Meeting: US DOT Domestic Independent Inspection Agency (IIA) Meeting

Date: Wednesday, November 4, 2015, 8:00 a.m. to 4:00 p.m.

Location: Media Center (Room 2), West Building, DOT Headquarters

In Attendance: Bruce Redfield, Terry Palmer, John A. Harris, John Ratka, Joe Cassidy, Shawn Mashburn, Gopal Nair, Mike Phares, Daniel John, Russell Stading, Frank Jensen, Tommy Hin, Duane Cassidy, Israel Mallard, Angie Wang, Diane Jones, Kim Yoder, Neil Benninghoven

8:09am Introduction and opening remarks from Ryan Paquet, Director, Approvals and Permits Division.

8:11am Introduction of attendees

8:13am Paquet discusses PHMSA's mission and the 3 Cs (Compliance, Consistency, and Communication).

- PHMSA is driven by our mission: To Safeguard people, property, and the environment from the risks of hazardous materials transportation.
- You will hear this repeated often during today's presentations.
- When approaching PHMSA with a request or issue, please address it from the perspective of our mission, as that is how we are going to address your concerns.

8:16am Introduction of Dr. Magdy El-Sibaie

- We have seen DOT cylinders either not manufactured correctly or retested properly.
- We need to maintain a high standard, and we expect and demand that our IIA's help PHMSA achieve this standard.
- Our staff today has put together lots of valid information regarding our expectations and your responsibilities. We demand that our designated agencies continue to meet and communicate PHMSA's mission, objectives, and safety standards outwardly.

8:19am Introduction of Rachel Meidl

- IIAs are the eyes and ears of PHMSA.
- The last IIA meeting was held in 2013 and this meeting is meant to bridge the gap from then until now.
- It is important to have open and transparent dialogue to close regulatory and policy gaps. We hope to achieve that today, which is why we are here.
- Question: How do we close these gaps?

8:22am Introduction of Duane Cassidy, Chief, Pressure Vessels Branch

- **PHMSA's MISSION –** As Ryan discussed, all things start with our mission.
- **SCOPE AND PURPOSE – BRIDGING THE GAP:**
  - We are here to discuss the approvals requirements that were revised in 2013.

- As Rachel alluded to, the purpose of this meeting is to "bridge the gap" from the 2013 meeting.
- In the past 2 meetings we discussed the program gaps, the revised approval provisions, and our expectations. Today, we will discuss the things we are doing internally to improve our process, we will look at areas that are/are not working, and discuss areas where we believe that the IIA's are meeting/not meeting the requirements of the revised approval.
- We are going to discuss and define the roles and responsibilities of the IIAs, continued efforts by PHMSA to increase the oversight and inspection of its approved entities.

- **OVERALL CYLINDER PROGRAM GOALS:**
  - Improved process and letter requirements and compliance
  - Continue improvement of our information sharing and communication with all approval holders, especially our 3rd party agencies.
  - Consistent application of the HMR to all applicants (foreign/domestic) - which has resulted in us meeting with our international IIA's this week as well.

- **CONTINUATION OF 3 Cs: Stressing the continued importance of the 3 C's. They haven't gone away.**
  - Compliance
  - Consistency
  - Communication

- **UPDATE – WHAT HAVE WE BEEN DOING?**
  - Increased review of fitness on all approved manufacturers and IIAs
  - Updated staffing – (Introduction of new staff members)
  - Updating our IT systems, automated processing, notification, RIN locator, etc.

- **QUESTIONS FOR YOU? –** Throughout the presentations today, you will be asked several questions to ponder. Please take some time to think about them and apply them to your processes and policies to determine how you, as IIA's, can assist in improvement of this program and the information reported to PHMSA.

  - **(Refer to slideshow for questions)**

8:37am Break

8:55am Introduction of Israel Mallard, Transportation Specialist, Pressure Vessels Branch

- **PHMSA's Mission was discussed for emphasis**
  - PHMSA's first responsibility is the safety of the American people related to the commercial transportation of Hazardous Materials.

