

# Transportation Program

▶ Recommended practices for driver safety, accident & injury reduction and DOT compliance in the scrap recycling industry

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## Using this manual:

This guidance manual is comprised of both driver safety and DOT compliance recommendations.



**Wherever you see this icon,  
it is a driver safety topic;**



**Wherever you see this icon,  
it is a DOT compliance topic.**

Customization of this manual to your unique needs is highly recommended. Documents in the appendix can be used in your existing company policy. Similarly, many of these pages can and should be shared with drivers during ongoing training sessions. At several chapter headings you will find ***italicized and underscored text*** indicating that these sections are also in the appendix for ease of duplication, or included in the Drivers Handbook. Hold an interactive discussion with your drivers on each of these topics.

### Disclaimer

The information in this manual is provided for informational purposes only and does not constitute legal advice on any matter. The material and information provided herein has been compiled from a multitude of sources believed to be accurate, however, the Institute of Scrap Recycling Industries, Inc., assumes no responsibility for the accuracy or timeliness of any information provided herein. This information is for guidance purposes only and is not a substitute for obtaining legal advice from the reader's own lawyer in the appropriate jurisdiction or state.

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# Introduction—

## A note to management

The intent of the ISRI Safety Transportation Program Manual is to provide guidance in developing, establishing, and improving your safety and health program for drivers and fleet operations.

Developing a proactive transportation safety program is one of the best ways to help you control costs from workplace vehicle accidents as well as costs associated with unsecured cargo and on-the-job injuries to drivers.

Here are some important reasons for implementing and managing an effective transportation safety program:

- ▶ To establish base line expectations and safe driving procedures and practices;
- ▶ To document management's commitment, responsibility, authority and accountability for safe vehicle operations;
- ▶ To provide a managerial reference guide;

Safe driving cultures begin with a management commitment to safe vehicle operations

- ▶ To identify and reinforce safe driving habits;
- ▶ To communicate procedures for recording and reporting accidents;
- ▶ To reduce your risk of liability: personal injury, property damage and lost cargo;
- ▶ To plan for the unexpected;
- ▶ To reduce the financial impact of lost-time injuries from vehicle-related accidents and injuries;
- ▶ To satisfy regulations;
- ▶ To give employees ownership in your program.

This manual is designed to provide you with a better understanding of the primary elements necessary to build the foundation for a successful transportation safety program. You can implement these policies and procedures as is, or fine-tune to your own needs. However, the most essential element in this transportation safety plan is your commitment to making it happen!

Compliance with DOT requirements alone is not enough to assure accident and injury prevention. Scrap driver/recycling employers must directly engage drivers on a regular basis with transportation focused training, hazard awareness, positive reinforcement, and related safety and policy messages. This guidance manual along with supplemental training and awareness will help you customize, implement and manage a successful driver safety program. Start by assigning authority and responsibility to someone familiar with your fleet operations as the designated **Fleet Safety Coordinator**.

For ease of use you will notice that sections of the manual that should be customized and shared with your truck driver population have been so indicated at the beginning of the section. We encourage duplication of these sections for distribution during training classes. These sections are also included in the appendix of the manual.

In addition, a separate Drivers' Handbook has been created to accompany this guidance manual that details important safety topics that should be discussed and reviewed with drivers. Additional copies are available from ISRI Safety.

▶ Safe driving cultures begin with a management commitment to safe vehicle operations

## II. Management Commitment

The ISRI Safety Transportation Program promotes safe driving on and off the job. When properly implemented, this program can help reduce the frequency and severity of accidents, violations and injuries in vehicle operations. *This statement is also included in the appendix for ease in reproduction.*



### Transportation Safety Mission Statement

The management of \_\_\_\_\_ believes that:

- ▶ The safety and well being of all company employees is our most important priority.
- ▶ Prevention of accidents is the responsibility of both management and individual employees. For these reasons, the company has developed an aggressive transportation safety program that applies to all operations and all employees, to reinforce our pledge to work *Safely or Not at All!*

### Responsibilities of the Driver Employee

All employees:

- ▶ Are required and expected to carry out their individual responsibilities as outlined in the transportation safety program,
- ▶ Will comply with all applicable federal, state, and local laws and ordinances,
- ▶ Will comply with the safety policies and procedures outlined in their Drivers Handbook. Failure to comply with these safety policies and procedures may result in disciplinary action.

**NOTE** We encourage you to relate any safety ideas or concerns to the Safety Committee. Your concern can be reported anonymously if you wish.

### Responsibilities of Management

Management at every level are charged with the responsibility of implementing the policies and procedures outlined in this transportation safety manual.



# III. Key Elements of a Successful Transportation Safety Program

The following 10-Steps are essential elements for what an employer can do to improve driving safety performance and minimize the risk of motor vehicle accidents and injuries. Following these steps helps to ensure that you hire capable drivers, only to allow eligible drivers to drive on company business, train them, supervise them, and maintain company vehicles properly. Adherence to these 10 steps can also help to keep your motor vehicle insurance costs as low as possible, while avoiding injuries to workers.

## Step 1: Senior Management Commitment and Employee Involvement

The safety of a scrap recycler's employees as they drive is so important that it requires the attention of top-level management. Senior management can provide leadership, set policies, and allocate resources (staff and budget) to create a safety culture. Actively encouraging employee participation and involvement at all levels of the organization is a good practice and will help the effort to succeed. Workers must be involved in the initial planning phase.

## Step 2: Written Policies and Procedures

A written statement emphasizing the commitment to reducing traffic-related deaths and injuries is essential to a successful program (see the Mission Statement above as an example). Create a clear, comprehensive and enforceable set of traffic safety policies and communicate them to all employees. These are the cornerstones of an effective driver safety program. Post them throughout the workplace, distribute copies periodically, and discuss the policies at company meetings. Offer incentives for sticking to the rules, and point out the consequences of disregarding them. Below are additional sample policies that can be adapted for use by your company.

*The following sample policies are also included in the appendix:*

### Sample Alcohol and Drug Use Policy

Our company has a vital interest in maintaining safe, healthy, and efficient working conditions for its employees. Therefore, the consumption of alcohol or illegal drugs by any employee during "duty hours" is prohibited. Duty hours consist of all working hours, including break periods and on-call periods, whether on or off company premises. The consumption of alcohol or illegal drugs while performing company business or while in a company facility is prohibited.

### Sample Seat Belt Use Policy

Our company recognizes that seat belts are extremely effective in preventing injuries and loss of life. It is a simple fact that wearing your seat belt can reduce your risk of dying in a traffic accident by 45 percent in a car and by as much as 60 percent in a truck or SUV. We care about our employees, and want to make sure that no one is injured or killed in a tragedy that could have been prevented by the use of seat belts. Therefore, all employees must wear seat belts when operating a company-owned vehicle, or any vehicle on company premises or on company business; and all occupants are to wear seat belts when riding in a company-owned vehicle, or in a personal vehicle being used for company business.



▶ The Key Elements are interdependent and must all be implemented to assure a successful transportation safety program

### Step 3: Driver Agreements

Establish a contract with all employees who drive assigned company vehicles (see the “**Promise Card**” attached). By signing a Promise Card, the driver acknowledges awareness and understanding of the organization’s driving safety policies, procedures, and expectations regarding driver performance, vehicle maintenance and reporting of moving violations.

### Step 4: Motor Vehicle Record (MVR) Checks

Check the driving records of all employees who drive for work purposes. You must screen out drivers who have poor driving records since they are most likely to cause problems in the future (see the “Accident Likelihood” statistics that follow). The MVR should be reviewed periodically to ensure that the driver maintains a good driving record. Clearly define the number of violations an employee/driver can have before losing the privilege of driving for work, and provide training where indicated. Under DOT rules, drivers are required to tell their employer of any motor vehicle violations (on and off the job) once per year.

### Step 5: Accident Reporting and Investigation

Establish and enforce an accident reporting and investigation process. All accidents, regardless of severity, should be reported to the employee’s supervisor or dispatcher as soon as feasible after the incident. Company traffic safety policies and procedures should clearly guide drivers through their responsibilities in a accident situation. All accidents should be reviewed to determine their cause and whether or not the incidents were preventable. Understanding the root causes of accidents and why they are happening, regardless of fault, forms the basis for eliminating them in the future.

### Step 6: Vehicle Selection, Maintenance and Inspection

Selecting, properly maintaining and routinely inspecting company vehicles is an important part of preventing accidents and related losses. It is also a DOT requirement for commercial motor vehicles. Vehicles should be on a routine preventive maintenance schedule for servicing and checking of safety-related equipment. Regular maintenance should be done at specific mileage intervals consistent with the manufacturer’s recommendations. A mechanic should do a thorough inspection of each vehicle at least annually with documented results placed in the vehicle’s file.

### Step 7: Disciplinary Action System

Develop a strategy to determine the course of action after the occurrence of a moving violation and/or “preventable” accident. There are a variety of corrective action programs available; the majority of these are based on a system that assigns points for moving violations (see example on page 10). The system should provide for progressive discipline if a driver begins to develop a pattern of repeated traffic violations and/or preventable accidents. The system should describe what specific action(s) will be taken if a driver accumulates a certain number of violations or preventable accidents in any pre-defined period.



► Compliance with DOT requirements alone is not enough to assure safe driving operations

## Step 8: Reward/Incentive Program

Develop and implement a driver reward/incentive program to make safe driving an integral part of your business culture. Safe driving behaviors contribute directly to the bottom line and should be recognized as such. Positive results are realized when driving performance is incorporated into the overall evaluation of job performance. Reward and incentive programs typically involve recognition, monetary rewards, special privileges or the use of incentives to motivate the achievement of a predetermined goal or to increase participation in a program or event.

## Step 9: Driver Training/Communication

Provide continuous driver safety training and communication. Even experienced drivers benefit from periodic training and reminders of safe driving practices and skills. It is easy to become complacent and not think about the consequences of driving habits. ISRI is producing a series of “2-Minute Warning”-themed driver safety training videos to augment and support your in-house training activities. Weekly safety talk topics and materials continue to be delivered via email. Make a commitment to use them in regularly scheduled safety briefings.

## Step 10: Regulatory Compliance

Ensure adherence to highway safety regulations. It is important to clearly establish which local, state, and/or federal regulations govern your vehicles and/or drivers. These regulations may involve, but may not necessarily be limited to the:

- ▶ Federal Motor Carrier Safety Administration (FMCSA)
- ▶ U.S. Department of Transportation (USDOT)
- ▶ National Highway Transportation Safety Administration (NHTSA)
- ▶ Federal Highway Administration (FHWA)
- ▶ State and local DOT rules.

An assigned Fleet Safety Administrator should have responsibility and authority to implement this transportation safety program, documentation, and related training activities.

▶ Drivers should always be included in regular safety training activities



## IV. Policy for Drivers

Throughout the scrap recycling industry transportation operations are fairly consistent. Regardless of the types of vehicles used, safe driver operating policies must be well known by all parties, and should include the following points. *The Drivers Handbook that accompanies this guidance program includes these important requirements.*

- ▶ Seat belts must be used by driver and all passengers (where passengers are allowed);
- ▶ Never leave materials or inventory in plain view where they will be susceptible to theft or damage. Drivers are responsible for the security of vehicles and cargo;
- ▶ Lock an unattended vehicle. Spare keys should be kept in the office;
- ▶ Observe posted speed limits, adequate following distance and other rules of the road;
- ▶ Maintain company vehicles in accordance with company policy. Drivers will be responsible for damage to company vehicles resulting from reckless or abusive handling or operation;
- ▶ Be courteous to other drivers and pedestrians;
- ▶ Do not use controlled substances or alcohol prior to or when operating a motor vehicle. Be aware of possible adverse effects of prescription drugs;
- ▶ Only the assigned driver or other company personnel engaged in the course of their employment are permitted to drive company vehicles;
- ▶ Use of cell phone while operating a company vehicle is not recommended and may be prohibited;
- ▶ Complete the end of shift inspection report as required by DOT and company policy;
- ▶ Report all incidents and accidents using the appropriate company forms.

# V. “Promise Cards”

The following Promise Card is an example of a written commitment by all drivers. It is a method of reinforcing mandatory Transportation Safety Program policy requirements, communicating these required policy elements, and assuring that drivers understand their own accountability.

These cards should be read, understood, and signed by all drivers, and posted in a visible location, perhaps an employee bulletin board, as routine reminders of their commitment.

The company makes a commitment to drivers...drivers need to make a commitment as well.

