

Minutes for IIA Meeting 2024

Start Time: 9:05

Diane Jones

- Open IIA Meeting
- Read Mission Statement
- Review Agenda
- Introduce Neil Benninghoven as the next speaker.

Neil Benninghoven

- Welcome Guest
- Explained Purpose of the Meeting
- Introduced Eamonn Patrick from Standards and Rulemaking as the 1st Presenter.
- Announced to the attendees that the meeting will be recorded.

1st Presenter Eamonn Patrick

- Recent Revisions to Cylinder Manufacture, Use, and Requalification Requirements (HM-234, HM-219C, HM-219D, HM-215Q)
 - Question from Joe Cassidy: Will PowerPoint be provided to attendees
 - Question from Joe Cassidy Question regarding Pressure Relief Device for non-refillable Cylinders regarding Pi-Mark UN ISO 11118 and answered Eamonn Patrick.

1st presenter concluded

Diane Jones

- Introduced Kate Maits from Field Investigations as the 2nd Presenter.

2nd Presenter Katelin Maits

- International Cylinder Inspections
 - Question from Bruce: confirming On-Site Inspection Timeframe (expectation of 1 year)
 - Response from Neil Benninghoven: Flexibility if the manufacturer's site is close to another manufacturer's site waiting for their On-Site Inspection.
 - Response from Katelin Maits: Investigators are sometimes doing 3-5 Trips Internationally in the year along with Domestic Inspections daily. If requests come in during the summer, expect the inspection to come the following year. 2024 was a catch up year for Enforcement.

2nd Presenter concluded

Break 9:36 – 9:41

Diane Jones

- Introduced Refaat Shafkey from the Technical Engineering as the 3rd Presented.

3rd Presenter Refaat Shafkey

- Technical Review of Applications for Approvals
 - Question from Joe Cassidy: How to submit an application with multiple specification, referring to DOT and UN ISO application.
 - Response from Refaat Shafkey: Preference to submit multiple specification separately.
 - Question from Joe Cassidy: How to submit an application with similar design to an approved design.

- Response from Refaat Shafkey: If it's the same but just a little bit longer or a little shorter, you reference the previous drawing in the modification no additional testing needed. New design requires test data, example burst and spun. Provide technical data.
- Question from Joe Cassidy: Explain Cover Letter and submitting an application for DOT 3AA with a water volume change.
- Response from Refaat Shafkey: Reference previous approved drawing and provide new information in case the manufacturer has added or made change (example: change with Threading). Also, provide the old drawing.

Duane Cassidy

- Welcome remarks to the attendees

Questions Continue

- Question from Joe Cassidy: Confirm if the Batch Test should be included with the application.
- Response from Refaat Shafkey: Yes, to see if there was a change if production.
- Question from Tommy Hin: Question about design variance for DOT 3AL requirement
- Response from Refaat Shafkey: Follow the requirements of the specifications and details in the regulations for the requested specification. IF you are changing the diameter and the pressure, think of it as a new design and provide all the associated technical test for a new design.

3rd Presenter Concluded

Diane Jones

Introduced 4th Presenter Kenneth Clark from the Pressure Vessels

- CA Approval (Chemical Analysis)
- 2 ½ Conditional Approval
- Special Permits Addition
 - Question from Blake Sykes: Conditional Approval DOT 3AL and UN ISO, separate applications
 - Response from Neil Benninghoven: After initial approval, they cannot get any modifications while on a conditional approval. This a PHMSA policy. Initial application should have all specifications you'd like to manufacture. Once Conditional is approved, company cannot add any additional designs until after an onsite inspection.
 - Refaat Shafkey explains to provide 2 separate complete applications if submitting for 2 designs to avoid confusion.
 - Question from Joe Cassidy: For the Chemical Analysis, how to submit a notification for change with the Chemical Analysis or for an ownership change
 - Response from Neil Benninghoven: This is in accordance with 49 CFR site 107.807. Treat as a regular modification request and submit request to Pressure Vessels.
 - Question/Comment from Joe Cassidy: During an inspection, they may see something has change.
 - Response from Neil Benninghoven: Report the change in accordance with the regulations
 - Questions from Tommy Hin: Does 2 ½ year approval apply to only manufacturers or Requalifiers?
 - Response from Neil Benninghoven: Only manufacturer's facility. Once we get a favorable endorsement from the IIA for a requalifier and we follow our Tier 1 memo along with procedures with our Field Ops team. They will get the full 5 years just as long as there are no major findings in the IIA report. Do not be leery of mentioning the

findings because it will get reviewed by the Field team and they will generally have their recommendation back to approvals in a week.

- Response from Irwin Pascal: Some 2 ½ approvals were issued due to the findings from Field.
- Question from Blake: For Conditional Approval (Manufacturers) should they submit 2 separate applications for adding ISO and DOT cylinder?
- Response from Neil Benninghoven: No new designs will be added to Conditional Approvals.
- Response from Refaat Shafkey: Submit two separate requests for DOT and ISO cylinder instead of putting both specification on one application. The two different specifications has different test requirements.
- Response from Neil Benninghoven: Two separate request for one submittal. The cover page will assist by clearly defining the purpose of the request.
- Question from Joe Cassidy: New manufacturer request will clearly states DOT/UN ISO . Will applicant get 1 Tracking Number to cover both DOT and UN ISO?
- Response from Neil Benninghoven: Yes, both DOT and UN ISO will be on a conditional approval.
- Question from Joe Cassidy: Will Conditional approval have both DOT and UN ISO design on the approval?
- Response from Neil Benninghoven: Yes, clearly define on the cover letter for each design to assist the Technical Reviewer.
- Question from Joe Cassidy: Can a new addition be added to a Conditional Approval while under Fitness Review?
- Response from Neil Benninghoven: Wait for On-Site Fitness to be completed.
- Question from Joe Cassidy: Possibility of DOT harmonizing with European Regulations/Specifications.
- Response from Duane Cassidy: This has not been added to our regulations. Contact Standards and Rulemaking for updates.

- **End of Meeting 11:08 a.m.**