

1050410 CONTRACTOR QUALITY CONTROL GENERAL REQUIREMENTS
COMMENTS FROM INTERNAL/INDUSTRY REVIEW

Alan McMillan
386-740-3516
alan.mcmillan@dot.state.fl.us

Comments: (5-31-18)

The statement as written could be construed as precluding items not specifically part of the production process or final product. This would include materials, documentation, personnel certification, etc. Ironically, an inspector from the office of Materials and Research inspecting a precast concrete facility might not have the authority to review things like reinforcing steel or grout. Additionally, including the word “the” before “Department inspectors” and “inspections” is clunky and unnecessary. Ideally, the sentence would end with the word “inspections” but, failing that, the following might suffice: “Include a statement in the Quality Control Plan allowing Department inspectors access to the production facility to perform inspections in accordance with the Specifications and Contract Documents.”

Response: The definite article “the” is used before noun when the noun is particular and specific. In this case the word “the” refers to inspectors (Department inspectors) and specific types of inspections (Inspection of production process and the products produced for Department.).

The inspection of the production process and products cover all materials, documents and personnel certifications. Specification is part of the Contract Documents. There is no need to mention Specifications and Contract Documents.

No change is needed or made.

Blake Stallworth
863 519-4231
blake.stallworth@dot.state.fl.us

Comments: (6-8-18)

Concern regarding removing the photo and video language prior to adding it elsewhere. What written documentation will provide FDOT inspectors the authority to take photos and videos for documentation purposes during inspections. However, I understand industry has concerns regarding the current language requiring them to add a statement to their QCPs. Thus, I recommend taking out requirement for producers to add language to their QCP and just make a statement in the specification itself allowing photographs and video for documentation purposes by inspectors. Or, at the very least, concurrently provide writing somewhere (i.e. Materials Manual 5.6) allowing the department authority to take photographs or video.

Response: The proposed changes have removed the photo and video requirements from specification. The photo and video requirements for precast concrete production facilities are concurrently proposed to be added in the related Sections of the Materials Manual.

No change is needed or made.

Heather Gilmer
512-299-2000
hgilmer@hrvinc.com

Comments: (6-21-18)

Requiring "access" but not explicitly defining the right for inspectors to take photos means that the fabricators can prohibit the inspectors from taking photos. This will greatly inhibit the ability of inspectors to document shop issues and to communicate these issues to FDOT. It is fair to permit the fabricator to place certain limits on photos such as avoiding personnel or equipment, blurring out when necessary, but this amounts to permitting fabricators to prohibit photography entirely and I do not think this is in FDOT's best interest.

Response: The proposed changes do not indicate that the Department inspectors are not authorized to take photographs.

The current specification requires that the all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the plants that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Steve Duke
352-955-6682
steve.duke@dot.state.fl.us

Comments: (6-25-18)

This is totally absurd and should be immediately withdrawn for further consideration. I see no reason why we should give up this very important tool for our inspections and see no reason as to why this change was even needed or wanted by FDOT.

Response: It is necessary to include the requirements of inspectors' photography in Materials Manual of the fabrication facilities that want details of the photography process at their plants. In order to prevent duplication of the same requirements in the specifications and Materials Manual, the requirements of Department right to photograph have been proposed to be deleted from specification.

The proposed changes do not indicate that the Department inspectors are not authorized to take photographs. The current specification requires that the all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the plants that do not have problem with Department inspectors taking

photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Tim McCullough

352-955-6681

Timothy.McCullough@dot.state.fl.us

Comments: (6-25-18)

Specification 105 is the most important language in the all of the Construction Specifications. If you want to remove this language, every section of the materials manual should have it written prior to its removal from 105. Further, a bulletin should go out to keep the language and interpretation clear. The main reason to photograph is to record for the protective interest of Florida. Lastly, these photos have allowed our Engineers to make the best and most informed decision possible. It greatly improves the risk assessment made by the Department. It should remain in the Construction Specification and I recommend rejecting the entire language change.

