation of *Crude Oil: Background and Issues for Congress*. Congressional Research Service. Retrieved from https://fas.org/sgp/crs/misc/R43390.pdf.

⁴⁰ Wallheimer, B. (2018, August 14). *Why transporting oil by rail is popular, despite the cost*. Chicago Booth Review. Retrieved from https://review.chicagobooth.edu/economics/2018/article/why-transporting-oil-rail-popular-despite-cost.

⁴¹ Conca, J. (2018, October 11). *Which Is Safer For Transporting Crude Oil: Rail, Truck, Pipeline Or Boat*? Forbes. Retrieved from https://www.forbes.com/sites/jamesconca/2018/10/11/which-is-safer-for-transporting-crude-oil-rail-truck-pipeline-or-boat/? sh=c1a8ee87b237.

⁴² Hazardous Materials: Enhanced Tank Car Standards and Operational Controls for High Hazard Flammable Trains. 80 FR 26643. (2015, May 8). Retrieved from https://www.federalregister.gov/documents/2015/05/08/2015-10670/hazardous-materials-enhanced-tank-car-standards-and-operational-controls-for-high-hazard-flammable.

⁴³ Supra note 8.

⁴⁴ Elliott, R., & Ziobro, P. (2019, January 31). *Oil Trains Make Comeback as Pipeline Bottlenecks Worsen*. The Wall Street Journal. Retrieved from https://www.wsj.com/articles/oil-trains-make-comeback-as-pipeline-bottlenecks-worsen-11548930600.

⁴⁵ Supra note 8.

⁴⁶ Issawi, H. (2018, August 2). *Oil on the tracks: what's the cost of shipping more product by rail?* thestar.com. Retrieved from https://www.thestar.com/edmonton/2018/08/02/oil-on-the-tracks-whats-the-cost-of-shipping-more-product-by-rail.html.

47 National Tank Truck Carriers. Tank Truck Industry Market Analysis.

⁴⁸ Christopherson, S., & Dave, K. (2014, November). *A New Era of Crude Oil Transport: Risks and Impacts in the Great Lakes Basin*. Retrieved from https://ecommons.cornell.edu/. https://ecommons.cornell.edu/bitstream/handle/1813/55991/A-New-Era-of-Crude-Oil-Transport.pdf?sequence=1&isAllowed=y.

⁴⁹ Supra note 2.

⁵⁰ Supra note 48.

⁵¹ Westenhaus, B. (2013, August 13). *Trucks, Trains, or Pipelines – The Best Way to Transport Petroleum*. OilPrice.com. Retrieved from https://oilprice.com/Energy/Energy-General/Trucks-Trains-or-Pipelines-The-Best-Way-to-Transport-Petroleum.html.

52 Supra note 8.

⁵³ Bureau of Transportation Statistics. (2021, March 22). *Hazardous Materials Fatalities, Injuries, Accidents, and Property Damage Data*. United States Department of Transportation. Retrieved from https://www.bts.gov/content/hazardous-materials-fatalities-injuries-accidents-and-property-damage-data.

⁵⁴ Wang, S., & Ge, M. (2019, October 16). *Everything You Need to Know About the Fastest-Growing Source of Global Emissions: Transport.* wri.org. Retrieved from https://www.wri.org/insights/everything-you-need-know-about-fastest-growing-source-global-emissions-transport.

⁵⁵ Manthers, J. (2015, March 24). *Green Freight Math: How to Calculate Emissions for a Truck Move.* business.edf.org. Retrieved from https://business.edf.org/insights/green-freight-math-how-to-calculate-emissions-for-a-truck-move/ #:~:text=The%20average%20freight%20truck%20in,of%20CO2%20per%20ton%2Dmile.

⁵⁶ Manthers, J., Craft, E., Norsworthy, M., & Wolfe, C. (2019, February 9). edf.org. Retrieved from https://storage.googleapis.com/scsc/Green%20Freight/EDF-Green-Freight-Handbook.pdf.

⁵⁷ Wetzel, B. (2019, November 1). *Strategic Transportation Solution Provider*. Breakthroughthroughfuel.com. Retrieved from https://www.breakthroughfuel.com/blog/oil-in-motion-visibility-into-crude-oil-transportation.

⁵⁸ Green, K. P. (2018, November 7). *Pipeline crunch sending crude to markets-by truck: op-ed.* Fraser Institute. Retrieved from https://www.fraserinstitute.org/article/pipeline-crunch-sending-crude-to-markets-by-truck.

59 Supra note 8.

60 Supra note 21.

⁶¹ Supra note 8.

⁶² Review of Maritime Transport. (2018). *Review of Maritime Transport 2018*. UNCTAD. Retrieved from https://unctad.org/ webflyer/review-maritime-transport-2018#:~:text=Maritime%20transport%20is%20the%20backbone,are%20handled%20by% 20ports%20worldwide.

⁶³ Green, K. P., & Jackson, T. (2017, July 27). *Safety First: Intermodal Safety for Oil and Gas Transportation*. fraserinstitute.org. Retrieved from https://www.fraserinstitute.org/studies/safety-first-intermodal-safety-for-oil-and-gas-transportation.

