

ISSUE NUMBER

19-035-VEH

ISSUE NAME

Operational Policy 15 - Brake Systems b.(3) Air Leaks

STATUS

Closed

Vehicle Committee

NAME

Andre De La Rosa

AGENCY

Public

ADDRESS

1101 Palm Avenue
Imperial Beach, CA 91933
United States

PHONE

7609600248

EMAILtruckingconsultants@gmail.com**SUMMARY OF ISSUE**

Operational Policy 15, Brake Systems, Question b(3) Answers and Notations need to be revised or corrected.

The Question reads: "When should an air leak in the brake system be documented as a violation?".

The Answer reads: "When a vehicle has an air leak at a proper connection or at an undetermined location, and the vehicle passes the CVSA OOSC air loss rate test, inspectors will record a violation for an air leak on the inspection report."

The question is referring to air leaks found nowhere else but in the components of the braking system. Defective brake system components that cause air leaks and air pressure loss are an obvious safety concern. The answer that is given however, does not seem to take into account the independent operating characteristics of an air brake system and instead regards not only air leaks from any vehicle component (whether safety-related or not) as a violation, but even air leaks found "at an undetermined location" as a violation.

This would mean that the following scenario would be justified;

There is a level 1 inspection in progress with a truck tractor in an inspection site, driver behind the controls of the vehicle and the inspector underneath the truck tractor. While the driver is seated and waiting to hear instructions given by the inspector, he lowers his pneumatic-powered seat position by discharging air using the seat hand controls. At the same time, the inspector hears this as an air leak. The inspector completes the inspection then cites the following: "396.3(a)(1): Unapplied air loss front left side near drivers compartment. Unable to determine location. Compressor maintains."

An air brake system is designed to operate independently of other air systems and due to utilizing many specifically designed, check-valves, pressure protection valves and a multiple of other safety components, the air brake system will not be dependent upon air pressure from another component such as an air spring, nor will it "leak" into another air system upon failure. If an air spring ruptures and loses all pressure, an air brake system will not be negatively affected.

This is why the main question is only asking about air leaks specifically in the braking system and nowhere else.

JUSTIFICATION OR NEED

Remove the words "or at an undetermined location" from the answer when referring to "unapplied" air loss..

If an applied air leak is found at an undetermined location, it's a safe bet that the leak is originating from a brake component but what if the inspector is referring instead to an "unapplied" air-loss? This type of air loss can originate from virtually any of the vehicle components that utilize air pressure such as the transmission or air conditioner.

This is why there is a necessity for "unapplied" air loss violations to be only cited when referring to defective safety-related components of an air brake system and nothing else. In this case, if the location of the unapplied air loss cannot be determined, a violation should not be documented because there would exist no evidence linking the leak to any safety-related defect.

REQUEST FOR ACTION

Amend this Q&A to instead read as follows:

When should an air leak in the brake system be documented as a violation?

ANSWER: When a vehicle has an air leak in the braking system, and the vehicle passes the CVSA OOSC air loss rate test, inspectors will record a violation for an air leak on the inspection report.

NOTE: In 393.45(d), it indicates that the leak has to affect the brake performance under 393.52. Enforcement cannot determine to what extent a leak has to be to affect the brake performance; therefore, any leak in the brake system will be documented as a violation.

NOTE: Leaks in the brake system, such as a leak discovered when the treadle valve is applied or a leak in a hose from an air reservoir to a relay valve will be documented under 393.45(d). Any other air leak that cannot be attributed to the brake system or suspension systems (see 393.207(f)) shall not be documented as a violation.

ACTION TAKEN BY COMMITTEE

Comments were made by committee members that a 5th wheel airline, although not brake related, should still be a violation but not OOS unless it fails the air loss rate test. No action taken on the portion of the action item for removing the undetermined location. The committee discussed the portion of the action item dealing with taking out the sentence, in the last note, talking about any other leak.

There was concern from industry that roadside inspectors note a violation in this instance. Comments were made that in the past, it was noted as 393.45 and the sentence was added to give guidance to note any other leaks as a violation under 396.3(a)1. Industry partners would like to have it put in the notes section on the inspection, but not noted as a violation. Motion was made to change Ops Policy 15 to the proposed wording in action item. The vote failed with only 3 in favor. No further action taken and item was closed.