- **ROLE OF THE INDEPENDENT INSPECTION AGENCY (IIA)**
  - The IIA's are required to perform onsite inspection of all tests and manufacturing requirements required by the Hazardous Materials Regulations (HMR).

- Performance of pre-approval audits of manufacturers, repair/rebuilders, and requalifiers of DOT authorized compressed gas cylinders.
- To perform verification testing of foreign manufactured cylinders prior to approval by PHMSA under the HM74 Inspection program.
- IIAs must comply with all provisions of their issued domestic IIA approval letter.

➢ **REQUIREMENTS OF THE IIA**
- Must act independently of the manufacturer
- Must conduct a pre-audit of foreign manufacturers prior to submittal of DOT approval as the IIA for that facility.
- Must verify compliance with the applicable regulations and note any deficiencies/corrected items, in detail, in their inspection report submitted to PHMSA.

➢ **APPROVAL LETTER PROVISIONS**
- Failure to respond to a show cause letter could lead to the termination of an approval. IIAs will have the opportunity to respond before the termination occurs.

➢ **QUESTIONS FOR YOU? (refer to slide show)**

9:05am IIA Comment (Terry Palmer, HSB Global)– It would be better if there were clearer step-by-step procedures. It would also be good to know the steps from PHMSA.

Response from Duane Cassidy – "PHMSA's Standard Operating Procedures (SOP) outlining the approvals process, is available on PHMSA's webpage. We plan to further clarify our procedures during today's discussion".

9:10am Introduction of Neil Benninghoven, **Transportation Specialist, Pressure Vessels Branch**

➢ **PHMSA's MISSION**
- Safety is paramount

➢ **IIA APPLICATIONS**
- Separate applications (from manufacturer and IIA) should be sent to PHMSA.
- We need to know who is on site and if they are trained.
- Must include:
  - Must meet general requirements of 49 CFR §§ 107.705 and 107.803
  - Pre-Audit reports
  - Duties of the inspector
  - Chemical analysis
  - List of inspectors
  - Stamp of the inspector (each inspector at the location)
  - IIA stamped copies of the manufacturers drawings submitted for approval

➢ **PHMSA's PART OF APPLICATION PROCESS**
- Discussion of what we do with your application once we receive it in our inbox
- We do our homework in finding the last known approval letter
- Conduct an initial fitness determination

- Draft an evaluation form (our initial recommendation on if the application should be approved or not)
- Review the drawings provided (if necessary) and forward package to Engineering for technical review
- Draft fitness determination form, this is sent to Field Operations/Enforcement if a fitness determination is needed in accordance with the criteria provided to the Approvals division by Field Operation/Enforcement

- **WHAT HAPPENS NEXT**
  - Both IIA and manufacturer applications get processed at the same time and are crossed referenced tin order to maintain better oversight on the approvals process
  - Field Operations/Enforcement requires that both IIA and manufacturer applications be submitted together for fitness determination (since both deemed FIT or UNFIT at the same time)
  - The IIA application and manufacturer applications will be approved at the same time and sent out with the same expiration date

- **ADDITIONAL INFORMATION REQUEST**
  - We are trying to cut back on the time to process approvals
  - IIAs will now be copied on all/any requests for additional information to help with the clarification needed to gain an approval for an application. By doing this it will also keep all parties involved in the approvals loop for a manufacturing location
  - After 30 days (as per 49 CFR 107.709) if no response the application will be denied

- **DOT's OVERSIGHT ON IIA PROGRAM**
  - Permits & Approvals – Final decision on whether the application is approved or denied
  - Engineering (Tech) – Checks to ensure the drawings are technically sound and are IAW the specifications and other information (i.e. CGA Pamphlets & UN ISO)
  - Field Operations/Enforcement - Responsible for Fitness Evaluations and enforcement actions on IIA's and manufacturers.

