INTERMODAL SAFETY COMMITTEE MEETING

WEDNESDAY, SEPTEMBER 18, 2019 – 8:00 TO 10:00 A.M.
RENAISSANCE HOTEL, THE PIKE ROOM
LONG BEACH, CA

THE BUSINESS OF INTERMODAL IS HERE
CALL TO ORDER
Please Consider

- Turn Cell Phones to Vibrate or Off
- No Side Bar Conversations – Please
- When Speaking
  - Use a Microphone
  - Identify Yourself and Company Affiliation
Safety Briefing

• Current Location:
  Renaissance Hotel
  Pike Room
  111 E Ocean Blvd, Long Beach, CA

• Hotel Security:
  o Located behind Pike Ballroom. Dial “0” from any Hotel Phone

• 911 Assignment:
  o Hotel Calls 911. Call Security, Dial “0” from any Hotel Phone
  o Primary?
  o Secondary?

• AED Assignment:
  o Contact Hotel Security. Dial “0” from any Hotel Phone
  o Primary?
  o Secondary?

• First Aid Kit Assignment:
  o Contact Hotel Security. Dial “0” from any Hotel Phone
  o Primary?
  o Secondary?
Safety Briefing – Continued

• CPR Assignments:
  o Primary?
  o Secondary?

• Evacuation Assignments:
  o Primary?
  o Secondary?
  o Evacuation Route:
    • Primary: Exit via the double doors into the Pike Ballroom Hallway, which leads outdoors.
    • Secondary: Exit via Starbucks.
  o Rally point:
    • Promenade and 1st Street at the Bike Park, caddy corner to the hotel.
  o Chairs pushed in
  o Avoid tripping hazards

• Fire extinguishers:
  o Total 3 – one in each section of Pike. One at North Wall and 2 at West Wall.

• Weather Forecast:

• Drills Planned:
Call to Order

• Turn Cell Phones to Vibrate or Off
• No Side Bar Conversations – Please
• When Speaking
  • Use a Microphone
  • Identify Yourself and Company Affiliation
Call To Order

- Antitrust Guidelines
- Determination of Quorum
- Sign-In Sheet
- Approval of May 2, 2019 Meeting Minutes
Safety Contact
TASK FORCE & WORKING GROUP UPDATES
Vendor Safety Handbook Task Force

Gene Coker, South Carolina Ports Authority
September 18th 2019
Long Beach, CA
Task Force Goals

• The goal of this Task Force is within 18 months to provide IANA members with a Vendor Safety Handbook to provide recommended practices that identify potential vulnerabilities and minimize risk while vendors perform work at their locations.

• The handbook will define recommended practices for vendors to use while performing their services.
Task Force Members

- Vernon Prevatt, CSX Transportation (Leader)
- Dale Bartley, P&B Intermodal Services
- Jeff Brashares, Sunteck TTS
- Bert Castillo, CLMG
- Gene Coker, South Carolina Ports Authority
- Mike Dougherty, TRAC Intermodal
- Thomas Graef, Kalmar Global
- Drue Gray, CSX Transportation
- Alison Humphrey, TTX Company
- Ryan Kelley, TTX Company
- Rodney Shockley, Mi-Jack Products
- Bill Traub, CSX Intermodal Terminals
- Patrick Valentine, Direct ChassisLink, Inc.
- Robert Wills, Ports America
What We Have Done

• Initiated work to deliver on the Charter.
• Task Force members represent the diversity of IANA with representation from maintenance providers from the Ports, Rail terminals, Chassis Pool IEP's, dray community and equipment manufacturers.
Key feedback themes from May Meeting

• Defining Safety
  • Safety First
  • Safety is a value, not a priority
  • Saving lives through analytics
  • Safety above all else

• Organizational Safety Rule Framework
  • Set safety expectations with employees
  • Monthly OSHA videos
  • Safety from top to bottom
  • Refreshing your safety culture

• Sharing Safety
  • Safety videos in breakrooms
  • Explore push notifications and social media messages pros and cons
  • In-person training

• Roundtable 2020 Safety Issues to Address
  • Slips, trips, falls
  • Distracted driving
  • Humans operating in automated environments
Handbook Submission Examples
Status Update

• The OSHA deep dive identified 56 elements for our work.
  • Handbook outline developed

• TF members assigned to each element.
  • Research OSHA and other regulatory requirements.
  • TF identifying critical elements required for study.

• IANA collaborative workspace being used.
  • Library and research materials uploaded for review/analysis.

