



U.S. Department
of Transportation

**Federal Railroad
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

MAR 23 2009

Mr. Craig Scott
Managing Director, Intumescent Associates Group
Fire & Insulation Products
15406 Crescent Oaks Court
Houston, TX 77068

Dear Mr. Scott:

Thank you for your request for a determination of compliance of your thermal protection system with the applicable requirements of Title 49 Code of Federal Regulations Part 179, Appendix B, (Procedures for Simulated Pool and Torch-Fire Testing). In addition, you requested that the Federal Railroad Administration (FRA) include NanoChar™ as an accepted system on the list of thermal protective systems that no longer need test verification for use on DOT specification tank cars. As supporting information, your request included a copy of your test report (Report Number 3145520 Rev. 2), originally issued on April 23, 2008, and subsequently revised on February 25, 2009. The report was issued by Intertek Evaluation Center in Elmendorf, Texas.

After reviewing the supplied data, FRA has determined that the NanoChar™ system does meet the required tests, as specified in 49 CFR § 179.18. Accordingly, NanoChar™ will be added to the list of thermal protective systems, per 49 CFR § 179.18(c). The Pipeline and Hazardous Materials Safety Administration will be notified of this addition, and a notice with an updated list will be published in the Federal Register at a later date as follows:

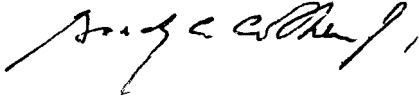
Intumescent Associates Group (IAG), Houston, Texas

NanoChar™

System Application: As outlined in the NanoChar™ Fire Proofing System Application Manual (December 1, 2008; Revision 2), the design thicknesses of the NanoChar™ application shall average a layer of at least 3.25 mm, with no point of the layer having a thickness of less than 3.1 mm.

If you have any questions, please contact FRA Hazardous Materials Staff Director,
Mr. William Schoonover, at (202) 493-6229; or via e-mail at William.Schoonover@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Grady C. Cothen, Jr.", written in a cursive style.

Grady C. Cothen, Jr.
Acting Associate Administrator for Railroad Safety/Chief Safety Officer