



AMERICAN SOCIETY OF
SAFETY PROFESSIONALS

Transportation and COVID -19

Transportation Practice Specialty

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Trucking

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Different World

- Drivers face many challenges as they deliver food and other products to stores in the USA
- Preparation is the key.

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- Transportation regulation exemptions, exceptions and declarations
 - How to enhance protecting a driver from exposure when they are an essential employee

**If you have the supplies you
need, more than likely a truck
brought it!**



To perform at optimal levels, a truck driver needs rest and respect.



FMCSA Response: Regulation Relief

- Hour of service
- Commercial Driver Licensing
- Drug and alcohol testing
- Fee waivers for registration



Safety versus Need

1. Hours of service were designed to make sure the driver is not fatigued.
2. The current hours of service base hours have been around a long time, changed a little over the years
3. ELD started a couple of years ago to more accurately log the hours (prevent cheating)
4. There are examples of other emergency exemptions, but nothing on this National scale

Safety versus Need

- You cannot use a obviously fatigued or ill driver at anytime
- If the driver request time off, they must be given 10 hours off, before sending them out.
- Driver should be instructed to make quality decisions as to their level of fitness and be encouraged to stop if needed, especially since the 14 hour clock does not have to be determinate.

What are the changes

1. Exemption from Hours of Service Regulations for drivers providing direct assistance to the emergency relief efforts
2. If providing direct assistance, they are exempt from parts 390-399
3. This does not include Drug/alcohol testing, CDL requirements, insurance and financial responsibility, hazardous materials



Hours of service

- This was FMCSA's first response to getting supplies where they are needed.
- The first order was limited, then expanded
- https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/2020-03/FMCSA_FAQs_HOS_ED_3-19-2020.pdf



Who qualifies?

1. medical supplies and equipment related to the testing, diagnosis and treatment of COVID-19;
2. supplies and equipment necessary for community safety, sanitation, and prevention of community transmission of COVID-19 such as masks, gloves, hand sanitizer, soap and disinfectants;
3. food, paper products and other groceries for emergency restocking of distribution centers or stores;
4. immediate precursor raw materials-such as paper, plastic or alcohol-that are required and to be used for the manufacture of items in categories (1), (2) or (3);
5. fuel;
6. equipment, supplies and persons necessary to establish and manage temporary housing, quarantine, and isolation facilities related to COVID-19;
7. persons designated by Federal, State or local authorities for medical, isolation, or quarantine purposes; and
8. persons necessary to provide other medical or emergency services, the supply of which may be affected by the COVID-19 response.

Direct assistance does not include routine commercial deliveries, including mixed loads with a nominal quantity of qualifying emergency relief added to obtain the benefits of this emergency declaration.



Drug and Alcohol

- Pre-employment
 - Cannot use unless you have a negative test or use 382.301 (b)
- Post-accident
 - Attempt tests, document reasons if unable to obtain.
- Random
 - If you can make the percentages for quarter, make up by end of calendar year (just like ag and school bus)
- Reasonable Suspicion
 - Document, remove from service
- Return to Duty and Follow-up tests
 - Cannot use unless negative test results



Driver's License

- FMCSA will exercise its enforcement discretion to not take enforcement action for the following:
- 49 CFR 383.23(a)(2) – a CLP or CDL holder operating a CMV with an expired license, but only if the CLP or CDL was valid on February 29, 2020, and expired on or after March 1, 2020.
- 49 CFR 383.37(a) – a motor carrier that allows a CLP or CDL driver to operate a CMV during a period in which the driver does not have a current CLP or CDL, but only if the CLP or CDL was valid on February 29, 2020, and expired on or after March 1, 2020.
- 49 CFR 391.11(b)(5) – a CMV driver (i.e., CLP, CDL, or non-CDL license holder) or motor carrier that allows a CMV driver to operate a CMV during a period in which the driver's operator license has expired, but only if the driver's license was valid on February 29, 2020, and expired on or after March 1, 2020, and the driver is otherwise qualified to drive under 391.11.
- 49 CFR 391.45(b) – a CMV driver or motor carrier that allows a CMV driver to operate a CMV during a period in which the driver does not have the current medical certificate as required by 49 CFR 391.45(b), but only if the driver has evidence of a medical certification that was valid on February 29, 2020 and expired on or after March 1, 2020.



CLP Holders

- The FMCSA has waived the requirement that a CLP holder, when driving, has to have a licensed CMV holder in front seat.
- This allows the CMV CDL holder to be in a sleeper berth.
- TPS understands the critical need for drivers, but collectively we do not support this decision and urge companies to thoroughly consider it before implementation. There are many driving conditions that require input from CDL holder to CPL holder if they have never encountered those situations, i.e.: steep grades, weather conditions, high winds.

Truck Maintenance

1. Make sure maintenance staff is aware of protocols and abide by them
2. Considering hiring fuel vendors to fuel truck in off hours to save time and eliminate time at third party fueling locations
3. Do not put off washing truck and trailer, including inside of van trailers



Cab Cleaning

1. If possible, reduce slip seating operations, which can reduce need to thoroughly clean cab after each operation
2. If you cannot eliminate slip seating, stagger times so cleaning can be accommodated.
3. Hire someone who's job it is to clean cabs, reducing the amounts of PPE for each driver
4. Make sure maintenance staff is aware of cleaning protocols and that they follow same



Cab Cleaning

1. We know that the virus can be viable for hours, if not longer, especially on plastic. Plastic is the main material in a truck cab. Clean thoroughly.
2. If you have acceptable cleaning materials, use them. If not check CDC website for how to make your own, such as rubbing alcohol or bleach. Operations associated with manufacturing plants may tap that resource for possible in house cleaning solutions.
3. Follow manufacturers recommendations on cleaning electronics like ELDs, tablets, cameras, GPS. Make sure you clean the knobs on you CB radio
4. Don't forget to disinfect exterior door handles and climbing rails in this process

Sleeper Berth

- Obviously this makes the job very hard as drivers can be in close proximity for long periods of time.
- Make sure drivers communicate their health to each other
- Extra time to completely clean sleeper berth, top to bottom
- Each driver should be assigned their own linens, spares if possible, stored in wrappings.
- Don't shake out linens, and store them in a plastic disposable bag. Wash in hot soapy water.