• Framework for **best in class** Safety Handbook being developed.
Handbook Table of Contents

• 101 - Bloodborne Pathogens - 29 CFR 1910.1030
• 102 - Blue Signal Protection - 29 CFR 1910.261(9)
• 103 - Cargo/Handling/Trailer and Container Doors - 29 CFR 1917.44
• 104 - Chemical Handling
• 105 - Compressed Gases & Air (Storage & Use)
• 106 - Confined Spaces
• 107 - Controlling Hazardous Energy Sources - 29 CFR 1910.147
• 108 - Drug/Alcohol Use
• 111 - Employee Assistance Programs
• 112 - Employee Fatigue
• 113 - Ergonomics and Repetitive Motion, General Duty Clause - OSHA 3341-03N
• 114 - Fall Protection - 29 CFR 1926.503
• 115 - Fire Protection and Prevention - 29 CFR 1926.352 /155
• 116 - First Aid and CPR - 29 CFR 1910.151 & 29 CFR 1926.050
• 117 - Flammable Liquids - 29 CFR 1910.106
• 118 - General Safety Rules
• 120 – Hazard Prevention & Control
Handbook Table of Contents

- 121 - Hazardous Communication - 29 CFR 1917.28
- 122 - Hearing Conservation Programs - 29 CFR 1910.095
- 123 - Heat & Cold Stress, General Duty Clause
- 124 - Hostler / Spotter truck Operator Safety
- 125 - Inspections and Audits, General Duty Clause
- 126 - Lift Equipment Maintenance
- 127 - Lift Equipment Operations
- 128 - Lifting and Carrying - OSHA 3341-03N
- 129 - Lockout/Tagout Procedure (LOTO) - 29 CFR 1910.147
- 132 - Mishap Reporting
- 133 - Motor Vehicle Operations (mobile service units and pick-up trucks) - 29 CFR 1910.601
- 134 - Office Safety, General Duty Clause
- 135 - Painting - 29 CFR 1915.35
- 136 - Personal Protective Equipment (PPE) - 29 CFR 1910.132
- 137 - Personnel On and About Tracks
- 138 - Powered Industrial Trucks - Forklifts - 29 CFR 1910.178
- 140 - Pre-Shift / Start work Briefing
## Handbook Table of Contents

- **141** - Protection During Incident Investigation
- **142** - Radio Rules
- **143** - Respiratory Protection - 29 CFR 1910.134
- **145** - Safe Start - Employee Orientation - BROWZ or other compliance measures
- **146** - Scaffolds, Ladders and other Staging Surfaces - 29 CFR 1915.071
- **147** - Servicing Loaded Container Handling Equipment
- **148** - Servicing Multi-Piece or Single Piece rim wheels - 29 CFR 1910.177
- **149** - Servicing Rubber Tired and Rail Mounted Gantry Cranes
- **150** - Servicing Vehicles
- **151** - Slips, Trips, and Falls
- **152** - Stretching Programs (Recommendations and benefits)
- **154** - Training required by host facility (Safety and other, Safety of 3rd parties) - 29 CFR 1910.119
- **156** - Welding & Cutting Metal - 29 CFR 1926.350 Subpart J / .253
Next Steps

• Bi-weekly conference calls.
• Further element research and recommended practice identification.
• Continue outreach to IANA members:
  • Communicate intent.
  • Gain additional participation.
  • Document collection and review.
  • Seek alignment across modes to simplify training, inspections and understanding of maintenance requirements at intermodal facilities.
“There is no competition when it comes to safety”
Questions & Discussion

Your thoughts and comments are welcome
Intermodal Safety Briefings Working Group

Dale Bartley, P & B Intermodal Services
September 18th 2019
Long Beach, CA
Working Group Objectives

• Purpose
  • Safety is a core component of intermodal freight transportation and the supply chain.
  • Sharing knowledge, experience, data and recommended practices among members is a critical part of IANA’s Mission.

• Goals
  • Reductions in mishaps, injuries and incidents.
  • Share lessons learned from the experiences of others.
  • Provide useful content that members can repurpose in their own companies.

• Audience
  • All members, partners and stakeholders who work or have influence within the operational environment
Working Group Members

• Dale Bartley  P & B Intermodal Services, LLC
• Michael Dougherty  TRAC Intermodal
• John Knight  Kansas City Southern
• Davey Miller  Container Maintenance Corporation
• Kevin Mullen  USI Transportation Group
• Robert Pettit  Arthur J. Gallagher
• Joe Shefchik  Paper Transport, Inc.
• Robert Wills  Ports America
• Cindy Verrecchia  Bondar Insurance Group
Safety Briefings

• Working Group members and Intermodal Safety Committee members serve as subject matter experts for briefings.

• Subject matter experts work with IANA editorial staff to produce a Safety Briefing article in each issue of Intermodal Insights (seven times annually.)

