



JIM SILVER

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Silver/CIMS LLC Inspection Services

Worldwide IMO/UN Portable Tank Testing and Inspection

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What's today's
elephant in
the room?



A Trump "fake news" tweet?
A bad "fat joke?" (*No more body shaming.*)
Is Kim Jong Un launching another rocket?
Or, is it the bandage on my right ear?

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SERVICES**

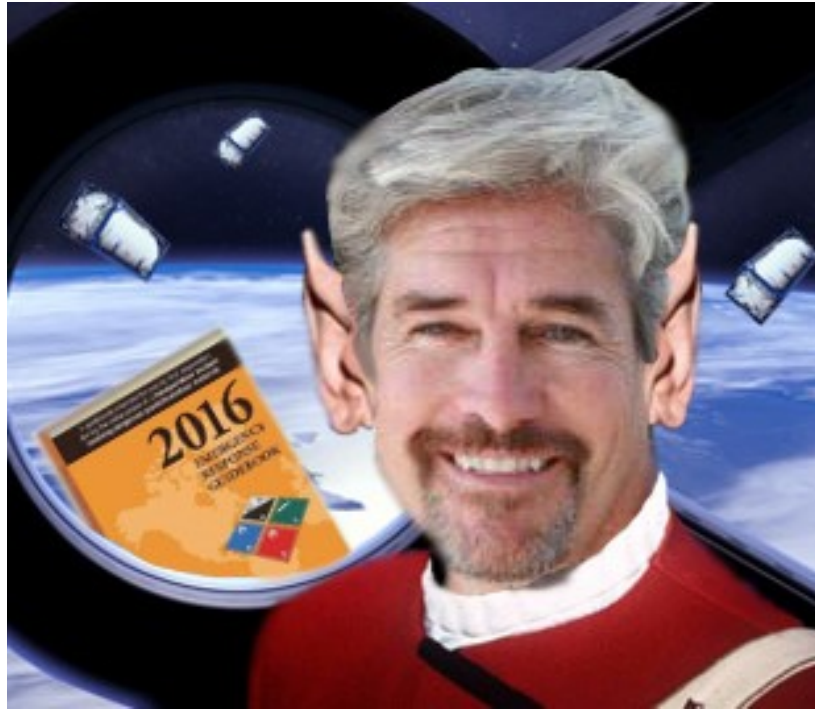
Did I call Mike Tyson a
“punk-ass bitch”
when I ran into him last week
in New York?



Was I in the
“wrong place at the wrong time”
and get nicked during the recent
shooting in the parking lot of
our local Home Depot?



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Did I drunkenly remove
my
Spock ears
after Comic Con?



WHY are we here today?

Time is short.

Time is money. (And I'm wasting your time.)



- Market conditions improve due to low bunker fuel prices! China building another tank factory, NT tank doubling capacity. Composite tanks under UN review.
- USDOT and ILT want your money!
- Can we afford to throw money away on easily avoidable fines?



Mattress Mack and I are here to
save you money!

Really!
Will save YOU
money!



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Wat doet de ILT De ILT zorgt voor rechtvaardig toezicht, goede dienstverlening en vergunningverlening en adequate opsporing. Ook doet de ILT onderzoek.

Ogen en oren

De ILT functioneert tevens als de ogen en oren van de minister en de staatssecretaris. Zij informeert de bewindspersonen over risico's en nieuwe ontwikkelingen. De inspecteurs zien immers vaak als eerste of het beleid werkt en welke ontwikkelingen en risico's spelen.





What does the ILT do? (The Competent Authority of The Netherlands)

The ILT ensures fair supervision, good service and licensing and adequate detection. The ILT also conducts research.

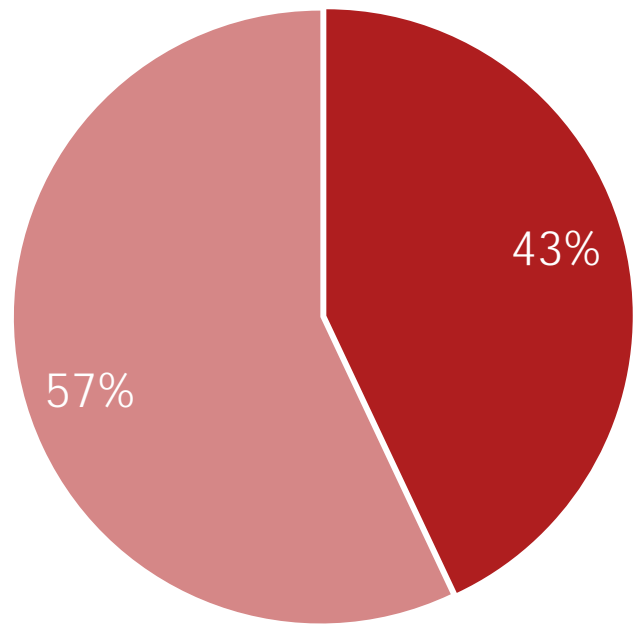
Eyes and ears

The ILT also functions as the eyes and ears of the minister and the state secretary. It informs government officials about risks and new developments. The inspectors are often the first to see if the policy works and what developments and risks are.



