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**Illinois Fertilizer & Chemical Association**

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September 13, 2010

Dear Cargo Tank Inspection Facility:

IFCA recently met with officials from USDOT Office of Hazardous Materials Enforcement Pipeline & Hazardous Materials Safety Administration (PHMSA) to clarify recent issues with the Nurse Tank Inspection Program (NTIP).

As you can see in the attached memo, PHMSA is requesting an addendum to the NTIP inspection reports in order for the industry to comply with the special provisions for recordkeeping listed in the Special Permit. There were several inspection report requirements left off the original NTIP inspection forms that must be added to the files. Please read the attached memo carefully for a full explanation.

We have instructed the nurse tank owners (ag retailers) to send you an addendum for every nurse tank that you inspected for them under the NTIP Program (i.e. nurse tanks with missing or illegible data plates). PHMSA has made it clear that you, as the inspector, should review the addendum, make any applicable notes on the addendum, and return the addendums to the tank owner who must keep them on file. If you did not perform any welded repairs on the nurse tanks, you DO NOT have to sign the addendum. As a CT inspector, you DO NOT have to keep the addendum on file. **You must review the addendums and return them to the tank owners by February 3, 2011.** USDOT has stated that nurse tank owners can assist you and fill out certain information on the addendum and send it to you for review and approval.

**IFCA strongly urges you to assist the ag retailer with the addendum, otherwise both the tank owners and cargo tanks inspection facilities will be out of compliance with federal USDOT regulations and subject to monetary penalties.** Please also ensure that all inspections you are currently performing for the NTIP program include the additional inspection requirements that are listed in the addendum.

If you have any questions, please feel free to contact Jean Payne or Kevin Runkle at the IFCA office.

Sincerely,

Kevin Runkle  
Manager Regulatory Services

**Representing the Agricultural Input Industry**