

*PIPELINE AND HAZARDOUS MATERIALS
SAFETY ADMINISTRATION*



Approvals Program
Draft: Standard Operating Procedures – To-Be

December 2009

DISCLAIMER

This document is intended to govern the internal business procedures of the Pipeline and Hazardous Materials Administration (PHMSA). This document does not create a right of action for any entity outside of PHMSA. Furthermore, while this document codifies the intent of PHMSA, all actions and decisions are still subject to internal agency considerations.

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1 INTRODUCTION

1.1 Purpose

This document establishes standard operating procedures (SOPs) for the administration of the Pipeline and Hazardous Materials Safety Administration's (PHMSA's) Approvals Program. These SOPs incorporate and strengthen PHMSA's current procedures. The SOPs will be updated periodically to incorporate recommendations and improvements arising out of ongoing program evaluation and upgrades to the data management systems that support the Approvals Program.

1.2 Approvals Program Overview

An approval is a document that provides written authorization from PHMSA for a shipper or a carrier to perform an activity that requires prior authorization under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).¹ The HMR are promulgated under the Federal hazardous materials transportation law (Federal hazmat law, 49 U.S.C. 5101 et seq.), and PHMSA's procedures for applying for an approval are set forth in 49 CFR, Part 107, Subpart H.

PHMSA processes several types of approval applications, which it receives from applicants in many different sectors of the hazardous materials industry. Approvals are grouped into five categories based on how they are processed by the agency. This section of the document introduces the types and categories of approvals.

1.2.1 Types of Approvals

PHMSA issues 23 different types of approvals that authorize a range of activities, such as the packaging and shipping of certain radioactive materials, the testing of certain types of cylinders, and the transporting of lithium batteries. It is important to note that the agency only grants approvals for activities specifically outlined in the HMR. Applicants seeking to perform an activity not requiring an approval but otherwise not permitted by the HMR must apply to PHMSA for a special permit.

Approvals granted by PHMSA are authorized by different parts of Title 49 of the CFR. Table 1 displays the different approvals granted by PHMSA, and also includes the authorizing sections of the CFR.

¹ 49 CFR 107.1

Table 1: Approvals Issued by PHMSA

Approval Type	CFR Citation
M numbers for identification of domestic manufacturers	49 CFR 178.3
Visual cylinder requalifiers	49 CFR 108.209
Commercial explosives	49 CFR 173.56
Government explosives	49 CFR 173.56
Fireworks	49 CFR 173.56
Chemical oxygen generators	49 CFR 173.168
Self-reactive materials and organic materials	49 CFR 173.24 & 49 CFR 173.28
Domestic cylinder requalifiers	49 CFR 107.805
Domestic cylinder repair/rebuild companies (k-number program)	49 CFR 107.805
Radioactive materials and packaging	49 CFR 173.400 – 49 CFR 173.499
Independent inspection agencies (IIAs) representing US cylinder manufacturers	49 CFR 107.803
Foreign cylinder requalifiers	49 CFR 107.805
Foreign cylinder repair/ rebuild companies (k-number program)	49 CFR 107.805
Foreign cylinder manufacturers with IIAs	49 CFR 107.801
United Nations (UN)/ International Organization for Standardization (ISO) cylinder manufacturers	49 CFR 107.807
UN Third-Party Certification Agencies	49 CFR 107.401
Designated approval agencies	49 CFR 107.401
Explosive test labs	49 CFR 173.56
Lighter testing agencies	49 CFR 173.308
International Maritime Dangerous Goods/ International Civil Aviation Organization (IMDG/ICAO) Competent Authority Approval (CAA)	NA ²
General CAA	NA ³
Lithium Batteries	49 CFR 173.185
Fuel Cells	TBD

For more information on the approvals listed in Table 1 see Section 6.1, located in the appendix of this document.

1.2.2 Categories of Approvals

For internal business purposes, PHMSA groups approvals into five categories. These categories include the: (1) Registration Process Category; (2) Classification Process Category; (3) Third-Party Inspection Process Category; (4) DOT Inspection Process Category; and (5) Safety Evaluation Process Category.

PHMSA uses different business procedures to evaluate the approval types in the different categories. For example, the agency uses one set of procedures to evaluate requests for approvals in the Classification Process Category, but a different set of procedures to evaluate requests for approvals in the Safety Evaluation Process Category.

² These approval types are governed by international agreements and therefore not authorized in any specific section of the HMR

³ Ibid.

The different categories, the approvals contained in each category, and the different business procedures associated each category are described in Section 4.

1.3 Definitions

Table 2 defines terms used throughout this SOP.

Table 2: Definitions

Term	Definition
APA Standard 87-1	This is an industry standard developed by the APA that outlines the types of products that can be approved by PHMSA as fireworks.
Applicant Fitness Review	This is a PHMSA evaluation of an applicant’s demonstrated and documented knowledge and capabilities resulting in the assurance of a level of safety and performance necessary to ensure compliance with the applicable provisions and requirements of the HMR or a special permit or approval issued under the regulations. It is important to note that the evaluation of applicant fitness differs across the various types of approvals. For more information, see Section 5.1 of this document.
Approval	An approval is written consent, including a competent authority approval, from the Associate Administrator or other designated Department official, to perform a function that requires prior consent under 49 CFR parts 171-180.
Competent Authority	A Competent Authority is a national agency that is responsible, under its national law, for the control or regulation of some aspect of hazardous materials (dangerous goods) transportation. Another term for Competent Authority is “Appropriate authority,” which is used in the ICAO Technical Instructions for the Safe Transport of Dangerous Goods by Air. The Associate Administrator is the US Competent Authority for purposes of 49 CFR part 107.
Evaluation Plan	This is a project management plan developed by PHMSA and relevant Operating Administration (OA) staff that outlines the necessary evaluation steps and milestones for an approval application.
ICAO	The ICAO regulates the international air transportation of hazardous materials.
IMDG Code	The IMDG Code regulates the international sea transportation of hazardous materials.
Operating Administration	OAs include the Federal Aviation Administration (FAA), Federal Motor Carrier Safety Administration (FMCSA), Federal Railroad Administration, PHMSA, and the United States Coast Guard (USCG).
Safety Evaluation	An evaluation that is intended to determine whether a proposed approval will either: (1) achieve a level of safety that is at least equal to that required by the HMR; or (2) be consistent with the public interest and adequately protect against the risks to life and property inherent in the transportation of hazardous materials. ⁴

1.4 Document Organization and Revision History

The remainder of this document is organized into the following sections:

- **Information Technology Resources** – Describes the information technology (IT) tools used by the Approvals Program to fulfill its mission goals.

⁴ For additional information, see 49 CFR 107.709(d)(2).

- **Operational Roles and Responsibilities** – Describes the respective roles and responsibilities required to execute processes associated with the Approvals Program.
- **Application Action Process** – Describes the processes for receiving, evaluating, and issuing approvals. The Application Action Process section is organized based on three key phases of the process: (1) Review for Application Completeness Phase; (2) Evaluation Phase; and (3) Disposition Phase. For each phase, subsections describe the purpose of the process, provide a high-level summary of the workflow, and present a table enumerating the detailed procedures. The procedures under the Review for Application Completeness Phase and Disposition Phase apply to all types of approvals. However, the subsection on the Evaluation Phase is further organized into five process categories of approvals: (1) Registration Process; (2) Classification Process; (3) Third-Party Inspection Process; (4) DOT Inspection Process; and (5) Safety Evaluation Process.
- **Supporting Sub-Processes and Documentation** – Describes sub-processes that are similar across all five process categories of approvals, including procedures for fitness reviews, appeals, and reconsiderations.
- **Appendix** – Includes forms and templates that support the execution of the SOPs. This section also includes the process maps that graphically depict the workflows identified in the procedures.

These SOPs are designed to evolve with PHMSA’s changing needs, statutory authorities, and operating methods. The document will be updated on a regular basis. The Approving Official for the Approvals Program is responsible for managing the maintenance and updates to the SOPs. Table 3 provides the history of revisions.

Table 3: Document Revision History

Revision Date	Author	Revision Description

2 INFORMATION TECHNOLOGY RESOURCES

PHMSA uses several information systems as resources to help manage the Approvals Program. Table 4 lists the IT resources currently used by PHMSA and its fellow Operating Administrations (OAs). These systems support specific functions, including document management and fitness reviews of approval applicants.

Table 4: IT Resources

Application	Description
Approvals IT System	The Approvals IT System is a Web-based application that maintains and provides access to information on the Approvals Program. The application serves as a document management system for processing approval applications and oversight of active approvals. Staff at PHMSA and the other OAs have access to the system and use it to collaborate when evaluating approval applications. ⁵
ISYS	ISYS is an application that functions as a search tool for the Approvals IT System. Users can search for existing approvals or other documents using keywords.
Hazmat Intelligence Portal (HIP)	HIP is a Web-based application that allows the OAs to collaborate on hazmat-related data. HIP seeks to support government hazmat professionals by providing enforcement and other information on companies involved in the hazmat industry. The system is currently under development.
Safety and Fitness Electronic Records System (SAFER)	SAFER is an FMCSA Web-based system that offers company safety data to government and industry professionals, as well as the public. Users can search FMCSA databases, register for a US DOT number, pay fines online, order company safety profiles, challenge FMCSA data using the DataQs system, access the Hazardous Material Route registry, obtain national crash and out-of-service rates for hazmat permit registrations, get printable registration forms, and find information about other FMCSA Information Systems.

⁵ Note that approvals dealing with radioactive materials and packaging are typically processed using the Hazardous Materials Information System instead of the Approvals IT System.

3 OPERATIONAL ROLES AND RESPONSIBILITIES

This section describes the roles required for PHMSA to execute processes associated with the Approvals Program. Table 5 illustrates where operational roles currently reside within PHMSA. The Coordinating Officials from the other OAs reside in different offices at their respective agencies. It is important to note that the staff and managers assigned operational roles may delegate their official responsibilities to others involved in processing approval applications.

Table 5: Current Organizational Alignment and Roles

Organizational Role	Organization	Current Organizational Position ⁶
Administrator	PH-1	Pipeline and Hazardous Materials Safety Administrator
Approving Official	PHH-1	Associate Administrator for Hazardous Materials Safety
Project Officer	PHH-30	Transportation Specialist, Senior Transportation Specialist
Senior Technical Officer	PHH-20	Director, Office of Hazardous Materials Technology
Technical Officer	PHH-20	Chemists, Physical Scientists, and Engineers
Enforcement Liaison	PHH-40	Director, Office of Hazardous Materials Enforcement
Standards Liaison	PHH-10	Director, Office of Hazardous Materials Standards
International Standards Liaison	PHH-70	International Standards Coordinator
Legal Counsel	PHC-10	Assistant Chief Counsel, Hazardous Materials Safety Law Division
OA Coordinating Official	FAA, FMCSA, FRA, USCG	Designated by the OAs
Nuclear Regulatory Commission (NRC) Coordinating Official	NRC	Designated by the NRC
Applicant	Industry	NA

3.1 Administrator

The Administrator is the Administrator of PHMSA. The responsibilities of the Administrator in the approvals process include:

- Review and approval of significant approval applications, based on public interest or other criteria as determined by the Administrator
- Participation in discussions to resolve issues among PHMSA staff and OA Coordinating Officials or Nuclear Regulatory Commission (NRC) Coordinating Official, as determined by the Administrator.

⁶ Note that all positions may delegate tasks to others involved in evaluating approvals.

3.2 Approving Official

The Approving Official is the Associate Administrator for Hazardous Materials Safety. Under Section 107.709(c) of the HMR, the Associate Administrator is responsible for signing approval and denial documents. The Approving Official is also responsible for:

- Determining whether the application evaluation is complete
- Reviewing disposition recommendations
- Approving disposition of approval applications, including rejection letters, denial letters, and approval letters
- Monitoring the volume and status of approval applications
- Resolving outstanding issues among OAs and other federal agencies
- Maintaining and updating the SOPs for the Approvals Program
- Making recommendations to the Administrator concerning the disposition of significant approval applications (based on public interest or other criteria determined by the Administrator)
- Delegating Approving Official responsibility for specific approvals, based on criteria related to the operations, transport modes, materials, or other criteria, as appropriate.

3.3 Project Officer

The Project Officer is responsible for managing the approval review process for a specific approval application. A Project Officer will be designated for each approval application. The Project Officer is responsible for:

- Providing oversight of the entire application evaluation and disposition processes across PHMSA and the OAs and the NRC
- Developing a draft evaluation plan for certain approval applications received (e.g., lithium battery approvals, general competent authority approvals)
- Coordinating the Review for Application Completeness Phase of an approval application, which may include:
 - Creating a folder in the Approval IT System for application materials
 - Conducting and coordinating application review for completeness
- Coordinating the Evaluation Review Phase of approval application evaluations, which may include:
 - Conducting applicant fitness review
 - Conducting safety evaluations
 - Coordinating with appropriate OA(s) and the NRC
 - Coordinating with PHMSA legal staff
 - Drafting and/or reviewing approvals.

3.4 Senior Technical Officer

The Senior Technical Officer is responsible for:

- Assigning and managing approval applications among appropriate Technical Officers
- Overseeing the Sufficiency Review Phase of approval application evaluations, which may include:
 - Providing input to draft evaluation plans
 - Drafting rejection letter justification language
- Overseeing technical evaluations of approval applications, which could include:
 - Conducting safety evaluations
 - Coordinating with OAs and the NRC
 - Drafting and/or reviewing approvals
- Reviewing and signing evaluations completed by Technical Officers.

3.5 Technical Officer

The Technical Officer has subject matter expertise in certain aspects of hazardous materials transportation safety. The Technical Officer may be assigned to participate in the review and evaluation of an approval application, if needed. The Technical Officer is responsible for:

- Assisting in the Completeness Review Phase of approval application evaluations, which may include:
 - Providing input to draft evaluation plans
 - Drafting rejection letter justification language
- Completing technical evaluations of approval applications, which may include:
 - Conducting safety evaluations
 - Conducting on-site reviews of applicants, as needed
 - Coordinating with OAs and the NRC
 - Drafting and/or reviewing approvals.

3.6 Enforcement Liaison

The Enforcement Liaison is responsible for:

- Reviewing applicant fitness as requested
- Managing and conducting investigations of applicants and holders of existing approvals.

3.7 Standards Liaison

The Standards Liaison is responsible for:

- Making recommendations as to whether the operations proposed for the approval should be addressed through rulemaking
- Reviewing evaluation plans as requested by the Project Officer
- Evaluating whether updates to the HMR are needed to accommodate the Approvals Program
- Reviewing approvals and other dispositions as requested by the Project Officer based on the agreed-upon criteria for Standards involvement, which could include:
 - Newly issued regulations
 - Requests with far-reaching effects that may be most appropriately handled under rulemaking.

3.8 International Standards Liaison

The International Standards Liaison is responsible for:

- Reviewing evaluation plans as requested by the Project Officer
- Reviewing approvals and other dispositions as requested by the Project Officer based on agreed-upon criteria for International Standards involvement.

3.9 Legal Counsel

The Legal Counsel, from PHMSA's Office of the Chief Counsel, is responsible for:

- Reviewing evaluation plans as requested by the Project Officer
- Providing legal guidance for decision making that pertains to approvals and other dispositions as requested.

3.10 OA Coordinating Official

An OA Coordinating Official is designated by the Federal Aviation Administration (FAA), Federal Motor Carrier Safety Administration (FMCSA), Federal Railroad Administration (FRA), and the United States Coast Guard (USCG) as the point of contact for each agency's review of approval applications. Depending on the type of approval under review, the OA Coordinating Official is responsible for:

- Providing input to draft evaluation plans
- Reviewing approval applications, applicant fitness reviews, and safety evaluations
- Completing technical evaluations of approval applications, which could include:
 - Conducting additional applicant fitness reviews
 - Conducting safety evaluations
 - Drafting approvals

- Providing concurrence, comments, information, and acknowledgments, as appropriate, to PHMSA in accordance with established coordination schedules and milestones.

3.11 NRC Coordinating Official

The NRC designates an NRC Coordinating Official as the point of contact for review of approval applications. Consistent with the responsibilities defined in the 1979 memorandum of understanding (MOU) between the US DOT and the NRC, the NRC Coordinating Official is responsible for:

- Reviewing approval applications, applicant fitness reviews, and safety evaluations involving radioactive materials and packaging
- Completing technical evaluations of radioactive material and packaging approval applications, which could include:
 - Conducting additional applicant fitness reviews
 - Conducting safety evaluation reviews
 - Drafting approvals
- Providing concurrence, comments, information, and acknowledgments, as appropriate, to PHMSA in accordance with the stipulations outlined in the MOU between the US DOT and the NRC.

3.12 Applicant

The Applicant is a person or firm requesting an approval to be issued by PHMSA. The Applicant is responsible for:

- Submitting a complete application for an approval as required under 49 CFR Part 107, Subpart H – Approvals, Registrations and Submissions. Applications that do not meet these requirements may be rejected
- Providing PHMSA with additional information or data if necessary
- Initiating a reconsideration or appeal if necessary
- Complying with the requirements of an approval when issued.

