

# API Ballot Comments Sheet

9/4/2007

**Ballot: 133-07-653-221 Addition of Engineering Support Activities for**  
**Start Date: Recertification Closing Date: 8/30/07**

**AMS Ballot ID: 1,186**  
**Associate: Gordon Robertson**  
**Coordinator: Gordon Robertson**

## Proposal:

**136219 Mark Baker**

**Baker Consulting Group, Inc.**

Specification Section

Type

Comment

Suggested Change

D 5.2 b.

Other

Where did not 75 tank requirement come from? Can this number be technically justified? I do not support a given quantity.

I do not support a given number. The section should be rewritten to remove a fixed number

**45528 Donald Comire**

**Eastman Chemical Company**

Specification Section

Type

Comment

Suggested Change

D.5.2 (b)

Technical

The arrival at "75" for the hurdle number of tank inspections is a mystery to me. What is the basis of this number? In general, I understand and agree with the principle of adding "engineering support of inspection activities" to D.5.2. I need to understand the basis of "75" before I can vote affirmative.

**69609 Bhana Mistry**

**TIW Steel Platework**

Specification Section

Type

Comment

Suggested Change

Technical

Actively engaged as an authorized inspector shall be defined as who meets one of the following provisions:

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134414 Roy Schubert

Shell Canada Energy, Ltd.

**Specification Section**

**Type**

**Comment**

**Suggested Change**

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D.5.2 Recertification

Technical

b. Performance of inspection activities or supervision of inspection activities or engineering support of inspection activities on 75 aboveground storage tanks as described in the API Std 653 over the most recent 3-year certification period

Donot understand the significance of # of Tanks, favour to identify a minimum amount of effort required to prove competency.

Actively engaged as an authorized inspector shall be defined as:

A minimum of 20% of the time spent performing inspection activities, or supervision of inspection activities, or engineering support of inspection activities as described in the API Std 653 over the most recent 3-year certification period.

Note: Inspection activities common to other API inspection documents (NDE, recordkeeping, review of welding documents, etc.) may be considered here.

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