*The card is also included in the appendix and in the Drivers’ Handbook for ease of duplication.*

## **Driver’s Promise Card**

I pledge to accept the requirements of my role as a critical member of the company team. I will abide by the safety requirements and policies of my employer, respecting my coworkers, customers, and the motoring public.

I will faithfully perform my duties as required, and be mindful of the unique safety hazards that I will face every day in the scrap yard, on the road, and at customer locations.

\_\_\_\_\_

Name

\_\_\_\_\_

Date

# VI. Pre-hire Recruitment—the Preferred Driver

Selecting the right employees to operate company vehicles is a very important function. Review of motor vehicle driving records alone is not sufficient to assure a good driver employee selection. The company should contact references to attain a full understanding of the potential employees’ attitudes, working ethic and history.

The following driver evaluation, selection, training and reporting tools should be used to help administer a successful safety plan:

Employees who regularly operate vehicles on company business are expected to maintain acceptable driving records per company definitions.

IF A DRIVER HAS EXPERIENCED:	THE CHANCES OF ANOTHER INCIDENT INCREASES:
A reckless driving violation	325%
An improper turn violation	105%
An improper or erratic lane change conviction	100%
A failure to yield right-of-way conviction	97%
An improper turn conviction	94%
A failure to maintain proper lane conviction	91%
A past accident	87%
An improper lane change violation	78%
A failure to yield right-of-way violation	70%
A driving too fast for conditions violation	62%

Employees with poor driving records expose the company to significant liability. We will **only** allow the use of company vehicles, and the operation of non-company-owned vehicles on company business, by those drivers who are qualified to drive based on the criteria that follows.

Applicants for jobs that require operation of a company vehicle must list all moving violations or vehicle accidents (within the most recent three years) on their application. If the application indicates an unacceptable driving record, the applicant will not be considered for a position requiring the operation of **any** vehicle.

Current employees who also drive company vehicles must also complete the Driver’s Questionnaire (see appendix).

## Motor Vehicle Record Check

The Motor Vehicle Record (MVR) is a list of moving violations and accidents reported against a driver’s license number for the past three to five years (in most states). The prospective driver must provide, in writing, a copy of their MVR once employment has been offered. A copy may be obtained, for a small fee, by writing to the proper state Department of Motor Vehicles. Drivers who have unacceptable driving records (refer to “Employee Acknowledgement and Agreement” in the Appendix) will be subject to having their jobs reviewed and possible removal from any position requiring driving.

▶ Driver attitude and driving history is a direct indicator of future performance



Drivers are required to report all accidents and/or moving violation citations to their supervisor at the time of the occurrence (*including use of a personal car while on company business*). Drivers are responsible for notifying their supervisor of final outcomes of violations. An MVR will be obtained on all employees who drive on company business at least annually as a condition of their continued employment as a company driver. Use the form in the Appendix to document MVR reviews.

The following driver evaluation point system is a useful tool in establishing minimum requirements for new driver candidates. These point system evaluation tools can also be helpful during annual performance reviews for existing drivers.

## DRIVER EVALUATION POINT SYSTEM

### POINTS EXPLANATION

#### AGE AND EXPERIENCE

- |   |   |
|---|---|
| 3 | Under 25 years of age; Lack of driving experience.  |
| 6 | Under 21 years of age; Above, plus additional lack of motor vehicle operation experience. In addition, specific written reasons must be provided for drivers under 21 years of age. |

#### NON-SPEED RELATED MOVING VIOLATIONS

- |    |  |
|----|--|
| 3  | Improper "U" turn  |
| 3  | Operating where prohibited   |
| 3  | Improper turn  |
| 3  | Failure to keep in proper lane   |
| 3  | Ran off road   |
| 3  | Driving on road shoulder, in ditch, or on sidewalk   |
| 3  | Making improper entrance to, or exit from, freeway   |
| 3  | Starting improperly from a parked position   |
| 3  | Improper backing   |
| 3  | Failure to signal  |
| 3  | Failure to yield right-of-way at stop sign   |
| 12 | Failure to yield right-of-way to emergency or other authorized vehicle                           |
| 12 | Failure to follow instruction of police officer  |
| 3  | Failure to yield right-of-way in any manner required at unsigned intersection                    |
| 3  | Spilled load (solid object)  |
| 4  | Failure to obey traffic instructions stated on traffic signs or shown by traffic control devices |
| 6  | Driving wrong way on one-way street  |
| 12 | Passing stopped school bus that has warning lights flashing                                      |

#### SPEED-RELATED MOVING VIOLATIONS

- |   |   |
|---|---|
| 4 | Improper lane change  |
| 4 | Speeding—controlled access freeway in thinly populated area |
| 4 | Driving in an improper lane                                 |

► The MVR record is absolutely essential to pre-qualify a prospective driver.

4	Following too closely
4	Passing on the wrong side
6	Driving too fast for conditions
4	Speeding < 15mph over the limit, urban/suburban
6	Speeding > 15mph over the limit, urban/suburban
4	Speeding in densely populated area
6	Passing where prohibited by posted signs, pavement markings, or on hill, curve or bridge
12	Speeding in school zone

**ACCIDENTS**

0	Accident—non-preventable, as indicated by accident review board or police report
3	Accident with a parked vehicle or fixed object
4	Accident—ran off roadway (excluding rollovers)
4	Accident—all others

**ALCOHOLIC, DRUGS, AND/OR RECKLESS DRIVING: OTHER MAJOR OFFENSES**

12	Reckless driving is included because it is frequently a reduction from an alcohol or drug related charge
12	Other major offenses must be considered on an individual basis, but generally disqualify the driver

**SEAT BELT VIOLATIONS**

3	Seat belt violations indicate a disregard for traffic violations and increase the potential for serious workers compensation injuries. At minimum consider these violations the same as moving violations. (Seat belt use serves to help keep the driver positioned to best control the vehicle in emergencies.)
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**NON-MOVING VIOLATIONS**

Non-moving violations are not normally considered in evaluating the individual driver, unless they are excessive or indicate a lack of moral character.

EXCEPTION: Brake adjustment citations can indicate driver ignorance of basic truck mechanical systems, which is obviously not desirable.

**EVALUATION**

Look at 5 Year MVR History for Major Offenses.

Look at 3 Year MVR History for other Moving offenses.

The best and most desirable drivers will have 0 to 3 points.

The average professional driver will have 0 points. The average individual who does not drive for a living will have less than 4 points.

5 or 6 points indicate a questionable rating as a driver, and management should give serious consideration to the desirability of maintaining this individual in a driving position.

7 to 11 points indicate that action is definitely needed on the part of management, and the individual should not be allowed to drive vehicles on company business, unless there are extremely extenuating conditions.

Drivers with 12 or more points are not acceptable and will not be considered for employment in a position that requires driving or continued employment in



a position that requires driving. (While details of major offenses (alcohol, drugs, reckless driving, etc.) should be explored, normally the negligent hiring/entrustment exposure to the organization should preclude hiring consideration.) A driver without a valid license is obviously not acceptable.

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#### **NOTES AND CLARIFICATION:**

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It is important to recognize that many jurisdictions have variations in wording and definitions of violations.

As an example, “Careless Driving” is treated like “Reckless Driving” in a few jurisdictions. Others use it as a “catch all” for more minor violations. Learn these for the jurisdictions your fleet operates in and keep these variations in mind when designing and applying your MVR Criteria.

5 years minimum permitted/licensed motor vehicle operation experience is recommended, including for those candidates over 21 years of age.

Strive to hire drivers that have “Clear” MVRs. Motivate in-service drivers to attain and maintain “Clear” MVR status.

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## **Hiring and Retention Standards and Employee Agreement**

The use of the “Hiring and Retention Standards and Employee Agreement” (see appendix) objectively evaluates applicants and existing employees who drive. The company policy defines the number of violations a driver can have before losing his or her privileges to operate a company vehicle or to perform driving duties. A copy of the policy should be given to the driver for their records. A signed copy should be placed in each driver’s personnel file.

## **Motor Vehicle Record Review Process**

Because the resources and assets of the company are on the line, management should not rely on insurance carriers and brokers to identify poor drivers, but should be proactive and take responsibility for screening drivers themselves.

Why is it important to identify and disqualify a poor driver from operating a company vehicle? Because of the legal doctrine of “*Negligent Entrustment.*”

## **Negligent Entrustment**

The company will take action to correct any situation involving a driver with a poor record. Failing to do so could result in a significant financial or punitive loss to the company. Allowing a driver with a poor record to operate company vehicles places the company at great financial risk.

Several legal interpretations of the Doctrine of Negligent Entrustment are:

*“The principle of ‘negligent entrustment’ is not founded upon negligence of the driver, but upon the negligence of the employer by supplying a motor vehicle to an incompetent driver.”*

*“It is generally recognized that one who places or entrusts his vehicle in the hands of one whom he knows, or from the circumstances is charged with knowing, is incompetent or unfit to drive, may be held liable for an injury inflicted by the use made thereof by that driver, provided the plaintiff can establish that the injury complained of was proximately caused by the driver’s disqualification, incompetence, inexperience, or recklessness...”*

*“Liability for the negligence of the incompetent driver to whom a motor vehicle is entrusted does not arise out of the relationship of the parties, but from the act of entrustment of the vehicle, with permission to operate the same, to one*

*whose incompetence, inexperience, or recklessness was known or should have been known by the owner.”*

## **Road Tests**

Prior to employment in a position which requires driving on company business, the applicant should complete a driving test in the vehicle that he/she will most likely be driving. An employee or manager trained in the administration of road tests will score the road test.

## **Accident Procedures and Reporting Forms**

Any vehicle driven on company business must contain an accident reporting form. All drivers are expected to conform to the state laws governing actions at the scene of an accident. All accidents, regardless of the severity, must be reported immediately to the employee's direct supervisor/manager. The supervisor/manager/dispatcher is responsible for collecting the accident/incident report form from the driver as well as a written statement of the incident. Each vehicle should have an emergency road kit containing a company accident report form with camera.

## **Vehicle Condition Reports (inspection reports)**

Drivers must complete the vehicle inspection form/checklist daily. DOT requires a completed inspection report form for every day. Service and maintenance logs must be kept for each vehicle. Manufacturer's recommendations for vehicle maintenance must be followed.

## **Safe Driving Performance Expectations**

Driving is a critically important part of the job for those employees assigned company vehicles. Evaluations of their job performance should include an evaluation of their driving performance.

## **Driver Training and Continuing Education**

The Fleet Safety Coordinator should distribute driver safety literature to drivers, dispatchers and supervisors of drivers. This will be done in addition to regular safety meetings. The weekly *For Your Driving* newsletter and *2-Minute Warning* videos provided by ISRI Safety can be useful in routine driver safety training activities.

# VII. Qualification of Drivers (49 CFR 391)

The company will ensure that all drivers of commercial motor vehicles meet the minimum qualifications as specified in Part 391 of the U.S. Department of Transportation rules.

## Driver Requirements:

A driver must meet the following requirements for employment before being allowed to drive a company commercial motor vehicle:

- ▶ Be at least 18 years of age (this is the federal requirement for intrastate drivers. Some companies have a different minimum);
- ▶ Speak and read English well enough to converse with the general public, understand highway traffic signs and signals, respond to official questions;
- ▶ Be able to make legible entries on reports and records;
- ▶ Be able to drive the vehicle safely;
- ▶ Is physically qualified by passing a DOT physical examination within the past 24 months;
- ▶ Have only one valid operator's license;
- ▶ Provide the employer with a copy of his or her current operator's license, and pass a driver's road test;
- ▶ Provide an employing motor carrier with a list of all motor vehicle violations or a signed statement that the driver has not been convicted of any motor vehicle violations during the past 12 months;
- ▶ Complete an application for employment. (sample in appendix)

We are required to maintain a qualification file for each driver, including the company owner if he/she is also a driver. The file must include:

### Drivers Application for Employment

- ▶ A prospective driver must complete and sign an application for employment (see appendix) that contains all the information required by DOT Part 391.21.

### Inquiry to Previous Employers

- ▶ A note regarding the investigation of the driver's employment record during the preceding three years is required. If the driver will be operating a motor vehicle requiring a commercial drivers license (CDL) he/she must supply an additional 7 years of past employment history (for a total of 10) if involved in driving such vehicles during that period. This investigation must be made within 30 days of the date his/her employment begins.

### Inquiry to State Agencies

- ▶ The employer must request a copy of the driver's driving record for the preceding three years.

