

Minutes of the Domestic IIA phone conference / meeting held on November 16, 2016

Pressure Vessels Branch (**PHH-33**) held a meeting with the Domestic IIAs to discuss new and upcoming changes at PHH-33 (with particular emphasis on **RINs**). The organizations present were, **Cylinder Services, Professional Services Inc, Arrowhead Industrial Services, T.H Cochrane Laboratories, Element Cleveland, Steigerwalt Associates, Cylinder Services, and HSB Global Standards.**

- One of the topics for discussion was RIN applicants with multiple testing methods and the need for the applicants to clearly state to their IIAs what special permits, DOT specification cylinders / UN ISO cylinders they are requiring to requalify by each testing method. By having this clearly outlined it decreases on the time of processing of the approvals, as the phone calls to the applicants, to provide such clarification is eliminated. This is in no way outlining how the IIA should submit its report, but rather the need for all parties concerned to be as specific as possible.
- Clarification was provided by PHH-33 to the IIAs reinforcing our current policy, requiring that applicants need to contact their IIAs, if they intend to add new DOT specification cylinders, UN ISO cylinders and special permits that were not originally on the recommendation sent to PHH-33 by the IIA.
- It was duly noted by the IIAs that additional verbiage needs to be added to approval letters to reflect the fact that additional special permits to be included on approval letters should be reviewed first by the IIAs (this has been adopted).
- PHH-33 reiterated the collaborative effort between PHH-33 here and the IIAs and the value that IIAs have both to the RIN applicants and to us. IIAs were reminded that their recommendation to us is what ultimately gets put on the approval and an additional review to check special permit(s) for expiration and DOT specification cylinders, UN ISO cylinders goes a long way, decreasing the processing time as there are fewer discrepancies that need addressing.
- To be consistent with the authority granted by RIN approval letters, applicants testing **DOT-106A, DOT-110AW**, will need to list the special permit that authorizes them to test the 106A and 110AW. 49 CFR § 107.805, states that a person must meet the requirements of this section (§107.805) to inspect, test, certify, repair or rebuild a **CYLINDER** - 49 CFR 171.8 defines cylinder to exclude Multi-unit Tank car tanks and portable tanks.

PHH-33 has contacted Special Permits and approvals (PHH-31) and will provide a template that applicants need to fill out (*see attachment*), and have their IIA review prior to sending the application to specialpermits@dot.gov . Through discussion with our counterparts at special permits approval we were informed that barring any “fitness” issues¹, these approvals would take approximately 30 days to process. Some of the special permits pertaining to testing of DOT-106A, DOT-110AW, are (SP15647, SP7835, SP14437). **Keep in mind that provision of these**

¹ If the company is a foreign company that has not previously been inspected, outstanding violations and fines

special permits, is no way an endorsement whatsoever by PHMSA as to what specific “special permits” for “party to” status should requested.

- All concerned were given a preliminary reminder that the mandatory Annual IIA meeting is tentatively scheduled for the second Tuesday in May of 2017. Additional information will be provided as the time approached.
- Clarification was provided that those coming in for party status would be granted an initial two (2) year approval after which they would have to apply for renewal, which would then be granted for four (4) year time frames.
- It was reiterated that it is ultimately the responsibility of the owner, to ensure that special permits they are party to are still valid.
- The question of UE examination and the need for a more detailed inclusion into the regulations was brought up and noted and PHH-33 Acting director noted he would take that up with PHMSA’s Standards Branch, as this is something that will need to be handled through some form of rule-making.
- The question of standardizing language in special permits that pertains solely to the requalifiers to minimize the confusion sometimes encountered by these folks, who read the special permits and sometimes confuse the section pertaining to the manufacturers, for what is required of them was brought up. It was decided that mention would be made to PHH-31 Chief about improving the language going forward.

This form of dialogue and information sharing is with our stakeholders, to include IIAs was well received by all concerned and we thank all the participating IIAs for taking time off from their schedule to participate.

Note: All IIA renewing their approvals should include the following language if nothing has changed. ***“No process has changed from the original approval, all functions and duties of the inspector of this renewal remain the same as originally approved.”***