Applicants are referred to 49 CFR Part 107 Subpart H – Approvals, Registrations and Submissions for the specific information, documentation, and justification required for an application. In summary, the requirements for submission, justification, and documentation include:

- Applications must include complete contact information to enable PHMSA to identify, contact, and locate the party responsible for the approval application and for compliance with the approval if it is granted, such as the applicant and agent names, addresses, e-mail, and phone contact information
- Applications must fully describe the proposed approval including:
 - The specific chapter under which the approval application is being made

- A description of the activity for which the approval is required
- The proposed duration of the approval
- The transport mode or modes affected
- Applications for approval that provide exceptions from regulatory requirements or prohibitions must include:
 - Identification of any increased risk to safety or property that may result if the approval is granted, and the specification of the measures that the applicant considers necessary or appropriate to address that risk
 - Substantiation, with applicable analyses or evaluations, demonstrating that the proposed activity will achieve a level of safety that is at least equal to that required by the HMR
- Applications for renewal or modification of existing approvals must be filed in the same manner as the original applications.

4 APPLICATION ACTION PROCESS

As noted in Section 1.2, PHMSA issues 23 types of approvals. All approvals, regardless of type, are evaluated by PHMSA using the three phases of the Application Action Process, which are depicted in Figure 1. Every application received by PHMSA follows the same basic procedures during the Review for Application Completeness Phase and the Disposition Phase; however, the detailed processes followed during the Evaluation Phase vary by the application categories outlined in Section 4.2 of this document.

Note that the business processes for the renewal and modification of existing approvals are the same as the procedures outlined in this section. Consequently, the processes for these types of approval applications are not enumerated in this document. For more information on modifications and renewals, see 49 CFR 107.709.

Figure 1: Application Action Process



During the Review for Application Completeness Phase, PHMSA reviews application materials submitted for an approval to ensure the information meets all of the application requirements defined under 49 CFR Part 107, Subpart H, and is complete and sufficient to make a determination to grant or deny the application. During this phase, PHMSA may contact the applicant to clarify application information and details, if needed. If the application materials do not meet the specified requirements, the application may be rejected and the applicant notified. Section 4.1 describes the details of this phase.

The Evaluation Phase follows the initial Review for Application Completeness Phase. In this phase, PHMSA and the OAs (depending on the nature of the approval application) determine whether the proposed approval meets the requirements outlined in the HMR. There are five categories of approvals; the business processes followed during the Evaluation Phase vary based on the category of approval. Section 4.2 describes in more detail specific processes associated with the different process categories.

The final phase of the Application Action Process is the Disposition Phase. Based on the results of the Evaluation Phase, PHMSA grants or denies the approval. Applicants may petition for reconsideration and appeal if they are dissatisfied with the agency's decision. Section 4.3 describes the specific features of this phase.

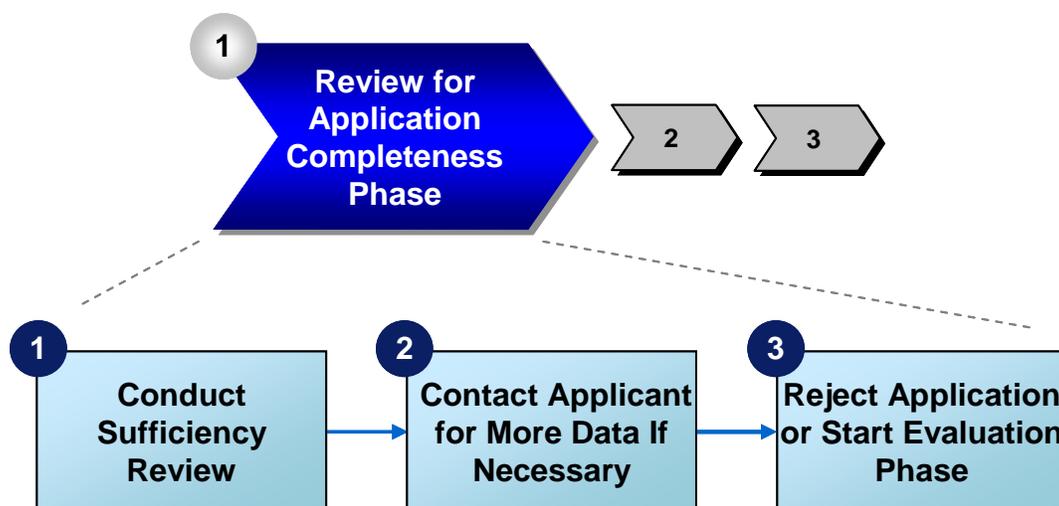
4.1 Review for Application Completeness

4.1.1 Purpose

The purpose of the Review for Application Completeness Phase is to determine whether an application received by PHMSA (regardless of approval category or type) has sufficient information required under 49 CFR Part 107 for the agency to evaluate the proposed approval. If the information contained in the application is sufficient, then the Application Action Process continues. However, if the applicant has not provided sufficient data in the application, PHMSA may request more data or reject the application outright.

4.1.2 Workflow

Figure 2: Review for Application Completeness Workflow



When PHMSA receives an application for an approval—regardless of approval type or category—the agency first reviews the application materials to determine whether the application includes the information, documentation, and justification required, and whether the information is sufficient as required under 49 CFR Part 107 to conduct a full evaluation.

Applicants may mail, e-mail, or fax their approval applications to PHMSA. When an application is received by PHMSA, a designated staff member reviews and assigns it to the appropriate Project Officer, depending on the content of the application.

After receiving the application, the Project Officer is responsible for generating a new folder in the Approvals IT System and populating the folder with the relevant application materials.⁷ At this time, the Project Officer also posts a notice on the PHMSA Website that the application has been received by the agency and is pending review. The Project Officer also ensures that a tracking number is assigned to the application and communicated to the applicant via e-mail or other means. This allows the applicant to check the status of the application online.

⁷ Note that, depending on the application type, this responsibility can be delegated to a contractor or administrative assistant.

After the Approvals IT System folder is generated and populated with all relevant files, the Project Officer performs the review for completeness, using the Application Completeness Form, which is located in Section 6.2.1. This review assesses whether the application materials include all of the information, documentation, and justification required by the HMR and whether enough information exists to complete a comprehensive evaluation of the application.

If the application requires a technical review, or review by an OA Coordinating Official, to determine whether the application materials are sufficient to move forward in the process, then the Project Officer sends the application materials via the Approvals IT System to the Senior Technical Officer or the appropriate OA Coordinating Official.

The Senior Technical Officer assigns the application materials via the Approvals IT System to the appropriate Technical Officer for review. The Technical Officer then completes the application review for sufficiency, analyzing the application materials to determine whether they are sufficient to move on to the next phase in the Application Action Process. A similar process occurs if OA review is required. After the technical or OA sufficiency review is completed, the Technical Officer or OA Coordinating Official returns the application via the Approvals IT System to the Project Officer.

If the application is incomplete, the Project Officer may request additional information from the applicant to be provided within 30 days or may draft a rejection letter explaining why the application was not accepted and send it to the Approving Official. At this point, the application enters the Disposition Phase of the process, described in Section 4.3 of this document.

If the application is complete, the Project Officer then moves the application into the Evaluation Phase, which is described in Section 4.2. It is important to note that the Project Officer may delegate some of the administrative responsibilities described above to the Administrative Assistant. This is left to the discretion of the Project Officer.

Specific steps involved in the Review for Application Completeness Phase are provided in Table 6 in Section 4.1.3 and in the corresponding process map provided in Section 6.3.1.

4.1.3 Procedures

Table 6: Review for Application Completeness Procedures

#	Description	Responsibility	Duration
1	Generate and Populate Approvals IT System Folder. The Project Officer is responsible for creating an application folder in the Approvals IT System, uploading the application, and populating other applicant information. If the application is not electronic, the Project Officer scans the application documents to create electronic files.	Project Officer	2 days
2	Notify Applicant of Receipt and Update Application Status on PHMSA Web Site. The Approvals IT System automatically sends an email to the applicant with the title and tracking number of the application.	Approvals IT System	Automated
3	Notify OAs and PHMSA Offices of Receipt of Application. Once a folder has been generated, the Approvals IT System sends an automatic	Approvals IT System	Automated

#	Description	Responsibility	Duration
	message to relevant PHMSA offices and OAs.		
4	Conduct Initial Completeness Review. The Project Officer determines whether the application meets the criteria outlined in the HMR and whether the information provided is adequate to conduct an appropriate evaluation. The Project Officer updates the Application Completeness Form and provides an explanation of the additional information needed from the applicant if appropriate.	Project Officer	NA
5	Determine whether Completeness Review is Needed by Technical Officer or OA Coordinating Official. The application may need additional technical or mode-specific information to be sufficient for evaluation. If review by the OA Coordinating Official is needed, skip to step 8. If additional technical review is needed, the Project Officer sends the application and Application Completeness Form to the Senior Technical Officer via the Approvals IT System; otherwise skip to step 9.	Project Officer	NA
6	Assign Application to Appropriate Technical Officer. The Senior Technical Officer assigns the application to the appropriate Technical Officer based on the subject of the application and area of expertise of staff.	Senior Technical Officer	NA
7	Conduct Completeness Technical Review. The Technical Officer determines whether additional information is necessary to perform the technical evaluation. The Technical Officer updates the Application Completeness Form and provides an explanation of the additional information needed from the applicant if appropriate.	Technical Officer	NA
8	Conduct Completeness OA Review. The OA Coordinating Official determines whether additional information is necessary to perform the technical evaluation. The OA Coordinating Official updates the Application Completeness Form and provides an explanation of the additional information needed from the applicant if appropriate.	OA Coordinating Official	NA
9	Determine whether Additional Information is Needed from the Applicant. The Project Officer reviews the Application Completeness Form and assesses whether the application is complete and ready for evaluation. If the application is complete, skip to step 15.	Project Officer	NA
10	Issue 30-Day Information Request Letter to Applicant. If additional information is needed, the Project Officer drafts a letter to the applicant using the explanations provided in the Application Completeness Form to justify the request for additional information. When requesting readily available information, the Project Officer may contact the applicant through the most efficient means available (e.g., phone, email, mail). If information is requested that may require significant time or resources for the applicant to attain, this request should be issued with a formal 30-Day Information Request Letter.	Project Officer	NA
11	Determine whether Applicant Provided Requested Information. If the applicant responds with the requested information within the allotted time frame, skip to step 15. If the applicant fails to respond or provide information that satisfies the request made in the 30-Day Information Request Letter, the Project Officer drafts a rejection letter. Note that applicants can request 30 days in addition to the time provided in the original 30-Day Information Request Letter.	Applicant	NA

#	Description	Responsibility	Duration
12	Draft Rejection Letter. The Project Officer drafts an application rejection letter stating the rationale for rejection. The Project Officer then sends the application to the Approving Official via the Approvals IT System for review.	Project Officer	NA
13	Review and Sign Application Rejection Letter. The Approving Official reviews and signs the rejection letter before it is sent electronically to the applicant via the Approvals IT System <end of process>.	Approving Official	NA
14	Rejection Letter Sent to Applicant and Application Status Updated on PHMSA Web Site. After the Approving Official signs the rejection letter, the Approvals IT System automatically sends the rejection letter to the applicant. Skip to step 28 in the Disposition Phase.	Approvals IT System	Automated
15	Finalize Application Completeness Form. The Project Officer reviews the Application Completeness Form to verify that all of the information needed for evaluation is included in the applications folder. After the Application Completeness Form is finalized, proceed to the Evaluation Phase. <End of phase>	Project Officer	NA

4.2 Application Evaluation

As noted in section 1.2, PHMSA issues 23 types of approvals. For the purposes of this document, approvals are organized into five different process categories. As previously noted, the key business processes used to evaluate approval requests vary depending on the category of approval.

Table 8 provides a summary of the five different process categories, displaying the key process features and approval types associated with each category. Note that approvals are not grouped according to subject matter or current organizational structure, but rather the manner in which PHMSA processes them. Subsequent sections describe the details of the business procedures used to process approvals in each category.

Table 7: Approval Process Categories

Process Category	Key Process Features	Approval Types
Registration	<ul style="list-style-type: none"> • Fitness review 	<ul style="list-style-type: none"> • M numbers for identification of domestic manufacturers • Visual cylinder requalifiers
Classification	<ul style="list-style-type: none"> • Fitness review • Confirm that proper tests were reported and evaluate results 	<ul style="list-style-type: none"> • Commercial explosives • Government explosives • Fireworks • Chemical oxygen generators • Self-reactive materials and organic peroxides
Third-Party Inspection	<ul style="list-style-type: none"> • Fitness review • Inspection by DOT-approved third party 	<ul style="list-style-type: none"> • Domestic cylinder requalifiers • Domestic cylinder repair / rebuild companies (k-number program) • Radioactive materials and packaging
DOT Inspection	<ul style="list-style-type: none"> • Fitness review • On-site inspection by DOT 	<ul style="list-style-type: none"> • Designated approval agencies • IIAs representing US cylinder companies • Foreign cylinder requalifiers • Foreign cylinder repair/rebuild companies (k-number program) • Foreign cylinder manufacturers with IIAs • UN/ISO cylinder manufacturers • UN third-party certification agencies • Explosive test labs • Lighter testing agencies
Safety Evaluation	<ul style="list-style-type: none"> • Fitness review • Safety evaluation by DOT 	<ul style="list-style-type: none"> • International IMDG/ICAO CAA • General CAA • Lithium batteries • Fuel cells

To evaluate a proposed approval in the **Registration Process Category**, PHMSA conducts a fitness review of the applicant. The agency does not typically conduct an on-site inspection of the applicant’s facilities prior to granting or denying an application for approval types under this category (i.e., M numbers for identification of domestic cylinder manufacturers, visual cylinder requalifiers) but has the option to do so as necessary. Inspections by third-party agencies are also not required for approvals in this process category.

At the end of the Application Action Process, depending on the outcome of the fitness review, PHMSA grants the applicant an approval with an expiration date. M numbers and identification numbers for visual cylinder requalifiers are included in this process category.

To assess a proposed approval in the **Classification Process Category**, PHMSA conducts a fitness review of the applicant and confirms that the applicant has properly tested the hazardous materials included in the approval application. Like approvals in the Registration Process Category, PHMSA does not typically perform on-site inspections of applicant’s facilities for approvals under the Classification Process Category though it has the option to do so as

necessary. Inspections by third-party agencies are also not required for approvals in this process category.

At the conclusion of the Application Action Process, after confirming that the applicant conducted the proper tests and is fit, PHMSA issues an approval. Commercial and government explosives, fireworks, and other hazardous materials shown in **Error! Reference source not found.** are included in this process category.

To review a proposed approval in the *Third-Party Inspection Process Category*, PHMSA performs a fitness review of the applicant and requires an applicant to receive an inspection from a third party approved by the agency.⁸ PHMSA is responsible for reviewing the results of all inspections conducted by third-party agencies, and for making the final determination on whether to grant or deny an approval request. Note that third-party inspection agencies do not act as agents of PHMSA.

At the end of the Application Action Process, depending on the results of the fitness review and third-party agency inspection, PHMSA grants or denies an approval to the applicant. Approvals in this process category include those for domestic cylinder requalifiers (excluding visual requalifiers, which are included in the Registration Process Category), domestic companies that rebuild and repair cylinders, and radioactive materials and packaging.

To assess a proposed approval in the *DOT Inspection Process Category*, PHMSA conducts a fitness review of the applicant and then performs an on-site inspection of the applicant's facilities to verify that it can adequately perform the activities authorized by the proposed approval. It is important to note that PHMSA personnel conduct the inspections required for approvals in this process category.

Depending on the outcomes of the fitness review and on-site inspection, PHMSA grants or denies an approval to the applicant. Approvals for independent inspection agencies (IIAs), UN third-party certification agencies, explosive test labs, and other entities shown in **Error! Reference source not found.** are included in this process category.

To review proposed approvals in the *Safety Evaluation Process Category*, PHMSA conducts a fitness review of the applicant, drafts an evaluation plan and timeline for processing the application, and then performs a safety evaluation. For approvals in this category, PHMSA may reach out to the OAs (i.e., FAA, FMCSA, FRA, and USCG) to assist with the evaluation. No on-site inspection is typically required for these types of approvals.

If an applicant is determined to be fit and the proposed approval is determined safe after thorough evaluation, PHMSA grants an approval. Competent Authority Approvals (CAAs), lithium battery approvals, and fuel cell approvals all fall into this process category.

The remainder of this section presents in more detail the purpose, workflow, and procedures for approvals in each of the five process categories described above.

⁸ Note that certain types of approvals for radioactive materials and packages do not require an inspection from a third party.