TANK-CONTAINER / PORTABLE TANK

Inspections



- Correct 43%
- Infringements 57% (1 or more per tank)

ONE YEAR LATER (IN COMPARISON WITH 2016)

The Inspectorate compared both 140 inspections

- Inspections **without** infringements/deviations:
2016: 43% → 2017: **54,3% (improvement of >11%)**
- Total found infringements /deviations:
2016: 146 → 2017: 80 (**severe reduction**)



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DUAL APPROVAL ADR 6.7 & 6.8

- A tank which is dual approved and contains both markings must ensure that the marking at all time corresponds with the actual equipment presented. **The tank must fulfill the most stringent construction and equipment conditions**
- **ADR 6.7 uses T instruction : example T-11 or T-12**
- **ADR 6.8 uses T code :example L4BN or L4BH**
- For the use the transport route is leading

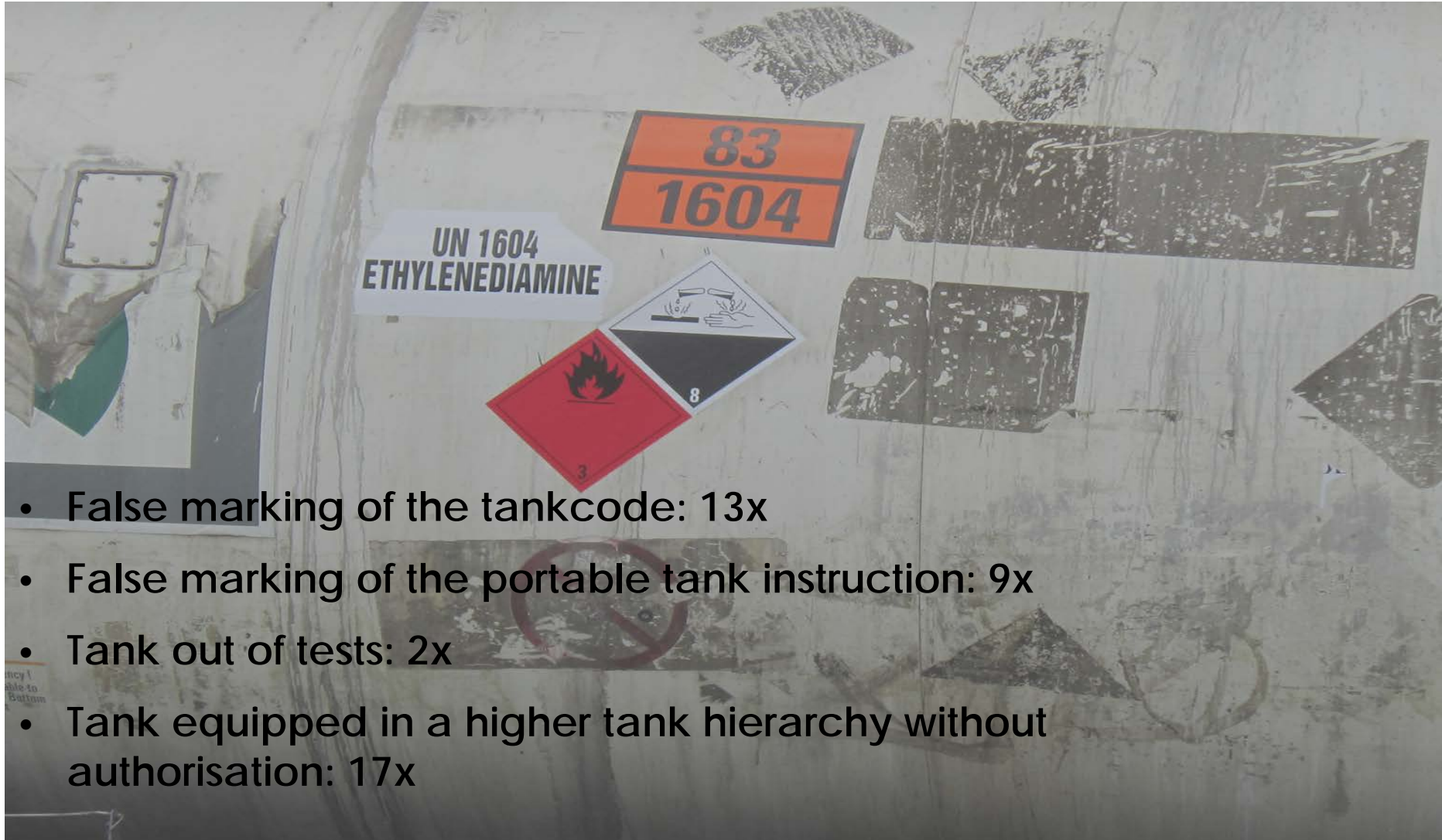


Authorized / approved bodies

- Adjustments of certificates: 19x
- No marking of the tankcode and/or portable tank instruction: 12x
- False / wrong metal marking plate: 2x
- Hermetically closed tank (external pressure - 0,21 bar) without vacuum valve: 3x



TANK-CONTAINER/PORTABLE TANK OPERATOR



- False marking of the tankcode: 13x
- False marking of the portable tank instruction: 9x
- Tank out of tests: 2x
- Tank equipped in a higher tank hierarchy without authorisation: 17x

OTHER INFRINGEMENTS ALSO RELATED TO FILLER, CARRIER OR CONSIGNOR

- Filling rates: 18x (3 participants concerned)
- Broken frangible / bursting discs / pressure gauge: 2x
- (Rest) Product outside: 3x
- Closure drip cap (3^e closure): 25x
- No gauze flame traps: 3x
- Broken clamp: 1x
- Unsuitable /outdated Gasket (replaced): 7x
- Missing remote control: 3x
- Documents / labelling/ psn 5x
- Tank-container (6.8 ADR) was not approved as IMO 4: 1x
- Pressure setting valve too high: 1x



COMPANY RELATED INSPECTIONS

Several inspection points:

- Comparison of the initial reports and the (2,5 and 5 year) approvals
- Are the initial reports/certificates in accordance with the legislation?
- Are the devices, equipment, tank instructions, tank codes still the same as during the approval?
- How is the anchoring in the system in relation to repairs/surveys?
- Reality checks



Conclusion:

- 4 of the 5 companies: Enforcement under administrative law

BUT . . .



Tankoperator:

Still more than 50% of the infringements are related to this participant:

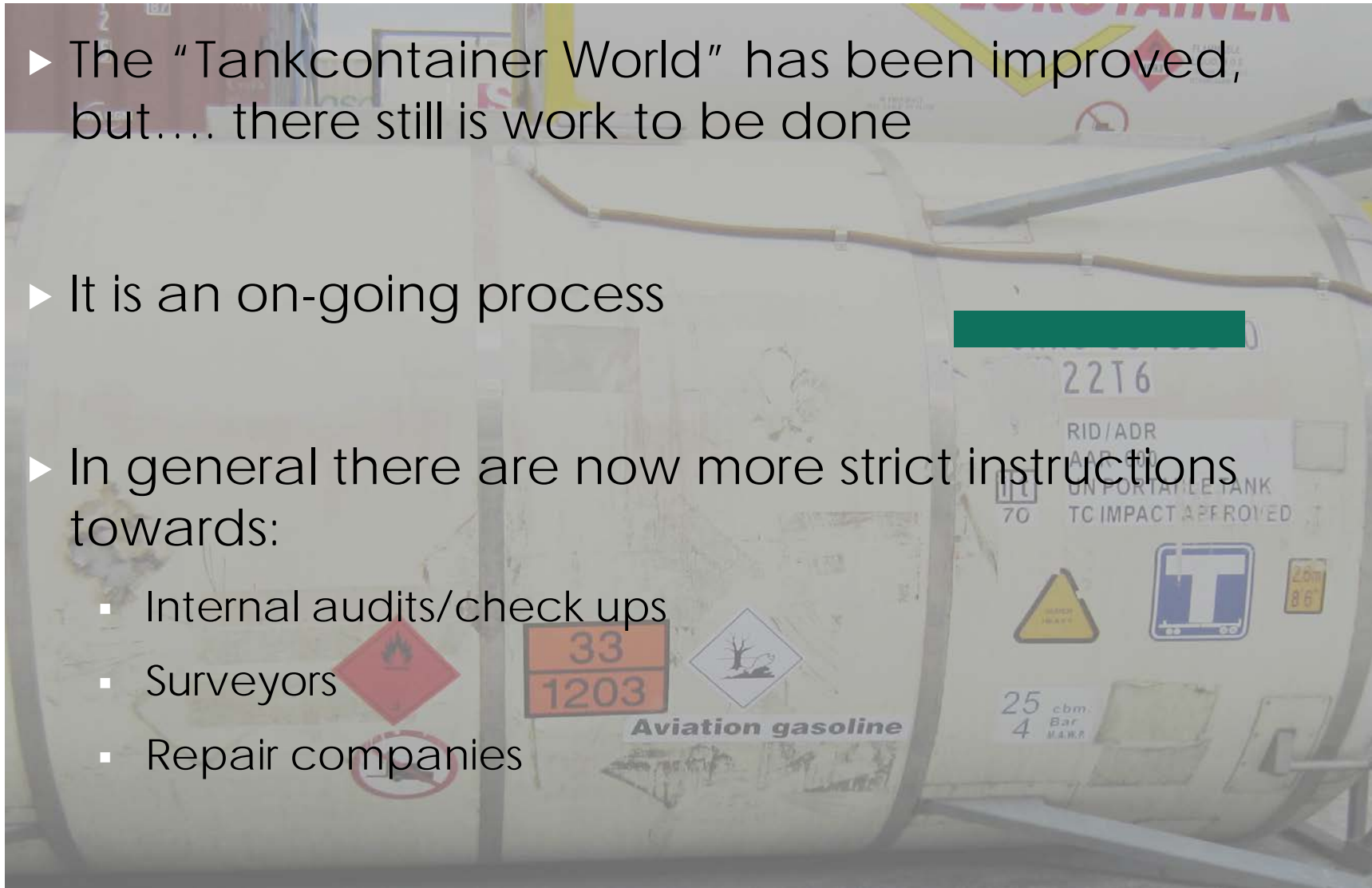
- no - or wrong portable tank instruction on the tank or metal plate (6.7) (20x)
- no -, wrong – or false marking of the tank code (6.8) (13x)
- Tanks equipped in a higher tank hierarchy without authorisation (4x)
- Hermetically closed tank (external pressure -0,21 bar) without vacuum valve (2x)
- Missing flame trap (3x)
- Missing remote control (1x)



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CONCLUSIONS:

- ▶ The “Tankcontainer World” has been improved, but.... there still is work to be done
- ▶ It is an on-going process
- ▶ In general there are now more strict instructions towards:
 - Internal audits/check ups
 - Surveyors
 - Repair companies





POSSIBLE PROPOSALS



- Most infringements are related to dual certification: It is preferable that tanks can only be single approved
- Developpe and prescribe one document / layout of approval (as 9.1.3.5 ADR for road tankers)
- Reformulate the definition of "tankoperator". Add the "holder" as participant (for example in relation to long lease (> 3 month))
- Regular technical meetings between the experts of different authorized/approved bodies