### Annual Review of Driving Record

- ▶ At least once every 12 months, we shall review the driving record of each driver must be reviewed;
- ▶ A new copy of the driver's driving record must be obtained from each state in which the driver held a driver's license during the prior 12 months;



- ▶ A note stating the results of this review must be included in the Driver's Qualification File.

### **Annual Drivers Certification of Violations**

- ▶ At least once every 12 months, each driver must prepare and furnish a list of all violations of motor vehicle traffic laws and ordinances during the previous 12 months, while on the job and off the job.

### **Drivers License or Drivers Road Test**

- ▶ Each driver must provide a copy of his/her valid driver's license and successfully complete a road test.

### **Medical Examinations**

- ▶ Drivers must pass a medical examination conducted by a licensed health care professional;
- ▶ A driver must be issued a Medical Examiner's Certificate, which must be carried at all times and must be renewed every two years.

### **Physical Requirements (Section 391.41 provides the complete list of physical requirements)**

- ▶ Driver has no loss of a foot, a leg, a hand, or an arm;
- ▶ Driver has no established medical history or clinical diagnosis of diabetes requiring insulin for control;
- ▶ Driver has no clinical diagnosis of any disqualifying heart disease;
- ▶ Driver has no clinical diagnosis of high blood pressure;
- ▶ Driver has no clinical diagnosis of epilepsy;
- ▶ Driver has 20/40 vision or better with corrected lenses;
- ▶ Driver has the ability to recognize the colors (red, green, and amber) of traffic signals;
- ▶ Driver has hearing to perceive a forced whisper;
- ▶ Driver has no history of drug use or any other substance identified in Appendix D of 49 CFR;
- ▶ Driver has no clinical diagnosis of alcoholism.

### **Disqualifying Offenses**

A driver should be disqualified from operating a commercial motor vehicle on public highways, for any of the following offenses:

- ▶ Revocation, suspension, or withdrawal of an operator's license;
- ▶ Conviction or forfeiture of bond for the following criminal offenses while driving a commercial motor vehicle;
- ▶ Driving while under influence of alcohol;
- ▶ Driving while illegally using drugs;
- ▶ Driving while illegally possessing or transporting drugs;
- ▶ Leaving the scene of an accident that resulted in injury or death;
- ▶ Using a commercial motor vehicle while committing a felony.

## VIII. Drivers File Checklist (regulatory citation from DOT 49 CFR Part 391.51)



It is highly recommended that each scrap recycling company who employs drivers place a completed copy of this checklist in the front of each driver's file. Each item is required by DOT so the checklist can be very useful in the event an audit is performed by DOT.

See the appendix for a drivers file checklist form which should be attached to the front of each driver's file folder. It's a good way to keep tabs on the completeness of each folder.

Failure to complete and check off each item is an admission that you are out of compliance, so be very thorough when completing this document for every driver—even part timers. DOT audits can happen randomly without advance notice.

### **Driver's Application for Employment 49 CFR 391.21**

- ▶ A completed employment application provided by the motor carrier to the applicant that is signed by the applicant; (see appendix)
- ▶ Drivers applying for a position that involves driving a vehicle requiring a commercial driver's license (CDL) must supply an additional seven years of past employment history, if involved in driving such vehicles during that period.

### **Inquiry to Previous Employers**

- ▶ An investigation of the driver's employment record during the preceding 3 years (see note above);
- ▶ This investigation must be made within 30 days of the date his/her employment begins.

### **49 CFR 391.23(a)(2)&(c)—Inquiry to State Agencies**

- ▶ The driver's driving record for the preceding three years;
- ▶ This investigation must also be made within 30 days of the date his/her employment begins.

### **49 CFR 391.23(a)(1)&(b)—Annual Review of Driving Record**

- ▶ At least once every 12 months, the employer must review the driving record of each driver.
- ▶ A note stating the results of this review shall be included in the driver's qualification file.

### **49 CFR 391.25—Annual Driver's Certification of Violations**

- ▶ At least once every 12 months, the employer must require each driver that it employs to prepare and furnish it with a list of all violations of motor vehicle traffic laws and 49 CFR 391.27 ordinances during the previous 12 months.



## **Driver's Road Test and Certificate (or equivalent)**

- ▶ A person must not be allowed to drive a commercial motor vehicle until he/she has successfully completed a road test and has been issued a certificate, or a copy of the license or certificate which the motor carrier accepted as equivalent to the driver's road test pursuant section 391.33.

### **49 CFR 391.31&33—Medical Examiner's Certificate**

- ▶ The driver must pass a medical examination conducted by a licensed healthcare professional. Driver must be issued a Medical Examiner's certificate, which must be carried at all times, and must be renewed every two years.

# IX. Drug and Alcohol Testing

After several significant transportation accidents, Congress passed the Omnibus Transportation Employee Testing Act of 1991, because they recognized the safety need for ensuring drug- and alcohol-free transportation employees. The “Act” required DOT Agencies to implement drug testing of safety-sensitive transportation employees in the aviation, trucking (including school bus drivers, and certain limousine and van drivers), railroads, mass transit, and pipelines.

The US Dept of Transportation requirements of substance abuse testing is crucial for the safety of employees, co-workers and the traveling public, so much that the company is fully committed to complying with all applicable laws.

The rules of a Commercial Drivers License {CDL} holder require that those employees who are designated as a **safety sensitive** employee of designated Commercial Motor Vehicles be subject to drug and alcohol testing.

*The following text is included in the Drivers’ Handbook to assure we have communicated this information to each and every driver, as the U.S.DOT requires.*

## Testing for Alcohol and Drugs

### **Make the following statements a part of your company policy:**

- ▶ Our company has a zero tolerance for Alcohol use during the course of workday and is monitored by supervisor/dispatcher observances and annual testing. In addition, the following alcohol tests are required:
- ▶ Post-accident—conducted after accidents on drivers whose performance could have contributed to the accident (as determined by a citation for a moving traffic violation) and for all fatal accidents even if the driver is not cited for a moving traffic violation;
- ▶ Reasonable suspicion—conducted when a trained supervisor or company official observes behavior or appearance that is characteristic of alcohol misuse;
- ▶ Random—conducted on a random unannounced basis just before, during, or just after performance of safety-sensitive functions;
- ▶ Return-to-duty and follow-up—conducted when an individual who has violated the prohibited alcohol conduct standards returns to performing safety-sensitive duties. Follow-up tests are unannounced. At least 6 tests must be conducted in the first 12 months after a driver returns to duty. Follow-up testing may be extended for up to 60 months following return to duty.

Note: Refusing to submit to an alcohol test or using alcohol within eight hours after an accident or until tested is strictly prohibited. Employees who refuse to submit to testing will be immediately suspended pending review by Management.

## How will Alcohol Testing be Done?

DOT rules allow for screening tests to be conducted using saliva devices or breath testing using evidential breath testing (EBT) and non-evidential breath testing devices approved by the National Highway Traffic Safety Administration (NHTSA). NHTSA periodically publishes a list of approved devices in the Federal Register.

Two tests are required to determine if a person has a prohibited alcohol concentration. A screening test is conducted first. Any result less than 0.02 alcohol concentration is considered a “negative” test. If the alcohol concentration is 0.02 or greater, a second confirmation test must be conducted. The driver and the individual conducting the confirmation breath test (called a breath alcohol technician (BAT) complete the alcohol testing form to ensure that the results are properly recorded. The confirmation test, if required, must be conducted using an EBT that prints out the results, date and time, a sequential test number, and the name and serial number of the EBT to ensure the reliability of the results. The confirmation test results determine any actions taken.

Testing procedures that ensure accuracy, reliability and confidentiality of test results are outlined in the Part 40 rule. These procedures include training and proficiency requirements for the screening test technicians (STT), breath alcohol technicians (BAT), quality assurance plans for the breath testing devices (including calibration requirements for a suitable test location), and protection of driver test records.

## Who does the testing?

The company is responsible for implementing and conducting the testing programs, and may use contract services. Post-accident testing shall be conducted unless law enforcement personnel object due to interference of an investigation and conduct their own testing.

## What are the consequences of alcohol misuse?

Drivers who engage in prohibited alcohol conduct shall be immediately removed from safety-sensitive functions. Drivers who have engaged in alcohol misuse cannot return to safety-sensitive duties until they have been evaluated by a substance abuse professional and complied with any treatment recommendations to assist them with an alcohol problem. To further safeguard transportation safety, drivers who have any alcohol concentration (defined as 0.02 or greater) when tested just before, during or just after performing safety-sensitive functions must also be removed from performing such duties for 24 hours. If a driver’s behavior or appearance suggests alcohol misuse, a reasonable suspicion alcohol test must be conducted. If a breath test cannot be administered, the driver must be removed from performing safety-sensitive duties for at least 24 hours.

## FMCSA Compliance

The company is required to keep detailed records of alcohol misuse prevention programs. The FMCSA (Federal Motor Carrier Safety Administration) will conduct inspections or audits of employers’ programs. Additionally, selected employers will have to prepare annual calendar year summary reports for the FMCSA. These reports will be used to help monitor compliance and enforcement of the rules, as well as to provide data on the extent of alcohol misuse and the need for any future program and regulatory changes.

## Driver Alcohol Testing Records

Test results and other confidential information may be released only to the company and the substance abuse professional. Any other release of this information is only with the driver’s written consent. If a driver initiates a grievance, hearing, lawsuit, or other action as a result of a violation of these rules, the employer may release relevant information to the decision maker.

▶ Our company must appoint and train a designated Substance Abuse Coordinator who will manage the drug & alcohol program

## Drug Testing

The drug testing rules cover the same drivers as the alcohol testing rules. The types of tests required are:

- ▶ pre-employment;
- ▶ reasonable suspicion;
- ▶ post-accident;
- ▶ random;
- ▶ return-to-duty;
- ▶ follow-up.

## How is Drug Testing Done?

Drug testing is conducted by analyzing a driver's urine specimen. The analysis is performed by a contracted laboratory certified and monitored by the Department of Health and Human Services (DHHS).

Drivers shall provide a urine specimen in a location that affords privacy and the "collector" seals and labels the specimen, completes a chain of custody document, and prepares the specimen and accompanying paperwork for shipment to a drug-testing laboratory. The specimen collection procedures and chain of custody ensure that the specimen's security; proper identification and integrity are not compromised. The Omnibus Transportation Employee Testing Act of 1991 requires that drug testing procedures for commercial motor vehicle drivers include split specimen procedures. Each urine specimen is subdivided into two bottles labeled as a "primary" and a "split" specimen. Both bottles are sent to a laboratory. Only the primary specimen is opened and used for the urinalysis. The split specimen bottle remains sealed and is stored at the laboratory. If the analysis of the primary specimen confirms the presence of illegal, controlled substances, the driver has 72 hours to request the split specimen be sent to another DHHS-certified laboratory for analysis. This split specimen procedure essentially provides the driver with an opportunity for a "second opinion."

## Drugs Tested For

All urine specimens are analyzed for the following drugs:

- ▶ Marijuana (THC metabolite)
- ▶ Cocaine
- ▶ Amphetamines
- ▶ Opiates (including heroin)
- ▶ Phencyclidine (PCP)

The testing is a two-stage process. First, a screening test is performed. If it is positive for one or more of the drugs, then a confirmation test is performed for each identified drug using state-of-the-art gas chromatography/mass spectrometry (GC/MS) analysis. GC/MS confirmation ensures that over-the-counter medications or preparations are not reported as positive results.

## Review and Interpretation of the Laboratory Results

All drug test results are reviewed and interpreted by a physician (Medical Review Officer (MRO)) before they are reported to the employer. If the laboratory reports a positive result to the MRO, the MRO contacts the driver (in person or by



telephone) and conducts an interview to determine if there is an alternative medical explanation for the drugs found in the driver's urine specimen. If the driver provides appropriate documentation and the MRO determines that it is legitimate medical use of the prohibited drug, the drug test result is reported as negative to the employer.

## **Drug Use Prohibited**

Drug rules prohibit any unauthorized use of the controlled substances. Illicit use of drugs by safety-sensitive drivers is prohibited on or off duty. The FMCSA has some additional rules that prohibit the use of legally prescribed controlled substances (such as barbiturates, amphetamines, morphine, etc.) by safety-sensitive drivers involved in interstate commerce. Drivers using these legally prescribed controlled substances must remove themselves from any safety sensitive functions, until they can be cleared for return to work by the MRO. Drivers should report any of these drug prescriptions to the company.