- **ACTIVE APPROVALS THAT ARE MISSING**
  - PHMSA will need you to verify all current approvals you are currently responsible for
  - Provide a list to PHMSA with a list (which some of you have already done) of any/all locations you currently perform IIA duties at you do not have an approval letter on file
  - Neil Benninghoven is the point of contact for all of these submissions
  - Final step will be for the IIA to submit an application for all locations that are "missing approval" letters with the required information

- **NO EXPIRATION DATE APPROVALS**
  - While reviewing approval history, any approvals found without a listed expiration date (This includes approvals based on special permit expiration dates) must be submitted as a renewal application
  - This may require onsite inspection by PHMSA prior to issuance, but this is based on the fitness review by Field Operations/Enforcement.

- This will not stop operations under your current approval, as without a valid expiration date it is still a valid approval, until fitness is determined by PHMSA and an updated approval is issued.

- **SEMI-ANNUAL REPORTING**
  - Semi-Annual reports must be submitted every 6 months (as per the approval letter)
  - PHMSA currently has this information provided on file for use in the approvals process and for information we may need to verify manufacturer locations/addresses by (Field Operations/Enforcement and Approvals)
  - We are currently exploring making the report submittal a web-based process.
  - Please bear with us during this process, as you will be asked to assist in testing the system and provide feedback to assist with the implementation and development

9:56am Comment from Kim Yoder - We need the following information in the semi-annual report: main domestic approval, name of manufacturers and their information, specs used, assigned investigators at the specified location(s), and statuses. We would also like to have facility addresses included in the report.

10:00am IIA Question - Where there be an additional page with definitions?

Answer - Yes

10:06am Neil Benninghoven (Cont.)

- **ADDITIONAL ITEMS OF CONCERNS**
  - Combined applications for different areas of approval
    - A RIN and a CA must be separated into two (2) separate applications because they are two (2) different approval and are processed separately within PHMSA
  - Incomplete drawings
    - Missing information on manufacturers drawings, PHMSA is developing a "sample" drawing to provide to the IIAs as a guide for the manufacturers to follow prior to submitting for approval
  - Missing Pre-Audit reports
    - Pre-audits are **REQUIRED** to be completed **PRIOR TO** submittal of the application, if not submitted, the application will be denied as the application will be deemed incomplete and not IAW the provisions provided in this presentation

- **QUESTIONS FOR YOU? (refer to slideshow presentation)**

10:12am IIA Comment – A drawing template would be imposing. There should be a checklist instead.

10:15am IIA Question – Why is it necessary for the client to send in an application, especially considering that the application can be manipulated by the client?

Answer- This is why the applications are being submitted separately. IIAs are required to

submit their findings separately to protect you from the manufacturer conducting operations for which the IIA is unaware. This will also allow PHMSA the ability to see if the drawings being submitted by the manufacturer are the same as the ones you have approved as the IIA of record

10:20am IIA Comment – The IIA's findings should be sent separately from the manufacturer's application. That way, there is no ambiguity. We should not have to submit the comprehensive findings to the client. IIAs should send findings directly to DOT and clients should send corrected application packages to DOT. We could convey our findings to the clients without giving them the actual documents.

10:35am Break

10:55am Introduction of Refaat Shafkey, Engineer, Engineering and Research Division

- **TECHNICAL REVIEW OF APPROVAL APPLICATIONS**
  - The Approvals staff introduced you to the application flow process through PHMSA's process
  - This presentation covers the technical review by the Engineering group
  - An organized and complete application facilitates the review process and reduces the review time for the technical officer, which in turn reduces the overall approvals process

- **WHAT DO WE NEED IN AN APPLICATION?**
  - It is ideal to have any application submitted to PHMSA to follow a standard organized format
  - Although the regulations do not address this, we request that applicants limit the number of design specifications to fewer than 4 designs per application. Obviously, an application with 18 designs and 4 variants to each design is very difficult to review and takes a much longer time to process
  - We are asking that applicants/IIA's include a cover letter which clearly states what you are requesting and specifically states the specification of cylinder, design drawing, and whether this is a new approval or an a revision to a previously authorized design
  - The purpose of the Cover Letter is to minimize the need for corrections or requests for missing information. This can lead to delays and repeat efforts to complete the application review
  - The idea is to get things right the first time. The technical reviewer should be able to complete the review in the first attempt. Understand, once the approval is sent out of the approvals process to request additional information, it loses its spot in the "production line" of approvals applications, and the reviewer moves on to the next application.