In the majority of inspections, USDOT Audits result in fines for lack of:

- General awareness training
- Function specific training
- Maintenance of training records



TRAINING AND OUTREACH

Part of DOT PHSMA's mission is to protect people and the environment from the risks of hazardous materials and transportation.

They educate and train state and local governments, tribes, first responders and the public in order to reduce consequences if an incident does occur.



TRAINING AND OUTREACH

PHMSA proactively improves safety through:

- A wide, targeted outreach program to build stakeholder and public trust
- Additional web-based training and compliance assistance
- PHMSA SPAM



NEW AND IMPROVED!
Hazardous Materials Transportation
Training Program

Free, interactive training modules available online!

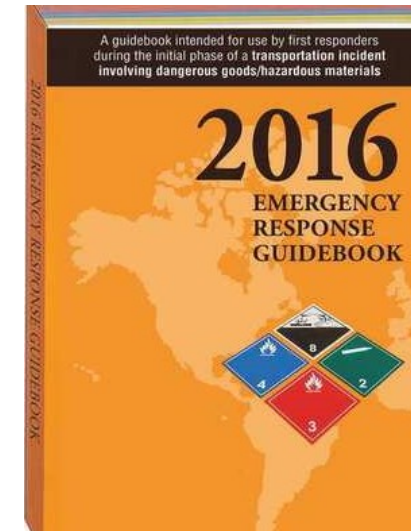
The advertisement features a blue header with a yellow border. Below the header, the text "NEW AND IMPROVED!" is in orange, "Hazardous Materials Transportation Training Program" is in blue, and "Free, interactive training modules available online!" is in black italics. At the bottom, there are four small images: an airplane, a yellow crane, a blue truck, and a red train.



