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## AAR QAC 7.1 PROPOSED CHANGES

By Bob Wolbert – Progress Rail

The AAR Quality Assurance Committee (QAC) formed a TAG to identify improvement opportunities for the 7.1 Nonconformance Reporting System, which is part of chapter 7 of the AAR M-1003 specification. The scope of the TAG included determining methods of improving the user experience and functionality of this on-line system. The items identified were then reviewed with the programming team to determine short and longer-term improvements, as well as preliminary costs. The QAC is reaching out to the technical committees for their input on improvements to develop the desired future state.

The planned improvement items include the following:

1. Allow the initiator of a 7.1 the option to edit or delete a form when needed
  - a. A text box for explanation would be completed to explain reason
  - b. Auto email sent to facilities impacted
  - c. Administrative transaction log maintained. Only accessible by the QAM
2. Attachments would be viewable for items in the 7.1 and 7.2 separately to avoid looking at all attachments combined regardless of form view opened
3. 7.2 response to include QMS element drop down selection to ID the primary contributing element associated with the root cause
4. Include Voluntary facilities in requirement for 7.1 use
5. 7.1's must be directed to the facility that performed the activity of the failed component / service and not the broker or distributor
6. Email notifications should take the recipient to the item as opposed to the log in system
7. Each facility / company should be able to run reports for their location(s)
8. Data utilization and reporting improvements for industry, technical committees and QAC.

## AAR QUALITY ASSURANCE COMMITTEE UPDATE

By Bob Wolbert – Progress Rail

The AAR Quality Assurance Committee (QAC) has improvement plans for the Electronic Adverse Audit Finding Report (E-AAFR) and the M-1003 Specification. The BOE has been piloting the improved E-AAFR. The new format offers improvements in the ability to data mine and in velocity. Utilizing M-1003 E- QAPE checklists and audit forms were also discussed in support of continual improvement.

With focus on the next AAR Quality Auditor Conference and RSI workshops well under way, the process for revision/improvement of the M-1003 Quality Specification will begin in the 1<sup>st</sup> quarter of 2025 to get a jump on the 2026 revision.

The AAR QAC welcomes input from the industry members. You can submit items to your RSI team members interfacing with the AAR QAC and directly through the circular solicitation for comments.

## DIFFERENCE IN REQUIREMENTS – FEEDBACK WANTED

By Brian Ricketts – AllTranstek, LLC/RSI Education TAG

The AAR Standard for Quality Assurance, Section J, is different from the 49 Code of Federal Regulations when it comes to requirements for language.

- 49 CFR 180.517 (b) states “***Inspection and test reporting.*** Each tank car that is inspected and tested as specified in [§ 180.509](#) must have a written report, in **English**, prepared according to this paragraph”.
- MSRP Section J section 2.7.4.2 states “Applicable standards, internal procedures, and forms necessary to demonstrate *compliance* with this specification and any related technical requirements must be maintained in **English**, as well as the appropriate language for the user”.

Tank car facilities including manufacturing and repair facilities that provide inspection and test reporting for example are required to provide documentation in English but based on the M-1003 Quality Assurance requirement they also have to provide documentation in the appropriate language for the user when completing forms that demonstrate compliance.



Does anyone have an opinion on why this regulation from DOT and requirement from AAR are different? We would like to hear from you. Email Jeffrey Ostrander at [jostrander@rsiweb.org](mailto:jostrander@rsiweb.org) with your comments.

## HM 265 - NOTICE OF PROPOSED RULEMAKING FROM PHMSA

By Gary Alderson – AllTranstek, LLC

The following is adapted from an October 9, 2024, email by Larry Loman, AllTranstek, LLC Engineer.

PHMSA (Pipeline and Hazardous Materials Safety Administration) announced that it submitted to the Federal Register the long-awaited HM-265 notice of proposed rulemaking which addresses many facets of hazmat transportation across all

modes. This is the rule that includes the 2017-approved Hazmat RSAC recommendations, with modification. It also addresses AAR delegated authority, for both quality assurance plans and tank car equipment approval. The pre-publication version of the NPRM is now available. PHMSA is initially providing a 90-day comment period from the date of publication in the Federal Register.

There are some major proposed changes for our industry. Design Certifying Engineers (DCE) would now approve the equivalent of Certificate of Compliance (4-2) applications for tank car builds and modifications. Registration of DCE's would be through PHMSA and audited by FRA. The AAR if they choose to continue approving tank car designs and modifications would have to register with PHMSA as a DCE too.

Tank car facilities would no longer be approved by the AAR. Like DCE's, tank car facilities would be registered by PHMSA and audited by FRA. The tank car facility QAP (quality assurance program) would have to meet the requirements of 49 CFR 179.7.

This will impact everyone in the tank car industry. Please provide your comments from your company to the Pipeline and Hazardous Materials Safety Administration on these proposed regulation changes for our industry.

[Read the full NPRM here.](#)

[Read the full DOT press release here.](#)

## 2025 AAR QUALITY ASSURANCE AUDITOR CONFERENCE



The AAR Quality Assurance Committee (QAC) has already begun planning next year's conference. Everyone be sure to save the date, which will be February 25 – 27, 2025. The venue will be in Phoenix again next year.



### Have an Idea for an Article?

Please submit your drafts to Gary Alderson at [alderson@alltranstek.com](mailto:alderson@alltranstek.com) or Alfredo Ricardo at [ricardo@alltranstek.com](mailto:ricardo@alltranstek.com)

### Interested in Joining RSI QAC?

Contact Jeffrey Ostrander at [jostrander@rsiweb.org](mailto:jostrander@rsiweb.org)

### Not Getting the Newsletter and Want to Subscribe?

Contact Jeffrey Ostrander at [jostrander@rsiweb.org](mailto:jostrander@rsiweb.org)



## 2024 AAR QUALITY ASSURANCE TRAINING SCHEDULE

Course	Date	Location
Advanced Auditor Training Class	November 5-7	Lincoln, Nebraska
Root Cause Analysis Class	November 19-20	Pueblo, Colorado

### USEFUL LINKS

[Railway Supply Institute](#)

[RSI QAC & Previous Newsletters](#)

[RSI Tank Car Resource Center](#)

[Registry of M-1003 Certified Companies](#)

[M-1003 Frequently Asked Questions](#)

[American Society for Quality - Training](#)

[RSI 100](#)

[AAR M-1003 Certification on-line Application](#)

[AAR M1003, Section J Specification for Quality Assurance](#)

[AAR Training Schedule](#)

[AAR Circulars](#)

[MSRP Publication Current Revision Status](#)

[AAR Online Material Nonconformance Reporting System \(Chapter 7\)](#)

[AAR FAQ Page includes QAPE](#)

### THE FOLLOWING RSI QAC TEAM MEMBERS WORKED ON THIS NEWSLETTER:

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