• The articles will be archived in IANA’s Online Resource Center.
  • Also available in downloadable PDF for redistribution/sharing
  • Additional resources can be added to online version
Safety Briefing: Tire and Rim Handling

Safe Tire Removal

Another safety issue, according to Ports America Equipment Services Manager Timothy Crawford, is the sheer size of tires, particularly on big lift equipment.

"There is always an uncertainty if the lock ring could come off at any time," he said. "The lesson is to use the correct tools to remove the tires, such as a forklift or tire clamp."

"A tire clamp is the best and safest method to remove the tires from this type of equipment," he added. "Install a heavy-duty chain through the wheel and around one side of the tire to ensure the lock ring cannot come flying off when handling the tire."
Safety Briefing: How CSA Works

“We have seen insurance companies cite scores, including simply the lack of improvement over time, as a reason to not offer a quote to prospective clients.”

— Kevin Mullen, USI Transportation

Mullen added that well-written, comprehensive policies and procedures that are consistently enforced is the only proven way to reduce violations and resulting scores.
Safety Briefing: Slips, Trips, and Falls

“Housekeeping is important not only in preventing slips, trips and falls, but as a good general indicator of a positive safety culture.”

Steve Allen, CN

Another challenge, Coker said, is getting workers to stay fully aware when mobile devices could cause ones’ focus to be interrupted.

Challenges

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<table>
<thead>
<tr>
<th>Intermodal <em>Insights</em></th>
<th>Safety Topic</th>
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<tbody>
<tr>
<td>May/June 2019</td>
<td>Safe Tire &amp; Rim Handling <em>Published</em></td>
</tr>
<tr>
<td>July/August 2019</td>
<td>CSA and Insurance <em>Published</em></td>
</tr>
<tr>
<td>EXPO, September 2019</td>
<td>Slips, Trips &amp; Fall Prevention <em>Published</em></td>
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<tr>
<td>September/October 2019</td>
<td>Track Crossing Safety <em>In Process</em></td>
</tr>
<tr>
<td>November/December 2019</td>
<td>Combating Cyber Risk</td>
</tr>
<tr>
<td>January February 2020</td>
<td>Distracted Driving</td>
</tr>
</tbody>
</table>
Top Topics Identified by the Committee

1. **Slips, Trips, and Falls**
2. **Safe Tire and Rim Handling**
3. **Distracted Driving**
4. Ascending/Descending - 3 Points of Contact
5. Bare Chassis Impacts
6. Worksite Securement
7. Avoiding “Caught Between” Risks
8. Crash Causation
9. Fall Protection
10. PPE
11. Cargo Security
12. Hand and Power Tools
13. **Safe Track Crossing**
14. Speed Management
15. **CSA/Insurance**
Questions & Discussion

Your thoughts and comments are welcome!

If you have an idea for a future Safety Briefing please email SafetyBrief@intermodal.org.
FMCSA Update

Darrell Ruban, FMCSA
September 18th 2019
Long Beach, CA
FMCSA’s Safety Mission

Our safety mission:

To reduce crashes, injuries, and fatalities involving CMV transportation through education, innovation, regulation, enforcement, financial assistance, partnerships, and full accountability.
Snapshot of the CMV Industry

560,809 regulated carriers operating in the United States in 2018

983,231 buses registered in 2017

596 million passenger trips in the U.S. and Canada in 2015

12.2 million large trucks registered in 2017

11.5 billion tons freight shipped by trucks in the U.S. in 2017

6.1 million CMV drivers (as of 2018)

315 billion vehicle miles traveled in 2017
The Challenge: Sharing the Road!

- Long-term trend shows an increase in truck & bus crashes and fatalities

- 5,005 people lost their lives in truck & bus crashes in 2017

- 885 Large Truck & Bus Occupant Fatalities in 2017
Large Truck and Bus Fatal Crashes
2005 - 2017

U.S. Department of Transportation
Federal Motor Carrier Safety Administration

39
FMCSA PRIORITY AREAS
ELDs: Rule Transition and Timeline

- **December 15, 2015:** ELD Final Rule Published
- **December 18, 2017:** ELD Final Rule Compliance Date
- **December 16, 2019:** ELD Mandatory Use of ELDs

[Diagram showing transition phases and compliance dates]
ELDs: Statistics

- About 35,000 successful data transfers per month (90% success).
- Less than one percent of inspections include violation for no ELD.
- Citations for False Records of Duty status have not decreased.
- Investigation data indicates increasing compliance with AOBRD/ELD Transition.
- FMCSA will continue to provide information and training to industry and law enforcement and encourage the immediate transition from AOBRDs to ELDs.
- Carriers required to use records of duty status that did not use AOBRD are required to be using ELDs.
- However, AOBRDs purchased and in-use before December 18, 2017, may be used until December 16, 2019.
HOS Rulemaking Process

- **August 23, 2018**
  - Advanced Notice of Proposed Rulemaking (ANPRM)
    - Document Development
    - Public Engagement
    - Comment Solicitation / Analysis

- **August 26, 2019**
  - Notice of Proposed Rulemaking (NPRM)
    - Document Development
    - Public Engagement
    - Comment Solicitation / Analysis

- **TBD**
  - Final Rule
  - Awareness

- **TBD**
  - Implementation
    - Training
    - Technical Assistance
Background

FMCSA began work on an Advanced Notice of Proposed Rulemaking (ANPRM) in 2018 in response to widespread Congressional, industry, and citizen concerns surrounding existing hours of service (HOS) rules.