## **Consequences of a Positive Drug Test**

Driver shall be removed from safety-sensitive duty if he/she has a positive drug test result. The removal cannot take place until the MRO has interviewed the driver and determined that the positive drug test resulted from the unauthorized use of a controlled substance. A driver cannot be returned to safety-sensitive duties until he/she has been evaluated by a substance abuse professional, has complied with recommended rehabilitation, and has a negative result on a return-to-duty drug test. Follow-up testing to monitor the driver's continued abstinence from drug use is also required.

## **How Does Random Drug Testing Work?**

The company is responsible for conducting random, unannounced drug tests. The total number conducted each year must equal at least 50% of the safety-sensitive drivers. Some drivers may be tested more than once each year; some may not be tested at all depending on the random selection. Random testing for drugs does not have to be conducted in immediate time proximity to performing safety-sensitive functions. Once notified of selection for testing, however, a driver must proceed immediately to a collection site to accomplish the urine specimen collection.

## **Employee Education and Training Requirements**

The company shall provide safety-sensitive drivers with required information on drug use and treatment resources. A supervisor and official of the company have attended at least one hour of training on the signs and symptoms of drug abuse. This training is necessary to assist supervisors and company officials in making appropriate determinations for reasonable suspicion testing.

## **Drug Testing Records**

Driver drug testing results and records are maintained under strict confidentiality by the employer, the drug-testing laboratory, and the medical review officer. They cannot be released to others without the written consent of the driver. Exceptions to these confidentiality provisions are limited to a decision maker in arbitration, litigation or administrative proceedings arising from a positive drug test. Statistical records and reports are maintained by employers and drug testing laboratories. This information is aggregated data and is used to monitor compliance with the rules and to assess the effectiveness of the drug testing



programs. Employers must release drug and alcohol records to prospective employers pending a signed consent from employee to prospective employer.

**Note:** Employees who refuse to submit to drug test at any time required to be tested is strictly prohibited. Employees who refuse to submit to testing shall be immediately suspended pending review by Management.

### **Post Accident Testing:**

- ▶ Towed vehicle;
- ▶ Hospitalization of driver;
- ▶ Driver charged with DUI.

These tests must be done within 8 hours (alcohol test) or 32 hours (drug suspicion).

# X. Understanding Your SafeStat Score

SafeStat is a U.S.DOT managed transportation safety incident monitoring system which is used for targeting enforcement activity. All DOT-registered fleets have SafeStat data recorded in a main database which is available immediately to compliance and enforcement personnel nationwide. When your driver gets pulled over or inspected at a scale, the enforcement folks can review your company's SafeStat score and history and determine how detailed their inspection needs to be. Any company with a SafeStat score **greater than 75** (on a 0 to 100 scale) will automatically be subject to a potential on-site compliance and enforcement audit. That's why it is critically important to have complete driver files with up to date and well organized drivers files (see the checklist in this manual for assuring you have what is required). Unfortunately, company's with a small fleet and a few drivers can end up with a high SafeStat score after only one or two violations or accidents.

The SafeStat score has become a critical factor in insurance rating, litigation management, and compliance audit selection. SafeStat is a data-driven analysis system that determines the current safety status of individual motor carriers. It involves assessing a motor carrier in four **Safety Evaluation Areas** or **SEAs**.

- ▶ Accident SEA;
- ▶ Driver SEA;
- ▶ Vehicle SEA;
- ▶ Safety Management SEA.

This scoring assessment is based on:

- ▶ State reported crashes (last 30 mos.);
- ▶ Recordable Crashes from Compliance Reviews (last 12 mos.);
- ▶ Roadside Inspection Violations (last 30 mos.);
- ▶ Serious Moving Violations (last 30 mos.);
- ▶ Compliance Review Violations (last 18 mos.);
- ▶ Closed Enforcement Cases (last 6 years).

A SEA value is derived from the indicators related to that SEA. For example, a SEA value of 85 means 85% of the carriers have a better safety status in that SEA and 15% have a worse status. SafeStat sums only the SEAs with values of 75 or greater to determine the SafeStat Score. In the Score calculation, more emphasis is put on the Accident SEA (twice the weight) and Driver SEA (1 ? times the weight) than Vehicle and Safety Management SEAs.

SafeStat Score = (2 x Accident SEA) + (1.5 x Driver SEA) + Vehicle SEA + Safety Management SEA

After the SafeStat Score is calculated, it will fall into one of the following categories:

- ▶ Category A: SafeStat score of 350 to 550;
- ▶ Category B: SafeStat score of 225 to 349;
- ▶ Category C: SafeStat score of 150 to 224;
- ▶ Category D: Accident SEA value of 75 or more;
- ▶ Category E: Driver SEA value of 75 or more;
- ▶ Category F: Vehicle SEA value of 75 or more;
- ▶ Category G: Safety Management SEA value of 75 or more.

Most insurance companies now include SafeStat scores as part of the underwriting process. It is extremely important that you review the information quarterly to make certain everything is correct (inspections, violations, number of units, etc.) You may obtain SafeStat information at [www.ai.volpe.dot.gov](http://www.ai.volpe.dot.gov).

# XI. New Driver Orientation

Once selected drivers will undergo a preliminary “new employee orientation” for new hires or transferred employees who now have driving responsibilities. The Fleet Safety Coordinator will determine a schedule of topics for regular continuing education.

Topics can include, but are not limited to:

- ▶ Company policies and procedures for operation of company-owned vehicles;
- ▶ Safe driving objectives and company expectations;
- ▶ Vehicle use and limitations for personal use;
- ▶ Annual MVR checks and methods for management evaluation;
- ▶ Cargo handling and security precautions;
- ▶ Driver training and accident reporting/response procedures;
- ▶ Vehicle maintenance and inspection requirements;
- ▶ Concepts of Decision Driving;
- ▶ Territory and routes of expected travel;
- ▶ License requirements (CDL, verification of physical/visual examinations, etc.);
- ▶ Observation reports;
- ▶ Cell phone-use restrictions (cell phones can be very distracting and some jurisdictions are prohibiting their use while driving. Most transportation professionals agree that cell phone use should be banned while operating any motor vehicle).

## Driver Testing and Training

**Purpose:** To establish a minimum level of driving skills needed to operate motor vehicles in a safe and legal manner. Driving skill and ability shall be demonstrated by the driver (and prospective applicant) by having him or her operate the vehicle (or similar type that will be used in the job) under the direct observation of their current (or prospective) supervisor. This evaluation will verify competency, driving habits, skills and attitudes conveyed during the operation of a vehicle.

**Responsibility:** Management has responsibility for ensuring that vehicles driven on company business are operated only by qualified drivers who have demonstrated their competency in operation of the vehicle under varied conditions.

**Demonstrating driving ability:** These tests will determine an applicant’s skill in handling equipment in a limited area. Different skill tests are required of automobile users versus operators of straight trucks or tractor-trailers. Performance will measure the applicant’s skill in maneuvering a vehicle and their ability to practice good judgment and courtesy.

Road tests will be given in normal traffic conditions over a prescribed course or route and will be checked on a score sheet by an experienced examiner. The checklist will include various maneuvers to be performed by the driver.

## When Preparing to Conduct a Road Test

Select a vehicle and test route that is the same (or similar) as the one the applicant may drive if hired.



Practice conducting the road test before actual administration to become familiar with the route and scoring procedure. Be certain it will be representative of the actual driving tasks the driver will perform.

Each applicant examined will be rated in accordance with the established standard.

**Points to Include During Road Test:**

- ▶ Knowing your surroundings in the scrapyard or equipment yard;
- ▶ Remembering to walk around the vehicle before moving it;
- ▶ Ability to maneuver the vehicle in tight spaces;
- ▶ Ability to judge the width and length of the vehicle;
- ▶ Ability to back up in a straight line (using mirrors only if a van or straight truck);
- ▶ Ability to successfully judge spaces and distance using spotters for backing;
- ▶ Stabilizing vehicle after connection (if applicable);
- ▶ Controlling speed and flow with traffic;
- ▶ Using mirrors effectively in maneuvering through traffic;
- ▶ Stopping smoothly and accurately judging distances;
- ▶ Anticipating and reacting to situations before they become critical;
- ▶ Observing all traffic laws

The following is included in the appendix for copying and distribution during driver training sessions.

**Procedures to Follow in a Vehicle Accident or Citation:**

- ▶ Protect the scene of the accident and take action to prevent additional collisions or injuries;
- ▶ Pull off the roadway as far as possible unless otherwise directed;
- ▶ Place reflectors or flares in front of and to the rear of your vehicle. (Follow applicable federal or state laws.);
- ▶ Contact emergency authorities immediately;
- ▶ Administer emergency first aid if trained to do so;
- ▶ Obtain and record the following information at the scene of the accident;
- ▶ Name and address of each driver, passenger and/or witness to the accident;
- ▶ License number of each vehicle involved;
- ▶ Name and policy number of the insurance company for each vehicle involved;
- ▶ Complete accident/incident form.

**What To Do**

- ▶ Be courteous—do not argue—keep calm;
- ▶ Give your name and address to the injured person or a police officer before leaving the scene;
- ▶ If police respond to the accident, do not leave the scene until you are told you may leave by the officer(s) responding;
- ▶ Take photos of the accident scene from various angles;
- ▶ Photo positions of all vehicles involved and any skid marks on the road surface;



- ▶ Photo all traffic control devices including stop signs, traffic lights and lane markings.

**What Not To Do**

- ▶ Do not talk about the accident, except to a police officer, your employer, or your insurance claim rep;
- ▶ Make no settlements or offers of settlements to anyone.
- ▶ Above all, do not sign any statements or reports other than official police reports
- ▶ Do not admit fault
- ▶ Do not photograph any injured or deceased persons

The fleet safety coordinator should conduct a review of each vehicle accident.

## XII. A Guide to Determining the Preventability of Accidents

*This is a great section to use as training tools during driver safety training sessions. Often, drivers are not clear on what constitutes a preventable accident and advance knowledge can reduce the possibility of significant conflict following an accident event.*

When a driver reports an accident, a designated company official should determine whether the accident was preventable by the driver involved. The determination should use the following definition of a “Preventable Accident” as developed by the National Safety Council.

A preventable accident is any occurrence involving a company owned or operated vehicle that results in property damage and/or personal injury, regardless of who was injured, what property was damaged, to what extent or where it occurred, in which the driver in question failed to exercise every reasonable precaution to prevent the occurrence.

Most physical damage losses also fall under this definition. However, physical damage losses over which the operator has no control, such as minor paint nicks, small dents and scratches from parking lot exposures, and chipped windshields, will not fall under the above definition of accident.

Accidents involve so many different factors that it is impossible to set hard and fast rules to classify them as preventable or non-preventable. Management must make this determination.

In making these decisions, the question should be “What standard of safe driving performance do we expect of company drivers?” Leniency condones a mediocre standard of safe driving performance. Drivers respect a strict interpretation of the policies as long as they are communicated and applied consistently and impartially.

The following is a guide to determining the preventability of accidents. It is impossible to describe in detail the many ways a driver might have prevented an accident for which he or she is not primarily or legally responsible. The paragraphs of this guide merely highlight the most frequent occurrences based on past decisions of accident review committees.

### **Intersections**

It is the responsibility of professional drivers to approach, enter, and cross intersections prepared to avoid accidents that might occur through the actions of other drivers. Complex traffic movement, blind intersections, or failure of the other driver to conform to law or traffic control devices will not automatically discharge an accident as “non-preventable.” Intersection accidents are preventable even when the professional driver has not violated traffic regulations. A driver’s failure to take precautionary measures before entering the intersection should be a factor in the decision. When a professional driver crosses an intersection and the obvious actions of the other driver indicate potential involvement because of either his excess speed, crossing his lane in turning, or coming from behind a blind spot, the accident should be considered preventable.

### **Backing**

Practically all backing accidents are preventable. A driver is not relieved of his responsibility to back safely when a guide is involved in the maneuver. A guide

cannot control the movement of the vehicle; therefore, a driver must check all clearances for himself.

## **Front-end Collisions**

Regardless of the abrupt or unexpected stop of the vehicle ahead, your driver can prevent accidents by maintaining a safe following distance at all times. This includes being prepared for possible obstructions on the highway, either in plain view or hidden by the crest of a hill or the curve of a roadway. "Over-driving" headlights at night is a common cause of front-end collisions. Night speed should not be greater than that which will permit the vehicle to come to a stop within the forward distance illuminated by the vehicle's headlights.

## **Rear-End Collisions**

Investigation will often disclose that a driver risked being struck from behind by failing to maintain a margin of safety in his own following distance. Rear-end collisions preceded by a roll back, an abrupt stop at a grade crossing, when a traffic signal changes, or when your driver fails to signal a turn at an intersection should be charged preventable. Failure to signal intentions or to slow down gradually should be considered preventable.