- **DESIGN DRAWING**
  - The design drawing is the most important part of the application
  - It should provide complete information about the cylinder, preferably on one page and should include the following, when applicable:
    - **Basic Elements (Service/test pressure, volume, weight, etc.)**
    - **The standard to which the design complies**
    - **Manufacturing method**

- **Material Chemistry**
- **Heat treatment**
- **Batch Tests required**
- **Tests on all cylinders (Hydro, Hardness, etc.)**
- **Wall Thickness Calculation**
- **Design Family (if applicable) identifying the cylinder used for design qualification**
- **Marking layout should be included on the drawing or should be referenced on the main drawing**

➢ **SAMPLE DESIGN DRAWING TEMPLATE**
  - A separate calculation page referencing drawing/diagram is acceptable. (See slideshow)

➢ **SAMPLE SUMMARY SHEET FOR APPROVALS APPLICATION - (See Slideshow)**
  - The summary sheet should include a list of all the referenced documents and test reports, and identify applicable clauses of the standard
  - It should list the acceptable requirements and the results obtained and whether they were satisfactory or not
  - Test reports and other documents are required to be in English, stamped by the IIA, numbered and organized as appendices to the summary sheet

➢ Dual marked cylinder (**parked item**) – Inefficient because of 2 sets of reports.

➢ **QUESTIONS?**

11:29am IIA Question – (Terry Palmer – HSB Global) - If a question posted to the E-Bulletin is a procedural one, will the question and the answer be disseminated to the other IIAs?

Answer - This question was in regards to the IIA E-Bulletin board discussed. Yes, such information could, and would, be communicated through the IIA bulletin board. IIAs will be alerted about any procedural questions that apply to everyone

11:33am Lunch

12:42pm Introduction of Diane Jones, Transportation Specialist, Pressure Vessels Branch

➢ **CFR REGULATIONS**
  - A general overview was given regarding most commonly used CFR reference cites, this includes the requirements for U.S. Agent (105.40), Record keeping requirements (180.215) and the IIA approval authority (107.803) - (see slides)

➢ **49 CFR OVERVIEW**
  - The E-CFR reference page was discussed. It is located on PHMSA's webpage under the "Regulations tab" and gives free access to the Hazardous Materials Regulations. It is updated every 2 weeks and gives the most accurate information available.

➢ **APPROVALS PROCESS – (SEE Slides)**

- A general overview of the approvals process was given. This included the application flow from the time an application is received, the initial fitness review and application completeness, Technical review

- **GENERAL APPLICATION REQUIREMENTS (See slides)**
  - The general approval application requirements are listed under 49 CFR 107.705
  - If the general requirements are not met, your application will be "rejected" as being incomplete. You may re-submit request at any time thereafter, upon correcting any errors noted. If your application is "denied", it means that the information submitted in your application was complete, but the request itself was evaluated and denied. Once you receive a denial you have 20 days to request a reconsideration of your application in accordance with 49 CFR 107.715.
  - A request is required for all applications/registrations being submitted to PHMSA
  - You must identify the section of the HMR for which you are applying and meet the general requirements of 49 CFR 107.705 and the applicable sections of the regulations for which you are applying for approval.
  - You should include any additional documentation (test data, description of the activity requested, photos, training certs/documentation) that will assist PHMSA in processing your request.

