



LAMPTON-LOVE, INC.

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Date: November 8, 2016

To: All Branch Managers

From: Gene Maddox *gm*
Safety Director

Subject: Branch Office Monthly Safety Meeting – November 2016

Company policy requires that each branch office hold a minimum of one safety meeting each month with the documentation of the material covered and the attendance being recorded on the “Monthly Safety Meeting Minutes and attendance Record” (see attached form). **Please detach the Monthly Safety Meeting Minutes and Attendance Record, fill it out and e-mail or fax a copy to Lynn Eldridge.** *Please keep the original for your records.*

NOTE: ONLY the Monthly Safety Meeting Minutes and Attendance Records is to be sent in.

To assist you in complying with this requirement, the following subjects are for your Monthly Safety Meeting, for the month of November 2016. You may add topics, but please document the following topics:

1. News Briefs!!! (FMCSA Updates Regs for Windshield-Mounted Safety Devices)
2. Safety Meeting: (Bobtail Requalification)

It is recommended that you thoroughly read this material prior to your meeting.

It is strongly recommended that you use the 3-ring binder to store the last 12 months of the Safety Meeting Minutes and Attendance Record Form!!! This material should be referred to or used to train new employees from the website. This manual should be kept in an area of the office that is easily accessible to all employees.

Be Smart...Be Safe and Be Courteous!!!



PROPANE
EXCEPTIONAL ENERGY

NEWS BRIEFS!!!

(This monthly “column” will include short newsworthy topics, which will serve as a friendly reminder to us all)

FMCSA Updates Regs for Windshield-Mounted Safety Devices

The Federal Motor Carrier Safety Administration has issued a Final Rule to allow certain “vehicle safety technology” to be mounted on windshield interiors. Including inside the area swept by the windshield wipers.

The rule, which took effect on October 23, 2016, stems from a section of the 2015 FAST Act highway bill that directs FMCSA to amend its regulations to allow for the “voluntary mounting on a windshield of vehicle safety technology”.

The FAST Act defines “vehicle safety technology” to include: camera systems, speed management system, lane departure warning system, forward collision warning or mitigation system, active cruise control system and any other technology FMCSA considers applicable.

Current regulations state that antennas and other devices cannot be mounted more than six inches below the upper edge of the windshield and must be outside the driver’s lines of sight to the road and highway signs and signals. The new regulations add an amendment to allow certain devices, including, but not limited to video event recorders, lane departure warning systems, collision mitigation or warning systems, transponders and sensors that are part of a hands-free driver aid equipment package, to be mounted within the area swept by the windshield wipers.

The devices covered in the amendment must be mounted no more than four inches below the upper edge or seven inches above the lower edge of the area swept by the windshield wipers, and must also be outside the driver’s sight lines to the road and highway signs and signals.

FMCSA clarifies in the rule that the amendments do not mandate the use of any of the aforementioned devices, but only allows the devices to be voluntarily mounted where they would have previously been in violation of the regulations.

Additionally, any windshield-mounted technology under a temporary exemption when the FAST Act went into effect on October 1, 2015, is included in the amendments to the regulations.

NOVEMBER 2016 SAFETY MEETING

Fact Sheet: Bobtail Requalification From NPGA

General Information

Several years ago, NPGA petitioned the U.S. Department of Transportation (DOT) to extend the hydrostatic pressure test requalification period for certain types of bobtail trucks from 5 years to 10 years. NPGA's petition was based on extensive research funded by PERC that demonstrated no reduction in safety to extend the period for certain types of bobtails. DOT determined that the petition had merit and, after a period of public review and comment, issued a Final Rule effective on July 5, 2016 to extend the hydrostatic pressure test requalification period from 5 to 10 years.

Eligible Bobtails

Bobtails that meet the following requirements are eligible for the 10 year requalification period:

- ♣ **MC 331 cargo tanks of less than 3,500 gallons water capacity in dedicated propane service constructed of nonquenched and tempered (NQT) SA-612 steel.**
- ♣ MC 331 cargo tanks of less than 3,500 gallons water capacity in dedicated propane service constructed of NQT SA-202 or NQT SA-455 steels provided the materials for these steels have full-sized equivalent (FSE) Charpy vee notch (CVN) energy test data that demonstrated 75% shear-area ductility at 32 degrees Fahrenheit with an average of 3 or more samples >15ft-lb FSE with no sample <10ft-lb FSE. **NOT AN OPTION FOR US.**

Start Date

Hydrostatic pressure tests and internal visual inspections of eligible bobtails that occur *on and after* July 5, 2016 carry a 10 year requalification period. Pressure tests and internal visual inspections that occur *before* July 5, 2016 carry a 5 year requalification period.

Common Questions

Question 1: **How do I know if a bobtail is made of SA-612, SA-202, or SA-455 steel?**

- a) Cargo tanks must have a Name Plate permanently attached to the outside of the tank. The Name Plate details the material specification of the tank, which identifies if the bobtail is eligible for the 10 year requalification period (49 CFR 178.337-17).

Question 2: **What if a bobtail does not have a Name Plate?**

- a) Cargo tank motor vehicle manufacturers must provide, and cargo tank owners must retain for the lifetime of the bobtail plus one year, an ASME Manufacturer's Data Report for

each cargo tank, which details construction and compliance information for the bobtail (49 CFR 178.337-18). The Data Report should contain information identifying the material specification of the steel and/or the necessary test data to determine the eligibility of a bobtail for the 10 year requalification period.

In addition to relying on this information for the requalification period, the bobtail owner may use the Data Report to obtain a replacement Name Plate.