64 Clear Seas. (2020, November 6). Oil Tanker Facts. clearseas.org. Retrieved from https://clearseas.org/en/tankers/.

⁶⁵ American Petroleum Institute. (2015, September). *Maritime Safety & Efficiency*. api.org. Retrieved from https://www.api.org/ oil-and-natural-gas/wells-to-consumer/transporting-oil-natural-gas/oil-tankers/maritime-safety-and-efficiency.

⁶⁶ American Petroleum Institute. (2016, April 2). *America's Energy Revolution*. api.org. Retrieved from https://www.api.org/-/ media/energyinfrastructure/images/maritime/related-docs/maritime-infrastructure-brochure-update2.pdf.

⁶⁷ Committee for a Study of Domestic Transportation of Petroleum, Natural Gas, and Ethanol, Transportation Research Board. *Special Report 325 Safely Transporting Hazardous Liquids and Gasses in a Changing U.S. Energy Landscape*. (2017). Transportation Research Board. Retrieved from https://www.nap.edu/read/24923/chapter/2#3.

⁶⁸ Id.

⁶⁹ Id.

⁷⁰ Olmer, N., Comer, B., Roy, B., Mao, X., & Rutherford, D. (2017). *GREENHOUSE GAS EMISSIONS FROM GLOBAL SHIPPING*, 2013–2015. theicct.org. Retrieved from https://theicct.org/sites/default/files/publications/Global-shipping-GHG-emissions-2013-2015_ICCT-Report_17102017_vF.pdf.

⁷¹ Id.

⁷² Orszag, P. R. (2021, March 30). *Huge Container Ships' Biggest Problem Is Emissions*. Bloomberg.com. Retrieved from https:// www.bloomberg.com/opinion/articles/2021-03-30/huge-container-ships-biggest-problem-is-emissions.

⁷³ BBC. (2018, April 12). *Reality Check: Are ships more polluting than Germany*? BBC News. Retrieved from https://www.bbc.com/news/world-43714029.

⁷⁴ Center for Climate and Energy Solutions. (2020, February 4). *What is Black Carbon*? c2es.org. Retrieved from https:// www.c2es.org/document/what-is-black-carbon/.

⁷⁵ Texas A&M Transportation Institute and Center for Ports and Waterways. (2017, January). A Modal Comparison of Domestic Freight Transportation Effects on the General Public: 2001-2014. National Waterways Foundation. Retrieved from http:// nationalwaterwaysfoundation.org/documents/Final%20TTI%20Report%202001-2014%20Approved.pdf.

⁷⁶ Supra note 37.

⁷⁷ Oilfieldfactoring.com. (2021, March 1). *The Pros and Cons of Oil Transportation*. Oil Field Factoring, LLC. Retrieved from https://www.oilfieldfactoring.com/pros-cons-oil-transportation/.

⁷⁸ Great Lakes Commission. (2015, February 2). *Advantages, Disadvantages and Economic Benefits Associated with Crude Oil Transportation*. glc.org. Retrieved from https://www.glc.org/wp-content/uploads/Oil-Transportation-IssueBrief2-2015.pdf.

⁷⁹ Frittelli, J. (2014, July 21). *Shipping U.S. Crude Oil by Water: Vessel Flag Requirements and Safety Issues*. Congressional Research Service. R43653. Retrieved from https://fas.org/sgp/crs/misc/R43653.pdf.

⁸⁰ Report, S. (2017, July 3). *The Basics of the Tanker Ship Market*. euronav.com. Retrieved from https://www.euronav.com/ media/65361/special-report-2017-eng.pdf.

⁸¹ Wallace, J. (2020, May 29). *Cost of Shipping Oil Tumbles as Production Cuts Bite*. The Wall Street Journal. Retrieved from https://www.wsj.com/articles/cost-of-shipping-oil-tumbles-as-production-cuts-bite-11590757528.

⁸² Seth, S. (2021, March 23). *Crude Tankers: The Business of Transporting Oil*. Investopedia. Retrieved from https://www.investopedia.com/articles/investing/012316/crude-tankers-business-transporting-oil.asp.

83 Supra note 78.

⁸⁴ U.S. Energy Information Administration. Frequently Asked Questions (FAQs) - U.S. Energy Information Administration (EIA). Retrieved from https://www.eia.gov/tools/faqs/faq.php?

id=33&t=6#:: text=EIA%20 uses%20 product%20 supplied%20 to, 6.63%20 billion%20 barrels%20 of%20 petroleum. & text=Last%20 updated%3A%20 March%209%2C%202021, Petroleum%20 Supply%20 Monthly%2C%20 February%202021.

⁸⁵ U.S. Energy Information Administration. U.S. Energy Information Administration - EIA - Independent Statistics and Analysis. Use of natural gas - U.S. Energy Information Administration (EIA). Retrieved from https://www.eia.gov/energyexplained/natural-gas/use-of-natural gas.php#:~:text=The%20United%20States%20used%20about,of%20U.S. %20total%20energy%20consumption.

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