## **Passing**

Failure to pass safely indicates faulty judgment and possible failure to consider one or more of the important factors a driver must observe before attempting to pass. Unusual actions of the driver being passed or of oncoming traffic might appear to exonerate a driver involved in a passing accident; however, the entire passing maneuver is voluntary and the driver's responsibility.

## **Being Passed**

Sideswipes and cut-offs involving a professional driver who is being passed are preventable when the driver fails to yield to the passing vehicle by slowing down or moving to the right where possible.

## **Lane Encroachment**

A safe driver is rarely a victim of entrapment by another driver when changing lanes. Similarly, entrapment in merging traffic is an indication of unwillingness to yield to other vehicles or to wait for a break in traffic.

Blind spots are not valid excuses for lane encroachment accidents. Drivers must make extra allowances to protect themselves in areas of limited sight distances.

Squeeze plays causing involvement with parked cars, pillars, and other road structures can be prevented by dropping back when it is apparent that the other driver is forcing the issue or contesting a common portion of the road.

## **Grade Crossings**

The professional driver is responsible for preventing collisions with fixed rail vehicles, such as trains and street cars, occurring at grade crossings, in traffic, in a rail yard or switch area, or on private property. When a vehicle is parked across a rail siding, the driver must first ascertain whether it is safe and permissible and, furthermore, must stand by in case rail cars move and conditions change.

## Opposing Vehicles

It is extremely important to review the actions of the company driver who is involved in a head-on or sideswipe accident with a vehicle approaching from the opposite direction. Carefully verify the exact location of vehicles prior to and at the point of impact.

## Turning

Turning movements, like passing maneuvers, require the most exacting care by the professional driver. Squeeze plays at left or right turns involving other vehicles, scooters, bicycles, or pedestrians are the responsibility of the driver making the turn. Consider the driver's failure to signal, properly position the vehicle for the turn, check the rearview mirrors, check pedestrian lanes, or take any other defensive action. Examine sudden turns by other drivers carefully. You may find that your driver failed to take precautionary action in response to clues from the other vehicle immediately preceding the incident. U-turns by your driver that result in a collision are preventable.

## Passenger Accidents

Passenger accidents in any type of vehicle are preventable when they are caused by faulty operation of the vehicle. Even though the incident did not involve a collision of the vehicle, it must be considered preventable when your driver suddenly stopped, turned, or accelerated. When emergency action by the company driver to avoid a collision results in passenger injury, review the incident to determine whether proper driving just before the emergency would have eliminated the need for the evasive maneuver.

## Pedestrians, Bicycles, and Similar Traffic

Traffic regulations and court decisions generally favor the pedestrian hit by a moving vehicle. An unusual route of a pedestrian at mid-block or from between parked vehicles does not necessarily relieve a driver from taking precautions to prevent such accidents. Even when speed limits are posted or the area is placarded with warning signs, speed that was too fast for conditions may have been involved. School zones, residential streets, and other areas with special pedestrian traffic must be traveled at reduced speeds appropriate to the situation. Bicycles, motor scooters, and similar equipment are generally operated by young and inexperienced operators. The driver who fails to reduce his speed when this type of equipment is operated within his sight distance has failed to take the necessary precautions to prevent an accident. Keeping within posted speed limits is not enough when unusual conditions call for voluntary reduction of speed.

## Weather

Adverse weather conditions are not a valid excuse for being involved in an accident. Rain, snow, fog, sleet, or icy pavements have never caused an accident. These conditions merely increase the hazards of driving. Failure to adjust driving to the prevailing weather conditions or to "call it a day" when necessary should be cause for deciding that an accident was preventable. When it is reasonable to expect a driver to use safety devices such as skid chains or snow tires, failure to use such devices should be cause for finding an accident preventable.

## **Alleys, Driveways, and Plant Entrances**

Accidents involving traffic originating from alleys, driveways, plant entrances, and other special intersecting locations should be carefully analyzed to determine what measures the professional driver might have taken to avoid the occurrence. Failure to slow down, sound a warning, or yield to the other driver can be considered cause to judge the accident preventable.

## **Fixed Objects**

Collisions with fixed objects are preventable. They usually involve failure to check or properly judge clearances. New routes, strange delivery points, resurfaced pavements under viaducts, inclined entrances to docks, marquees projecting over traveled sections of road, and similar situations are not, in themselves, valid reasons for absolving a driver of blame. Drivers must be constantly on the lookout for such conditions.

## **Private Property**

When a driver is expected to make deliveries at unusual locations such as construction sites or on driveways not built to support heavy commercial vehicles, the driver is responsible for discussing the operation with the proper authorities and obtaining permission before entering the area.

## **Parking**

Unconventional parking, including unusual locations, double parking, or failure to put out warning devices, is generally evidence of a preventable accident.

Roll-away accidents from a parked position normally should be classified preventable. These accidents can involve unauthorized entry into an unlocked and unattended vehicle, failure to properly block wheels, or failure to turn wheels toward the curb to prevent vehicle movement.

## **Mechanical Failure**

Any accident caused by mechanical failure that reasonably could have been detected by the driver but went unheeded should be judged preventable. It is the driver's responsibility to report unsafe vehicle conditions and obtain immediate repairs where continued operation might result in an accident. When mechanical difficulties occur unexpectedly during a trip and the driver fails to check with the company for emergency instructions, the resulting accident is preventable. An accident caused by mechanical failure that results from abusive driving should be considered preventable.

## **Non-Collision**

Many accidents, such as overturning, jackknifing, or running off the road, may result from emergency action by the driver to prevent being involved in a collision. Examination of his or her driving just before the incident may reveal speed that was too fast for conditions. Also examine the company driver's actions before the accident for possible errors or lack of defensive driving.

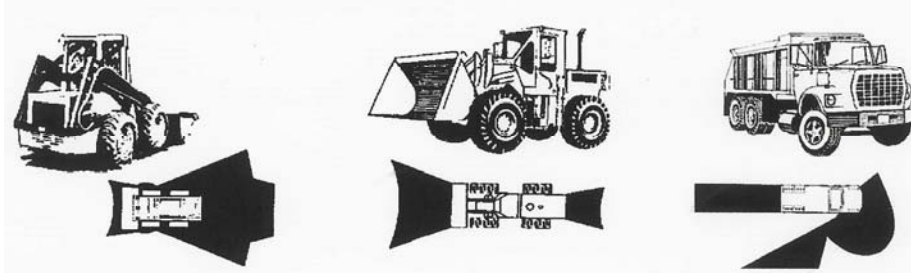
## **Miscellaneous**

Projecting loads, loose objects falling from the vehicle, loose tarpaulins or chains, doors swinging open, etc. resulting in damage to the vehicle, cargo, or other

property are preventable when caused by the driver's actions or failure to secure the property. **Cargo damage resulting from unsafe vehicle operation is preventable.**

## Blind Spot Safety

*This section and the graphic is included in the Drivers' Handbook.*



A "blind spot" is any area that a driver can't see by looking around or by using his or her mirrors, and they can be a big problem in the recycling processing operations. Blind spots are caused by the way the equipment has been designed to get the work done. In the examples the shadowed areas around each piece of equipment represents a blind spot. If someone or something is in this area, it will be invisible to the driver or operator.

When it comes to working safely around equipment, understanding blind spots is everyone's responsibility.

### Know Your Zone!

It is just as important for scrapyards workers to understand the nature of blind spots as it is for truck and equipment operators—maybe even more important. Remember that if you can't see the driver's eyes, he can't see you, and you should never approach operating mobile equipment unless and until you have the driver's attention. For drivers, it is important to know where blind spots are and never assume that the "coast is clear." Back up alarms and lighted beacons should always be in good working condition on every piece of equipment.

When it comes to protecting customers, try to keep them as far away from equipment as possible. The general public knows little about blind spots, and think nothing about walking behind skid steers and other material handlers. Every year, customers at recycling facilities are injured or killed by yard equipment whose operators never saw them approaching.

Use your safety sense when working around equipment.

# XIII. Vehicle Maintenance and Inspections

*This section is included in the Drivers' Handbook.*

Employees operating company vehicles are expected to make a safety check on their vehicle before driving. The inspection should include, at a minimum, lights, horn, turn signals, brake lights, oil level, coolant level, tire pressure and condition, and adjustment of rearview mirrors. The operator should complete a vehicle condition report according to the schedule required by the driver's supervisor. Vehicle condition reports must be maintained by the operator assigned to company vehicles for regular inspections and for recording maintenance or repair needs.

All maintenance including oil changes, lubrication, repair, parts, etc., will be recorded on an up-to-date vehicle maintenance log, which will be kept in the glove compartment of each vehicle. All scheduled maintenance will be in accordance with the vehicle manufacturer's recommendations. All repair needs must be highlighted and brought to the immediate attention of employee's supervisor/manager.

Random inspections will be conducted and results will be forwarded to the Fleet Safety Coordinator for review. Personal vehicles used on company business must be well maintained and in a manner that reflects positively on the company.

The company reserves the right to inspect a personal vehicle at random, and will subject that vehicle to the same safety criteria as with company-owned vehicles. The reports will be retained by the company and kept within the personnel file of the owner/driver.

## Circle Check Policy

During a trip any problems with the fleet triggers a variety of other problems, including increased cost for repairs, lost time, customer dissatisfaction. In addition to regular maintenance service, it is important that drivers thoroughly inspect their truck before leaving the yard each day.

### Equipment Check:

- ▶ Safety Equipment;
- ▶ (3) reflective triangles;
- ▶ fire extinguisher;
- ▶ 10 foot hardened chain;
- ▶ chock block;
- ▶ first aid kit;
- ▶ spill kit.

### Open both hoods after walk-up observance of ground under truck and CHECK:

- ▶ Oil Level—add only 1 or 2 quarts if at low mark, then check again;
- ▶ Belts for proper tension;
- ▶ Oil or Water Leaks (anything out of the ordinary);
- ▶ Coolant Level (unplug block heater as you do);
- ▶ Hydraulic Tank for proper level;



- ▶ A written vehicle inspection sheet is required by DOT at the end of each shift for every vehicle



- ▶ PTO—engage PTO and operate hoist & winch. Do this especially in cold weather when both PTO and controls can freeze up.

### **Air System**

- ▶ Make sure system reaches 120 psi (+/- 5 psi). Listen for air drier to pop off;
- ▶ Release maxis, listen for leaks;
- ▶ Push foot brake to floor & hold, listen for leaks;
- ▶ A leak is significant if it's more than 5 psi in 1 minute for each of the 2 tests.

### **Lights**

- ▶ head lamps;
- ▶ markers;
- ▶ directionals;
- ▶ brake;
- ▶ plate light;
- ▶ backup/work lamps must all be working. There is a fine for as little as one marker light being out.

### **Mud Flaps**

- ▶ They should all be there and in decent shape.

### **Cable for broken strands.**

- ▶ Too many strands are very dangerous, and a frayed cable can snap.

### **Wheel Seals**

- ▶ Look at the inside of the wheel. If you see oil sprayed on the rim and tire, it is time for a replacement wheel seal.

### **Wiper Blades & Fluid**

- ▶ Top off washer fluid bottle when roads are in salty condition.
- ▶ Check springs on suspension system for broken leafs or movement.
- ▶ Check pinion seals for leakage
- ▶ Rear-end and/or drive shaft will appear wet with oil.

### **Tires:**

- ▶ Wheel dogs for looseness;
- ▶ You can tell this by a shiny area next to the dogs or by paint worn away. Sometimes you can hear the rims slipping against the spacer and dogs when you go around a corner and apply the brakes;
- ▶ Bump or kick tires;
- ▶ Kicking tires won't tell if a tire is down 10 or 15 psi, but you will be able to tell if a tire is flat or excessively low;
- ▶ Check tire with pressure gauge;
- ▶ Visually inspect tires for incorrect wear, i.e. cupping or balding (tread thin);
- ▶ Visually inspect tires for nails or any foreign materials;
- ▶ Nails in the front tires are a severe safety hazard. The front tire is more expensive than a recapped gripper tire. If you find a nail, pull it out

immediately. If air starts to leak out, see a mechanic quickly. If no air leaks out, run the truck;

- ▶ Side wall gashes;
- ▶ If you see one that is questionable, see a mechanic.