Response: All Sections of the specifications are important to ensure that project construction meet the requirements of contract documents.

The proposed changes do not indicate that the Department inspectors are not authorized to take photographs. The current specification requires that the all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the plants that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Jamie Hilton

412-722-6194

jhilton@kta.com

Comments: (6-25-18)

The proposed changes are not acceptable. As third party QA working for the FDOT, being able to take photographs has become a valuable and necessary component of our daily documentation. Including photos in the daily inspection report enhances the communication. We are the eyes and ears of the Department, and why wouldn't the Department want to "see" what we are seeing? Our product is our report, and the better we can document and report to the

Department, the better the information is communicated. We need to be able to take photos without seeking approval from the fabricator/contractor each time we take a photo. Too much time can be wasted tracking down the appropriate parties to seek permission when we could be using the time effectively for inspection.

Response: The proposed changes do not indicate that the Department inspectors are not authorized to take photographs. We agree that the availability of the photographs is valuable and necessary component of the project documentation.

The current specification requires that all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the plants that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Ivan Lasa
352-955-2901
ivan.lasa@dot.state.fl.us

Comments: (6-25-18)

Recommend including the language limiting the photo documentation to pre-manufactured concrete products only as it seems that it is the intent. Eliminating the ability to document with photographs all types of production will negatively affect QA on other industries. Especially those that have contracted personnel on site and rely of this type of documentation to update FDOT management.

Response: The proposed languages in the related sections of the Materials Manual have described the photo taking process. For precast concrete production facilities that want the details of photography process, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

The proposed changes do not indicate that the Department inspectors are not authorized to take photographs. This statement is not necessary for the plants that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

Action: No change is needed.

No change is needed or made.

Ray Monson
727-421-5283
rmonson@pennoni.com

Comments: (6-25-18)

The ability of the inspectors on behalf of FDOT to document by photographs, the project progress and the nature of any deficiencies is critical to the Department's Quality Assurance role. That ability should remain explicitly stated in the Specification.

Response: We agree that Department should have the authority to document by photographs, the project progress and the nature of any deficiencies.

The proposed changes do not indicate that the Department inspectors are not authorized to take photographs. This statement is not necessary for the plants that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification. For precast concrete production facilities that want the details of photography process, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Linda Houk
352-339-0097
lhousk@pennoni.com

Comments: (6-26-18)

It is vital to inspection documentation for third party inspectors under contract with FDOT and FDOT inspectors to take pictures and recordings for FDOT. Pictures and recordings should not include individuals' pictures, nor any fabricator proprietary processes. Defective fabrication and corrections need to be documented with pictures. Many times the project personnel at the job site depend on pictures of the fabrication process for jobsite installation. Language needs to be in the FDOT Specification to allow inspectors full access to the fabrication process.

Response: We agree that it is necessary for the inspectors to document their inspections. This type of documentation may require use of pictures. The proposed changes do not indicate that the Department inspectors are not authorized to take photographs. This statement is not necessary for the plants that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to remove the unnecessary photo taking requirements from Specification and add them to the related Sections of the Materials Manual.

No change is needed or made.

Doug Yates
904-813-0587
dyates@pennoni.com

Comments: (6-26-18)

As a Senior Quality Assurance Inspector for this and other state DOTs on structural steel bridges and sign structures, the ability to photograph the project status, and in particular any deficiencies, without the fabricator having the ability to suppress or censor the findings is essential to QA being able to accurately report our findings. The ability of your hired and assigned QA to freely see and document findings is central to their ability to perform their service. It is my personal belief and experience that there are fabricator managements that would abuse and unnecessarily restrict the use of photography to document their shortcomings. This would be a BAD idea!

Response: We agree that the inspectors should be able to photograph the project status and the deficiencies without the fabricator's interference in the reports.

The proposed changes do not indicate that the Department inspectors are not authorized to take photographs of the steel bridge component and sign structures at their fabrication facilities. We agree that the availability of the photographs is valuable and necessary component of the project documentation.