TRAINING AND OUTREACH

Emergency Response Guidebook – ERG2016

- DOT Compliant – HMR; 49 CFR 172.602
- Distributed 14.5 million free copies to firefighters, EMTs and law enforcement officers nationwide
- Available in spiral, handbook and android/iOS mobile apps



FREE:

Hazardous Materials Transportation Training Program

<http://phmsa.dot.gov/hazmat/training-modules>



TRAINING AND OUTREACH

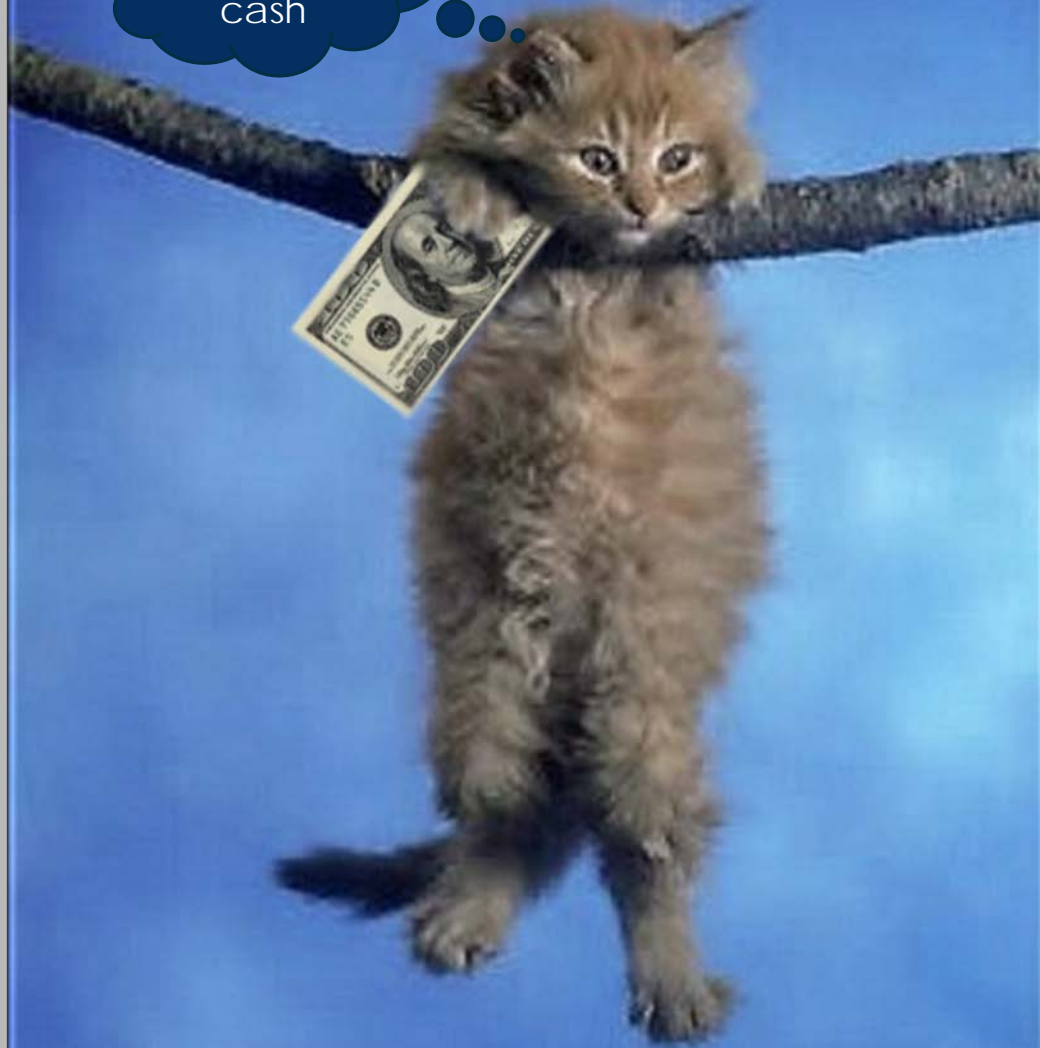
To prevent this...



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HANG IN THERE

Hanging
on to my
cash



**SILVER/CIMS^{LLC}
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SERVICES**

Regulatory Compliance...

will not only keep money in your pocket,
it will ensure that the UN Portable tank
remains the safest method for shipping
dangerous goods throughout the world.