4.2.1 Applications for Registration Approvals

4.2.1.1 Purpose

The purpose of this phase is to determine whether an applicant is qualified to hold an approval in the Registration Process Category. Approvals in the Registration Process Category include:

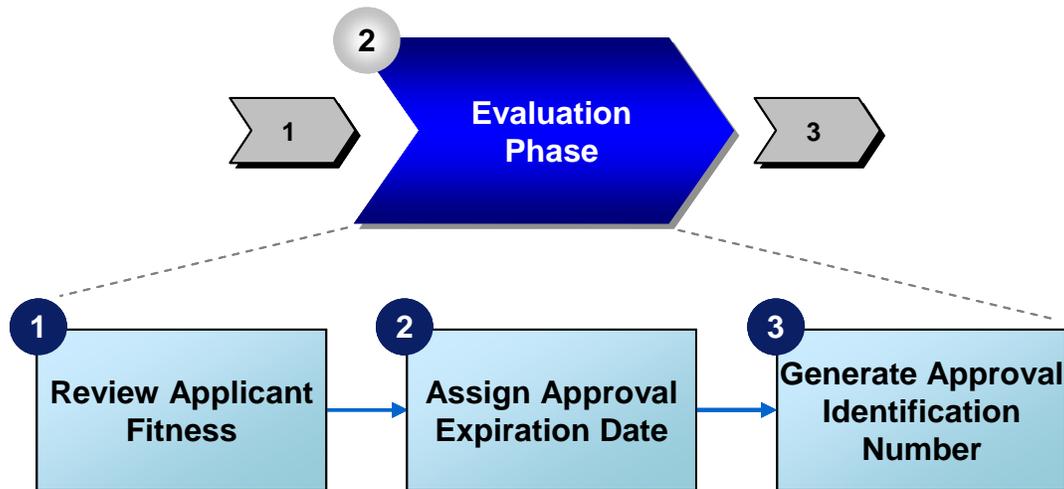
- M numbers for identification of domestic manufacturers
- Visual cylinder requalifiers.

4.2.1.2 Workflow

After PHMSA determines that an application for an approval in the Registration Process Category is complete, the agency evaluates the application to determine whether the applicant is qualified to hold the type of approval for which it has applied.

While it may differ depending on the nature of the application, the evaluation process for proposed approvals in the Registration Process Category typically involves three core procedures: (1) an applicant fitness review, (2) the assignment of an approval expiration date, and (3) the generation of an M or Visual Requalifier Identification Number.

Figure 3: Application Evaluation Workflow for Registration Approvals



4.2.1.2.1 Review Applicant Fitness

The objective of the applicant fitness review is to determine whether an applicant is “fit to conduct the activity authorized by the approval, or renewal or modification of approval.”⁹ PHMSA conducts different types of fitness reviews for different types of applicants. See Section 5.1 for a detailed description of the applicant fitness review sub-process.

⁹ 49 CFR 107.709(d)(5)

4.2.1.2.2 Assign Approval Expiration Date

If PHMSA determines that the applicant is fit to perform the activity authorized by the approval, the Project Officer assigns an expiration date for the approval, as stipulated by the HMR or PHMSA policy.

4.2.1.2.3 Generate Approval Identification Number

After completion of the fitness review and creation of an expiration date, the Project Officer uses the Approvals IT System to generate a unique identification number for the approval. This is either an M number or a Visual Requalifier Identification Number, depending on the application type.

4.2.1.3 Procedures

Table 8: Application Evaluation for Registration Approvals

#	Description	Responsibility	Duration
1	Conduct Fitness Review. At the beginning of the Evaluation Phase, the Project Officer is responsible for conducting a fitness review of the applicant. See the fitness review sub-process in Section 5.1 for details.	Project Officer	NA
2	Is Applicant Fit? The Project Officer determines whether the applicant is fit to conduct operations under the approval. If the applicant is determined unfit, the Project Officer denies the application and determines whether the applicant holds any additional approvals; see the fitness review sub-process in Section 5.1 for details. Skip to step 5.	Project Officer	NA
3	Assign Approval Expiration Date. If the applicant is fit, the Project Officer assigns an expiration date for the approval. Unless the applicant requests the approval for a shorter period of time, the Project Officer should assign the approval an expiration date as stipulated by the HMR or PHMSA policy.	Project Officer	NA
4	Generate Approval ID Number. After an expiration date is set, the Project Officer should use the Approvals IT System to generate an identification number for the approval (i.e., M number or Visual Requalifier Identification Number).	Approvals IT System	Automated
5	Draft Justification for Approval or Denial Letter. If the applicant is unfit, the Project Officer drafts a justification for denial letter. If the applicant is fit, the Project Officer drafts an approval letter.	Project Officer	NA
6	Review Application Materials for Completeness. The Project Officer reviews the Safety Evaluation Form and fitness review, and conducts a final review of the approval or denial letter, which includes checking for format, content, and spelling.	Project Officer	NA
7	Send Application to Approving Official. Once the application is completely evaluated, the Project Officer sends the application to the Approving Official via the Approvals IT System. See the Disposition Phase, which is in Section 4.3. <End of phase>	Project Officer	NA

4.2.2 Applications for Classification Approvals

4.2.2.1 Purpose

The purpose of this phase is to determine whether an applicant is qualified to hold an approval in the Classification Process Category. Approvals in the Classification Process Category include:

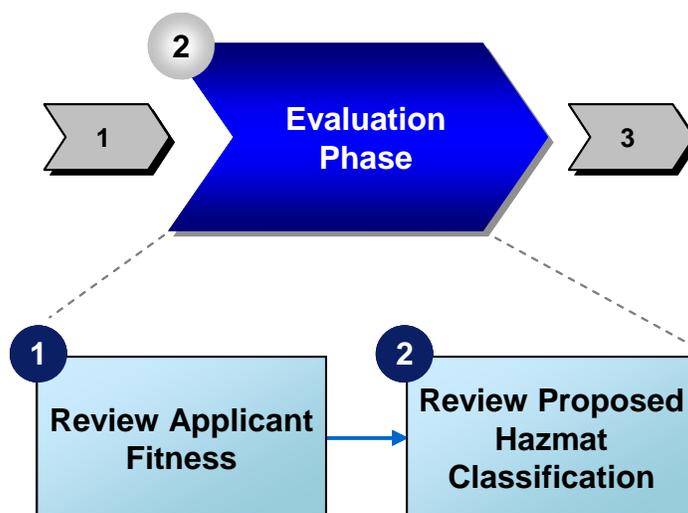
- Commercial explosives
- Government explosives
- Fireworks
- Chemical oxygen generators
- Self-reactive materials and organic peroxides.

4.2.2.2 Workflow

After PHMSA determines that an application for an approval in the Classification Process Category is complete, the agency evaluates the application to determine whether the applicant is qualified to hold the type of approval for which it has applied.

While it may differ depending on the nature of the application, the evaluation process for proposed approvals in the Classification Process Category typically involves two core procedures: (1) an applicant fitness review; and (2) a review of the proposed hazardous materials classification included in the application.

Figure 4: Application Evaluation Workflow for Classification Approvals



4.2.2.2.1 Review Applicant Fitness

The objective of the applicant fitness review is to determine whether an applicant is “fit to conduct the activity authorized by the approval, or renewal or modification of approval.”¹⁰

¹⁰ 49 CFR 107.709(d)(5)

PHMSA conducts different types of fitness reviews for different types of applicants. See Section 5.1 for a detailed description of the applicant fitness review sub-process.

4.2.2.2 *Review Proposed Hazmat Classification*

During this phase of the evaluation workflow for approvals in the Classification Process Category, PHMSA reviews applications to verify that applicants are attempting to obtain the correct classifications for their products. With the exception of government explosives¹¹, which are reviewed and classified by the DOE and DOD, PHMSA performs this type of review on all classification approvals, including fireworks, commercial explosives, self-reactive materials and organic peroxides, and chemical oxygen generators.

When completing this review, either the Project Officer or Technical Officer—depending on the content of the application—reviews the application to determine whether the applicant followed the stipulations of the HMR when creating the application.

For fireworks applications, the Project Officer verifies that the proposed fireworks product conforms to APA Standard 87-1 (see **Error! Reference source not found.** for definition). If the product does not conform to APA Standard 87-1, the Project Officer denies the application as specified by PHMSA policy. The Project Officer then drafts a denial letter and moves the application to the Disposition Phase of the Application Action Process, which is detailed in Section 4.3 of this SOP. If the product conforms to the standard, the Project Officer determines whether a Technical Officer needs to review the application.

If the fireworks application needs a technical review, the Project Officer sends the application via the Approval IT System to the Technical Officer for evaluation. Otherwise, the Project Officer conducts the evaluation to determine whether the proposed product classification is correct by comparing the product specifications in the application with rules outlined in APA Standard 87-1 and the HMR. If the application needs technical review, the Technical Officer makes a determination of whether the proposed product should be classified as a fireworks device. These determinations are documented in the Application Evaluation Form. See Section 0 for more details on the Application Evaluation Form.

Once these reviews are complete and the Application Evaluation Form is completed, the Project Officer (or the Technical Officer, depending on the content of the application) makes a recommendation to deny or authorize the approval. At this point, the Project Officer (or Technical Officer) drafts justification language for the approval or denial letter and moves the application into the Disposition Phase of the Application Action Process, which is described in Section 4.3.

For other types of applications, including commercial explosives, self-reactive materials and organic peroxides, and chemical oxygen generators, the Technical Officer reviews the test results contained in the application to ensure that the proposed classification is correct. The Technical Officer uses his or her professional judgment and the criteria outlined in the HMR to ascertain

¹¹ Explosives owned or under the responsibility of a government agency

whether the proposed classification fits the product outlined in the application. Again, the results of the Technical Officer’s evaluation are documented in the Application Evaluation Form.

Once the review of all the application data is complete, the Technical Officer makes a recommendation to deny or authorize the approval. The Technical Officer then drafts the justification language for the approval or denial letter and moves the application into the Disposition Phase of the Application Action Process, which is described in detail in Section 4.3.

4.2.2.3 Procedures

Table 9: Application Evaluation for Classification Approvals

#	Description	Responsibility	Duration
1	Conduct Fitness Review. At the beginning of the Evaluation Phase, the Project Officer is responsible for conducting a fitness review of the applicant. See the fitness review sub-process in section 5.1 for details.	Project Officer	NA
2	Is Applicant Fit? The Project Officer determines whether the applicant is fit to conduct operations under the approval. If the applicant is determined unfit, the Project Officer denies the application and determines whether the applicant holds any additional approvals; see the fitness review sub-process in Section 5.1 for details. Skip to step 20.	Project Officer	NA
3	Is Applicant Requesting a Fireworks Approval? If the applicant is requesting a fireworks approval, the Project Officer evaluates the application to determine whether the proposed firework device is covered by APA Standard 87-1. If the applicant is requesting an approval for commercial explosives, chemical oxygen generators, or organic peroxides and self-reactive materials, then skip to step 6.	Project Officer	NA
4	Is Fireworks Device Covered by APA 87-1? If the applicant has applied for a fireworks approval for a device not covered by APA Standard 87-1, the Project Officer drafts a denial letter. Skip to step 20.	Project Officer	NA
5	Does Application Require Technical Evaluation? If yes, the Project Officer sends the application via the Approvals IT System to the Senior Technical Officer; otherwise skip to step 16.	Project Officer	NA
6	Assign Application to Technical Officer. The Senior Technical Officer assigns the application to the appropriate Technical Officer.	Senior Technical Officer	NA
7	Evaluate Application. The Technical Officer evaluates the application to determine whether the proposed classification of hazardous materials is correct and documents findings in the Application Evaluation Form. The Technical Officer uses available tools (e.g., ISYS) to check for previous applications that may provide information regarding how similar applications were previously classified.	Technical Officer	NA
8	Is Proposed Hazmat Classification Correct? If yes, skip to step 10.	Technical Officer	NA
9	Correct Classification. If the applicant has proposed an incorrect classification for the hazardous materials in the application, the Technical Officer determines the correct classification for the material and revises the approval and updates the Application Evaluation Form.	Technical Officer	NA
10	Complete Technical Evaluation. The Technical Officer completes the Application Evaluation Form and justification for authorization or denial of the approval.	Technical Officer	NA

#	Description	Responsibility	Duration
11	Draft Approval or Denial Letter. The Technical Officer uses the justification drafted in the Application Evaluation Form to populate the boilerplate approval or denial letter. The application is then sent to the Senior Technical Officer for review via the Approvals IT System.	Technical Officer	NA
12	Review Technical Evaluation. The Senior Technical Officer reviews the technical evaluation and recommendation.	Senior Technical Officer	NA
13	Concur with Technical Evaluation? If yes, the Senior Technical Officer returns the technical evaluation to the Technical Officer. Skip to step 15. If the Senior Technical Officer does not concur with the evaluation, he/she sends the technical evaluation with comments and/or suggestions to the Technical Officer via the Approval IT System.	Senior Technical Officer	NA
14	Review Comments. The Technical Officer reviews comments from the Senior Technical Officer and reevaluates the application. If questions still exist, the Technical Officer and Senior Technical Officer meet to discuss issues over the technical evaluation and then send their final recommendation to the Project Officer via the Approvals IT System. Repeat steps 7 through 13.	Senior Technical Officer and Technical Officer	NA
15	Send Recommendation to Project Officer. The Technical Officer sends the application materials, including the justification language and recommendation for the approval, to the Project Officer via the Approvals IT System. Skip to step 21.	Technical Officer	NA
16	Evaluate Application. If the application does not require technical review, the Project Officer completes the Application Evaluation Form and drafts the justification language for the application. The Project Officer uses available tools (e.g., ISYS) to check for previous applications that may provide information regarding how similar applications were previously classified. The Project Officer evaluates the application to determine whether the proposed classification of hazardous materials is correct and documents findings in the Application Evaluation Form.	Project Officer	NA
17	Is Proposed Hazmat Classification Correct? If yes, skip to step 19.	Project Officer	NA
18	Correct Classification. If the applicant has proposed an incorrect classification for the hazardous materials in the application, the Project Officer determines the correct classification for the material and revises the approval and updates Application Evaluation Form.	Project Officer	NA
19	Complete Evaluation. The Project Officer completes the Application Evaluation Form and justification for authorization or denial of the approval.	Project Officer	NA
20	Draft Approval or Denial Letter. If the applicant is unfit or the application is otherwise deficient, the Project Officer drafts a justification for denial letter. If the applicant is fit and otherwise adequate, the Project Officer drafts an approval letter. The Project Officer uses the justification drafted in the Application Evaluation Form to populate the boilerplate approval or denial letter.	Project Officer	NA
21	Review Application Materials for Completeness. The Project Officer reviews the Application Evaluation Form and fitness review, and conducts a final review of the approval or denial letter, which includes checking for format, content, and spelling.	Project Officer	NA
22	Generate Classification Number. If approval is recommended, assign EX number to the application.	Approvals IT System	Automated

#	Description	Responsibility	Duration
23	Send Application to Approving Official. Once the application is completely evaluated, the Project Officer sends the application to the Approving Official via the Approvals IT System. See the Disposition Phase, which is in Section 4.3. <End of phase>	Project Officer	NA

4.2.3 Applications for Third-Party Inspection Approvals

4.2.3.1 Purpose

The purpose of this phase is to determine whether an applicant is qualified to hold an approval in the Third-Party Inspection Process Category. Approvals in the Third-Party Inspection Process Category include:

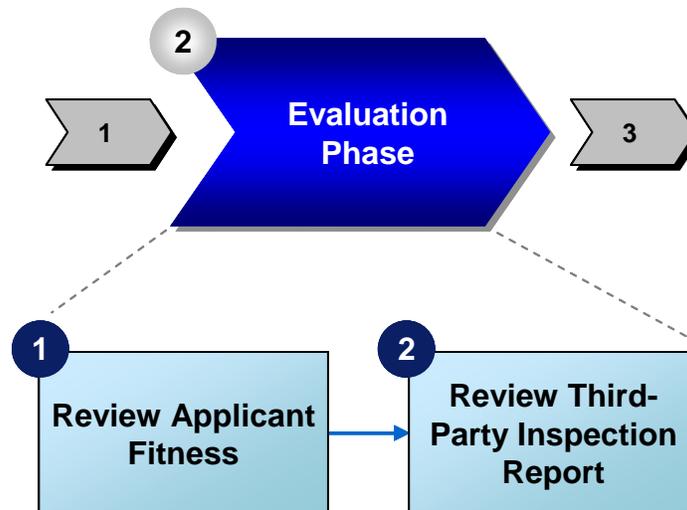
- Domestic cylinder requalifiers
- Domestic cylinder repair/rebuild companies (k-number program)
- Radioactive materials and packaging.

4.2.3.2 Workflow

After PHMSA determines that an application for an approval in the Third-Party Inspection Process Category is complete, the agency evaluates the application to determine whether the applicant is qualified to hold the type of approval for which it has applied.

