

Minutes for DAA Meeting transcribed by Kenneth Clark

Link: https://usdot-my.sharepoint.com/:v/g/personal/kenneth_clark_ad_dot_gov/EaUJhHeBc39PicuFZsdbtWoBuCmt7isFiydUpPwEG_2aGQ

Attendees:

- American Bureau of Shipping
 - Burdette & Associates, Inc.
 - Bureau Veritas
 - EEC Testing services
 - A.C.I Agence De Controle Independent
 - British Engineering Services
 - Hartford Steam Boiler Inspection and Insurance Company (HSB)
 - KR Hellas Ltd.
 - Silver / Cims LLC
 - LRQA Verification Ltd.
 - Western Cascade Truck, Inc. dba Western Cascade
 - OSM LLC
 - Gold Tank Inspection Service, Inc.
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- Meeting commenced with welcome remarks by PHH25 Chief Duane Cassidy, give an overview of the DAA meeting. He mentioned the minutes would be out as soon as they were completed.
 - Participants were informed that the meeting was going to be recorded then the recording began.
 - Duane transferred the floor to Director of Sciences and Engineering, Mr. Lad Falat who gave a breakdown of PHH-20 then transferred the speaking role to Mr. William Quade, Deputy Associate Administrator and Mr. William Schoonover, Associate Administrator

Mr. William Schoonover Presentation:

- Mr. Schoonover gave an overview of the where PHMSA as an organization would like to see the third-party agencies.
- Discussed the strategic 4-year strategic vision for PHMSA. Advised that not all third-party agencies. Seen that programs are not all overseen or consistent in the same way, in a way PHMSA wants it to be. Improve relationships with other agencies and trust.
- Discussed PHMSA Brand Value within the third-party agencies
- Agreement between DAA and the Govt that outlines expectations from PHMSA and DAA's. This will not replace the approval but more or less define the relationship.

- While this is still in the framework of development, this agreement between the IIAs and PHMSA are expected to be something formal between the two parties. The document will clearly outline expectations by both participants, expectations, support to be provided along with certain criteria that are deal breakers.
- Considering a single point of contact from the Agency to third parties to lessen confusion in communication.
- Developing clear guidelines on how we work together specifically with Fitness.

Duane Cassidy asked for questions:

-Bruce Redfield commented on the list of items provided by Mr. Schoonover, would like to see clear guidelines for DAA activities, comply to fitness requirements and communication would be a real improvement for both parties involved.

Mr. Schoonover says he wants a relationship where this is a high bar for entry but once you're in you are family. Third party agencies are the eyes of innovation for PHMSA.

Duane Cassidy reiterates Mr. Schoonover's remarks on trust and communication.

Duane Cassidy introduces Diane Jones/Transportation and Irwin Pascal/Transportation Specialists

Diane Jones/Transportation Specialist:

Reviewed the PHMSA Mission Statement

Reviewed the Agenda

Irwin Pascal states that whenever there are meetings, the DAA should feel free to approach PHMSA with any questions they may have. Irwin states that PHMSA does not authorize remote inspections, however this is the direction of the future. The Pandemic played a major role in this.

Duane Cassidy thanks HSB, also goes on to reiterate that PHMSA does not authorize remote inspections for third party agencies. He further states that PHMSA just got their own program up and running and it's still in its infancy. Noted that PHMSA is not endorsing HSB presentation.

The ensuing presentation was given by Paul Coco (HSB). The presentation dealt with HSB's experience with virtual presentations and lessons learned from conducting these inspections. **(Noted that PHMSA does not currently authorize virtual inspections).** The delivery of this presentation was well received by the other participants, in light of the fact that the industry was emerging from the pandemic, which saw operations almost come to a standstill. The HSB presenter went over the methodology, techniques utilized and how they are able to provide an accurate determination of real-time pictures of welds and other operations. Mentioned how ASME and Industry groups were able to establish technical oversight to provide a set of consistent guidelines for such inspections. Minute details such as geotags embedded in photographs, highlighted how inspection location could be verified. This presentation had a captive audience as the information provided was practical and based on actual inspections conducted by HSB. Following this the floor was opened to questions.

HSB Questions:

Danny Shelton- Thankful for the presentation, said there was interpretations throughout the year where cameras were authorized by PHMSA to use cameras for Cargo Tank inspections. Advises that the interpretation said that cameras has to be as good as what the eye can see but there's no clear guidelines. Expresses concerns of the use of cameras.

Duane agrees that there are interpretations out there but does not substitute for an approval or permit to clarify PHMSA positions on remote inspections and the use of cameras.

PHMSA isn't advocating those remote inspections be done in the same manner as HSB but feels there's a lot of useful information that was provided that can be used in the future.

Dane- advises that the UK DGC approved remote individual inspections for petroleum tankers. Only for internal and external inspections.

MR. LeClair- shared an experience in Europe in 2020. Attempted the same remote inspection HSB did. Says this format is the best median to use for remote inspection. They experienced an issue when performing the internal inspection where they lost connection during the remote inspection because the signal could not pass through the tank. They had to get someone at the facility to record inside of the tank and then send them the video. Advises there are still some limitations but is a great pathway.

Paul Coco advised they used mobile hotspots to assist with that issue.

Duane states that he believes the government may go with the Hybrid model of using both onsite and/or virtual inspections. Something PHMSA may take a look at also.

Joe Vega/PHMSA Investigator Vega Presentation:

-Speaking on what PHMSA does from a field investigator viewpoint. Disclaimer: These slides are informational and reference generalities, not strict practices or policies.

Inv Vega covered the activities of PHMSA OHMSA Field Operations and the activities and functions that they perform. He covered the organization chart to provide the audience a better understanding communication cycle between the departments within PHMSA OHMSA. Vega also spoke on the various regions in PHMSA and what PHMSA regulates. He explained the differences between the various site visits. (Inspection/Investigation – Fitness Review.

Explained the site visit process and what to expect before and during the walkthrough.

Violation trends discussed were administrative violations. Incomplete training records, SOP's not corresponding to actual operations and incomplete semi-annual reports. Technical violations, using expired special permits and incorrect markings.

Overall takeaways were to review the HMR and CA Approval and review uncommon procedures and tanks. Not much was received in terms of questions

Diane Jones presentation:

- Overview of application submission for new, renewal and modification.

Irwin Pascal – gave responses to the questions submitted by DAA's- see the recording for details.

Meeting was recorded by Kenneth Clark: 25 May 2022

[Recordings - OneDrive \(sharepoint.com\)](#)

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