

Dear Industry,

PPI TR-2 and TR-3 policies are continually being refined and improved. Even still, there are times when an existing or prospective Listing Holder has a situation that is not clearly addressed in the policy language. In those cases, PPI TR-2 and TR-3 provides a way for the Listing Holder to make a Special Case presentation to the HSB.

The HSB Special Case process is referenced in PPI TR-2 and PPI TR-3 but is not defined in either document. It is summarized in TR-3 Notes to Reader #15 and is now used by many TR-2 and TR-4 Listing Holders.

The HSB Special Policy (Draft) was written to describe the process and requirements for a Special Case to be brought. This policy language, once it publishes, will be incorporated as a new Part A.1.5 in PPI TR-3.

This IRC document includes:

1. This cover letter
2. HSB Special Case Draft Policy

The HSB invites comments from the public, by way of this Industry Review & Comment (IRC) posting.

To submit comments, please use the Excel template posted to the HSB IRC section of the HSB Announcement page.

Please contact me if you have any questions.

On behalf of the HSB,

A handwritten signature in black ink, appearing to read "M. Casavant". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Mike Casavant
HSB Chair

mcasavant@plasticpipe.org

469 499 1045

403-971-0333

HSB Special Case Policy (draft) – For IRC

A.1.5 Special Case Request Policy

The policies and procedures in PPI TR-2 and PPI TR-3 detail requirements for the routine request process. The HSB recognizes there may be circumstances or products that are not explicitly covered in the PPI TR-2 or PPI TR-3 policies. For circumstances not covered by the routine request process, manufacturers can make a presentation request for their ingredients, compounds or composite pipe to be assessed in accordance with the special case process. The manufacturer must satisfy the special case requirements in A.1.5.1, A.1.5.2 and A.1.5.3.

NOTE 1: The special case is presented in-person to the HSB at one of their two semiannual meetings, usually in February and August. Alternatively, a virtual presentation option is available providing these are booked a minimum of 3 months in advance. If the timeline cannot be met, contact the HSB Chair.

NOTE 2: The electronic slides are only viewed by the HSB members when presented. All information provided is held in strict confidence in accordance with HSB confidentiality policy and the HSB Principles of Conduct.

NOTE 3: Special cases are conducted and reviewed by the HSB. HSB decisions are based on the information (presentation document and oral statements) supplied by the petitioner during the Special Case and the Board's experience and understanding of current science and engineering principles. Special Cases may be exemptions to current HSB policies and are not considered HSB policy unless incorporated in TR-2 or TR-3.

NOTE 4: Special case requests, presented to the HSB, incur a one-time fee which is invoiced separately.

A.1.5.1 Mandatory Preliminary Reviews

The manufacturer shall confer with the HSB Chair to confirm that the routine request process does not apply to the circumstance or the product. If the special case process is determined to be applicable, the HSB Chair will schedule the mandatory preliminary reviews. For each mandatory preliminary review, the manufacturer and identified persons (e.g., consultants, test laboratory, etc.) are expected to participate with the HSB Chair.

A.1.5.1.1 When the manufacturer requires the participation of approved guests who are not direct employees of the company, they shall grant the HSB Chair permission to communicate directly with the identified persons. Permissions must be received in writing. The manufacturer shall modify the following statement to reflect the situation and shall be emailed to the HSB Chair.

- PERSON'S NAME (COMPANY NAME) grants permission for direct communications to PERSON(S) NAME (COMPANY NAME) on project ADD SHORT PROJECT DESCRIPTION.

NOTE: The Special Case fee includes up to three mandatory preliminary review consultations (two hours maximum each) to prepare the information and the request for the special case presentation. This is an iterative process, and an additional fee shall be charged for additional review sessions.

A.1.5.1.2 The manufacturer and identified persons will provide the initial draft presentation 1 week in advance of the first mandatory preliminary review using the PowerPoint template.

NOTE: A document explaining the presentation process and the presentation template are available on the HSB web page:

<https://plasticpipe.org/HydrostaticStressBoard/HydrostaticStressBoard/HSB-Special-Case.aspx>

A.1.5.1.3 The content of the initial draft must be sufficient to drive discussions. In addition, a maximum of 3 related requests can be included in the same presentation. The request type(s) shall be initially identified. Below are general examples from requests presented to the HSB in the past. The list is not all inclusive:

- an initial ingredient listing or equivalency request (see PPI TR-2 Part A and B policies);
- pipe compound or composite pipe initial listing or equivalency request (see PPI TR-3 policies);
- the ingredient, material, pipe compound or composite pipe is not listed in either PPI TR-2 or TR-3;
- a listing temperature that is not within the scope of PPI TR-3 (not within 20°C to 93.3°C)

A.1.5.1.4 For each mandatory preliminary review, the manufacturer, identified persons and the HSB Chair, work to refine the presentation contents. The technical rationale used to support the request shall include the following:

- the request(s) and the listing type (Experimental and/or Standard Grade or both) and;
- when applicable, product listing history and;
- product details (e.g., material or ingredient type, technology, chemistry, formulation) and;
- product use (e.g., applications, regions, OD/ wall of the pipe, certifications, case studies) and;
- how the request is an exception to PPI TR-2 and/or PPI TR-3 policies and cite any policy/policies that are potentially relevant and;
- when applicable, regression and cell classification data and/or the proposed test matrix and;
- when applicable, characterization data (e.g., physical properties, mechanical and/or performance data, rheology, percent crosslink, torque rheometer curves and/or other relevant information) and;
- polymer compositional features or other relevant technical information.

A.1.5.2 Presentation Confirmation

When the draft presentation is completed, the HSB Chair shall confirm that the request can be presented, without further modification. Subsequently, the manufacturer shall confirm the presentation will be presented and the format (in-person or virtual). In addition, the manufacturer shall identify the person(s) presenting the request. The HSB Chair shall then confirm the date and time of the presentation.

NOTE: The manufacturer is responsible for their own travel expenses.

A.1.5.3 Special Case Request Presentation and Outcome

The manufacturer and/or their approved delegate shall present the special case request to the HSB. The HSB determines the outcome of the request based on the presented technical rationale. The three potential outcomes are as follows:

- a. The request is accepted as presented.
- b. The HSB modifies the request(s) and accepts.
- c. The request is not accepted.

A.1.5.3.1 The HSB letter describing the special case outcome shall be issued by letter one week after the presentation.

A.1.5.3.2 When the manufacturer satisfies the requirements of the special case outcome, they shall submit a listing request packet in accordance with PPI TR-3 Part A.1.3. The request letter shall include reference to the special case outcome and the packet shall include the required data.

NOTE: Based on modifications, manufacturers are not obligated to complete the conditions of the special case request. However, the conditions must be completed before the HSB Chair issues action(s) pertaining to the request.

Update to Note No. 10 (Notes to the Reader Some Rules and Conditions) in PPI TR-3.

10. Disclaimer: While every effort has been made by HSB to assure that that these policies are sound, reasonable and prudent, HSB expressly disclaims any guarantee or warranty regarding their application. Each manufacturer who lists ingredients, thermoplastic compounds, or composite pipe in accordance with the procedures in PPI TR-3, including a determination under HSB's Special Case Request Policy, does so voluntarily and with the express agreement that PPI assumes no liability in regard to the listed ingredient, thermoplastic compound, or composite pipe, and that the manufacturer will hold PPI harmless from any claims or liability arising in connection with its listed thermoplastic compounds or composite pipe.