The current specification requires that all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the steel fabrication facilities that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, such as precast concrete plants, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Ed Moore
606-922-2555
emoore@kta.com

Comments: (6-26-18)

Digital photography is a "must have" part of fabrications, field inspections, communication between inspectors and owners, CEIs, engineering groups, et al, who need to be made aware of certain situations (critical and otherwise). The Digital Inspection as well as the use of electronic devices, involves true QC apps and programs, which is completed on ipads, cell phones and other electronic devices, which improves the time necessary to address NCRs and RFIs. My vote is NOT to make these crucial changes because of their importance as well as the possible elimination of digital and/or electronic devices access by all involved.

Response: We agree with the comments and suggestions that digital photography is essential part of fabrications process. The proposed changes do not indicate that the Department inspectors are not authorized to take photographs of the steel bridge component and sign structures at their fabrication facilities.

The current specification requires that all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the steel fabrication facilities that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, such as precast concrete plants, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

James Tucker
813-764-7063
jtucker2@kta.com

Comments: (6-26-18)

For the proposed memorandum of spec. 105410, I think it is important to keep the ability for pictures and digital documentation. It is a way of providing a visual record for the quality of products throughout the fabrication process. In the event of non-conformances and areas of steel fabrication regarding rejection a visual/digital records to reference if there is structural failure or quality issues noted at a later date. Pictures cannot be refuted especially when included into an inspectors daily report.

Response: We agree that it is important to keep the ability of inspectors to take pictures and digitally record the quality of products throughout the fabrication process. The proposed changes do not indicate that the Department inspectors are not authorized to take photographs of the steel bridge component and sign structures at their fabrication facilities.

The current specification requires that all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the steel fabrication facilities that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, such as precast concrete plants, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Anonymous

Comments: (6-26-18)

Not allowing the inspector the ability to document items and areas deemed important whether to provide proof of compliance or of non-compliance would severely handicap the inspection

process. Images are of vital importance to illustrate the work performed daily in both shop and field. Pictures assist in documenting the events of fabrication for future review and analysis removing them from the daily inspection process would be irresponsible.

Response: The proposed specification changes do not restrict the inspector to document non-compliance products during their fabrication process by taking pictures and they do not indicate that the Department inspectors are not authorized to take photographs of the fabrication facilities.

The current specification requires that all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the steel fabrication facilities that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, such as precast concrete plants, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Anonymous 2

Comments: (6-26-18)

From a CEI perspective, it is not a good idea to take away the current explicit right of the Department to take pictures, videos, etc. We have seen more fabrication issues of late, and this could lead to additional issues.

Response: We agree that our CEI inspectors should have the right to take pictures and videos. The proposed specification changes do not restrict the inspector to document non-compliance products during their fabrication process by taking pictures.

The current specification requires that all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the steel fabrication facilities that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, such as precast concrete plants, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Glenn Peterson
407-466-6110
gpeterson@eismanrusso.com

Comments: (6-26-18)

This proposed revision eviscerates the Departments representatives ability to do their job and to document the manufacturing processes. some wise dude along time ago said that a picture is worth a thousand words. The Department representatives need to be able to photograph and or video production processes.

Response: This proposed specification changes do not restrict the Department inspectors' ability to do their job and to document the manufacturing processes.

The current specification requires that all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the steel fabrication facilities that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, such as precast concrete plants the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Jimmy Brewer

205-540-1585

jbrewer@kta.com

Comments: (6-27-18)

Recommend to leave the 1050410 as is. Taking this out may be restricting the ability take pictures of misfit, incorrect welding performed, reject able welds, damage from handling or anything else that would make the product unacceptable. Proof of issues in question when it is the inspectors word vs many individuals in a shop setting or at a job site that will be that would be an on-going problem when a fabricator or contractor continues to move forward with work without corrections. There are hold points on structures that cannot or rather should not move forward without repairs or corrections made. The right to photograph or video an issue for a customer or as a means of recording and record keeping a specific issues location or orientation by the representative QA should be somewhere as a customer requirement as needed.