While it may differ depending on the nature of the application, the evaluation process for proposed approvals in the Third-Party Inspection Process Category typically involves two core procedures: (1) an applicant fitness review; and (2) a review of the Third-Party Inspection Report completed as part of the application.

Figure 5: Application Evaluation Workflow for Third-Party Inspection Approvals



4.2.3.2.1 *Review Applicant Fitness*

The objective of the applicant fitness review is to determine whether an applicant is “fit to conduct the activity authorized by the approval, or renewal or modification of approval.”¹²

PHMSA conducts different types of fitness reviews for different types of applicants. See Section 5.1 for a detailed description of the applicant fitness review sub-process.

4.2.3.2.2 *Review Third-Party Inspection Report*

Applicants requesting an approval in the Third-Party Inspection Process Category need to obtain an inspection from a third party approved by PHMSA.¹³ As part of the evaluation, the Project Officer is responsible for reviewing the inspection report that is submitted with the application.

For approval requests from domestic cylinder requalifiers and domestic cylinder repair/rebuild companies, the Project Officer reviews the inspection report from the applicant’s IIA. An IIA is an entity that is approved by PHMSA to conduct inspections of cylinder manufacturers and firms that repair or rebuild cylinders. It is important to note, however, that an IIA is not an agent or representative of PHMSA.

During this phase of the evaluation, the Project Officer is responsible for verifying that the IIA performed all required activities during the inspection, and that the applicant is in fact qualified to perform the actions authorized by the proposed approval. After the Project Officer finishes reviewing the inspection report, he or she documents the results of the evaluation in the Application Evaluation Form, which is placed in the Approvals IT System. Depending on the outcome of the evaluation, the Project Officer drafts the justification language for an approval or denial letter that is included in the application folder in the Approvals IT System.

For approval requests involving the domestic transport of radioactive materials or packaging, the Technical Officer is responsible for reviewing an evaluation completed by the NRC. The NRC is responsible for evaluating regulated radioactive materials and packaging transported within the United States. During this part of the application evaluation, the Technical Officer is responsible for verifying that the NRC has completed the proper evaluation.

After reviewing the NRC evaluation, the Technical Officer makes a determination to grant or deny the approval request. This determination is documented in the Application Evaluation Form, which is placed in the application folder in the Approvals IT System. Once a decision is made, the Technical Officer drafts the language for the approval or denial letter and then moves the application into the Disposition Phase of the Application Action Process.

For proposed approvals involving the international transport of radioactive materials or packaging, the Technical Officer conducts an initial review of the application to ensure that the applicant is meeting the requirements of the HMR. Then the Technical Officer sends the application to the NRC.

¹² 49 CFR 107.709(d)(5)

¹³ Note that certain types of approvals for radioactive materials and packages do not require an inspection from a third party.

Technical experts at the NRC are responsible for writing a detailed Safety Evaluation Report (SER). Once the report is complete, the NRC sends the SER to PHMSA for review. The Technical Officer is then responsible for reviewing the SER to determine whether to authorize or deny the approval request. After a determination is made, the Technical Officer completes the Application Evaluation Form and drafts the language for the approval or denial letter and then moves the application into the Disposition Phase.

Approval requests involving regulated quantities of uranium hexafluoride are unique because they do not require review by the NRC. For these types of approvals, the Technical Officer completes an evaluation of the application to determine whether the proposed approval would meet the provision outlined in the HMR. After the evaluation, the Technical Officer makes a determination to authorize or deny the application, and then drafts the language for the approval or denial letter. The Technical Officer then moves the application into the Disposition Phase.

4.2.3.3 Procedures

Table 10: Application Evaluation for Third-Party Inspection Approvals

#	Description	Responsibility	Duration
1	Conduct Fitness Review. At the beginning of the Evaluation Phase, the Project Officer is responsible for conducting a fitness review on the applicant. See the fitness review sub-process in Section 5.1 for details.	Project Officer ¹⁴	NA
2	Is Applicant Fit? The Project Officer determines whether the applicant is fit to conduct operations under the approval. If the applicant is determined unfit, the Project Officer denies the application and determines whether the applicant holds any additional approvals; see the fitness review sub-process in Section 5.1 for details. If the applicant is unfit, skip to step 18.	Project Officer	NA
3	Is Applicant Applying for a Radioactive Materials Approval? If yes, skip to step 10.	Project Officer	NA
4	Review Test Results from Independent Inspection Agent. The Project Officer reviews the results of the inspection conducted by the IIA for the domestic cylinder manufacturer or repair/rebuild firm applying for the approval (depending on the proposed approval type). During this review, the Project Officer verifies that the proper activities and tests were conducted during the inspection.	Project Officer	NA
5	Evaluate Application. The Project Officer completes the Application Evaluation Form and drafts the justification language recommending an approval or denial.	Project Officer	NA
6	Draft Approval or Denial Letter. If the applicant is unfit or the application is otherwise deficient, the Project Officer drafts the justification for denial letter. If the applicant is fit and otherwise adequate, the Project Officer drafts an approval letter. The Project Officer uses the justification drafted in the Application Evaluation Form to populate the boilerplate approval or denial letter.	Project Officer	NA

¹⁴ Note that the Project Officer and Technical Officer role may be held by the same person for applications involving radioactive materials and packaging.

#	Description	Responsibility	Duration
7	Review Application Materials for Completeness. The Project Officer reviews the Application Evaluation Form and fitness review, and conducts a final review of the approval or denial letter, which includes checking for format, content, and spelling.	Project Officer	NA
8	Generate ID Number. If approval is recommended, the Approvals IT System assigns a Requalifier Identification Number (RIN) for approvals to requalify cylinders. K numbers are issued for approvals that authorize the repair/rebuild of DOT cylinders.	Approvals IT System	Automated
9	Send Application to Approving Official. Once the application is completely evaluated, the Project Officer sends the application to the Approving Official via the Approvals IT System. See the Disposition Phase, which is in Section 4.3. <End of phase>	Project Officer	NA
10	Assess Radioactive Materials Application Type. The Senior Technical Officer reviews the application to ascertain what type of radioactive materials approvals the applicant is seeking. The Senior Technical Officer then assigns the application to the appropriate Technical Officer. If the applicant is applying to transport radioactive regulated quantities of uranium hexafluoride, continue to step 11. If the applicant is applying to transport radioactive materials domestically, skip to step 12. If the applicant is applying to transport radioactive materials internationally, skip to step 14.	Senior Technical Officer	NA
11	Conduct Evaluation. For approval applications involving regulated quantities of uranium hexafluoride, the Technical Officer completes an evaluation of the application using the Safety Evaluation Form to determine whether the proposed approval would meet the provision outlined in the HMR. Skip to step 17.	Technical Officer	NA
11 2	Review Nuclear Regulatory Commission Evaluation. For approval applications involving domestic transport of certain radioactive materials, the NRC completes the initial safety evaluation. Once this is complete, PHMSA reviews the evaluation to verify that it, along with the rest of the evaluation, conforms to the appropriate regulations.	Technical Officer ¹⁵	NA
13	Complete Technical Evaluation. After reviewing the NRC evaluation, the Technical Officer completes the Safety Evaluation Form and justification for authorization or denial of the approval. After technical evaluation is complete, skip to step 17.	Technical Officer	NA
14	Conduct Initial Evaluation. For approval applications involving international transport of certain radioactive materials, the Technical Officer completes an initial evaluation of the application using the Application Evaluation Form and then sends it to the NRC for further review.	Technical Officer	NA
15	Conduct Safety Evaluation. The NRC Coordinating Official conducts a more comprehensive evaluation of the approval application and documents this evaluation in the SER. Once complete, the SER is sent to PHMSA by the NRC Coordinating Official.	NRC Coordinating Official	NA

¹⁵ Note that the role of Technical Officer and Project Officer are performed by the same individual for RAM approval applications.

#	Description	Responsibility	Duration
16	Review NRC SER. The Technical Officer reviews the SER produced by NRC to verify that all required safety reviews were conducted by the agency. After reviewing the NRC SER, the Technical Officer completes the Safety Evaluation Form, which includes the justification for authorization or denial of the approval.	Technical Officer	NA
17	Draft Approval or Denial Letter. If the applicant is unfit or the application is otherwise deficient, the Project Officer drafts the justification for denial letter. If the applicant is fit and otherwise adequate, the Project Officer drafts an approval letter. The Project Officer uses the justification drafted in the Safety Evaluation Form to populate the boilerplate approval or denial letter.	Project Officer	NA
18	Review Application Materials for Completeness. The Project Officer reviews the Safety Evaluation Form and fitness review, and conducts a final review of the approval or denial letter, which includes checking for format, content, and spelling.	Project Officer	NA
19	Attach SER for Applicant. The Project Officer includes the SER completed by the NRC to provide additional explanation and justification for the applicant.	Project Officer	NA
20	Review Technical Evaluation. The Senior Technical Officer reviews the technical evaluation and recommendation.	Senior Technical Officer	NA
21	Send Application to Approving Official. Once the application is completely evaluated, the Project Officer sends the application to the Approving Official via the Approvals IT System. (Note that whether PHMSA denies or grants a RAM approval, the agency informs the NRC of its decision.) See the Disposition Phase, which is in Section 4.3. <End of phase>	Senior Technical Official	NA

4.2.4 Applications for DOT Inspection Approvals

4.2.4.1 Purpose

The purpose of this step is to determine whether an applicant is fit and capable of operating in accordance to the specifications outlined in the approval. The approval application types listed below all require a thorough fitness review and on-site inspection conducted by the DOT prior to approval to determine whether the applicant is fit and capable of safely executing the actions specified in the requested approval.

Approvals in the DOT Inspection Process Category include:

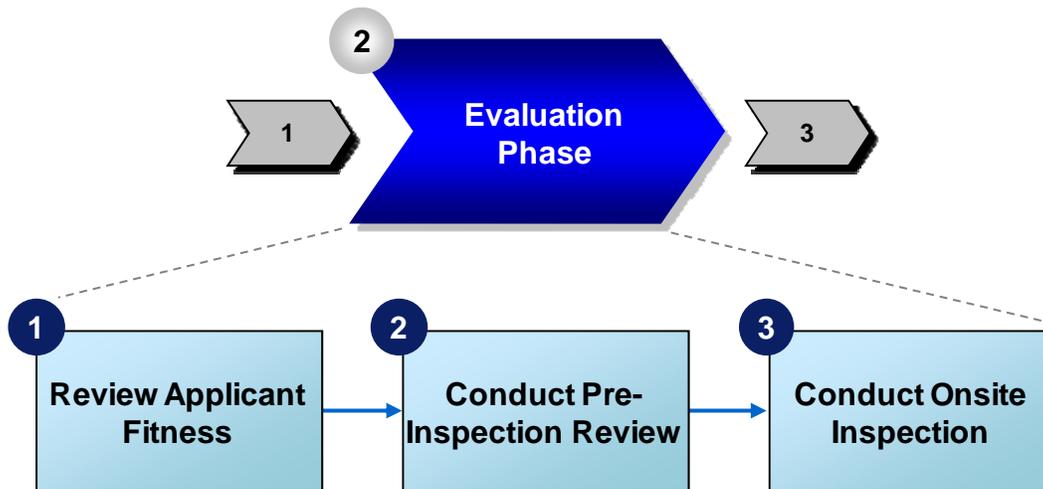
- IIAs representing US cylinder companies
- Foreign cylinder requalifiers
- Foreign cylinder repair/rebuild companies (k-number program)
- Foreign cylinder manufacturer with IIA
- UN/ISO cylinder manufacturer
- UN third-party certification agencies
- Explosive test labs

- Lighter testing agencies.

4.2.4.2 Workflow

After PHMSA determines that a DOT Inspection Approval is complete, the agency performs a fitness review of the applicant. Additionally, PHMSA coordinates and conducts an on-site inspection to determine whether the applicant is fit and capable of performing the actions specified in the approval request. While it may differ slightly depending on the nature of the application, the evaluation process for a DOT Inspection Approval typically involves three core procedures: (1) an applicant fitness review, (2) a pre-inspection review, and (3) an on-site inspection.

Figure 6: Application Workflow for DOT Inspection Approvals



4.2.4.2.1 Review Applicant Fitness

The objective of the applicant fitness review is to determine whether an applicant is “fit to conduct the activity authorized by the approval, or renewal or modification of approval.”¹⁶ PHMSA conducts different types of fitness reviews for different types of applicants. See Section 5.1 for a detailed description of the applicant fitness review sub-process.

4.2.4.2.2 Conduct Pre-Inspection Review

The pre-inspection review includes a thorough evaluation of the application and the specifications of the approval requested. The fitness evaluation and the pre-inspection review are used to determine whether the applicant merits an on-site inspection. If the application is not found sufficient to conduct an on-site inspection, it is denied or additional information is requested from the applicant. The applicant has 30 days to respond to the information request letter and may request an extension of up to 30 days. The purpose of a thorough pre-inspection review is to determine whether an application merits an on-site inspection, which requires additional time and resources on behalf of the applicant and PHMSA.

¹⁶ 49 CFR 107.709(d)(5)

4.2.4.2.3 Conduct On-Site Inspection

On-site inspections are conducted by the DOT to determine whether an applicant is fit and capable of operating in accordance with the specifications outlined in the approval. Before the on-site inspection can take place, the PHMSA inspector is responsible for coordinating all scheduling and relevant financial logistics with the applicant. The procedures for conducting on-site inspections are specific to the application type, but all on-site inspections evaluate the fitness and ability of the applicant to safely perform the activities outlined in their approval request. After the on-site inspection is complete, the inspector drafts an Inspection Report that is used to justify the approval or denial letter (see Section 6.2.4 for the Inspection Report template). Depending on the outcome of the on-site inspection, an approval or denial letter is drafted and reviewed before it is sent to the Approving Official.

4.2.4.3 Procedures

Table 11: Application Evaluation for DOT Inspection Approvals

#	Description	Responsibility	Duration
1	Conduct Fitness Review. At the beginning of the Evaluation Phase, the Project Officer is responsible for conducting a fitness review on the applicant. See the fitness review sub-process in Section 5.1 for details.	Project Officer	NA
2	Is Applicant Fit? The Project Officer determines whether the applicant is fit to conduct operations under the approval. If the applicant is determined unfit, the Project Officer denies the application and determines whether the applicant holds any additional approvals; see the fitness review sub-process in Section 5.1 for details. Skip to step 5.	Project Officer	NA
3	Is Approval Cylinder Related? If yes (i.e., IIAs representing US cylinder companies, foreign cylinder requalifiers, foreign cylinder repair/rebuild companies (k-number program), foreign cylinder manufacturer with IIA, UN/ISO cylinder manufacturer), steps 4-8 will be performed by the Project Officer. If no (i.e., UN third-party certification agencies, explosive test labs, lighter testing agencies), steps 4-8 will be performed by the Technical Officer, and step 9 will be performed by the Senior Technical Officer.	Project Officer	NA
4	Conduct Pre-Inspection Review. Evaluate application and determine whether the applicant is ready to be inspected. If not, communicate with the applicant to explain what additional information needs to be provided or what changes need to be made for the application to move forward.	Project Officer/ Technical Officer	NA
5	Coordinate Inspection with Applicant. Establish a time to conduct the on-site inspection and arrange for expenses and other administrative items.	Project Officer/ Technical Officer	NA
6	Conduct On-site Inspection. Travel to the location where the applicant is seeking approval. Follow inspection procedures for the specific approval type and conduct an on-site fitness evaluation.	Project Officer/ Technical Officer	NA
7	Draft Inspection Report. After the on-site inspection is completed, an Inspection Report is drafted detailing the findings of the inspection using a standard template.	Project Officer/ Technical Officer	NA

#	Description	Responsibility	Duration
8	Draft Approval or Denial Letter. If the applicant is unfit or the application is otherwise deficient, then draft the justification for denial letter. If the applicant is fit and otherwise adequate, then draft an approval letter. The Project Officer uses the justification drafted in the Safety Evaluation Form to populate the boilerplate approval or denial letter. If approval is cylinder related, skip to step 10.	Project Officer/ Technical Officer	NA
9	Review Technical Evaluation. The Senior Technical Officer reviews the technical evaluation and recommendation.	Senior Technical Officer	NA
10	Review Application Materials for Completeness. The Project Officer reviews the Safety Evaluation Form and fitness review, and conducts a final review of the approval or denial letter, which includes checking for format, content, and spelling.	Project Officer	NA
11	Assign Expiration Date and Reporting Requirements to Approval. If the application is approved, the Project Officer is responsible for assigning an expiration date and relevant reporting requirements for each approval. Additional reporting guidance and templates should also be included for distribution with the approval letter.	Project Officer	NA
12	Send the Application to Approving Official. Once the evaluation is complete, send to the Approving Official via the Approvals IT System; skip to step 1 of the Disposition Phase.	Approving Official	NA

This concludes the application evaluation process for DOT Inspection Approvals. At this point, the application moves to the Disposition Phase of the Application Action Process, which is described in Section 4.3.