### **PM Circle Check:**

- ▶ Basic quick check of all of the above;
- ▶ Drain air tanks;
- ▶ Fuel truck each night or as otherwise specified;
- ▶ Plug in truck during the winter season;
- ▶ Clean out truck—driver is responsible for appearance of truck.
- ▶ Report any problems to maintenance department so it may be repaired by the next shift.

### **Driver Daily Vehicle Inspection Report:**

- ▶ Driver must prepare an inspection report every day and turn in to Maintenance Department.

# XIV. Driver Safety

## Three-Point Entry & Exit

Falls from vehicles are a significant source of injuries to operators of heavy equipment and large trucks. To help eliminate these accidents, remember to always maintain three-point contact when entering or exiting the vehicle. This means keeping both hands and one foot or both feet and one hand in contact with the vehicle while entering or exiting. Other things to do are:

- ▶ Wear safe lace up work boots with good support;
- ▶ Make sure you have a firm grip on handles;
- ▶ Face the vehicle while entering and exiting;
- ▶ Look for obstacles on the ground before exiting.

## Personal Protection Equipment (P.P.E.)

In order to try to protect employees from hazards that they may be exposed to during their work shift the company has purchased and supplied all employees with personal protective equipment. All employees have been informed that this equipment is available to them, how to wear it, and where it is required as it applies to them. No reasonable request for additional equipment will be refused or taken lightly.

### All drivers are required to wear the following items:

- ▶ Work Boots;
- ▶ Safety Glasses;
- ▶ Reflective vests;
- ▶ Hard hats when in scrapyards or at customer locations that require them.
- ▶ Safety glasses are required wherever there is a flying materials hazard. Check with your Supervisor for specific areas. Also, many customer locations require use of safety glasses and possibly other PPE.

### Rain Gear:

- ▶ All employees who are exposed to the elements are issued rain gear.
- ▶ Consider safety glasses, gloves and work boots in good condition as part of your everyday uniform.
- ▶ Your personal appearance is to be clean and neat. You are expected to be in uniform when you are on the job. Replace your torn or worn shirts, sweatshirts and pants as needed.

## Defensive Driving

**Pay attention.** The number one over-arching cause of traffic collisions is inattention and distraction. Almost every collision involves one or both of these two related errors. When I'm behind the wheel, driving is my number one task. It is my responsibility to keep my ton of metal, rubber and glass pointed safely down the road without hitting you or your property. I am not honoring that responsibility when I'm daydreaming, eating a burger, or chatting away on my cell phone. I don't have the right to endanger you. Paying attention is the first and most important way I can shoulder that critical responsibility.



*Good example of 3-point contact during entry of cab*

**Don't speed.** Speeders like to say that speeding doesn't "cause" collisions. That's rubbish. Speeding (driving at a speed higher than is safe for conditions) leaves you with less reaction time and distance than you may need to avoid an accident. An honest, intelligent person has to come to the conclusion that the cause of such an accident is the excessive speed. Speed also increases the risk of serious injury in an accident. "Speed not reasonable and prudent" is the most common measurable element in traffic collisions.

**Use the Three-Second Rule.** About 40% of all collisions are rear-end collisions. Avoid them by maintaining your following distance. This rule is so basic, and yet it is one of the most ignored. Also keep in mind that three seconds is the minimum—four is better. Stretch it out when you can, because sometimes two seconds isn't enough. Don't believe for a second you can't use this technique in heavy traffic; you can, and that's when it is most important.

**Don't drive impaired.** Wait at least two hours *for each drink* before you drive. Staying on top of the driving task means being 100% there to do the job. You need all your skills and faculties for driving. Even small amounts of alcohol impair the most important skills you need to drive safely. Studies have proven that impairment starts with alcohol concentrations as low as .03% or .04%—about half of the "legal limit" in most states, and the first thing affected is your judgment. Not surprisingly, studies have linked impaired driving to increased incidences of reckless driving. Typically, about 30% to 50% of all collisions have driver impairment as a factor, and fatality is more likely in alcohol-related accidents.

**Use safety equipment.** Wear your safety belts. It is the law in most locations, an OSHA requirement, and company policy. The use of safety belts alone typically cuts the rate of injury and death in traffic collisions by about 50%.

## Roll Over Prevention

Big rigs roll easily. You can put a number on the tendency that a vehicle has to rollover—the higher the better (safer). Full size cars are about 1.3, pickups are 1.1, Jeep type vehicles are 0.8-1.0. Fully loaded semis are about 0.4 or lower. A half empty tanker with a bad suspension might be 0.15! These numbers are the cornering "g's" required to roll the vehicle. No car can generate 1.3 g's in cornering but your rig can probably generate 0.4 g's going around a corner or in a variety of other maneuvers involving steering. If you go around a curve too fast, you will go over, but you probably already knew this. Here are some things you may not know:

A truck can rollover in a curve without going too fast for the curve if the rear tires strike something (like a curb) while you're cornering. Articulating vehicles (5th wheel type) with rubber tires out-track when turning above a certain minimum speed, typically 15 mph. This is inherent to the vehicle and not the result of poor driving. The trailer axle might be 2 feet outside the steering axle if pulling a long trailer. Picture this: You're coming down a freeway ramp, turning right (a right hand curve). Your left front tire might be 1' inside the fog line while your outer left rear tire might be 1' outside the fog line. What's out there to trip you and turn you over?

A truck can probably roll your rig at speeds as low as 5 mph, especially on slopes or where a strong tripping influence is present. Strike next line

Many rollovers happen when drivers try to return to the road after putting a tire off the pavement. A truck can rut in soft ground or catch a pavement separation and roll over. A wheel off the pavement or even onto a paved shoulder that may have separations, straighten the rig out and bring it to a stop. Don't try to return to the road at speed. Get out of the rig, carefully inspect the site and determine that you can get back on the road without catching or tripping a tire

before you move out again. Return to the road as slowly as possible and at as shallow an angle as possible. The more steep the easier it is to roll over. If it looks too bad, call a wrecker. Strike next line Treat any load that can move like a load of dynamite and drive accordingly.

## Vehicle Backing Safety

According to the National Safety Council, one out of four vehicle accidents can be blamed on poor backing techniques. Backing accidents cause 500 deaths and 15,000 injuries per year. The use of safe vehicle backing tips by employees can help prevent accidents while on the job.

Get to know a vehicle's blind spots (see page 29). In a medium-sized truck, blind spots can extend up to 16 feet in front and 160 feet behind a vehicle. Drivers need to remember that mirrors can never give the whole picture while backing.

**Think in advance.** Drivers should not put themselves into unnecessary backing situations.

**Park defensively.** Drivers must choose easy-exit parking spaces that don't crowd neighboring vehicles and park their vehicle in the center of the parking space.

When parking in an alley. If an alley doesn't permit driving all the way through or room to turn around, a driver should back into it (if local ordinances permit) so that when leaving the vehicle can pull forward into the street.

**Do a walk-around.** Walking around a vehicle gives a driver firsthand view of the backing area and any limitations. They can check for children, soft or muddy areas, potholes, tire hazards, and other dangers.

**Know the clearances.** When performing a walk-around, drivers can check for obstructions, low-hanging trees and wires, and any other potential clearance-related problems.

Every backing situation is new and different. Sometimes a driver visits the same location several times a day and should be watchful each visit for changes and any new obstacles.

**Use a spotter.** A driver should use another person to help them when backing. The driver and spotter should use hand signals instead of verbal ones and make sure they understand each other's signals. Don't have the spotter walking backwards while giving instructions. Never let a spotter leave your line of sight. If you lose sight of the person directing you stop immediately and do not continue until you know they are in a safe location. Be certain your spotter knows your intentions before you make a move.

When driver's spot for themselves, they need to return to the vehicle and start backing within a few seconds after finishing the walk-around. This will allow very little time for people and/or obstacles to change behind the vehicle. Backing without a spotter should only take place after a driver has as much information about the area as possible. A back up alarm can help warn away pedestrians and drivers of other vehicles who may try to enter the area the vehicle is backing into.

No amount of forward-driving experience can help a driver with backing a truck or other vehicles. All drivers need to practice, practice, practice in safe surroundings until they become familiar with the way the vehicle backs up compared to the direction the steering wheel is turned.

▶ No amount of forward driving experience can help a driver with backing a truck

## Driver Fatigue and Tiredness Management

Last year driver fatigue caused 1 in 5 fatal accidents. A momentary loss of concentration due to feeling sleepy can easily lead to losing control of your vehicle. The risk of a fatal fatigue accident is 4 times greater between 10pm and 6am. Another high-risk time is between 1pm and 3pm.

Driver fatigue can affect anyone. It is particularly dangerous because one of the symptoms is a decreased ability to judge a level of tiredness.

### Advise drivers to not ignore the signs of fatigue:

- ▶ Constant yawning;
- ▶ Drifting in your lane of traffic;
- ▶ Missing road signs;
- ▶ Sore or heavy eyes;
- ▶ Trouble keeping your head up;
- ▶ Delayed reactions;
- ▶ Loss of attention, daydreaming or 'zoning out';
- ▶ Difficulty remembering the last few miles;
- ▶ Variations in driving speed;
- ▶ Mood swings such as irritability or boredom;
- ▶ Objects or shadows on the roadside appear distorted;
- ▶ Microsleeps.

### Avoid fatigue by:

- ▶ Get adequate sleep before starting a long day;
- ▶ Pull over and stop when you notice the early warning signs of fatigue;
- ▶ Share the driving where possible;
- ▶ Make arrangements to be picked up after a tiring shift;
- ▶ If you must drive, take a short nap at the end of your shift;
- ▶ Don't drink alcohol before or during your trip;
- ▶ Eat healthy foods and drink plenty of water;
- ▶ Take regular breaks from driving;
- ▶ Inform your manager or doctor if you are regularly feeling tired;
- ▶ Talk to your Safety Officer or Fleet Manager about reducing your driver fatigue risks.

### Pre-Trip risk assessment and planning:

- ▶ An important responsibility of driving for a service oriented company is planning an efficient route to each destination:
- ▶ If you are unclear of your destination, ask another experienced driver for directions or question the dispatcher;
- ▶ If you are unsure of a container location, find out before you leave the facility;
- ▶ Be sure to plan trip routes that consider safe passage for your truck or tractor trailer. Some roads may not have adequate clearance under bridges and underpasses;
- ▶ Try to avoid traffic congestion whenever possible;
- ▶ Whenever possible, take the shortest route to a destination.

# XV. Controlling Hazardous Energy for Drivers

In addition to the potential hazards on roadways every day, fleet drivers are exposed to just as many types of potentially hazardous energies that other types of employees are exposed to on a daily basis.

Having the knowledge to recognize such hazardous energies and an ability to either avoid or control them can greatly minimize the occurrence of serious injury.

Controlling hazardous energy covers the servicing and maintenance of machines and equipment in which the “unexpected” energizing or start up of machines and equipment, or the release of stored energy could cause injury to an employee.

## TYPES OF ENERGY    EXAMPLES

Mechanical	Moving Machine Parts, Belts & Pulleys, Drive Train Components
Hydraulic	Container Lifting, Push out Trailers
Pneumatic	Air Braking system
Chemical	Battery Acid, Hydraulic Fluid, Antifreeze-Coolant, Diesel Fuel, Transmission Fluid,
Differential	Gear oils
Thermal	Antifreeze-Coolant, Exhaust System
Gravity	Lifting System-Suspended Equipment

Drivers essential work activity includes performing daily equipment inspection of truck and/or trailer, which may require they put their hands and/or body parts in areas where machine parts move or where potentially hazardous energy is present.

Therefore, fleet drivers must understand the seriousness of such energies by taking precautions by not putting themselves in harms way, no matter what the situations present.

### **Additional activities that fleet drivers may encounter during their normal workday that have potential for injury include:**

- ▶ Contact with physical hazard, such as heat & chemicals;
- ▶ Contact with falling truck part;
- ▶ Unjamming object(s) from equipment;
- ▶ Cleaning equipment;
- ▶ Repairing equipment;
- ▶ Performing routine maintenance;
- ▶ Installing equipment;
- ▶ Malfunctioning equipment, such as dump body assembly, rolloff doors, or containers.

### **Drivers are responsible to protect themselves from potentially hazardous energy by:**

- ▶ Avoiding direct contact with hot surfaces & chemicals, use appropriate PPE;
- ▶ Chocking wheels on both sides to prevent truck-trailer from rolling;
- ▶ Shutting down equipment, removing key before attempting to un-jam, work in engine compartment, going under truck-trailer;



- ▶ Apply warning tag to steering wheel to alert other workers of maintenance in progress;
- ▶ Allowing equipment to cool down;
- ▶ Securing objects suspended by blocking or supporting;
- ▶ Secure raised dump body assembly by installing dump body brackets to truck or trailer frame.