The purpose of the ANPRM was to seek feedback from the public to determine if HOS revisions may alleviate unnecessary burdens placed on drivers while maintaining safety on our nation’s highways and roads.

ANPRM was published and open for comment from August 23-October 10, 2018:

- More than 5,000 comments were received
- Considered four areas for revision along with two related petitions
- Used to develop the Notice of Proposed Rulemaking (NPRM)
Goals of the Proposed Rule

The proposed rule on HOS regulations seeks to improve safety by providing additional flexibility for the nation’s CMV drivers.

FMCSA believes this proposal will improve safety by offering the flexibility drivers need to not feel like they must race the clock, needlessly drive through congestion, or have troubles finding parking.

This proposed update to HOS rules is designed to improve safety, but will also provide critical regulatory savings ($270 million) for the American economy.

This rule is only a proposal and an additional comment period is now open. FMCSA strongly encourages everyone to submit their comments to the Federal Register and take part in shaping this critical reform.

GOALS:
Improved Safety
Increased Flexibility
Focus Questions

FMCSA continues to seek input and data from industry and the public on a number of questions included throughout the NPRM such as the following:

Any comments and/or supporting data on the possibility of a 6 and 4 hour split-sleeper berth break?

What operations would benefit from multiple off duty periods totaling 3 hours?

How often do work shifts require an individual to drive more than 8 hours without at least a 30-minute change in duty status?

Understanding adverse conditions cannot be predicted, will drivers utilize this provision more often after the proposed changes?
Comments

Federal eRulemaking Portal: [https://www.regulations.gov](https://www.regulations.gov)

- Enter the Docket Number in the Search box (FMCSA-2018-0248)
- Click on the “Comment Now” button to submit a comment electronically
- Ability to view the full NPRM and other comments submitted
- All comments must be submitted on or before **October 7, 2019**

For Additional Information: [https://www.fmcsa.dot.gov/regulations/fmcsa-hours-service-proposed-rule](https://www.fmcsa.dot.gov/regulations/fmcsa-hours-service-proposed-rule)
34-HOUR RESTART

SUMMARY: FMCSA amends its hours-of-service (HOS) requirements applicable to drivers of property-carrying commercial motor vehicles (CMVs) to remove provisions requiring that a 34-hour restart include two periods between 1 a.m. and 5 a.m. and limiting use of a restart to once every 168 hours.

DATES: This final rule is effective September 12, 2019.
Drug and Alcohol Clearinghouse

- Published: December 5, 2016
- Compliance Date: January 6, 2020
- Requires FMCSA to establish a drug and alcohol clearinghouse for all CDL holders subject to the drug and alcohol regulations
- The Drug & Alcohol Clearinghouse will be a database containing drivers’ drug and alcohol program non compliance
- For more information: https://clearinghouse.fmcsa.dot.gov
Under-21 Military Pilot Programs

- Study the feasibility, benefits, and safety impacts of allowing a covered driver to operate a commercial motor vehicle in interstate commerce

- Conduct, monitor, and evaluate the pilot program in consultation with a working group

- Working group will review the data collected and provide recommendations

- Submit report to Congress no later than one year after pilot program is concluded
A covered driver is an individual who is:

- Ages 18, 19 and 20
- A member of the armed forces, National Guard, or reserve components

Three-year pilot: no later than one year after programs concludes, describe the working group’s findings and recommendations in report to Congress.

