

## 2019 IIA Phone conference minutes

Date held: Tuesday October 15, 2019

Venue: DOT Headquarters (Skype-phone meeting)

### Agenda

**Welcome Remarks** *PHH 33 Chief Duane Cassidy.*

**Creating a portal account** *Transportation Specialist Kenneth Clark.*

**Portal Overview** *Senior Transportation Specialist Neil Benninghoven.*

**GC creation / submission in the Portal** *Transportation Specialist Irwin Pascal.*

**Questions** / feedback from participants.

### Attendees:

- Chris Martin (Cylinder Services)
- Mike Phares (PSI)
- Joe Cassidy (Arrowhead Industrial Services USA, Inc.)
- John Ratka (Element Services)
- John Harris (T.H Cochrane Labs)
- Tommy Hin (Authorized Testing Inc.)
- Mike Anderson (HSB)
- Bruce Redfield (HSB)
- Steigerwalt Associates

The Pressure Vessels Branch Chief, Mr. Duane Cassidy, welcomed the Independent Inspection Agency (IIA) participants and gave brief remarks on scope of the meeting. Participant were informed that the meeting would focus primarily on two items: (1) the competent authority portal (creating an account, submitting semiannual reports using the portal); and (2), providing an update of the IIA white paper. He mentioned that conference-style meetings are very much in play but a number of factors determine the meeting format, such as the content and any current issues. It was tentatively agreed upon that the IIAs should expect to be part of a meeting where all are physically present in the same location, biennially. Since the switch to the portal, PHH33 has recognized that the portal is being under-utilized. To address this, a presentation was given to familiarize the IIAs with creating a portal account and utilizing their portal account to submit general correspondence (GC) (e.g., semiannual reports, other non-technical information) themselves instead of sending these requests in by mail or email. Another key feature was an update on the 'White Paper'.

Following the opening remarks, transportation specialist, Mr. Kenneth Clark, presented slides on how applicants can go about creating an account in the Competent Authority portal. Mr. Clark emphasized that while the most internet platforms will work, Internet Explorer 10 and above, provide the optimal operating conditions for the portal.

Immediately following, senior transportation specialist, Mr. Neil Benninghoven along with Branch Chief Mr. Cassidy gave an overview of the competent authority portal and spoke on the IIA 'White Paper'. They informed the participants that they should always use their "Domestic IIA" approval ID number when creating general correspondence files to fulfill their semiannual reporting requirements. This presentation focused on semi-annual reporting for Domestic IIAs. If you are submitting an application or report pertaining to another CA approval, you should reference the correct CA. They mentioned that the portal has been updated since its inception, now sends out email notifications to IIAs 120 days prior to expiration of approvals and 30 days prior to the deadline when semiannual reports are due.

Regarding the 'White Paper', Mr. Cassidy mentioned that the ultimate goal is the reduction of approvals on the 180-day list and getting requests through the technical and field operations in a timelier manner. The paper recommends merging a fitness documents with the approvals process; issuance of 2-year conditional approvals to allow entities to gain the necessary clientele, which in turn allows field operations to perform inspections on all processes that require verification.

Participants were informed that at times certain changes requested by IIAs differ in time to completion because factors such as: (1) Last onsite inspection by field operations; (2) Fitness history; and (3) Whether the applicant has been placed on the schedule for an inspection. All these factors help determine how requested changes are approved. Another factor such as the availability of funds for international travel also indirectly affects the scheduling on onsite inspections. It was re-emphasized that the 'white paper' is **not yet policy.**

The design change criteria is a work in progress and the end goal is to get "design change requests" to under 30 days from submittal to approval. The objective is to have something in place that mirrors design changes for Domestic IIA approvals. IIAs were reminded that when submitting design change requests where the changes required were under 10% (under the significant change threshold), they should document that and submit comparison tables, as oftentimes these approvals can be approved right away. This did not pertain to UN ISO receptacles. The White paper is attempting to get 'design changes' as a function of IIA approval letters.

The final presentation showed participants how to submit a General Correspondence request using the competent authority portal (CA portal). Participants were reminded that to access this part, they need to first create a portal account (demonstrated by Mr. Clark). They were informed that the utilization of the CA portal, in lieu of sending the request to the approvals email will result in quicker receipt and processing of requests. In addition, once they have submitted their

semiannual reports they will instantaneously receive a tracking number that will serve as proof of timely submission of semiannual reports. IIAs were also reminded that as part of the conditions of their approval they are prohibited from submitting request for applicants. It is the responsibility of the applicants to submit all requests.

IIA participant asked for the optimum manner in which information should be formatted for Technical Reviews. The applicant was reminded of the IIA presentation performed 2 years ago in which approvals presented information on the topic. (use comparison tables, ensure method of manufacture is clearly spelled out, include all appropriate tests and inspection reports, reference to specification to which the design complies, fully dimensioned sketch covering all dimensions as required in the reference standard, service and test pressure, minimum volume and empty cylinder weight, material chemistry, heat treatment, mechanical properties, performance tests required on batch analysis, sidewall thickness) were some of the criteria mentioned. Applicants requiring another copy of the presentation can email [approvals@dot.gov](mailto:approvals@dot.gov).

***Just a reminder, meeting attendance is not optional and going forward a reminder will be sent to remind all participants. This language will also be added to the approval letter as a condition of your approval. All the IIAs were present, and if for whatever reason an IIA is unable to attend a meeting due to extenuating circumstances then another representative should be present.***