- **PROCESSING REQUALIFIERS (RINS) & REPAIR/REBUILD (K-NUMBERS) (See Slides)**

  - For RIN and Repair/Rebuild (K Number) applications, you are required to also submit a copy of the inspection report and recommendation from an approved Independent Inspection Agency with your application in accordance with 107.805.

- **ADDITIONAL REVIEW PROCESS**
  - Once the application has been reviewed by the initial Project Officer, it is forwarded for secondary review by the cylinder team lead (Neil Benninghoven) or the Program Chief (Duane Cassidy).
  - A determination is made as to whether additional fitness review is required by PHMSA's Field Operations Division, based on internal guidelines, fitness history, and the information submitted with the approval request package.
  - Although the IIA gives a recommendation for approval, PHMSA makes the final determination as to whether the application is approved, based on the applicant's approval and fitness history and the application submitted.
  - If forwarded for additional fitness review, an investigator will review the file and will make a determination of fitness. This fitness determination may be based on a desk top audit, or make require onsite inspection of the facility by a PHMSA investigator depending on the severity of the issue or if there are outstanding violations or issues on file with PHMSA.
  - PHMSA's Field Operations Division then gives a recommendation of fitness to the Approvals team, and the approval is either approved or denied.

12:48pm Introduction of Angie Wang, Transportation Specialist, Pressure Vessels Branch

- **WHAT IS REQUALIFICATION OF SPECIAL PERMIT CYLINDERS**

- Special permits set forth alternative requirements or variations, to the requirements in the HMR.

➢ **HOW TO SEARCH A SPECIAL PERMIT CYLINDER**
- **A search engine is available on PHMSA's Special Permits webpage that allows you to search to see whether special permits are still valid/authorized (see slides).**

➢ **SPECIAL PERMIT**
- **When conducting RIN pre-audits of companies requalifying RINs, please verify that the applicant has the ability to meet the requirements of each special permit that they are requesting approval to requalify.**
- **Ensure that special permit cylinders included on your recommendation letter are currently valid. Very often we receive IIA reports that recommend authorization of special permits that are NOT VALID.**

12:55pm IIA Question – Are we looking at current 5 year period? If expired, do we (IIAs) still indicate that?

Answer – Yes, the IIAs should be examining the permits and verifying compliance to ensure the RIN holder is able to meet the provisions of the permits for which the applicant is authorized, or for which the IIA is providing a recommendation for approval.

12:57pm Angie Wang (Cont.)

➢ **COMPLETE APPLICATION**
- A signed application or stamped form is needed from the IIA to verify recommendations

➢ **CURRENT PROJECTS**
- Bulletin Board – Open forum for Approvals and Special Permits division, as well as other divisions. Will be used to push out information (e.g. teleconferences, topics, quarterly IIA meetings). If you don't have access, please request access from PHMSA at approvals@dot.gov or via the forum page located at: http://vbulletin.phmsa.dot.gov/forumdisplay.php?f=168

- Cylinder requalification locator – search by RIN, State, or Zip Code, and/or address to find approved cylinder requalifiers/Visual requalifiers.

➢ **QUESTIONS?**
- **When conducting pre-approval audits of cylinder requalifiers, are you verifying that the company meets the requirements of each DOT Special Permit for which you are giving a recommendation for approval?**

- **Are you verifying that the DOT Special Permits are still active prior to adding them to your list of recommended cylinders to be requalified?**

1:25pm Break

1:40pm Introduction of Kim Yoder, Acting Cylinder Program Manager, Office of Hazardous Materials Safety Field Operations

- **ENFORCEMENT OPERATIONAL ACTIVITIES**
  - Field Operations does more than just cylinder inspections, which include the following:
    - Compliance inspections (permits, explosives, fireworks, etc.)
    - Incident Investigation
    - Fitness determination
    - Outreach and Training
    - Information and intelligence gathering
- **HAZMAT SHIPMENTS IN THE U.S.**
  - Over 1,000,000 shipments of hazmat daily
  - 2.2 Billion Tons shippied annually by all modes
  - HazMat materials support $1.4 Trillion of the U.S. Economy annually