FMCSA expects to need 70 motor carriers that will provide 200 drivers to each group

- Covered driver (study group)
- Control group

We’ve received 13 applications from motor carriers
Crash Preventability DEMONSTRATION Program
(Crashes June 1, 2017 – July 31, 2019)

- Eight crash types
- 30-day public input period for “Not Preventable” crashes
- Determinations noted on Safety Measurement System (SMS) and alternative measure/percentile provided to submitter
  - All crashes still listed and used for prioritization
- Determinations not noted in Pre-employment Screening Program (PSP)
- Post Final “Not Preventable” List on website
- Accepting crashes until September 30, 2019
- Received more than 14,000 Requests for Data Review (RDR) through DataQs
  - 60% were one of the eight eligible crash types
  - 93% of eligible crashes were “Not Preventable”
Crash Preventability DETERMINATION Program
(Crashes on or after August 1, 2019)

- Reduce original eight crash types to seven by merging cargo and debris
- Must provide Police Accident Report
- Federal Register notice published **August 5, 2019**, with 60-day comment period
- Will publish follow up Federal Register to announce that Agency will accept RDRs, once comments are reviewed and IT systems are ready
FMCSA Inspection Metrics for Intermodal Equipment (IME)

Steve Keppler, IANA
September 18th 2019
Long Beach, CA
Chassis Inspections
Level 1 & Level 5 Inspections

13,198 inspections in 2019-H1; 24% were Level 5

Source: FMCSA & IANA
Chassis Inspections
Level 1 & Level 5 Inspections

22% of total chassis inspections in 2019-H1 had a violation

Source: FMCSA & IANA
## Top 10 Jurisdictions for Chassis Inspections

### 2018 vs. 2019-H1

<table>
<thead>
<tr>
<th>State</th>
<th>2018</th>
<th>% of Total</th>
<th>State</th>
<th>2019-H1</th>
<th>% of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA</td>
<td>17191</td>
<td>59%</td>
<td>CA</td>
<td>7341</td>
<td>56%</td>
</tr>
<tr>
<td>TX</td>
<td>2613</td>
<td>9%</td>
<td>TX</td>
<td>1507</td>
<td>11%</td>
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<tr>
<td>VA</td>
<td>1560</td>
<td>5%</td>
<td>VA</td>
<td>730</td>
<td>6%</td>
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<tr>
<td>Federal</td>
<td>1449</td>
<td>5%</td>
<td>Federal</td>
<td>458</td>
<td>3%</td>
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<tr>
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<td>1165</td>
<td>4%</td>
<td>MD</td>
<td>517</td>
<td>4%</td>
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<td>GA</td>
<td>630</td>
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<td>GA</td>
<td>261</td>
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<tr>
<td>IN</td>
<td>465</td>
<td>2%</td>
<td>HI</td>
<td>284</td>
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<tr>
<td>PA</td>
<td>275</td>
<td>1%</td>
<td>WI</td>
<td>225</td>
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<tr>
<td>OH</td>
<td>196</td>
<td>1%</td>
<td>MO</td>
<td>112</td>
<td>1%</td>
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<tr>
<td>WI</td>
<td>331</td>
<td>1%</td>
<td>OH</td>
<td>78</td>
<td>1%</td>
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Source: FMCSA & IANA
# Inspections vs. OOS Rates 2019-H1

<table>
<thead>
<tr>
<th>State</th>
<th>2019-H1</th>
<th>% of Total</th>
<th>OOS Rate</th>
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</thead>
<tbody>
<tr>
<td>CA</td>
<td>7341</td>
<td>56%</td>
<td>11%</td>
</tr>
<tr>
<td>TX</td>
<td>1507</td>
<td>11%</td>
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<td>41%</td>
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<tr>
<td>OH</td>
<td>78</td>
<td>1%</td>
<td>29%</td>
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Source: FMCSA & IANA
Chassis OOS Violations Rates
Level 1 & Level 5 Inspections

OOS Rate trending up for 2019-H1

Chassis OOS Rate = \frac{\text{Chassis Inspections w/ OOS Violation(s)}}{\text{Total Chassis Inspections}}

<table>
<thead>
<tr>
<th>Year</th>
<th>Chassis OOS Rates</th>
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<tbody>
<tr>
<td>2015</td>
<td>19.37%</td>
</tr>
<tr>
<td>2016</td>
<td>16.92%</td>
</tr>
<tr>
<td>2017</td>
<td>16.09%</td>
</tr>
<tr>
<td>2018</td>
<td>12.35%</td>
</tr>
<tr>
<td>2019-H1</td>
<td>15.41%</td>
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</table>

Source: FMCSA & IANA
## Top 10 Jurisdictions with Highest Chassis OOS Rates*

Source: FMCSA & IANA

<table>
<thead>
<tr>
<th>State</th>
<th>Inspection Total</th>
<th>OOS Rate</th>
</tr>
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<tbody>
<tr>
<td>Michigan</td>
<td>122</td>
<td>49.2%</td>
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<tr>
<td>Tennessee</td>
<td>59</td>
<td>42.4%</td>
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<tr>
<td>Missouri</td>
<td>112</td>
<td>42.0%</td>
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<td>Washington</td>
<td>65</td>
<td>33.8%</td>
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<tr>
<td>Indiana</td>
<td>190</td>
<td>31.6%</td>
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<tr>
<td>New York</td>
<td>93</td>
<td>30.1%</td>
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<td>Ohio</td>
<td>78</td>
<td>29.5%</td>
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<tr>
<td>South Carolina</td>
<td>105</td>
<td>29.5%</td>
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<tr>
<td>Wisconsin</td>
<td>225</td>
<td>28.9%</td>
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<tr>
<td>Arkansas</td>
<td>114</td>
<td>26.3%</td>
</tr>
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* Jurisdictions with a minimum of 50 total inspections
# Top 10 Jurisdictions with Lowest Chassis OOS Rates*