**OSHA recommends the following sequence to control hazardous energy:**

- ▶ Preparation for shutdown;
- ▶ Shutdown;
- ▶ Machine or equipment isolation;
- ▶ Application of lockout/tagout devices;
- ▶ Testing of lockout / tagout;
- ▶ Perform service, maintenance, correction of malfunction or jam-up;
- ▶ Removal of lockout/tagout devices;
- ▶ Re-energization;
- ▶ Equipment reactivation.

## **Group Lockout/Tagout**

Group hazardous energy control shall be practiced when more than one person is performing repair, maintenance, correction of malfunction or jam-up.

- ▶ This shall be accomplished by one individual who shall be responsible for taking charge to ensure that all involved individuals control hazardous energy. That individual shall be the lead employee;
- ▶ Each employee shall apply tag in plain view of truck ignition;
- ▶ Lead employee shall secure ignition key;
- ▶ Lead employee shall be responsible to have each employee remove own tag at conclusion of maintenance, repair, malfunction or jam-up and re-energize truck.

# XVI. Oil Spill Procedures For Drivers— What To Do

*This section is included in the Drivers' Handbook.*

Find the cause—Stop the leak—Don't jeopardize your safety

Turn off PTO and shut off valve at hydraulic tank. If hydraulic hose breaks while dumping or switching:

- ▶ Shut down the vehicle if that will slow the leak;
- ▶ Use whatever means you can to stop the flow;
- ▶ Rags in the ends of hoses;
- ▶ Round pieces of wood in ports or hoses;
- ▶ Tape around fittings or hoses;
- ▶ Buckets under leaks;
- ▶ Rags or wood wedges in slits or splits in tanks;
- ▶ Shut off valves or controls;
- ▶ Call Dispatch as soon as possible;
- ▶ Give a clear evaluation of the situation;
- ▶ Do you need more immediate help to contain the spill?
- ▶ Is there another driver near by to help you?
- ▶ What is the threat to the environment?
- ▶ Approximate how much oil has spilled?
- ▶ Have you stopped the flow?
- ▶ Contain the spill;
- ▶ Break out the spill kit;
- ▶ The environment should take top priority after your personal safety.

Try to stop the flow into the soil or drainage systems by using whatever resources are available to you:

- ▶ Spill absorbent pads or socks;
- ▶ Sand/dirt;
- ▶ Sod;
- ▶ Metal, etc.

Notify dispatcher or supervisor when you have contained the spill

# XVII. Cargo Securement Rules

*This is another good topic for a specialized safety training class particularly for drivers of flattened, baled or logged vehicles. It is also in the appendix for ease of duplication and distribution.*



## Flattened or Crushed Vehicles (DOT Section 3.9.2)

Transport flattened or crushed vehicles so that:

- ▶ Cargo does not shift while in transit, and;
- ▶ Loose parts from the flattened vehicles do not dislodge and fall from the transport vehicle;
- ▶ Do not use synthetic webbing to secure vehicles.

### Options (DOT Section 3.9.2.1)

Secure flattened or crushed vehicles on a vehicle that meets one of the following four options:

#### Option 1

Transport vehicle has containment walls on four sides that:

- ▶ Extend to the full height of the load;
- ▶ Block against cargo movement in the forward, rearward, and sideways directions.

#### Option 2

Transport vehicle has containment walls on three sides that:

- ▶ Extend to the full height of the load;
- ▶ Block against cargo movement in the forward, rearward, and one sideways direction;
- ▶ Transport vehicle secures each stack of vehicles with a minimum of two tie downs, each having a minimum WLL (working load limit) of 5,000 lbs.

#### Option 3

Transport vehicle has containment walls on two sides that:

- ▶ Extend to the full height of the load;
- ▶ Block against cargo movement in the forward and rearward;
- ▶ Transport vehicle secures each stack of vehicles with a minimum of three tie downs, each having a minimum WLL of 5,000 lbs.

#### Option 4

- ▶ Transport vehicle has a minimum of four tie downs per vehicle stack with each tie down having a minimum WLL of 5,000 lbs.

(NOTE: The sum of the WLL from all tie downs must be at least 50% of the weight of the cargo.)

## Containing Loose Parts (DOT Section 3.9.2.2)

Use a containment system that:

- ▶ Prevents loose parts from falling from all four sides of the vehicle, AND;
- ▶ Extends to the full height of the cargo.

The containment system can consist of one or a combination of the following methods:

- ▶ Structural walls;
- ▶ Sides or sideboards;
- ▶ Suitable covering of material;
- ▶ The use of synthetic material for containment of loose parts is permitted.



## XVIII. RollOff Doors

Procedures for opening a side hinged roll off container door, provided safety chain, locking mechanism, door, and container itself are in safe working order.

Always wear appropriate P.P.E:

- ▶ Hard hat;
- ▶ Safety glasses;
- ▶ Safety toed shoes;
- ▶ Reflective or highly visible clothing.

### G.O.A.L. (Get Out And Look)

- ▶ Check for people, equipment, and uneven slopes or grades in the area where the container will be opened;
- ▶ After the area has been checked, stand to the side of the container and release the safety chain;
- ▶ Open the locking mechanism, checking for tension on the door and handle. (Always standing to the side of the container) **Beware of the handle striking you as it may be under pressure;**
- ▶ Attach the extension rope (rope with hasp, minimum 8ft in length) to the safety chain. Pull door open with the extension rope, staying clear of possible falling material;
- ▶ Remove extension rope and secure door to the side of the container with the safety chain;
- ▶ Return to cab of truck from the same side of the container where the door is secured. Never walk directly behind an open container when it is loaded;
- ▶ Dump load, pull truck forward allowing enough room to close and secure the door without obstruction;
- ▶ Stay within 6 feet of the vehicle at all times. Do not scavenge for material or wander away.

# XIX. Hours of Service

*This is another section included in the Drivers' Handbook.*

The Federal Highway Administration regulates the hours drivers may be on duty. Each driver is required to be familiar with and adhere to these regulations. Remember, if a driver has a second job those working hours count too!

**On-Duty Time:** Includes time at terminals waiting to be dispatched, all the time spent inspecting equipment, all driving time as defined below, all time spent in a motor vehicle except time spent resting in a sleeper berth, all time spent loading or unloading, or performing the attendant functions to such loading or unloading, time spent performing driver functions during an accident, time spent repairing, obtaining assistance, or attending a disabled vehicle.

**Driving Time:** Includes all time spent at the driving controls of a motor vehicle.

**Sleeper Berth:** Time spent in a "sleeper berth" that meets the requirements of Section 393.76, when not on duty, and not required to be in readiness to work or under any responsibility for performing work.

**Off-Duty Time:** Period of time when driver is not on duty, is not required to be in readiness to work, or under any responsibility for performing work.

A driver may drive a maximum of eleven (11) hours following ten (10) consecutive hours off duty. The eleven (11) hour driving maximum must be completed within the first fourteen (14) hours on duty, after the ten (10) consecutive hours off. If because of adverse driving conditions a driver cannot complete his run within the eleven (11) hour maximum, he may be permitted to drive for not more than two (2) additional hours to complete the run to reach a place of safety.

Drivers may not be on duty (driving and non-driving) more than sixty (60) hours in any seven (7) consecutive days. Thirty four (34) consecutive hours off duty will reset the sixty hour clock to zero (0).

All drivers must include total work time from all employment sources when figuring on duty and/or driving time.

Employees failing to abide within these rules are subject to disciplinary action up to termination.

## Daily Logs Interstate (this is for long-haul drivers)

The Federal Highway Administration requires that each driver keep a daily log. Each driver is required to be familiar with the Federal Highway Administration, DOT regulations concerning daily log. It is the driver's responsibility to prepare and keep logbook records in a correct manner. The regulations are summarized below:

- ▶ Time will be recorded on the daily log on a 24 hour calendar day in effect at the terminal/scrapyard/starting point;
- ▶ All entries shall be made by the driver in his own handwriting, and each day's entry signed by the driver;
- ▶ Logs are required to be current as of the last change from off duty to on duty and from driving on duty to not driving. Cities, towns, or villages where change of duty takes place;
- ▶ The vehicle number or state license number of the vehicle operated that day must be entered;
- ▶ The month, day and year for the beginning of each 24 hour period shall be shown on the log;



- ▶ The total mileage driven during the 24 hour period shall be recorded on the log;
- ▶ Company address is to be shown on the log;
- ▶ Total hours in each duty status shall be entered to the right of the grid;
- ▶ The shipping document number(s) or name of shipper and commodity shall be shown on the log;
- ▶ Time will be recorded separately for off duty, sleeper berth, driving and on duty not driving;
- ▶ The origin and final destination must be recorded on the log.

## **Daily Logs Intrastate (Local)**

Local drivers will fill out container logs only if on duty (driving & not driving) for 12 hours or less, and within 100 air miles of their terminal. If on duty time exceeds twelve (12) hours or if they drive further than 100 air miles from their terminal a DOT graph log in addition to a container log must be completed.

Driver employees who violate or falsify the hours of service regulations (logs) are subject to disciplinary action up to termination

## **100 Mile Radius Drivers**

Management will review the less than 100 mile radius driver's time card on a regular basis to assure that their maximum hours of driving does not exceed eleven (11) hours per day and their maximum hours on duty does not exceed fourteen (14) hours per day following 10 consecutive hours off duty.

Management in addition to checking the driver's time card will check and review the dispatch sheet to verify the driver's time and on duty time.

Using the time card and dispatch sheet, hours of service for less than 100 radius mile drivers can and will be controlled to conform with Part 395 Federal Motor Carrier Safety Regulations.

Violations and non-compliance will not be tolerated. Violations will be covered with each driver and are subject to disciplinary action up to termination for repeat offenses.



## XX. Reward/Incentive Plans

Employees should understand that safe driving is expected, however, any encouragement that will help an employee to drive more safely is certainly worthwhile. An effective incentive program offers the driver something he or she will value and appreciate. The rules for awards should be explained to drivers and then fairly administered. The value of an award can be enhanced by an appropriate ceremony for the presentation of awards. Recognition in front of ones peers can be a reward in itself. Feature safe drivers on newsletters and interoffice bulletin boards and correspondence. People are not always motivated by money alone.

But here's where we need to be very, very careful. Incentive programs are intended to promote safe behaviors, but some companies have experienced 'hidden' accidents and injuries as a result. You must be very careful and closely monitor any incentive program to assure that it is a legitimate reward for legitimate safety achievement.

ISRI Safety would be happy to create customized driver award certificates for presentation to employees. Recognition among peers can go a long way.

# Appendix

# Transportation Safety Mission Statement

The management of \_\_\_\_\_ believes that:

- The safety and well being of all company employees is our most important priority;
- Prevention of accidents is the responsibility of both management and individual employees. For these reasons, the company has developed an aggressive transportation safety program that applies to all operations and all employees, to reinforce our pledge to work Safely or Not at All!

## Responsibilities of the Driver Employee

All employees:

- Are required and expected to carry out their individual responsibilities as outlined in the transportation safety program;
- Will comply with all applicable federal, state, and local laws and ordinances;
- Will comply with the safety policies and procedures outlined in their Drivers Handbook. Failure to comply with these safety policies and procedures may result in disciplinary action.

NOTE We encourage you to relate any safety ideas or concerns to the Safety Committee. Your concern can be reported anonymously if you wish.

## Responsibilities of Management

Management at every level are charged with the responsibility of implementing the policies and procedures outlined in this transportation safety manual.

# Driver Questionnaire

Name: \_\_\_\_\_

Present Address: \_\_\_\_\_

List all states in which you have held a valid driver's license: \_\_\_\_\_

1. Do you possess a current vehicle operator's license?  YES  NO

Vehicle Operator License  Other License (CDL, Chauffeur, etc.)

State \_\_\_\_\_ Expiration \_\_\_\_\_

License # \_\_\_\_\_

Full Name (As it appears on license) \_\_\_\_\_

2. Have you ever had an operator's license revoked or suspended?  YES  NO

If yes, please explain. \_\_\_\_\_

\_\_\_\_\_

3. List all moving violations and crashes you have had within the last three years. (If none, please write "NONE." If you need additional space, write on the reverse side of this form.)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. Have you ever received a citation for driving while under the influence of alcohol, drugs or other controlled substances?  YES  NO

If yes, explain. \_\_\_\_\_

\_\_\_\_\_

5. Have you ever been required to attend an alcohol offender's school, traffic offender's school or other remedial traffic school required by the courts?  YES  NO

If yes, explain. \_\_\_\_\_

\_\_\_\_\_

6. Have you ever completed a driver's education course?  YES  NO

If yes, when? (Date). \_\_\_\_\_

I understand that all of the information provided on this form will be kept confidential and certify that, to the best of my knowledge, the above information is correct, and that any falsification may result in disciplinary action up to and including termination.