4.2.5 Applications for Safety Evaluation Approvals

4.2.5.1 Purpose

The purpose of this step is to determine whether an applicant is fit and capable of operating safely in accordance to the specifications outlined in the approval. The approval application types listed below require a fitness review, evaluation plan, and thorough safety evaluation to be completed.

Approvals in the Safety Evaluation Process Category include:

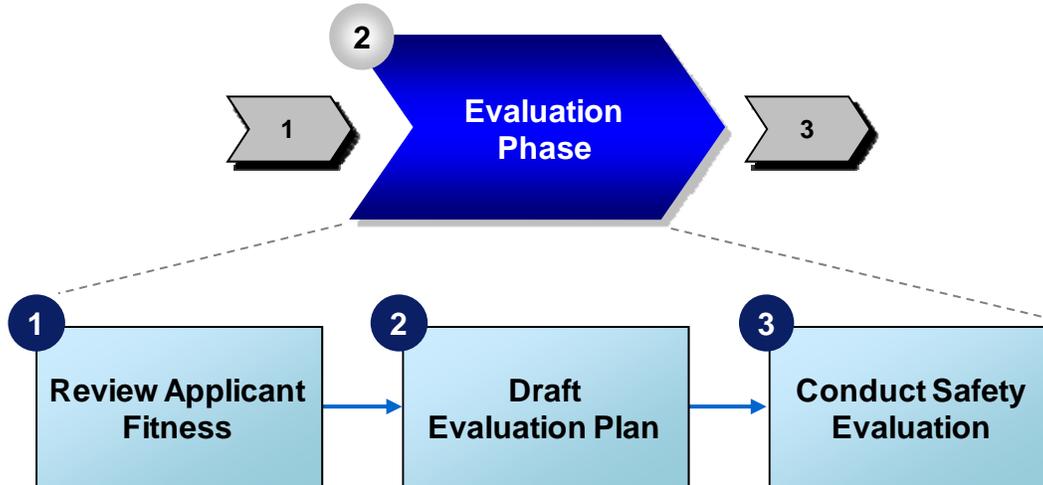
- International IMDG/ICAO CAA
- General CAA
- Lithium batteries
- Fuel cells.

4.2.5.2 Workflow

After PHMSA determines that a Safety Evaluation Approval is complete, the agency performs a fitness review of the applicant. After applicant fitness is determined, an evaluation plan is developed to outline the necessary evaluation steps and milestones of the Safety Evaluation Approval. The evaluation plan is then implemented to ensure that a thorough and complete safety evaluation is conducted and fully documented. While it may differ slightly depending on

the nature of the application, the evaluation process for Safety Evaluation Approvals typically involves three core steps: (1) an applicant fitness review, (2) an evaluation plan, and (3) a safety evaluation.

Figure 7: Application Workflow for Safety Evaluation Approvals



4.2.5.2.1 Review Applicant Fitness

The objective of the applicant fitness review is to determine whether an applicant is “fit to conduct the activity authorized by the approval, or renewal or modification of approval.”¹⁷ PHMSA conducts different types of fitness reviews for different types of applicants. See Section 5.1 for a detailed description of the applicant fitness review sub-process.

4.2.5.2.2 Draft Evaluation Plan

The Project Officer is responsible for drafting an evaluation plan, which includes outlining the necessary evaluation steps and milestones of the Safety Evaluation Approval. After reviewing the application, the Project Officer determines which PHMSA Office Liaisons and OA Coordinating Officials need to be involved in the evaluation of the application. This determination is based on triggers and criteria established by the OAs and PHMSA offices. OAs and PHMSA offices may request to be involved even if the need for their involvement was not specifically triggered.

The Project Officer proposes an initial evaluation plan that outlines the order in which relevant contacts will be evaluating the application and provides rough estimates on anticipated completion time. The drafted evaluation plan will then be sent to and coordinated with PHMSA Office Liaisons and OA Coordinating Officials that are included in the evaluation plan, to ensure those involved have the opportunity to provide input and understand expectations.

¹⁷ 49 CFR 107.709(d)(5)

4.2.5.2.3 Conduct Safety Evaluation

During this phase of the application process, the Project Officer reviews the evaluation plan and sends the application materials to the individuals responsible for conducting the primary safety evaluation (e.g., Senior Technical Officer, Technical Officer, OA Coordinating Officials). The individual responsible for completing the primary safety evaluation uses his or her professional judgment and historical precedence to assess the applicant’s explanation of equivalent level-of-safety or justification for alternatives provided. The Application Evaluation Form is provided to complete this step of the process. A copy of this form can be found in Section 6.2.3 of this SOP. The completed form is included in the Approvals IT System folder for the approval application.

It is important to note that the Project Officer may complete the safety evaluation if the application is of a non-technical nature (e.g., General CAA,). Also, an OA Coordinating Official can be delegated responsibility to act as the Technical Officer for mode-specific approval applications and complete the safety evaluation. In these instances, the Coordinating Official uses the Application Evaluation Form to complete his or her review.

Once the safety evaluation is complete, the Project Officer reviews the evaluation language. At this time, the Project Officer prepares the final draft of the approval or the denial letter, depending on the outcome of the safety evaluation. The Project Officer also coordinates with the OAs at this point in the process if formal modal coordination is included as part of the evaluation plan. The relevant OAs (i.e., FAA Coordinating Official, FMCSA Coordinating Official, FRA Coordinating Official, and USCG Coordinating Official) review the application materials and the technical evaluation and provide comments and recommendations. OAs may also recommend operational restrictions or limitations to be incorporated into the approval. It is the responsibility of the OAs to inform the Project Officer of their comments and recommendations as referenced in the Section 3.10 on OA Coordinating Officials.

If the OAs do not concur with the recommendation based on the evaluation made by PHMSA, the Project Officer sends the application materials, along with any input from the OAs, to the Approving Official. The Approving Official coordinates with the Administrator, as appropriate, and then works with the OAs to reach a resolution.

Once a recommendation has been made to issue or deny an approval, the Project Officer either finalizes the approval or drafts and sends a denial letter to the Approving Official for review.

4.2.5.3 Procedures

Table 12: Application Evaluation for Safety Evaluation Approvals

#	Description	Responsibility	Duration
1	Conduct Fitness Review. At the beginning of the Evaluation Phase, the Project Officer is responsible for conducting a fitness review of the applicant. See the fitness review sub-process in Section 5.1 for details.	Project Officer	NA
2	Is Applicant Fit? The Project Officer determines whether the applicant is fit to conduct operations under the approval. If the applicant is determined unfit, the Project Officer denies the application and determines whether the applicant holds any additional approvals; see the fitness review sub-process in Section 5.1 for details. Skip to step 9.	Project Officer	NA

#	Description	Responsibility	Duration
3	Determine Participants Needed for Evaluation. After reviewing the application, the Project Officers determines which PHMSA Office Liaisons and OA Coordinating Officials need to be involved in the evaluation of the application. This determination is based on triggers and criteria established by the OAs and PHMSA offices. OAs and PHMSA offices may request to be involved even if the need for their involvement was not specifically triggered.	Project Officer	NA
4	Draft Evaluation Plan. The Project Officer proposes an initial plan that outlines the order in which relevant contacts will be evaluating the application and provides rough estimates on anticipated completion time. The drafted evaluation plan will then be sent to and coordinated with PHMSA Office Liaisons and OA Coordinating Officials that are included in the evaluation plan, to ensure those involved have the opportunity to provide input and understand expectations.	Project Officer	NA
5	Does Evaluation Plan Involve Additional Participants? If yes, the Project Officer is responsible for communicating with the relevant PHMSA Offices and OA Coordinating Officials to review the evaluation plan. If no, skip to step 8.	Project Officer	NA
6	Assign Application to Technical Officer. If the application is a technical evaluation, the Senior Technical Officer assigns the application to the appropriate Technical Officer.	Senior Technical Officer	NA
7	Review and Validate Draft Evaluation Plan. PHMSA Office Liaisons and OA Coordinating Officials involved in the evaluation process provide input and modify the evaluation plan as necessary.	PHMSA Office Liaisons, OA Coordinating Officials ¹⁸	NA
8	Conduct Final Review of Evaluation Plan. The Project Officer compiles input from evaluators and updates the evaluation plan.	Project Officer	NA
9	Draft Initial Version of Approval or Denial Letter. The Project Officer uses boilerplate language and information from the application to draft an initial version of the approval or denial letter based on the Project Officer's initial review. The Project Officer sends the application folder to the Senior Technical Officer via the Approvals IT System.	Project Officer	NA
10	Assign Application to Technical Officer. The Senior Technical Officer assigns the application to the appropriate Technical Officer for evaluation.	Senior Technical Officer	NA
11	Conduct Safety Evaluation. The Technical Officer evaluates the application to determine whether the approval achieves a level of safety as provided under the HMR. The safety evaluation should be conducted using the Safety Evaluation Form; refer to Section 6.2.3 for details.	Technical Officer	NA
12	Consult Modes as Necessary. The Technical Officer consults with the OA Coordinating Officials on the safety evaluation (if necessary).	Technical Officer	NA
13	Complete Safety Evaluation Form. The Technical Officer completes the Safety Evaluation Form, which includes providing the technical justification for an approval or denial letter.	Technical Officer	NA

¹⁸ Only participants identified in step 24 would review and validate the evaluation plan.

#	Description	Responsibility	Duration
14	Update Approval or Denial Letter with Technical Justification. The Project Officer uses the technical justification drafted in the Safety Evaluation Form to update the pre-drafted approval or denial letter. The Technical Officer then sends the application to the Senior Technical Officer for review via the Approvals IT System.	Technical Officer	NA
15	Review Technical Evaluation. The Senior Technical Officer reviews and sends the letter and application to the Project Officer via the Approvals IT System.	Senior Technical Officer	NA
16	Review Technical Evaluation and Approval or Denial Letter Draft. The Project Officer reviews the technical evaluation form for completeness and approval language.	Project Officer	NA
17	Does Evaluation Plan Include OA Concurrence? If the evaluation plan includes concurrence by OA Coordinating Official(s), the Project Officer sends application materials to the appropriate officials via the Approvals IT System. If it does not include concurrence, skip to step 25.	Project Officer	NA
18	Review Fitness and Safety Evaluation. Receive access to full application, including Evaluation Form and supporting documents via the Approvals IT System. Review information regarding fitness and safety evaluations. Determine whether provisions need to be added to the approval.	OA Coordinating Officials ¹⁹	NA
19	Does Approval Need Additional Provisions? OA Coordinating Officials determine whether additional provisions need to be added to the approval before providing concurrence. If no additional provisions are needed, skip to step 21.	OA Coordinating Officials	NA
20	Provide Additional Provisions for Approval. Include any additional restrictions or limitations to the approval that the OA Coordinating Official finds necessary.	OA Coordinating Officials	NA
21	Provide Concurrence Decision and Justification. If the OA Coordinating Official does not concur, then an explanation for this decision is provided.	OA Coordinating Officials	NA
22	Review Concurrence Decision and Justification. The Project Officer reviews OA concurrence decision and justification for completeness.	Project Officer	NA
23	Does OA Recommendation Concur with PHMSA Evaluation? If yes, skip to step 25.	Project Officer	
24	Coordinate Resolution. If the OA recommendation does not concur with the PHMSA evaluation, the Approving Official coordinates with the Administrator, as appropriate, on resolution of PHMSA/OA Coordinating Official decisions.	Approving Official	NA
25	Review Application Materials for Completeness. The Project Officer reviews the Safety Evaluation Form and fitness review, and conducts a final review of the approval or denial letter, which includes checking for format, content, and spelling.	Project Officer	NA
26	Send Application to Approving Official. Once the evaluation is complete, send to Approving Official via the Approvals IT System; skip to step 1 of the Disposition Phase.	Approving Official	NA

¹⁹ The FRA Coordinating Official, FAA Coordinating Official, FMCSA Coordinating Official, and USCG Coordinating Official could all be involved in this step of the process.

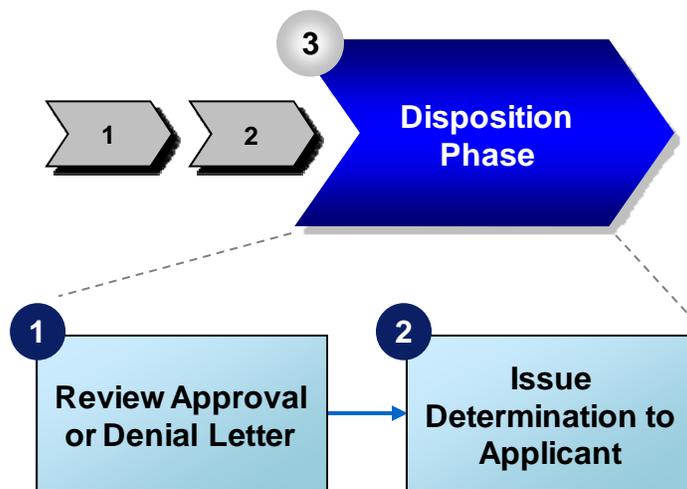
4.3 Application Disposition

4.3.1 Purpose

The purpose of this phase, which is uniform across all application types, is to review the recommendation to deny or issue an approval and then inform the applicant of the decision reached by PHMSA in the application evaluation process.

4.3.2 Workflow

Figure 8: Application Disposition Workflow



At the beginning of the Disposition Phase, the Approving Official reviews the approval or denial letter, depending on the outcome of the Evaluation Phase. If there are questions about the outcome of the Evaluation Phase, the Approving Official contacts the Project Officer, Technical Specialist, or other relevant participants including OAs. The Approving Official will also coordinate with the Administrator for review and approval of significant approvals, based on public interest or other criteria, as determined by the Administrator. Once all remaining issues are resolved and documented in the Approvals IT System file, the Approving Official makes a final disposition on the approval application and notifies the OAs.

If the approval is granted, the Approving Official signs the approval letter, and it is automatically sent to the applicant via the Approvals IT System. At this point, the OAs are informed that the approval has been granted, and the Project Officer updates the status of the application on PHMSA's Website. Supplemental information relevant to the approval type (e.g., approval maintenance and reporting requirements, suggested templates for reporting, and detailed evaluation reports) may be attached to the approval letter to the applicant.

If the application is to be denied, the Approving Official signs the denial letter, and it is then sent to the applicant via the Approvals IT System. At this point, the OAs are also notified that the approval was denied. The Project Officer then updates the status of the application on the PHMSA Website. The applicant has the option to ask the agency to reconsider its decision. Section 5.2 of this SOP provides more detail on this reconsideration sub-process.

If PHMSA denies the applicant’s request for reconsideration, the applicant may also appeal this decision. Section 5.3 of this SOP provides more detail on this appeal sub-process.

4.3.3 Procedures

Table 13: Application Disposition

#	Description	Responsibility	Duration
1	Review Approval or Denial Letter. Review relevant documents and the justification for issuing approval or denial letter. This review includes verifying that an expiration date is set and that reporting or other compliance requirements for the applicant are clearly outlined. The Approving Official will coordinate with the Administrator for review of approvals proposed to be issued based on public interest or other significant approvals, as determined by the Administrator. The Approving Official may also request further explanation from the Project Officer or Technical Officer.	Approving Official, Administrator	NA
2	Issue Signed Approval Letter? After the review and the Administrator’s approval, as appropriate, the Approving Official is responsible for signing the approval or denial letter. If the approval letter is not signed, skip to step 3B.	Approving Official	NA
3A	Send Approval Letter to Applicant and Relevant PHMSA Office Liaisons and OA Coordinating Officials. After the denial letter is signed by the Approving Official, the Approvals IT System will automatically send a notice to the applicant including the signed denial letter. The Project Officer will have indicated which points of contact were relevant to the review of the approval, which the Approvals IT System will use to determine who should receive copies of the approval documents. Skip to step 9.	Approvals IT System	NA
3B	Send Denial Letter to Applicant and Relevant PHMSA Office Liaisons and OA Coordinating Officials. After the denial letter is signed by the Approving Official, the Approvals IT System will automatically send a notice to the applicant including the signed denial letter. The Project Officer will have indicated which points of contact were relevant to the review of the approval, which the Approvals IT System will use to determine who should receive copies of the approval documents.	Approvals IT System	NA
4	Applicant Submits Request for Reconsideration? The applicant has 30 days to submit a request for reconsideration. If the applicant chooses to exercise this option, follow the Reconsideration Sub-process. If the applicant does not request reconsideration, skip to step 9.	Applicant	30 Days
5	Follow Reconsideration Sub-Process. Section 5.2 outlines the reconsideration sub-process.	Project Officer	NA
6	Issue Signed Approval Letter after Reconsideration? The evaluation of the reconsideration is ultimately assessed by the Approving Official who will determine whether an approval or denial letter is issued. If the approval is not issued, the applicant has the opportunity to request an appeal.	Approving Official	NA

#	Description	Responsibility	Duration
7	Applicant Submits Request for Appeal? The applicant has 30 days to submit a request for an appeal. If the applicant chooses to exercise this option, follow the Appeal Sub-process. If the applicant does not request an appeal, skip to step 9.	Applicant	30 Days
8	Follow Appeal Sub-Process. Section 5.3 outlines the appeal sub-process. An appeal is the last opportunity for the applicant to receive an approval for that specific application. The decision resulting from the appeal sub-process is final. Applicants may reapply by submitting a new approval application.	Project Officer	NA
9	Change Application Status on PHMSA Website. After the document has been electronically signed, the Approvals IT System will also trigger a change in application status to reflect the decision made on the PHMSA Website. <End of Process>	Approvals IT System	NA

At the conclusion of the Disposition Phase, the approval Application Action Process ends.