2019-H1

<table>
<thead>
<tr>
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<td>16.4%</td>
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<tr>
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<td>22.4%</td>
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<td>HI</td>
<td>284</td>
<td>22.5%</td>
</tr>
<tr>
<td>PA</td>
<td>137</td>
<td>22.6%</td>
</tr>
</tbody>
</table>

* Jurisdictions with a minimum of 50 total inspections

Source: FMCSA & IANA
Top 10 Chassis Violations

- 393.9 - INOPERABLE REQUIRED LAMP
- 393.47E - CLAMP OR ROTO TYPE BRAKE OUT-OF-ADJUSTMENT
- 393.45B2UV - BRAKE HOSE OR TUBING CHAFING AND/OR KINKING
- 393.55E - NO OR DEFECTIVE ABS MALFUNCTION INDICATOR LAMP
- 396.3A1 - AIR LEAK AT SPLITTER / RELAY
- 393.53B - AUTOMATIC AIR BRAKE ADJUSTMENT
- 393.11 - STOP LAMPS REQUIRED
- 393.9TS - INOPERATIVE TURN SIGNAL
- 392.2RG - NO COPY OF REGISTRATION WITH VEHICLE
- 396.3A1BOS - BRAKES OUT OF SERVICE

Source: FMCSA & IANA
Top 10 Chassis OOS Violations

393.9TS - INOPERATIVE TURN SIGNAL
396.3A1BOS - BRAKES OUT OF SERVICE
393.9 - REQUIRED LAMP(S) INOPERATIVE
393.75A3 - TIRE-FLAT AND/OR AUDIBLE AIR LEAK
393.126 - FAILURE TO ENSURE INTERMODAL CONTAINER SECUREMENT
393.207A - IMPROPER AXLE POSITIONING PART
393.11 - STOP LAMPS REQUIRED
393.9BRKLAMP - INOPERATIVE BRAKE LAMPS
393.25F - STOP LAMP VIOLATIONS
393.126B - INTERMODAL CONTAINER SECUREMENT

Source: FMCSA & IANA
Top 10 Chassis Violations (IEP)

- 393.45B2UV - BRAKE HOSE OR TUBING CHAFING AND/OR KINKING
- 393.47E - CLAMP OR ROTO TYPE BRAKE OUT-OF-ADJUSTMENT
- 396.3A1 - AIR LEAK AT SPLITTER / RELAY
- 393.53B - AUTOMATIC AIR BRAKE ADJUSTMENT
- 393.11 - STOP LAMPS REQUIRED
- 392.2RG - NO COPY OF REGISTRATION WITH VEHICLE
- 396.3A1BOS - BRAKES OUT OF SERVICE
- 393.9 - INOPERABLE REQUIRED LAMP
- 393.55E - NO OR DEFECTIVE ABS MALFUNCTION INDICATOR LAMP
- 393.9TS - INOPERATIVE TURN SIGNAL

Source: FMCSA & IANA
Top 10 Chassis OOS Violations (IEP)

- 396.3A1BOS - BRAKES OUT OF SERVICE
- 393.207A - IMPROPER AXLE POSITION PART-BROKEN
- 393.11 - STOP LAMPS REQUIRED
- 393.9 - REQUIRED LAMP(S) INOPERATIVE
- 393.9TS - INOPERATIVE TURN SIGNAL
- 393.126 - FAILURE TO ENSURE INTERMODAL CONTAINER SECUREMENT
- 393.75A3 - TIRE-FLAT AND/OR AUDIBLE AIR LEAK
- 393.9BRKLAMP - INOPERATIVE BRAKE LAMPS
- 393.25F - STOP LAMP VIOLATIONS
- 393.126B - INTERMODAL CONTAINER SECUREMENT

Source: FMCSA & IANA
Top 10 Chassis Violations (MC)

Source: FMCSA & IANA
Top 10 Chassis OOS Violations (MC)