PPE

1. Latex, nitrile or other similar protective glove
2. N95 respirator
3. Face shield
4. Cleaning wipes to cleanse equipment and cab of truck
5. Bottled water in truck for drinking and washing, along with soap

Freight Drivers

1. Large number of cotton gloves that can be changed often, rewashed and returned to service. Leather gloves absorbs moisture and normally not changed out. While it is certainly acknowledged that the protection is limited at best, most drivers would not use dirty gloved hand to touch their mouth, nose and eyes. Wear latex gloves underneath.
2. Freight hook or fifth wheel puller. Drivers can use this device to limit hands on pallets/boxes, thereby limiting contact
3. Face mask use could be eliminated if the driver dropped shipment on dock or was unloaded by dock worker. Difficult issue is when shipment is verified, as that is usually done face to face for count and review. Maybe work with customer to come up with different method.

Delivery Drivers

1. Latex or nitrile gloves, if available, should be provided to drivers who as part of their jobs would be required to stock shelves, especially at locations like grocery stores.
2. Face mask should be worn as they are normally in the store when occupied by large amounts of customers
3. While face shield would probably be impractical, safety glasses may help keep them from inadvertently touching their eyes.



Delivery Drivers

- Make sure they understand that anything they take into a location must be cleaned when done with that location
- Clipboards, tablets, electronic scanners, etc. Make sure they require customer to use their (customers) pen if signing is required. If handhelds are used, consider having the driver sign the handhelds- many companies using a CVD code and receiver last name as a signature.
- A quick wipe-down of two wheeler would be a good practice



Delivery Drivers

- There may be “high risk” deliveries where delivery procedures may need to be changed;
 - i.e. nursing homes, prisons, hospitals
 - Arrangements may need to be made where driver does not enter the facility- leave the product on a loading dock.
- Everyone is dealing with the same issues- you could be amazed at how customers understand these decisions as they are trying to reduce exposures to their employees!

STOP!

ATTENTION ALL VISITORS, CONTRACTORS
EMPLOYEES, TRUCK DRIVERS
IF YOU HAVE TRAVELED WITHIN THE PAST
14 DAYS TO:

**OUTSIDE THE
CONTINENTAL
UNITED
STATES**

State of New York
State of Washington
State of California
State of Illinois
State of New Jersey

**ALL EMPLOYEES
RETURNING FROM
VACATION (CALL HR)**

PLEASE **DO NOT ENTER THE BUILDING**. PLEASE CALL YOUR
CONTACT VIA PHONE FOR INSTRUCTIONS. IN ALMOST
ALL CASES YOU WILL NOT BE ALLOWED INTO THE
FACILITY. **(615-904-3000)**

As of 3/22/2020 Updates will be published by Corporate

Version 1.2

Driver Access

While limited access is occurring, truck drivers have always been restricted in access at many locations for restrooms, food/vending and hand washing.



Washing hands

1. Many drivers are banned from entering a location, limiting their ability to conduct a restroom break or wash their hands.
2. If available, hand sanitizer
3. If not available, soap and water bottle with one use towels
4. Make sure you have plastic trash bags to place refuse
5. Wash hand at least after every stop, including breaks





Eating

- Drivers have a hard time getting refreshments and meals on the road due to closings and size of vehicle which limits parking or inability to use drive through facilities

Truck stops

- Truck stops are open, however those that use them come from all over the country.
- Truck Stop association, like the NATSO have protocols for their members to meet COVID-19 guidelines
- Drivers should still be cautious, take food to truck to eat, wipe restroom equipment, like handles and seats before use.
- Limit contact with fuel island personnel



Food

- Provide drivers with snacks prior to them leaving so if they are unable to stop or unable to obtain refreshments, they have some available throughout the day.
- Consider the increase costs imposed on the driver



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Passenger Transportation

Matthew McDonald

Health Safety and Environmental Manager

TPS Member

Security to gate into government or secured facility with buses or trucks

1. Going in all government facilities or customer secured facilities will be asked about your health. If you driving buses your passenger's heath will be checked. Some locations temperature and your passenger's temperature will be taken.
2. Questions asked:
 - a) Have you been out of the country in last two months
 - b) Do you have cough, fever, or flu in last week
 - c) Any one you know have COVID-19 virus. When?



Disinfectant of the Buses:

1. Any vehicles that the Maintenance Motor Pool starts working on buses, trucks, tactical or any other vehicles will be disinfectant by an employee before it enters the shop.
2. If the vehicle was operated by a person who has COVID-19. Then employee who trained in Hazardous Waste will be wearing a Tyvek suit, mask and gloves. The vehicle will be disinfectant the whole inside of the cab. Any handles around the truck before enters the shop.



Bus Drivers

- Buses: When return with our vehicles the driver must now mop out all the surfaces floors with either with disinfectant or Clorox and water. Then sweep out the buses to prevent dust. The drivers need to use disinfectant spray on all seats, steel and driver area of the bus. They need to wiped down to prevent the spread of COVID-19



Passenger Vehicles

- Maintain positions, out and back (same driver)
- Clean vehicle each day before and after use
- Wear face mask during trip
- If ventilation is required, use floor setting so as not to assist in dispersion of any particles floating in air.



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Questions?