Question 3: What if I do *not* have the Data Report detailing the test data necessary for a bobtail made of SA-202 or -455 steel?

- a) If the bobtail was registered with the National Board of Boiler and Pressure Vessel Inspectors, a copy of the Data Report can be requested by the owner of the bobtail.

National Board of Boiler and Pressure Vessel Inspectors
1055 Crupper Avenue
Columbus, OH 43229
T: 614-888-8320
www.nationalboard.org/

- b) If the bobtail was *not* registered with the National Board of Boiler and Pressure Vessel Inspectors, the owner may record identification information of the bobtail and receive conformity certification by a Registered Inspector of the National Board of Boiler and Pressure Vessel Inspectors.

Question 4: What if a bobtail received an Internal Visual Inspection and/or Pressure Test *before* July 5, 2016?

- a) Tests that occurred *before* July 5, 2016 still carry a 5 year requalification period. The 10 year requalification period is available *only* for Inspections and/or Pressure Tests that occur *on and after* July 5, 2016.

Questions 5: If a bobtail is due for an Internal visual Inspection and/or Pressure Test after July 5, 2016, can I wait another 5 years?

- a) **No; the Final Rule is *not* retroactive. The Inspection and/or Pressure Test should proceed as scheduled and thereafter, will carry a 10 year requalification period.**

For example: An eligible bobtail receives and passes an internal visual Inspection and/or Pressure Test in February 2013. The next Internal Visual Inspection and/or Pressure Test is due in February 2018. The bobtail owner should proceed with the Internal Visual Inspection and/or Pressure Test in February 2018. The February 2018 Internal Visual Inspection and/or Pressure Test will carry a 10 year requalification period. The next Inspection and/or Pressure Test is due in February 2028.

Regulatory Text⁴**49 CFR 180.407(c) Requirements for test and inspection of specification cargo tanks**
COMPLIANCE DATES – INSPECTIONS AND TEST UNDER §180.407(c)

Test or inspection (cargo tank specification, configuration, and service)	Date by which first test must be completed (see Note 1)	Interval period after first test
* *	* *	* *

Internal Visual Inspection:

All insulated cargo tanks, except MC 300, MC331, MC 338 (see Note 4)...	September 1, 1991.....	 1
All cargo tanks transporting lading corrosive to the tank.....	September 1, 1991.....	 1
MC 331 cargo tanks less than 3,500 gallons water capacity in dedicated propane service constructed of nonquenched and tempered NQT SA612 steel (see Note 5).....	See Note 6.....	 10
All other cargo tanks, except MC338	September 1, 1995.....	5
* *	* *	* *

Pressure Test (Hydrostatic or pneumatic) (See Notes 2 and 3):

All cargo tanks which are insulated with no manhole or insulated and lined, except MC 338.....	September 1, 1991.....	 1
All cargo tanks designed to be loaded by vacuum with full opening rear heads.....	September 1, 1992.....	 2
MC 330 and MC 331 cargo tanks in chlorine service.....	September 1, 1992.....	 2
MC331 cargo tanks less than 3,500 gallons water capacity in dedicated propane service constructed of nonquenched and tempered NQT SA-612 steel (see Note 5)...	See Note 6.....	 10
All other cargo tanks.....	September 1, 1995.....	 5

Note 1: If a cargo tank is subject to an applicable inspection or test requirement under the regulations in effect on December 30, 1990, and the due date (as specified by a requirement in effect on December 30, 1990) for completing the required inspection or test occurs before the compliance date listed in table I, the earlier date applies.

Note 2: Pressure testing is not required for MC 330 or MC 331 cargo tanks in dedicated sodium metal service.

Note 3: Pressure testing is not required for uninsulated lined cargo tanks, with a design pressure MAWP 15 psig or less, which receive an external visual inspection and lining inspection at least once each year.

Note 4: Insulated cargo tanks equipped with manholes or inspection openings may perform either an internal visual inspection in conjunction with the external visual inspection or a hydrostatic or pneumatic pressure-test of the cargo tank.

Note 5: A 10-year inspection interval period also applies to cargo tanks constructed of **NQT SA-202 or NQT SA-455 steels** provided the materials have full-size equivalent (FSE) Charpy vee notch (CVN) energy test data that demonstrated 75% shear-area ductility at 32 degrees F with an average of 3 or more samples >15 ft-lb FSE with no sample <10 ft-lb FSE.

Note 6: Only MC 331 cargo tanks that are tested on and after July 5, 2016 are eligible for the 10 year requalification period.

NOVEMBER 2016
MONTHLY SAFETY MEETING
MINUTES & ATTENDANCE RECORD

Company Name: _____

City: _____ **State:** _____

Date: _____ **Time Started:** _____ **Time Finished:** _____

Instructed By: _____ **Number Attending:** _____

Subject Covered and Comments:

1. FMCSA Updates Regs for Windshield-mounted Safety Devices: _____
2. Fact Sheet: Bobtail Requalification (from: NPGA) _____

By my signature below, I certify that I attended and participated in this Safety Meeting and I understand the material presented.

Employee Name (Please print)	Employee Signature	License Expires *	Endorsements**	DOT Physical Expires***
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
13.				
14.				

**List driver's license expiration date in this column.*

***Check licenses for proper endorsements and re-testing (For example: "HazMat") List endorsements in this column.*

****List DOT physical expiration date in this column.*

By my signature below, I hereby certify that the employees listed above have been trained in accordance with the applicable regulation and curriculum for this monthly safety meeting.

Instructor's Signature: _____

E-Mail or fax this sheet only to: Lampton-Love, Inc.

Gene Maddox/Lynn Eldridge

Date: _____

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