- 393.9TS - INOPERATIVE TURN SIGNAL
- 393.75A3 - TIRE-FLAT AND/OR AUDIBLE AIR LEAK
- 393.9 - REQUIRED LAMP(S) INOPERATIVE
- 393.126 - FAILURE TO ENSURE INTERMODAL CONTAINER SECUREMENT
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- 393.25F - STOP LAMP VIOLATIONS
- 393.126B - INTERMODAL CONTAINER SECUREMENT
- 396.3A1BOS - BRAKES OUT OF SERVICE
- 393.207A - IMPROPER AXLE POSITION PART-BROKEN
- 393.11 - STOP LAMPS REQUIRED

Source: FMCSA & IANA
## Inspection, Violation and OOS Violation Breakdown by Equipment Length

### 2019 H1

<table>
<thead>
<tr>
<th>Equipment Length</th>
<th>% of GIER</th>
<th>% of Inspections</th>
<th>% of Violations</th>
<th>% of OOS Violations</th>
</tr>
</thead>
<tbody>
<tr>
<td>20</td>
<td>11.92%</td>
<td>14.38%</td>
<td>10.73%</td>
<td>10.69%</td>
</tr>
<tr>
<td>23</td>
<td>3.87%</td>
<td>4.22%</td>
<td>4.09%</td>
<td>4.09%</td>
</tr>
<tr>
<td>40</td>
<td>47.70%</td>
<td>53.15%</td>
<td>47.2%</td>
<td>47.1%</td>
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<tr>
<td>43</td>
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<td>0.12%</td>
<td>0.13%</td>
<td>0.13%</td>
</tr>
<tr>
<td>45</td>
<td>7.17%</td>
<td>6.97%</td>
<td>5.48%</td>
<td>5.43%</td>
</tr>
<tr>
<td>48</td>
<td>0.41%</td>
<td>0.37%</td>
<td>0.42%</td>
<td>0.41%</td>
</tr>
<tr>
<td>53</td>
<td>28.80%</td>
<td>20.79%</td>
<td>31.95%</td>
<td>32.15%</td>
</tr>
</tbody>
</table>

Source: FMCSA & IANA
Tractor OOS Violation Rates
Level 1 & Level 5 Inspections involving Intermodal Chassis

Tractor OOS Rate = \( \frac{\text{Tractor Inspections w/ OOS Violations}}{\text{Total Tractor Inspections}} \)

<table>
<thead>
<tr>
<th>Year</th>
<th>Tractor OOS Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>17.02%</td>
</tr>
<tr>
<td>2016</td>
<td>16.26%</td>
</tr>
<tr>
<td>2017</td>
<td>16.40%</td>
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<tr>
<td>2018</td>
<td>12.51%</td>
</tr>
<tr>
<td>2019-H1</td>
<td>16.03%</td>
</tr>
</tbody>
</table>

Source: FMCSA & IANA
Top 10 Tractor OOS Violations

- 396.3A1BOS - BRAKES OUT OF SERVICE
- 393.75A3 - TIRE-FLAT AND/OR AUDIBLE AIR LEAK
- 396.3A1BL - BRAKE SYSTEM PRESSURE LOSS
- 393.45 - BRAKE TUBING AND HOSE ADEQUACY
- 393.209D - STEERING SYSTEM COMPONENTS WORN
- 393.4582 - BRAKE HOSE OR TUBING CHAFING AND/OR KINKING
- 396.3A1B - BRAKES (GENERAL)
- 393.47A - OTHER DEFECTIVE LINING CONDITIONS
- 393.48A - INOPERATIVE/DEFECTIVE BRAKES
- 396.3A1 - INSPECTION, REPAIR AND MAINTENANCE OF PARTS

Source: FMCSA & IANA
Questions & Discussion

Your thoughts and comments are welcome
EDUCATION SESSION: Why Does Safety Culture Matter?

Collin McNamara, TrueNorth Companies
IANA Intermodal EXPO
Intermodal Safety Committee Meeting
Long Beach, CA

September 18, 2019
SAFETY CULTURE

WHAT IS A SAFETY CULTURE?
What is (Safety, Corporate, Operational, Etc.) culture?

It’s the way we do things around here.

Your values minus what you allow and tolerate!
SAFETY CULTURE

Values

• Zero accidents.
• Every person to go home the way they come to work.
• Safety first.
• Safety is a condition of employment.

Your values minus what you allow and tolerate.
SAFETY CULTURE

How do you keep/monitor/ensure your corporate values?

- Corporate Mission Statement
- Policies
- Executive Team
- Management
- Day to Day, Front Line Supervisor.

Profit will determine who exists, Technology will determine who competes. Quality will determine who grows and **People will determine who wins.** .... Jason Smith, President TrueNorth Companies.
MEASURING CULTURE

PERCEPTION SURVEY

• A nine-year study, “Using Behavioral Techniques to Improve Organizational Program Effectiveness” by Mr. Charles W. Bailey, PhD.