- **PHMSA OFFICE OF HAZARDOUS MATERIALS SAFETY (OHMS) REGIONAL OFFICES**
  - Headquarters – Washington D.C.
    - Southern Region – Atlanta, GA
  - Southwest Region – Houston, TX
  - Western Region – Ontario, CA
  - Central Region – Des Plaines, IL
  - Eastern Region – West Trenton, NJ

- **WHO DOES PHMSA REGULATE?**
  - Shippers/Carriers
  - Freight Forwarders
  - 3rd Party labs
  - Permit and Approval holders
  - Independent Inspection Agency
  - Designated Approval Agencies (Portable Tanks/MEGCs)
  - Fillers
  - Agricultural Industry
  - Packaging Manufacturers/certifiers
  - Distributors/Brokers
  - High Hazard entities

- **DETERMINATION OF SCHEDULING ON-SITE**
  - Foreign flag indicators used to be an automatic flag for additional fitness review. This has changed. A new internal criterion is now used based on 74 month inspection history and compliance history.
  - PHMSA will conduct on-site inspections before issuing new approvals or terminating approval/permit holders for non-compliance.
  - Risk-based determination – used if a violation has occurred, if a facility has not been visited in years, or if a facility has not been inspected.

- **INSPECTION TRENDS**

- Common Issues noted were discussed (see slide show for complete listing)
    - Administrative
    - Technical

- **THE INSPECTION PROCESS – The a general overview of the steps of the inspection process was discussed (see slides)**

- **THE INSPECTION PROCESS – ITEMS REVIEWED**
    - The inspection process by the PHMSA investigator is a "cradle to grave" look at the manufacture, starting from raw material through to final inspection

- **THE INSPECTION PROCESS – EVIDENCE GATHERING (DOCUMENTATION)**
    - Training records
    - Certifications (test reports)
    - Production records (travelers are reviewed)
    - Invoice/sales records (releasing cylinders prior to final approval stamp/signature of the invoice by the IIA)
    - QC Manuals and SOP's
    - Drawings
    - Calibration receipts

- **THE INSPECTION PROCESS – CLOSING THE INSPECTION**
    - An Exit Briefing is given and is a "field report" and not a "final report"
    - A summary of the inspection findings are discussed and noted
    - Corrective actions and penalty guidelines are discussed
    - Signatures of final report and copies are given to the applicant prior to departure
    - Corrective actions – IIAs are encouraged to ask for an interpretation if they have any questions.

- **INVESTIGATOR FEEDBACK**
    - Goal is Inspector consistency based on overall compliance and safety
    - However, each inspector is different based on experience, but all are trained and certified as investigators prior to being authorized to conduct inspections.

- **THE INSPECTION PROCESS – NEXT STEPS**
    - Upon return to the office, the investigator prepares the inspection report based on findings and any additional corrective action provided by the applicant
    - Company has 30 days to provide corrective action.
    - All evidence and corrective action documentation is attached to the completed report and forwarded to Region Chief within 60 days.
    - Region Chief/Director will review the report. Upon approval, the Investigator of record will forward an internal "fitness memo" to Approvals office for action.
    - Approvals office will then take appropriate action on the approval application.

- **INSPECTION RESULTS/ACTIONS**
    - Several actions can take place based on findings by onsite inspection, including:
        - Issuance of approval (No further action)
        - Warning letter (no fines)

- Ticket for non-compliance (fines)
- Civil Penalty Case (depending on severity of violations will be forwarded to General Counsel's Office for review and action)
- Criminal Case (Criminal intent in violation, will be forwarded to General Counsel's office as well as the Office of the Inspector General for review and action)

- **ACTIVITY OF DOMESTICALLY –BASED IIAs AS REPORTED (EXCLUDING REQUALIFIERS)**
  - (See slide)

- **ACTIVITY OF INTERNATIONALLY-BASED IIAs AS REPORTED/KNOWN (AT MANUFACTURERS)**
  - (See slide)

- **IIA INSPECTIONS**
  - (See slide)

- **ADDITIONAL ISSUES**

  - Misuse of inspection checklist with DOT symbol and letterhead – After initial IIA meeting, DOT made available its inspection report for reference. However, the IIA's have been using it with the DOT (PHMSA) letter head still visible.
  - IIA's are welcomed to use the document, but must remove the letter head, which references PHMSA, as this causes confusion to applicants.