5 SUPPORTING SUB-PROCESSES

5.1 Fitness Review Sub-Process

TBD

5.2 Reconsideration Sub-Process

Applicants may petition for reconsideration if an approval is denied. If applicants choose to submit a request for reconsideration, PHMSA will reevaluate the application taking into consideration the new information provided. As outlined in 49 CFR 107.715, requests for reconsideration must:

1. Be in writing and filed within 20 days of receipt of the decision
2. State in detail any alleged errors of fact and law
3. Enclose any additional information needed to support the request to reconsider
4. State in detail the modification of the final decision sought.

5.2.1 Purpose

The purpose of the reconsideration process is to allow applicants the opportunity to provide new information and receive additional review from PHMSA.

5.2.2 Workflow

Figure 9: Petition for Reconsidering Workflow



5.2.2.1 Sufficiency Review

The Project Officer generates a new folder in the Approvals IT System and populates the folder with the relevant application materials. If the application includes non-electronic documents, the Project Officer uses a scanner to create electronic files.

After the folder in the Approvals IT System is generated and populated with all relevant files, the Project Officer performs a brief sufficiency review. This review assesses whether the petition for reconsideration meets all of the criteria required by the HMR, which is stated in Section 6.4. If the petition for reconsideration includes this information, the Project Officer determines whether technical evaluation is needed.

5.2.2.2 Evaluation

The Project Officer sends petitions for reconsideration that require technical evaluation to the Senior Technical Officer, who is responsible for assigning the appropriate Technical Officer to conduct the evaluation. The Technical Officer evaluates the petition for reconsideration and drafts a justification that recommends issuing an approval or denial letter, which is reviewed by the Senior Technical Officer. If the petition for reconsideration is not technical, the Project Officer conducts the evaluation and drafts the justification for issuing an approval or denial letter.

After the evaluation is complete, the Project Officer determines whether the petition for reconsideration needs to be reviewed by any of the OA Coordinating Officials or other offices within PHMSA, including the Administrator, if appropriate. If a coordinated review is needed, the Project Officer is responsible for communicating with the relevant contacts and documenting concurrence and other feedback provided. The Project Officer conducts a final review and quality check of the justification and sends it to the Approving Official for review.

5.2.2.3 Disposition

The Approving Official is responsible for reviewing all materials related to the petition for reconsideration and will coordinate with the Administrator for review of applications proposed for consideration based on public interest or other significant issues as determined by the Administrator. After reviewing the documents, the Approving Official with the Administrator's approval, as appropriate, must sign the approval or denial letter before it is sent to the applicant.

5.2.3 Procedures

Table 14: Reconsideration Sub-Process

#	Description	Responsibility	Duration
1	Receive Application for Reconsideration. Assess petition for reconsideration and assign to the appropriate Project Officer.	Project Officer	NA
2	Generate and Populate Approval IT System Folder. The Project Officer is responsible for creating a new application folder in the Approvals IT System, uploading the application, and populating other applicant information. Information from the initial approval application should also be uploaded to this folder including the original application, safety evaluation, and justification.	Project Officer	NA
3	Post Receipt of Application on PHMSA's Website. After the folder is created, the Approvals IT System will automatically update PHMSA's Website to indicate that the application has been received and that a tracking number has been created for the applicant.	Approvals IT System	1 day
4	Conduct Initial Sufficiency Review. Determine whether the application meets the criteria outlined in the HMR and whether the information provided is adequate to conduct an appropriate evaluation. Application must be in writing and filed within 20 days of receipt of the decision, state in detail any alleged errors of fact and law, enclose any additional information needed to support the request to reconsider, and state in detail the modification of the final decision sought. If information provided is insufficient, PHMSA may reject the application.	Project Officer	NA

#	Description	Responsibility	Duration
5	Determine Participants Needed for Evaluation. After reviewing the application, the Project Officer determines which PHMSA Office Liaisons and OA Coordinating Officials need to be involved in the evaluation of the application. This determination is based on triggers and criteria established by the OAs and PHMSA offices. OAs and PHMSA offices may request to be involved even if the need for their involvement was not specifically triggered.	Project Officer	NA
6	Assign to Appropriate Technical Specialist. If a technical review is needed, the Senior Technical Officer assigns the application to the appropriate staff for review.	Senior Technical Officer	NA
7	Conduct Safety Evaluation. The Technical Officer evaluates the application to determine whether the approval achieves an equivalent level of safety as provided under the HMR. The Technical Officer conducts an equivalent level-of-safety evaluation using the Application Evaluation Form; refer to Section 6.2.3 for details.	Technical Officer	NA
8	Consult Modes as Necessary. The Technical Officer consults with the OA Coordinating Officials on the equivalent level-of-safety evaluation (if necessary).	Technical Officer	NA
9	Draft Technical Justification for Approval or Denial Letter. The Technical Officer drafts the technical justification for approval or denial letter and sends it to the Senior Technical Officer for review via the Approvals IT System.	Technical Officer	NA
10	Review Technical Evaluation. The Senior Technical Officer reviews the letter and application and sends it to the Project Officer via the Approvals IT System.	Senior Technical Officer	NA
11	Review Technical Evaluation and Approval or Denial Letter Draft. The Project Officer reviews the Application Evaluation Form for completeness and approval language.	Project Officer	NA
12	Is OA Concurrence Appropriate? If the application needs concurrence by the OA Coordinating Official(s), the Project Officer sends the application materials to the appropriate officials via the Approvals IT System. If it does not need concurrence, skip to step 20.	Project Officer	NA
13	Review Application Folder in Approvals IT System. The OA Coordinating Official(s) receives access to the full application, Application Evaluation Form, and supporting documents. Historical information including the original approval application, safety evaluation, and justification will also be provided.	OA Coordinating Officials ²⁰	NA
14	Review Safety Evaluation. The OA Coordinating Official(s) reviews information regarding safety evaluations. The OA Coordinating Official(s) determines whether provisions need to be added to the approval.	OA Coordinating Officials	NA
15	Provide Concurrence Decision and Justification. If the mode does not concur, an explanation for this decision is provided. The mode also provides restrictions/limitations for approval, if any.	OA Coordinating Officials	NA
16	Review Concurrence Decision and Justification. The Project Officer reviews OA concurrence decision and justification for completeness.	Project Officer	NA

²⁰ The FRA Coordinating Official, FAA Coordinating Official, FMCSA Coordinating Official, and USCG Coordinating Official could all be involved in this step of the process.

#	Description	Responsibility	Duration
17	Does Modal Recommendation Concur with PHMSA Evaluation? If yes, skip to step 20.	Project Officer	
18	Coordinate Resolution. If the OA recommendation does not concur with the PHMSA evaluation, the Approving Official coordinates with the Administrator, as appropriate on resolution of PHMSA/OA Coordinating Official decisions. Skip to step 20.	Approving Official	NA
19	Conduct Safety Evaluation. If the evaluation needs of the application do not include OA or technical evaluation, the Project Officer conducts the evaluation using the Application Evaluation Form to determine whether the approval application provides an equivalent level of safety as that in HMR; refer to Section 6.2.3 for details.	Project Officer	NA
20	Draft Justification for Approval or Denial Letter. Based on the results from the safety evaluation, the Project Officer drafts the justification for an approval or a denial letter.	Project Officer	NA
21	Review Application Evaluation Form for Completeness. The Project Officer reviews the application folder in the Approvals IT System folder to ensure all relevant information is captured correctly. The Project Officer sends the folder to the Approving Official via the Approvals IT System. Follow the steps outlined in Table 12, "Application Disposition."	Project Officer	NA

5.3 Appeal Sub-Process

Applicants may request an appeal if an approval is denied after a petition for reconsideration. If an applicant requests an appeal, PHMSA will reevaluate the application taking into consideration the new information provided. As outlined in 49 CFR 107.717, the appeal must:

1. Be in writing and filed within 30 days of receipt of the Associate Administrator’s decision on reconsideration
2. State in detail any alleged errors of fact and law
3. Enclose any additional information needed to support the appeal
4. State in detail the modification of the final decision sought.

5.3.1 Purpose

The purpose of the appeal process is to allow applicants, who were denied an approval in the reconsideration process, the opportunity to provide new information and receive additional review from PHMSA.

5.3.2 Workflow

Figure 10: Appeal Request Workflow



5.3.2.1 Sufficiency Review

The Project Officer generates a new folder in the Approvals IT System and populates the folder with the relevant application materials. If the application includes non-electronic documents, the Project Officer uses a scanner to create electronic files.

After the folder is generated and populated with all relevant files in the Approvals IT System, the Project Officer performs a brief review to ensure the application is complete. This review assesses whether the appeal request meets all of the criteria required by the HMR. If the appeal includes this information, the Project Officer determines whether a technical evaluation is needed.

5.3.2.2 Evaluation

The Project Officer sends appeal requests that need technical evaluation to the Senior Technical Officer, who is responsible for assigning the appropriate Technical Officer to conduct the evaluation. The Technical Officer evaluates the appeal request and drafts a justification that recommends issuing an approval or denial letter, which is reviewed by the Senior Technical Officer. If the appeal request is not technical, the Project Officer conducts the evaluation and drafts the justification to recommend issuing an approval or a denial letter.

After the evaluation is complete, the Project Officer determines whether the appeal request needs to be reviewed by any of the OA Coordinating Officials or other offices within PHMSA, including the Administrator, if appropriate. If a coordinated review is needed, the Project Officer is responsible for communicating with the relevant contacts and documenting concurrence and other feedback provided. The Project Officer conducts a final review and quality check of the justification and sends it to the Approving Official for review.

5.3.2.3 Disposition

The Approving Official is responsible for reviewing all materials related to the appeal request and will coordinate with the Administrator regarding approval applications that are based on public interest or other significant issues as determined by the Administrator. After reviewing the documents, the Approving Official, with approval by the Administrator, as appropriate, must sign the approval or denial letter sent to the applicant.

5.3.3 Procedures

Table 15: Appeal Sub-Process

#	Description	Responsibility	Duration
1	Receive Application for Appeal. Assess application for appeal and assign to the appropriate Project Officer.	Project Officer	NA
2	Generate and Populate Approval IT System Folder. The Project Officer is responsible for creating a new application folder in the Approvals IT System, uploading the application, and populating other applicant information. Information from the initial approval application should also be uploaded to this folder including the original application, safety evaluation, and justification.	Project Officer	NA

#	Description	Responsibility	Duration
3	Post Receipt of Application on PHMSA's Website. After the folder is created, the Approvals IT System will automatically update PHMSA's Website to indicate that the application has been received and that a tracking number has been created for the applicant.	Approvals IT System	1 day
4	Conduct Initial Sufficiency Review. The Project Officer determines whether the application meets the criteria outlined in the HMR and whether the information provided is adequate to conduct an appropriate evaluation. The application must be in writing and filed within 20 days of receipt of the decision, state in detail any alleged errors of fact and law, enclose any additional information needed to support the request to reconsider, and state in detail the modification of the final decision sought. If the information provided is insufficient, PHMSA may reject the application.	Project Officer	NA
5	Determine Participants Needed for Evaluation. After reviewing the application, the Project Officer determines which PHMSA Office Liaisons and OA Coordinating Officials need to be involved in the evaluation of the application. This determination is based on triggers and criteria established by the OAs and PHMSA offices. OAs and PHMSA offices may also request to be involved even if the need for their involvement was not specifically triggered.	Project Officer	NA
6	Assign to Appropriate Technical Specialist. If a technical review is needed, the Senior Technical Officer assigns the application to the appropriate staff for review.	Senior Technical Officer	NA
7	Conduct Safety Evaluation. The Technical Officer evaluates the application to determine whether the approval achieves an equivalent level of safety as provided under the HMR. The Technical Officer conducts an equivalent level-of-safety evaluation using the Application Evaluation Form; refer to Section 6.2.3 for details.	Technical Officer	NA
8	Consult Modes as Necessary. The Technical Officer consults with the OA Coordinating Officials on the equivalent level-of-safety evaluation (if necessary).	Technical Officer	NA
9	Draft Technical Justification for Approval or Denial Letter. The Technical Officer drafts the technical justification for the approval or denial letter and sends it to the Senior Technical Officer for review via the Approvals IT System.	Technical Officer	NA
10	Review Technical Evaluation. The Senior Technical Officer reviews and sends the letter and application to the Project Officer via the Approvals IT System.	Senior Technical Officer	NA
11	Review Technical Evaluation and Approval or Denial Letter Draft. The Project Officer reviews the Application Evaluation Form for completeness and approval language.	Project Officer	NA

#	Description	Responsibility	Duration
12	Is OA? Concurrence Appropriate? If the application needs concurrence by the OA Coordinating Official(s), the Project Officer sends the application materials to the appropriate officials via the Approvals IT System. If it does not need concurrence, skip to step 20.	Project Officer	NA
13	Review Application Folder in Approvals IT System. The OA Coordinating Officials receive access to the full application, Application Evaluation Form, and supporting documents. Historical information including the original approval application, safety evaluation, and justification will also be provided.	OA Coordinating Officials ²¹	NA
14	Review Safety Evaluation. The OA Coordinating Officials review information regarding safety evaluations. The OA Coordinating Officials determine whether provisions need to be added to the approval.	OA Coordinating Officials	NA
15	Provide Concurrence Decision and Justification. If the mode does not concur, an explanation for this decision is provided. The mode also provides restrictions/limitations for approval, if any.	OA Coordinating Officials	NA
16	Review Concurrence Decision and Justification. The Project Officer reviews the OA concurrence decision and justification for completeness.	Project Officer	NA
17	Does OA? Recommendation Concur with PHMSA Evaluation? If yes, skip to step 20.	Project Officer	
18	Coordinate Resolution. If the OA recommendation does not concur with the PHMSA evaluation, the Approving Official coordinates with the Administrator, as appropriate, on resolution of PHMSA/OA Coordinating Official decisions. Skip to step 30.	Approving Official	NA
19	Conduct Safety Evaluation. If the evaluation needs of the application do not include OA or technical evaluation, the Project Officer conducts an evaluation using the Application Evaluation Form to determine whether the approval application provides an equivalent level of safety as that in HMR; refer to Section 6.2.3 for details.	Project Officer	NA
20	Draft Justification for Approval or Denial Letter. Based on the results from the safety evaluation, the Project Officer drafts the justification for an approval or a denial letter.	Project Officer	NA
21	Review Application Evaluation Form for Completeness. The Project Officer reviews the application folder in the Approvals IT System folder to ensure all relevant information is captured correctly. The Project Officer sends the folder to the Approving Official via the Approvals IT System. Follow the steps outlined in Table 12, "Application Disposition."	Project Officer	NA

²¹ The FRA Coordinating Official, FAA Coordinating Official, FMCSA Coordinating Official, and USCG Coordinating Official could all be involved in this step of the process.

6 APPENDIX

6.1 Types of Approvals

Table 16 presents brief definitions for the 23 different types of approvals granted by PHMSA.