Signature \_\_\_\_\_ Date \_\_\_\_\_

# Motor Vehicle Record Checks

Note: Some states require a specific form requesting MVRs.

Company/Location \_\_\_\_\_

Requested By \_\_\_\_\_

Street Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_ Request Date \_\_\_\_\_

Drivers License Number: \_\_\_\_\_ State: \_\_\_\_\_

Employee Name \_\_\_\_\_

Date of Birth \_\_\_\_\_ Social Security Number \_\_\_\_\_

## Hiring and Retention Standards and Employee Agreement

This policy defines the driver hiring/retention standards a prospective or current employee must meet in order to be eligible to operate a vehicle on company business.

### Drivers Qualification

1. Age—Must be at least 21 years old for non-CDL drivers and age 23 for CDL drivers.
2. Driving Experience—Minimum of two years verifiable like-type vehicle driving.
3. No Positive Drug or Alcohol Test including, Pre-employment, Random, Post-Accident or Reasonable Suspicion.
4. Driving and Accident Record
  - ▶ No more than two moving traffic violations (including no more than one preventable accident) during the previous 36 months.
  - ▶ No driving under the influence, D.U.I. (drug or alcohol) conviction during the previous five years in a commercial or personal motor vehicle.
  - ▶ No vehicular homicide
  - ▶ No operating a vehicle with a Suspended or Revoked Driver's License
  - ▶ No using a motor vehicle in the commission of a Felony
  - ▶ No operating a vehicle without permission, unauthorized use or grand theft
  - ▶ No reckless driving or speed contests
  - ▶ No leaving the scene of and accident

Applicants with an unacceptable record, based on the above criteria, will not be considered for employment.

Current drivers who violate the criteria will have one of the following actions taken:

- ▶ Temporary reassignment to a non driving position and required attendance/certification of a licensed remedial driver training course. Drivers will be subject to additional retraining per the decision of management.
- ▶ Permanent reassignment to a non driving position if the employee's driving performance falls below company requirements again.
- ▶ Termination or employment. All final decisions and rationale must be documented and approved by management. Information shall be retained in the driver's personnel file indefinitely.

# Motor Vehicle Record Criteria

## Minor Offenses:

Within any 36 Consecutive-Month Period:

- ▶ First Offense—Written warning and counseling
- ▶ Second Offense—Three-day suspension from work without pay
- ▶ Third Offense—Termination or removal from position requiring driving

## Major Offenses:

Major Offenses are defined below and carry a consequence per the following:

- ▶ Any felony conviction in which a vehicle is used; Termination
- ▶ Failure to stop, report or comply with state statutes when involved in a crash; Termination
- ▶ Any display or evidence of reckless driving, excessive speeding, endangerment of others, etc.; Termination
- ▶ D.U.I. (driving under the influence), D.W.I. (driving while intoxicated) OR O.U.I. (operation under the influence) First Offense—Termination

## Preventable Crashes

Defined by the National Safety Council regarding what actions the driver took to do *“everything reasonable to avoid the crash, etc.”* A formal review by management and the employee’s supervisor will convene to evaluate the circumstances of the crash.

- ▶ Within 36 Months:
  - ▶ First Crash—Evaluation and counseling by management
  - ▶ Second Crash—Termination or removal from position requiring driving

*I acknowledge and fully understand the consequences of my driving performance as evident by my crash and/or violation history.*

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(Driver Signature)

(Supervisor Signature)

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(Date)

(Company Name)

# Employment Application Driving Position Supplement

Please attach a photocopy of your valid drivers license

Applicant Name \_\_\_\_\_ Date \_\_\_\_\_

Social Security No. \_\_\_\_\_

Present Street Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

How long? \_\_\_\_\_ Telephone No. ( \_\_\_\_\_ ) \_\_\_\_\_

Previous Street Address (if less than three years at present address) \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

How long? \_\_\_\_\_ Telephone No. ( \_\_\_\_\_ ) \_\_\_\_\_

License Restrictions \_\_\_\_\_

Drivers License Number \_\_\_\_\_ State \_\_\_\_\_ Exp. Date \_\_\_\_\_

**Traffic Violation Record** (List all traffic convictions and forfeitures in the past three years except parking violations)

Location	Date	Court	Charge	Penalty
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

Has your license or permit to operate a motor vehicle ever been suspended or revoked?  YES  NO

If yes, when, where and why? \_\_\_\_\_  
\_\_\_\_\_

**Crash Record** (List all crashes in which you have been involved in the last three years:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_

**To Be Read and Signed By Applicant**

I certify that all information on this application is true and complete to the best of my knowledge and that any misrepresentation could be reason for dismissal or denying employment. I authorize management to obtain a current Motor Vehicle Record of my driving history now and at any time in the future. I recognize that I will not be permitted to operate a company vehicle or drive on company business if a review of my driving record indicates any of the following convictions: (1) Hit and run, (2) Driving under the influence of alcohol or drugs, (3) Any felony, homicide or manslaughter involving use of a motor vehicle or (4) Leaving the scene of a crash. I acknowledge that I have read the company's policy on safe driving and will follow requirements stated in this policy while I am driving on company business.

Driver Signature \_\_\_\_\_ Date \_\_\_\_\_

# Driver's Promise Card

**Driver's Promise Card**

I pledge to accept the requirements of my role as a critical member of the company team. I will abide by the safety requirements and policies of my employer, respecting my coworkers, customers, and the motoring public.

I will faithfully perform my duties as required, and be mindful of the unique safety hazards that I will face every day in the scrap yard, on the road, and at customer locations.

\_\_\_\_\_

Name

\_\_\_\_\_

Date



# Flattened or Crushed Vehicles (DOT Section 3.9.2)

Transport flattened or crushed vehicles so that:

- ▶ Cargo does not shift while in transit, and,
- ▶ Loose parts from the flattened vehicles do not dislodge and fall from the transport vehicle
- ▶ Do not use synthetic webbing to secure vehicles.

## Options (DOT Section 3.9.2.1)

Secure flattened or crushed vehicles on a vehicle that meets one of the following four options:

### Option 1

- ▶ Transport vehicle has containment walls on four sides that:
  - ▶ Extend to the full height of the load
  - ▶ Block against cargo movement in the forward, rearward, and sideways directions.

### Option 2

- ▶ Transport vehicle has containment walls on three sides that:
  - ▶ Extend to the full height of the load
  - ▶ Block against cargo movement in the forward, rearward, and one sideways direction.
- ▶ Transport vehicle secures each stack of vehicles with a minimum of two tie downs, each having a minimum WLL (working load limit) of 5,000 lbs.

### Option 3

- ▶ Transport vehicle has containment walls on two sides that:
  - ▶ Extend to the full height of the load
  - ▶ Block against cargo movement in the forward and rearward
- ▶ Transport vehicle secures each stack of vehicles with a minimum of three tie downs, each having a minimum WLL of 5,000 lbs.

### Option 4

- ▶ Transport vehicle has a minimum of four tie downs per vehicle stack with each tie down having a minimum WLL of 5,000 lbs.

(NOTE: The sum of the WLL from all tie downs must be at least 50% of the weight of the cargo.)

## Containing Loose Parts (DOT Section 3.9.2.2)

Use a containment system that:

- ▶ Prevents loose parts from falling from all four sides of the vehicle AND
- ▶ Extends to the full height of the cargo.

The containment system can consist of one or a combination of the following methods:

- ▶ Structural walls
- ▶ Sides or sideboards
- ▶ Suitable covering of material
- ▶ The use of synthetic material for containment of loose parts is permitted.

# Procedures to Follow in a Vehicle Accident or Citation

- ▶ Protect the scene of the accident and take action to prevent additional collisions or injuries.
- ▶ Pull off the roadway as far as possible unless otherwise directed.
- ▶ Place reflectors or flares in front of and to the rear of your vehicle. (Follow applicable federal or state laws.)
- ▶ Contact emergency authorities immediately.
- ▶ Administer emergency first aid if trained to do so.
- ▶ Obtain and record the following information at the scene of the accident:
  - ▶ Name and address of each driver, passenger and/or witness to the accident
  - ▶ License number of each vehicle involved
  - ▶ Name and policy number of the insurance company for each vehicle involved

Complete accident/incident form

## What To Do

- ▶ Be courteous—do not argue—keep calm.
- ▶ Give your name and address to the injured person or a police officer before leaving the scene.
- ▶ If police respond to the accident, do not leave the scene until you are told you may leave by the officer(s) responding.
- ▶ Take photos of the accident scene from various angles.
- ▶ Photo positions of all vehicles involved and any skid marks on the road surface.
- ▶ Photo all traffic control devices including stop signs, traffic lights and lane markings.

## What Not To Do

- ▶ Do not talk about the accident, except to a police officer, your employer, or your insurance claim rep.
- ▶ Make no settlements or offers of settlements to anyone.
- ▶ Above all, do not sign any statements or reports other than official police reports
- ▶ Do not admit fault
- ▶ Do not photograph any injured or deceased persons

Our fleet safety coordinator will conduct a review of each vehicle accident.

## Sample Alcohol and Drug Use Policy

Our company has a vital interest in maintaining safe, healthy, and efficient working conditions for its employees. Therefore, the consumption of alcohol or illegal drugs by any employee during “duty hours” is prohibited. Duty hours consist of all working hours, including break periods and on-call periods, whether on or off company premises. The consumption of alcohol or illegal drugs while performing company business or while in a company facility is prohibited.

## Sample Seat Belt Use Policy

Our company recognizes that seat belts are extremely effective in preventing injuries and loss of life. It is a simple fact that wearing a seat belt can reduce your risk of dying in a traffic accident by 45 percent in a car and by as much as 60 percent in a truck or SUV. We care about our employees, and want to make sure that no one is injured or killed in a tragedy that could have been prevented by the use of seat belts. Therefore, all employees must wear seat belts when operating a company-owned vehicle, or any vehicle on company premises or on company business; and all occupants are to wear seat belts or, where appropriate, child restraints when riding in a company-owned vehicle, or in a personal vehicle being used for company business. All employees and their families are strongly encouraged to always use seat belts and the proper child restraints whenever they are driving or riding in any vehicle, in any seating position.

# Tarping Rolloff Containers

## Tarp the container while on the ground:

- ▶ Inspect the load for sharp objects, above the rail and may catch the tarp when pulling it over the load. Reposition or flatten any objects above the rail.
- ▶ Attempt to level from the ground.
- ▶ Avoid walking inside the container.
- ▶ Never walk on top of the sides of the container.

## If you must walk across the load:

*(NOTE: walking on the load should be avoided whenever possible)*

- ▶ Look inside for hazards.
- ▶ If on a slope move the container to level ground.
- ▶ Wear proper PPE, safety glasses, steel toe boots, long pants, and gloves.
- ▶ Use the box ladder to enter the container.
- ▶ Use three points of contact while climbing into the container, always facing the container.
- ▶ While walking on the load, test each step for stability.
- ▶ Keep a low center of gravity.
- ▶ Test the obstacle preventing tarping by gently pushing/pulling on the obstacle.
- ▶ Avoid far reaches, keeping your center of gravity toward the center of the container.
- ▶ Plan on a safe landing in case of an accidental slip.
- ▶ Push/pull carefully on the object to avoid straining muscles.
- ▶ Reverse your steps when exiting the container.
- ▶ Do not jump off the equipment.

## Tarp the load:

- ▶ At the front of the container, unfold the tarp, leaving 2-feet of the tarp down the front of the container and secure the front with straps.
- ▶ Unroll the tarp by pulling the tarp down the length of the container, a few feet on one side and then a few feet down the other side.
- ▶ You may need to loosely strap the tarp in position on the sides of the container.
- ▶ Continue pulling the tarp over the entire container until about 2-feet of the tarp hangs over the door of the container.
- ▶ Strap the tarp to the container looking for cuts, tears, bent hooks, eyes and weather wear.
- ▶ Do not stretch the rubber straps too far causing them to break and snap back at you.
- ▶ When attaching the straps make certain they are secured before letting go because they will snap back and injure you.
- ▶ Keep your face away from the straps when pulling tight in case the strap breaks.