- **QUESTIONS:**
  - **What improvement would you suggest to enhance Enforcement/Field Operations?**
  - **What would you like to see happening that is not happening now?**
  - **What worries you the most about your role?**

2:30pm IIA Comment – It would be nice to get a document/email from the investigator to indicate a list of testing.

Answer: The investigators normally make contact with the applicant prior to the onsite inspection with regards to the items to be reviewed and made available, as well as the inspection process. A copy of this presentation will be made available after this meeting.

2:41pm IIA Comment – There are concerns about IIAs being out of the loop. We are not informed about certain changes.

Answer: That is reason for this meeting. Additionally, we are implementing additional quarterly/semi-annual teleconference meetings in the future. Lastly, we have also set up the IIA electronic forum, which can be used for this purpose as well.

2:44pm Comment from Kim Yoder – IIAs should never tell clients that they cannot be approved if they change IIAs. This is a false statement. They can absolutely use a different IIA or multiple IIA's at a location, if they choose to. They simply have to request approval from PHMSA first.

2:53pm Closing remarks from Duane Cassidy

- Thank you for your participation and continued efforts to increase communications and make this program better. PHMSA has made a number of improvements internally, as you heard here today. We are doing better. However, we look forward to an increased amount of trust of, and from, the IIA's, which will lead to, hopefully, less oversight and increased usage of the IIA's in other capacities.

- We are looking into the possibility of future use of IIAs to approve design changes for currently approved manufacturers of approved designs.

- What is next?
  - Possible revision of the Domestic approval letter. This could include additional requirements based upon noted trends, as well as removal of current requirements that are redundant or irrelevant. Of course, we are required to issue a show cause letter to notify the IIA's prior to revising the approval, based on a PHMSA initiated action.
  - Using data that Field Ops has collected to make fitness calls of IIA renewals
  - Future IIA meetings – Will continue annually, but we look to possibly add a quarterly or semi-annual teleconference to discuss specific issues in detail.

3:00pm IIA Question (via phone) - Is there an issue with not reviewing low-pressure Visual Requalifiers, it seems that they do not get inspected as often?

Answer – PHMSA conducts inspections based on risk. We have developed a risk matrix, which is used internally to determine the priority of onsite inspections. Low Pressure visual requalifiers are considered lower on the risk ranking. However, reviews are being conducted, but they are not considered as high of a priority, at this point. However, that can change based upon increased violations, incidents, and death or injury data.

3:05pm Meeting adjourned

PARKING LOT ITEMS:

1. Verify special permits on inspection reports – **Due diligence should be taken to ensure that special permits included on inspection reports/recommendations are valid and that the RIN applicants have the capability to meet the requirements prior to issuance of a recommendation.**

2. Determine if IIAs need to be informed when special permits are added. **Yes, RIN applicants should notify PHMSA in writing if they wish to add requalification of a new special permit to their RIN. Depending on the special permit requirements, a new IIA inspection will not be required to add a new special permit, but PHMSA would require updated training certificates which cover the use of the new special permit. In some cases (i.e. – Ultrasonic, or other new testing method to which the applicant is not currently authorized to requalify) an IIA pre-audit would be required.**

3. Determine if PHMSA needs to be notified every time an IIA adds a special permit. **Yes.**

4. Provide information about the application on the web for the ease of the applicant. **This information is provided in this document, as well as the IIA meeting presentations which have already been made available to the attendees after the meeting.**