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ISSUE NAME

Operational Policy 15 - b(3) Air Leak in Valve Clarification

STATUS

Closed

Vehicle Committee

NAME

Keith Kerns

AGENCY

Public Utilities Commission of Ohio

ADDRESS

180 East Broad St
Columbus, OH 43215
United States

PHONE

3304729728

EMAILkeith.kerns@puco.ohio.gov**SUMMARY OF ISSUE**

What FMCSR section to cite a brake system valve that is leaking.

JUSTIFICATION OR NEED

FMCSR Part 393.45 is titled "Brake tubing and hoses; hose assemblies and end fittings." and therefore is specific to those items. Inspectors have no guidance on which section should be cited when a brake system valve is leaking and are more than likely citing 393.45

REQUEST FOR ACTION

Amend CVSA Operational Policy 15, Section 1, Paragraph b.(3) to include guidance for brake system valves.
NOTE: An audible leak 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). An audible leak from a brake system valve, brake diaphragm or an air reservoir will be documented under 396.3(a)(1). Any other leak that cannot be attributed to the brake system or suspension systems (see 393.207(f)) will not be placed out of service and will be documented under 396.3(a)(1)

ACTION TAKEN BY COMMITTEE

A motion was made to amend CVSA Operational Policy 15, Section 1, Paragraph b.(3) to include guidance for brake system valves. Discussion described the justification included in the request and there was no further discussion. The addition of "brake system valve" was made.

b.(3) When should an air leak in the brake system be documented as a violation?

ANSWER: 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.

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: An audible leak 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). An audible leak from a brake system valve, brake diaphragm or an air reservoir will be documented under 396.3(a)(1). Any other leak that cannot be attributed to the brake system or suspension systems (see 393.207(f)) will not be place out of service and will be documented under 396.3(a)(1).