Table 16: Types of Approval

Approval	Definition
M numbers for identification of domestic manufacturers	An M number for identification of a domestic manufacturer approval is issued to a person or organization as a means of identification. Under certain regulations, an M number must be used solely as the identifier on a package (i.e., DOT 39 nonrefillable cylinders). For more information, see 49 CFR 178.3.
Visual cylinder requalifiers	A visual cylinder requalifier approval is issued to a person or organization that seeks to visually inspect certain types of low-pressure domestic cylinders in accordance with the HMR. PHMSA issues a Visual Requalifier Identification Number as evidence of approval to requalify cylinders. For more information, see 49 CFR 107.805 and 49 CFR 108.209.
Commercial explosives	A commercial explosive approval is issued for classification and transportation of explosives, except those produced for the Department of Defense (DOD) or Department of Energy (DOE). For more information, see 49 CFR 173.56.
Government explosives	A government explosive approval is issued for classification and transportation of explosives made by or under the direction or supervision of the DOD or the DOE. For more information, see 49 CFR 173.56.
Fireworks	A fireworks approval is issued for fireworks products that are manufactured in accordance with the requirements of American Pyrotechnics Association (APA) Standard 87-1, and that pass a required thermal stability test. For more information, see 49 CFR 173.56.
Chemical oxygen generators	A chemical oxygen generator approval is issued for chemical oxygen generators that are shipped with means of initiation attached. Under these circumstances, these materials must be classed in accordance with 49 CFR 173.56. For more information, see 49 CFR 173.168.
Self-reactive materials and organic materials	<p>A self-reactive material approval is issued for self-reactive materials not identified by technical name in any of the self-reactive materials tables in § 173.224(b) of the HMR. For more information, see 49 CFR 173.124.</p> <p>An organic peroxide material approval is issued for organic peroxide materials not identified by technical name in any of the organic peroxide tables found in § 173.225 of the HMR. For more information, see 49 CFR 173.128.</p>
Domestic cylinder requalifiers	A domestic cylinder requalifier approval is issued to persons or organizations that seek to inspect, test, certify, repair, or rebuild a domestic cylinder in accordance with DOT specifications. PHMSA issues a Requalifier Identification Number (RIN) as evidence of approval to requalify cylinders. For more information, see 49 CFR 107.805.
Domestic cylinder repair/rebuild companies (k-number program)	Approvals issued to domestic cylinder repair/rebuild companies (k-number program) are approvals that authorize the repair/rebuild of DOT cylinders in the United States. These types of approvals require inspection by an approved third-party agency prior to issuance. For more information, see 49 CFR 107.805.
Radioactive materials and	A radioactive materials and packaging approval is issued for certain radioactive

Approval	Definition
packaging	materials and packaging regulated under the HMR. For more information, see 49 CFR 173.400 – 49 CFR 173.499.
Independent inspection agencies (IIAs) representing US cylinder manufacturers	An approval for an IIA representing a US cylinder manufacturer is issued to an individual or organization approved by PHMSA to conduct and prepare the required tests and documentation for a US cylinder manufacturer that seeks to conduct DOT cylinder inspections. While PHMSA uses information provided by IIAs in its evaluation of approval applications, it is important to note that IIAs are not agents or representatives of PHMSA. For more information, see 49 CFR 107.803.
Foreign cylinder requalifiers	A foreign cylinder requalifier approval is issued to a person or an organization located outside the United States that seeks to requalify DOT cylinders. Persons or organizations need to receive an on-site inspection from the DOT before obtaining an approval. For more information, see 49 CFR 107.805.
Foreign cylinder repair/rebuild companies (k-number program)	A foreign cylinder repair/rebuild approval is issued to a person or an organization located outside the United States that seeks to repair and rebuild DOT cylinders. Persons or organizations need to receive an on-site inspection from the DOT before obtaining an approval. For more information, see 49 CFR 107.805.
Foreign cylinder manufacturers with IIAs	A foreign cylinder manufacturer with an IIA approval is issued to a manufacturer located outside the United States that seeks to manufacture DOT cylinders. Foreign manufacturers need to have an IIA and both manufacturers and IIAs need to receive an on-site inspection from the DOT before obtaining an approval. For more information, see 49 CFR 107.801.
United Nations (UN)/International Organization for Standardization (ISO) cylinder manufacturers	A UN/ISO cylinder manufacturer approval is issued to a manufacturer, located inside and outside the United States, which seeks to manufacture UN/ISO cylinders. Manufacturers need to receive an on-site inspection from the DOT and need to have an IIA before obtaining an approval. For more information, see 49 CFR 107.807.
UN Third-Party Certification Agencies	A UN third-party certification agency approval is issued to a person or an organization to conduct package testing as a DOT-approved agency. Approvals are granted based on the technical qualifications of the applicant as well as the results of an on-site inspection by PHMSA personnel to determine the capability of the laboratory in which the package testing would take place. For more information, see 49 CFR 107.401.
Designated approval agencies	A designated approval agency approval is issued to a person or an organization that certifies the manufacture of UN portable tanks, multiple element gas containers and other specialized containers for foreign manufacturers. For more information see 49 CFR 107.401.
Explosive test labs	An explosive test lab approval is issued to an organization that has been approved to examine and make recommendations concerning the shipping description, classification, and compatibility group of new explosives. For more information, see 49 CFR 173.56.
Lighter testing agencies	A lighter testing agency approval is issued to a person or organization that has been approved to test new lighters in accordance with the requirements of the HMR. For more information, see 49 CFR 173.308.
International Maritime Dangerous Goods/International Civil Aviation Organization (IMDG/ICAO) Competent Authority Approval (CAA)	An IMDG/ICAO CAA is issued when either set of international regulations (i.e., IMDG or ICAO codes) requires an approval from a competent authority to ship a specified type of hazardous material internationally.
General CAA	A general CAA is issued by PHMSA to a person or an organization when an action requires approval by the Competent Authority of the United States.

Approval	Definition
Lithium Batteries	A lithium battery approval is issued for lithium batteries in commercial transportation unless exempted by provisions in 49 CFR 173.185. These approvals typically contain specific requirements and limitations concerning testing, packaging, and hazard communication, particularly for those batteries approved for transportation by aircraft. For more information, see 49 CFR 173.185.
Fuel Cells	To be determined.

6.2 Supporting Approvals Forms

6.2.1 Application Completeness Form

TBD

Commercial Explosives Application Completeness Form

[Note the Commercial Explosives Application Completeness Form is currently included in this section for illustrative purposes only. PHMSA can enhance this form, and develop other forms and documents relevant to the Approvals Program, as its business processes evolve and mature.]

PHMSA uses the Commercial Explosives Application Completeness Form to analyze whether an application for a commercial explosives approval contains enough information to merit a full technical evaluation. PHMSA developed this form to guarantee that the agency has sufficient information when evaluating commercial explosives approval applications. The form should be completed by the Project Officer and then stored in the Approvals IT System.

The form was revised as of November 23, 2009, and will be updated as necessary by PHMSA.

Note to Project Officers: All sections and questions must be completed. If the question is not applicable to the approval application under review, then enter “NA” as appropriate.

1. Has the examination and class recommendation report been signed by an authorized examining laboratory, agency-recognized Competent Authority of a foreign government?

Y N

2. Does the UN Identification number agree with the proper shipping name given in the Hazardous Materials Table in 49 CFR 172.101?

Y N

3. Does the spelling of the proper shipping name agree with the Hazardous Materials Table in 49 CFR 172.101?

Y N

4. Do the product names, part numbers, or drawing numbers for the explosive substances or articles correctly correspond to the supporting documentation?

Y N

5. Is there a complete summary table for all of the explosive compositions contained in the explosive substance or article, the percentages by weight shown, and the composition of all mixtures specifically enumerated?

Y N

6. Are there clear and legible engineering drawings in 8.5 x 11 in. format of all of the explosive articles with names, product numbers, or drawing numbers that correspond to the class recommendation report?

Y N

7. What, if any, packaging instructions or recommendations are specified in the class recommendation report? List them in the space below.

8. What tests were conducted to support the class recommendation report or Competent Authority document? List them in the space below.

9. If they were waived for any reason, are those reasons clearly presented?

Y N

10. Were all UN tests conducted in conformance with the most current edition of the *UN Test and Criteria Manual*?

Y N

11. Were the tests in conformance with the hazardous materials regulation requirements in 49 CFR 173.57 and 49 CFR 173.58?

Y N

12. Have the explosive substances (e.g., solid propellants for rocket motors, explosives for warheads, detonators for ammunition) within articles been separately classed and previously approved?

Y N

13. If so, what were these UN and EX-approval numbers? List them in the space below.

14. Have any and all special provisions applicable to the UN numbers and proper shipping names been certified in writing by the examining laboratory as having been met (e.g., Special Provision 103 for detonators and detonator assemblies, Special Provision 116 for detonating fuzes, Special Provision 109 for rocket motors, Special Provision 51 for model rocket motors)?

Y N

Project Officer:

Office:

Date:

6.2.2 Application Evaluation Form

TBD

6.2.3 Safety Evaluation Form

TBD

6.2.4 Other Approvals Program Forms and Documents

Inspection Report Template

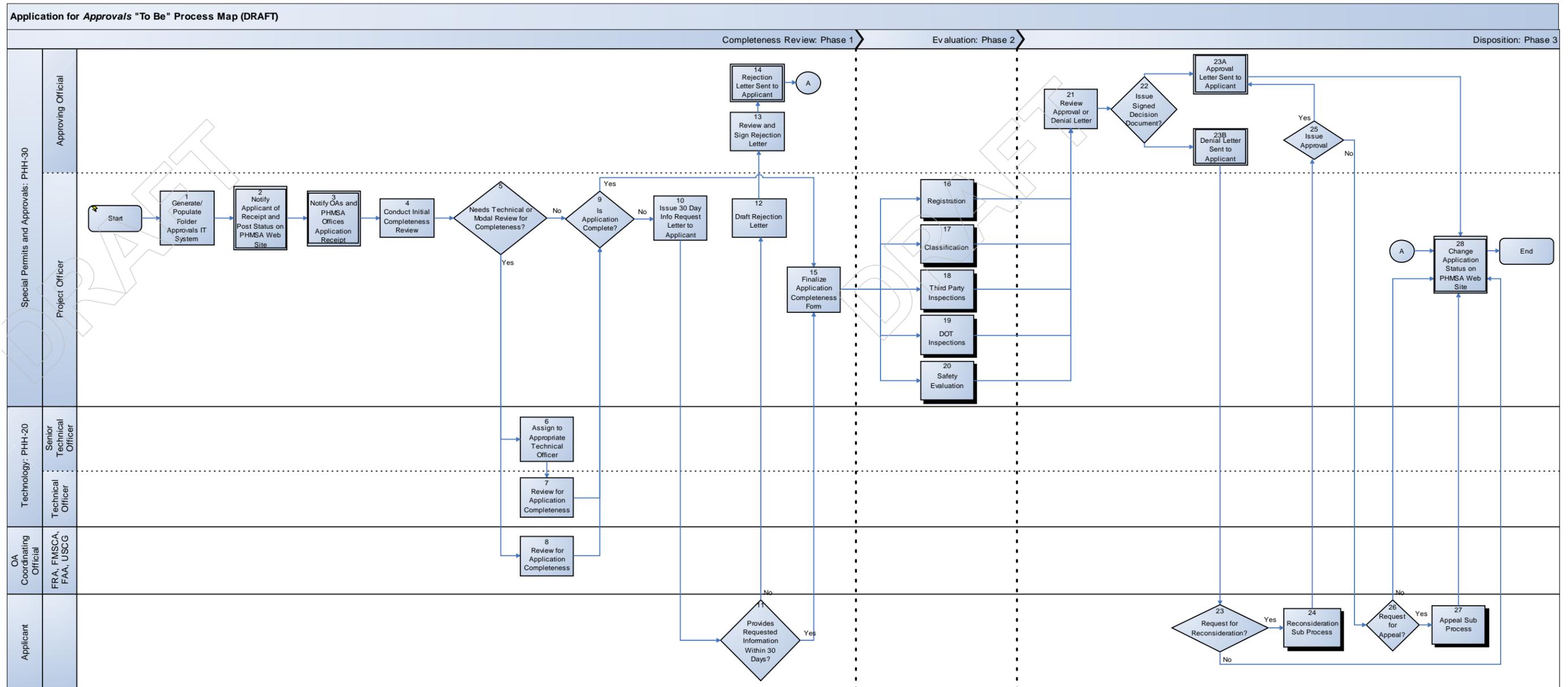
TBD

OA Coordination Document

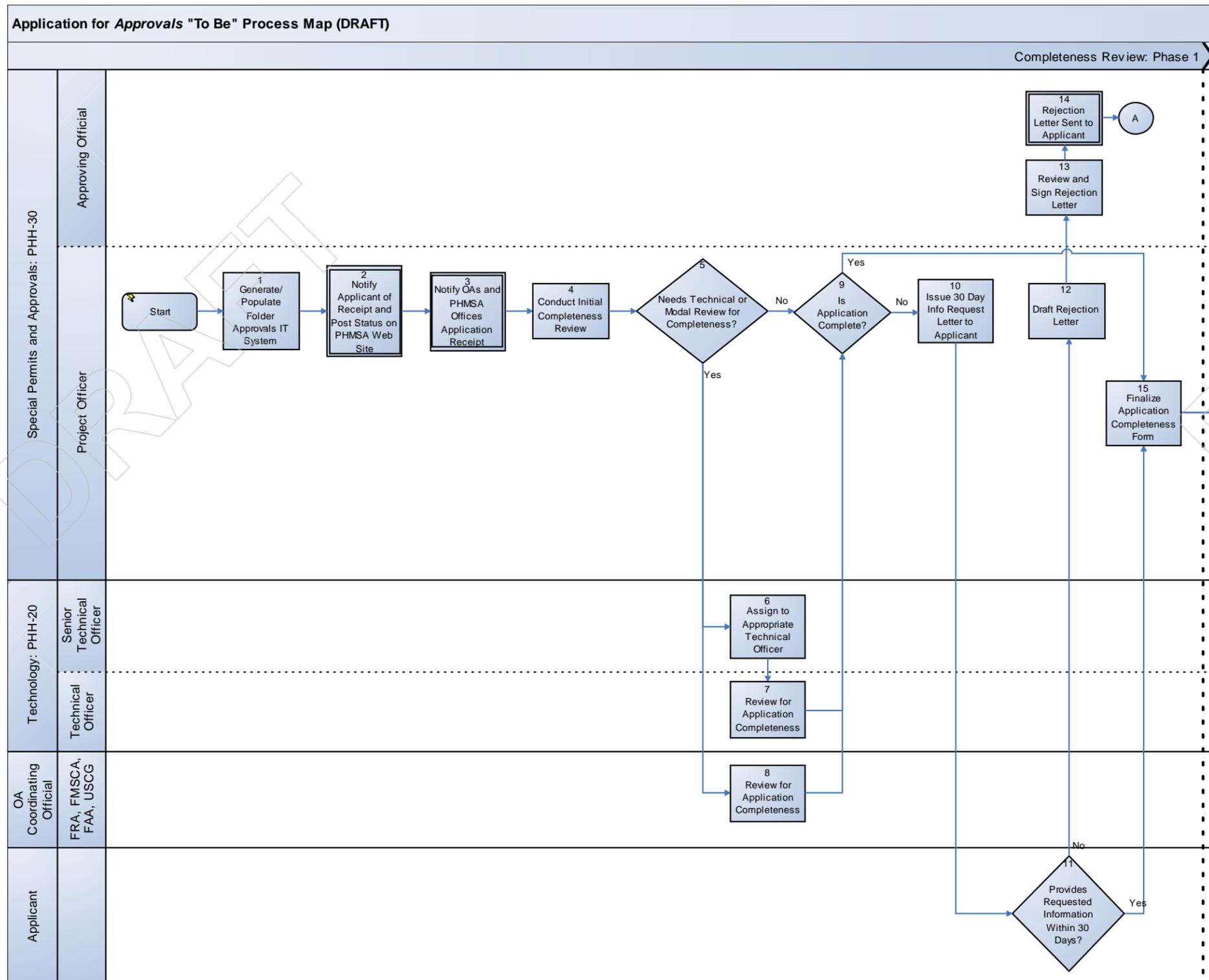
TBD

6.3 Approvals Program Process Flow Maps

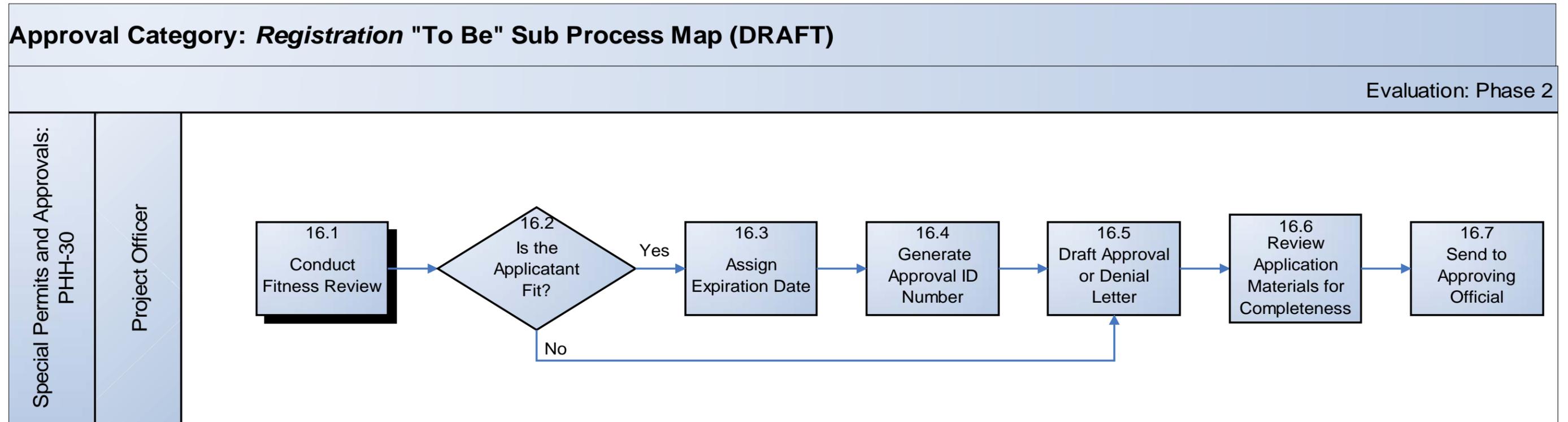
6.3.1 Approvals Application Action Process Flow Map