Response: The proposed changes do not restrict the ability of the inspectors to take pictures of incorrect welding and unacceptable metal products. We agree that inspectors should have right to take photograph or video of deficient products.

This proposed specification changes do not restrict the Department inspectors' ability to do their job and to document the manufacturing processes. The current specification requires that all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the steel fabrication facilities that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, such as precast concrete plants, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Rex Wright
727-216-5452
rwright@kta.com

Comments: (6-27-18)

Taking digital photos of production welding is a very accurate way of documenting the work and it can cover the fabricator as well, before shipment to the job site. Most shops that I have been in do not have any problem with photos.

Response: We agree that taking digital photos of production welding is essential part of the documentation of the fabrication process. This proposed specification changes do not restrict the Department inspectors' ability to do their job and to document the manufacturing processes

The current specification requires that all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the steel fabrication facilities that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, such as precast concrete plants, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Greg Richards
727-453-9007
grichards@kta.com

Comments: (6-27-18)

The use of photographs are a good way to document non conforming items and to document the correction process. This is a common practice in all states. Remember the FDOT is the owner and the work is per their specification and should be documented to verify conformance.

Response: We agree that the use of photographs is essential part of the documentations of noncompliance items. This proposed specification changes do not restrict the Department inspectors' ability to do their job and to document the manufacturing processes

The current specification requires that all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary

for the steel fabrication facilities that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, such as precast concrete plants, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Ronald Burgess
304-377-0271
rburgess2@kta.com

Comments: (6-28-18)

The proposed change to Specification “1050410 Contractor Quality Control General Requirements” does not provide adequate material or activity documentation of the production activities for the Department. Photographic documentation provides the Department with an exact duplication of the material condition or activity being performed at that moment in time. This critical piece of data enables the Department the ability to make examination review and analysis of a specific inspection, component or activity with respect to meeting Department specifications, Codes or contract documents. With out photographic documentation the Department limits its ability to analyze the condition of materials and activities to only narrative information. Using only this as its only form of documentation of Oversight and Inspection, the Departments Inspection Representative is severely limited in documenting Oversight and Inspection Activities of production facilities producing products to specifications, codes and contract documents for the Department.

Response: The proposed changes to the Specification do not restrict the Department inspectors' ability to do their job and to document the manufacturing processes

We agree that the use of photographs is essential part of the documentation of noncompliance items. The current specification requires that all production facilities must include a statement in their quality control plan that it is Department's right to photograph. This statement is not necessary for the steel fabrication facilities that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, such as precast concrete plants, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.

Philip Dzikowski
904-252-0054

philip.dzikowski@woodplc.com

Craig Cavins

904-521-0324

craig.cavins@woodplc.com

Comments: (6-28-18)

The right to use photographic images during inspections is a critical tool in performing the commercial inspection services required by FDOT specifications. Photographs help record and track material traceability issues, fabrication nonconformances (NCRs) and repairs, member/bridge line assemblies, coating operations, and numerous other aspects of the welding and fabrication processes. We have often found as well that having photographs helps relay information more effectively to Engineers of Record and to Construction Engineering & Inspection personnel. This helps speed up the decision making process on items such as NCRs. If producers are concerned about processes, then just remove “process” from the section. If the right to photograph or digitally record is removed, it should not be removed before it is added to the respective Sections of the Materials Manual, else the State potentially immediately loses their right to photograph.

Response: We agree that the inspectors should have the right to use photographic images during inspections and track material traceability issues, fabrication nonconformance. The proposed changes to the Specification do not restrict the Department inspectors’ ability to do their job and to document the manufacturing processes

The current specification requires that all production facilities must include a statement in their quality control plan that it is Department’s right to photograph. This statement is not necessary for the steel fabrication facilities that do not have problem with Department inspectors taking photographs of their production process and products. For this reason, it has been proposed to be removed from Specification.

For production facilities that want the details of photography process, such as precast concrete plants, the requirements have been concurrently proposed to be added at the related Sections of the Materials Manual.

No change is needed or made.