• Study conclusion: The survey identifies major discrepancies in the perception of company program elements between employees, front line supervisors, and management. The gap in perceptions proves to be an indicator of program effectiveness.
MEASURING CULTURE

PERCEPTION SURVEY

*All (117) Motor Carrier Surveys
# MEASURING CULTURE

## PERCEPTION GAP

<table>
<thead>
<tr>
<th></th>
<th>Company</th>
<th>Manager</th>
<th>Dispatcher</th>
<th>Rules</th>
<th>Hazards</th>
<th>Training</th>
<th>Involvement</th>
<th>Teamwork</th>
<th>Safety</th>
<th>Climate</th>
<th>Rewards</th>
<th>Compensation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Gap</strong></td>
<td>6.4%</td>
<td>10.6%</td>
<td>32.2%</td>
<td>5.1%</td>
<td>8.9%</td>
<td>1.0%</td>
<td>12.1%</td>
<td>5.4%</td>
<td>14.9%</td>
<td>3.1%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Average Preventable Crash Rate: .78

*All (117) Motor Carrier Surveys*
**MEASURING CULTURE**

**Average* Preventable Crash Rate:**

- **.78**

**Top Ten**

- Operations/Management: 87.5%, 87.7%, 82.7%, 76.2%
- Drivers: 83.3%, 83.3%

*All (117) Motor Carrier Surveys

**Top Ten (Based on Crash Rate) Motor Carrier Surveys

**Average** Preventable Crash Rate:**

- **.32**
How do you build a culture of safety within your companies?

- Engagement: Encouragement from all team members.
- Enforcement: Repercussions for not following the rules.
- Transparency and an open-door policy.
- Sincere servant leadership mentality.

What are the biggest challenges to further improve your safety culture?

• Never any time to “coast” on safety, or anything for that matter. Failing to recognize and to take appropriate action to changing conditions is probably the biggest challenge.
• Production efficiency vs timely safety procedures.
• Keeping people engaged and connected.

How does your current safety culture support and enable your revenue and business strategy?

- **Retention**: The US is in a talent inversion and finding people to work is hard right now. We have had employees leave for better wages and benefits packages, to return because they did not feel safe and cared for while they are at work.
- **Cost Reduction**: Keeping people safe reduces cost.
- (Most importantly…) **Culture**: We hire and fire by core values. Having safety as one of them creates a clear picture of what is, and is not, tolerated.
- Engaged successful employees will deliver superior a customer experience. Reduction in losses allows greater focus and resources to be allocated to other areas of the business.
- Operations has to be bought into the process and held accountable for safety.

Communicate up stream! Safety is a profit center.
Describe the role your CEO's play in culture of safety?

- The CEO was part of the creation of the core values but the responsibility is pushed to everyone within the company and measured by department.
- Personal involvement. I’ve been at in every safety meeting for the last ten plus years, over 120 meetings.
- Critical for the CEO to understand the message, be able to communicate it and hold leadership accountable but they cannot carry the full burden. It is the responsibility of the people.

Executive must fully support with actions.
What role do the day to day supervisors have, as it related to safety?

- Supervisors are responsible for their people. Each department is measured by a safety metric. They are responsible for the paperwork, working with our safety coordinator to determine preventative actions, creative problem-solving, and how to best take care of the employee while he/she is healing.
- Most employees can tell you that we need to be safe but I don’t know that they can clearly articulate their exact role or expectations or techniques as they relate to safety. We must improve on this.
- Each supervisor is responsible for their employee’s safety. We measure it and hold them accountable (financially) for it. We also publish this.
- Each supervisor must understand their role in the mission and share their passion & challenging their team each day.

Day to day, front line supervisors are key!
BUILDING CULTURE

Words of Wisdom


Communicate up stream! Safety is a profit center.

Executive must fully support with actions.

Day to day, front line supervisors are key!
Day to day, front line supervisors are key!

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<td>14.9%</td>
<td>3.1%</td>
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</tbody>
</table>
SAFETY CULTURE

Your culture is your values minus what you allow and tolerate.

People will determine who wins!
SAFETY CULTURE

THANK YOU!

Bert Mayo, CDS
Vice President, Risk Solutions
TrueNorth Companies
(803) 634-9255
bmayo@truenorthcompanies.com

People will determine who wins!
Questions & Discussion

Your thoughts and comments are welcome
Safety Roundtable

• Members to identify one safety success story
• 3 key talking points
  • What was the problem/challenge?
  • What was done to address it?
  • What were the lessons learned
New Business

• Member Safety Challenges/Needs
• Member issues for Committee consideration?
• Educational needs/topics?
  • Sessions at IANA Events
  • Webinars
  • Intermodal Insights
  • Intermodal Edge
HOUSEKEEPING AND ADJOURN
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