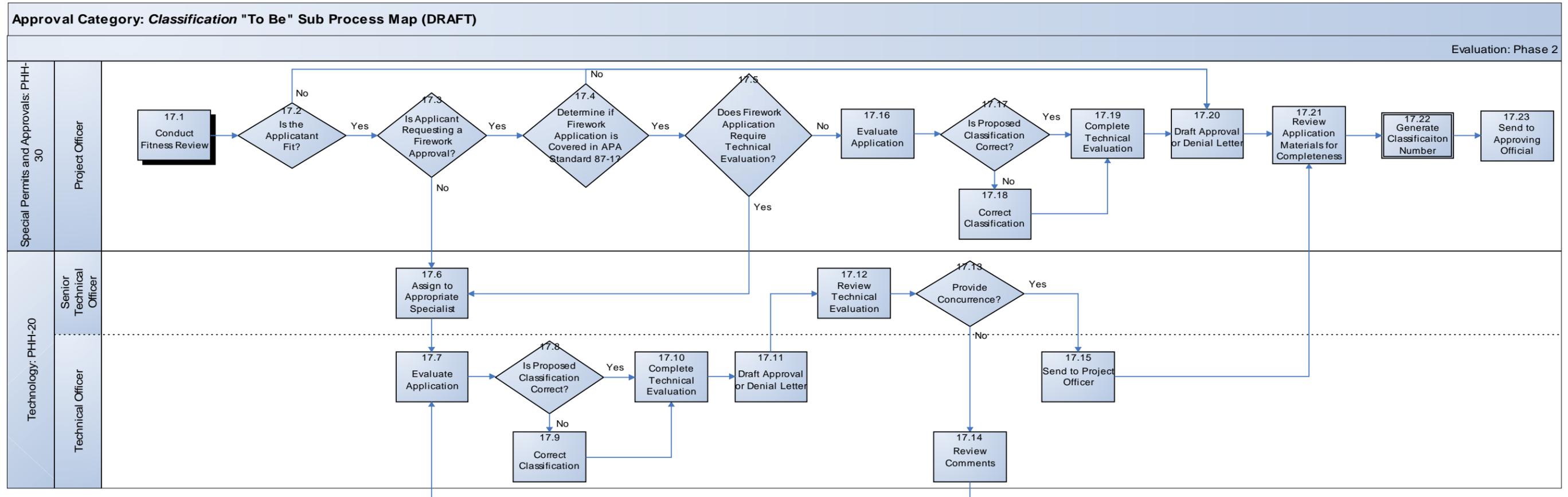
6.3.2 Application Completeness Review (Phase 1) Process Flow Map



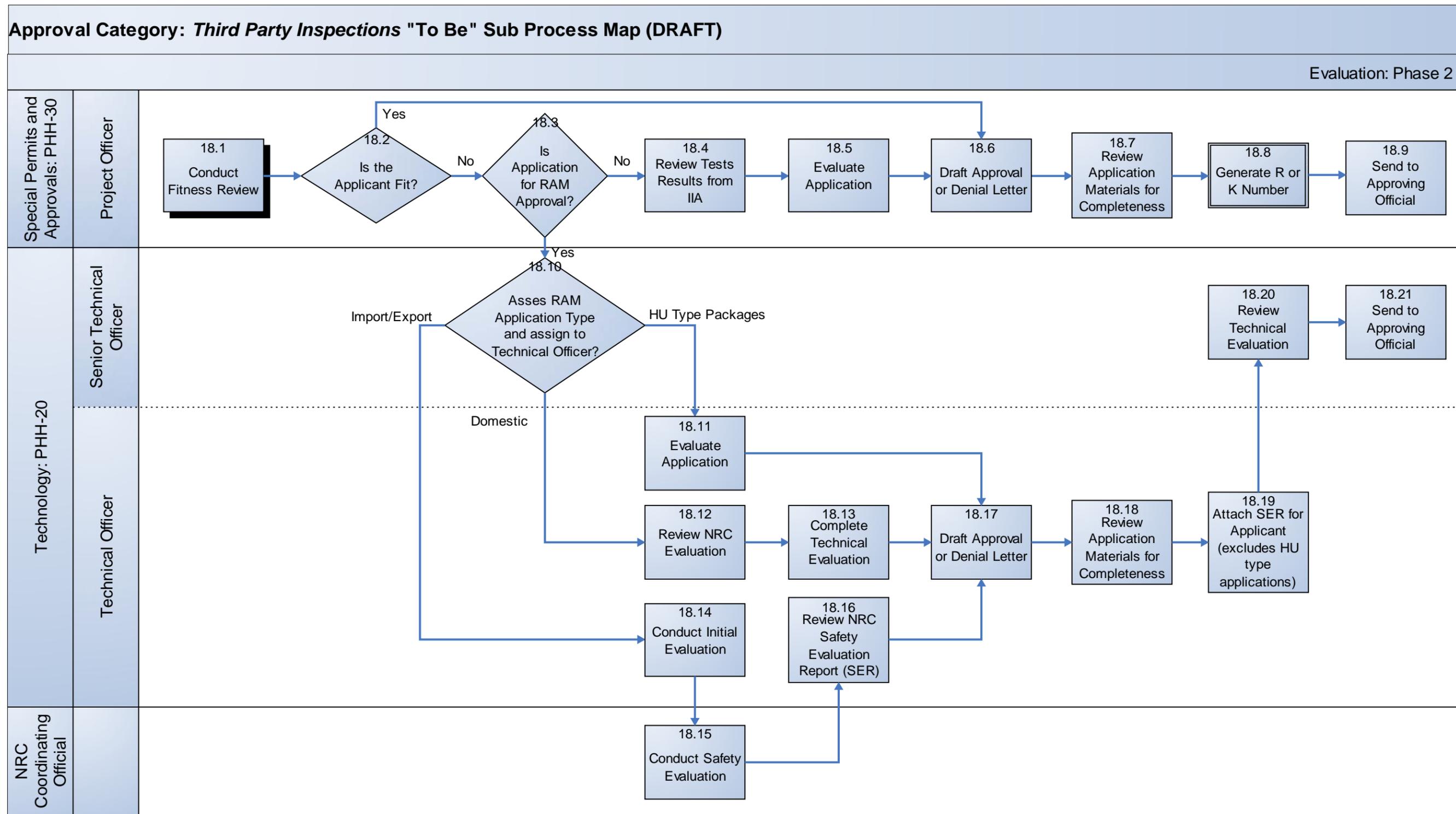
6.3.3 Registration Process Flow Map



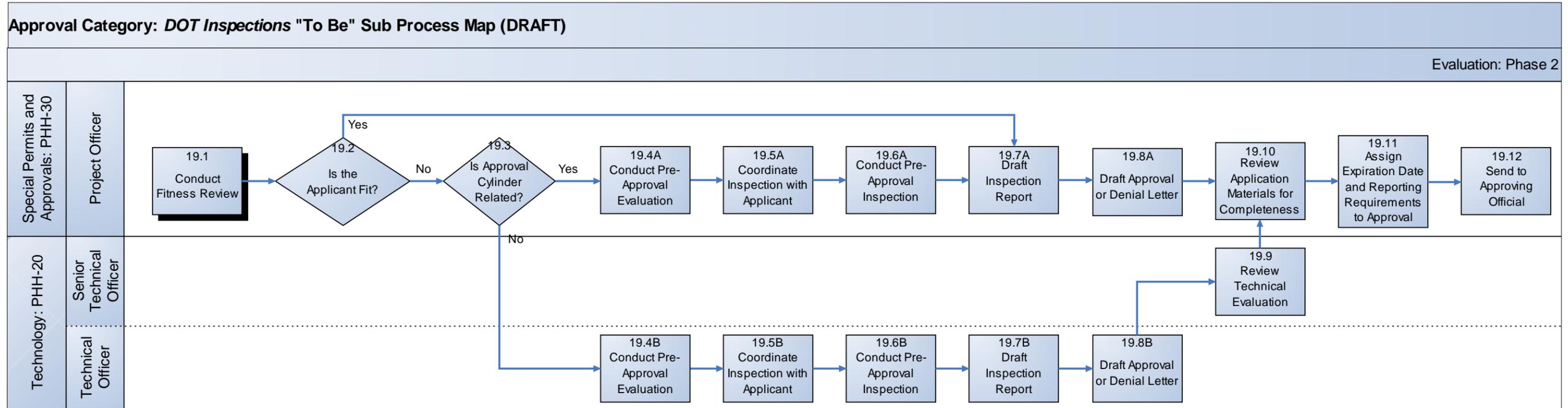
6.3.4 Classification Process Flow Map



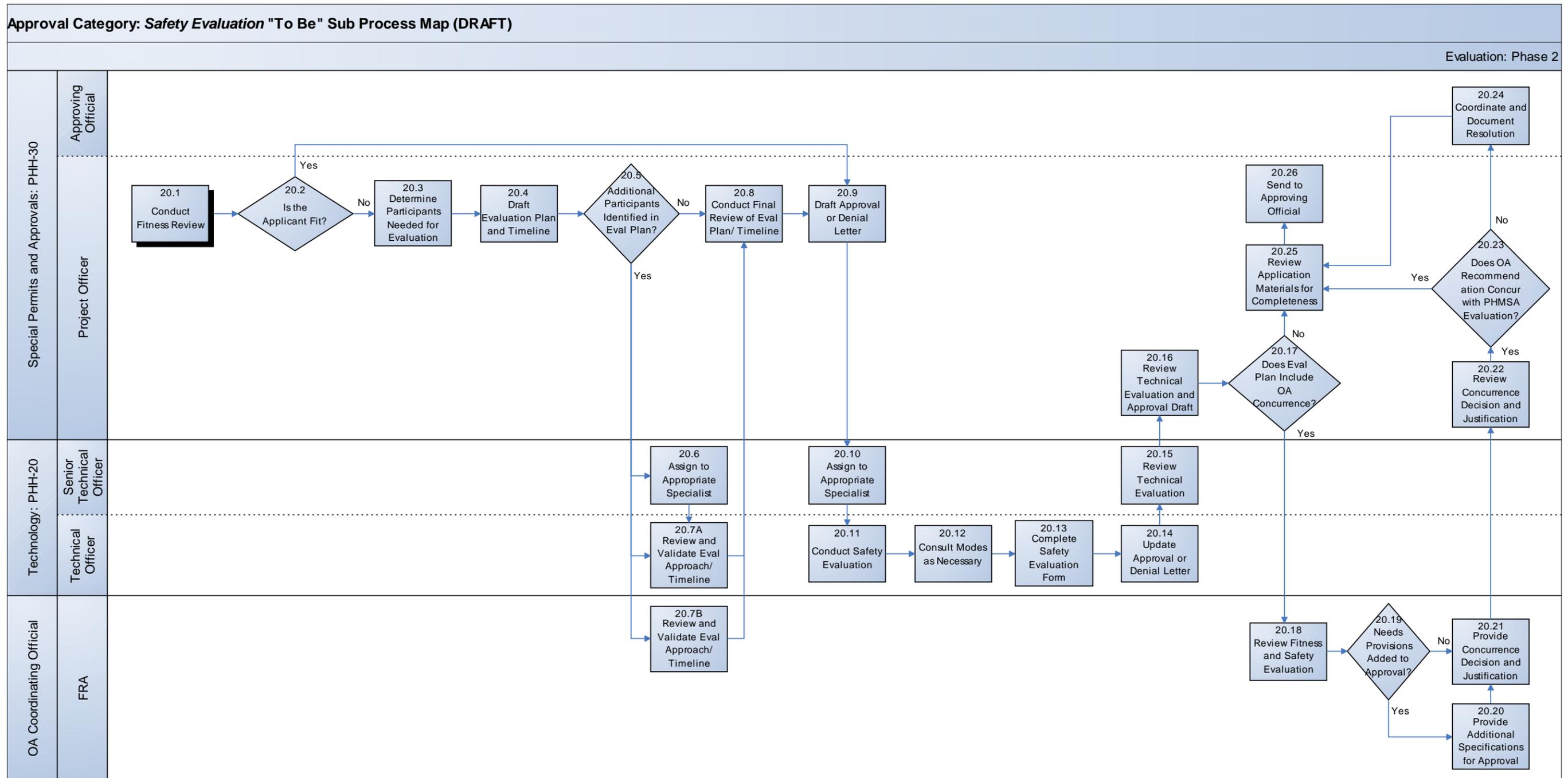
6.3.5 Third-Party Inspection Process Flow Map



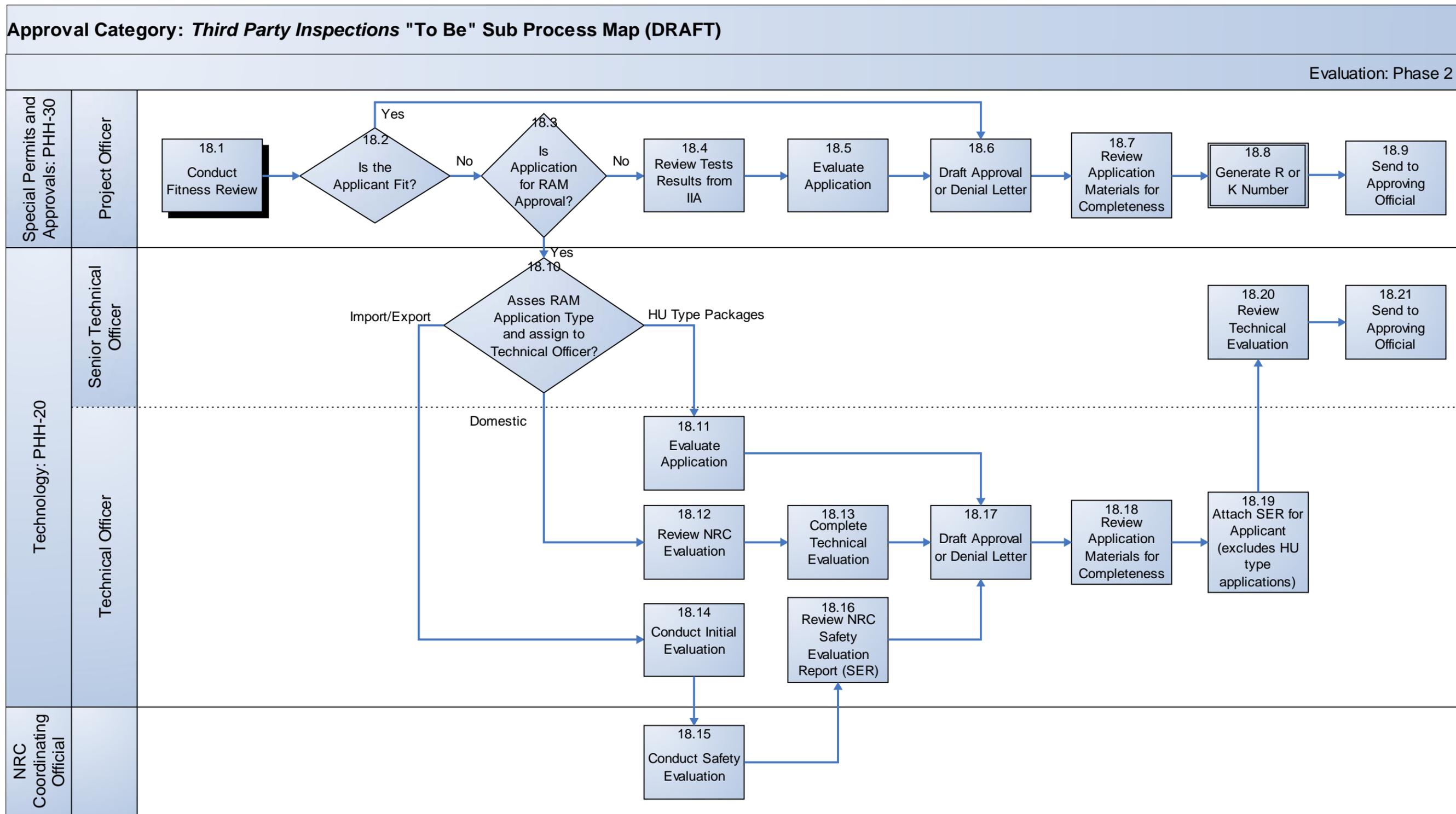
6.3.6 DOT Inspection Process Flow Map



6.3.7 Safety Evaluation Process Flow Map



6.3.8 Third-Party Inspection Process Flow Map



6.3.9 Disposition (Phase 3) Process Flow Map

