

ISSUE NUMBER

19-014-VEH

ISSUE NAME

OOSC, Part II, Item 2. Cargo Securement - Lugger Boxes

STATUS

Closed

Vehicle Committee

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Enforcement has been placing carriers in many regions out of service for load securement. Some luggers have hydraulically activated tipping/dumping pins on their frames. Some commercial vehicle enforcement units accept using the tipping/dumping pins.

For those who do not have approval to use the pins or do not have pins on their vehicles the ANSI Z245-1 committee assigned a subgroup to come up with a container securement solution.

The subgroup was comprised of at least three lugger manufacturers, container manufactures, and many other individuals representing Safety & compliance, and Operations from Lugger owners/users. A draft document was presented at the last meeting of ANSI Z245-1 Mobile equipment committee on February 18th, 2019. The Z245.1 sub-committee finalized the document for a final vote of acceptance and acceptance of the Federal Motor Carrier Safety Administration and the Commercial Vehicle Safety Alliance.

JUSTIFICATION OR NEED

There is inconsistent enforcement and understanding of what constitutes proper securement for a lugger truck.

REQUEST FOR ACTION

The National Waste and Recycling Association and Institute of Scrap Recycling Industries, Inc ask the Commercial Vehicle Safety Alliance and FMCSA to review the attached securement method as a mitigation solution for proper securement.

SUPPORTING DOCUMENTS/PHOTOS

- [Figure-3-Hold-Down.pdf](#)
- [Figure-2-Lugger-Tie-Down-Strap-to-Top-of-Box.pdf](#)
- [Figure-1-Lugger-Pocket-and-Strap.pdf](#)
- [ANSI-Lugger-securement-DRAFT-19-3-7.pdf](#)

ACTION TAKEN BY COMMITTEE

The virtual meeting discussion began with Commodore Hall representing ISRE giving a presentation on the testing

that was done in Wisconsin with the use of the hydraulic lift pins and chains. The testing results were presented to Vehicle Committee. Karl Mittlestadt from Wisconsin State Police was present during the testing and both Karl and Luke Loy from FMCSA reported out to the committee that they accepted that the testing met the equivalent means for the U.S. in 393.102. Currently, no commodity regulation specific to lugger trucks in comparison to roll-on roll-off trucks. By their design, the hoist on luggers provides container securement. Have done testing for 45 months to determine securement sufficiency. Under 393.102, they have met the equivalent means of securement. Performed, on site testing 07/29/20 and 8/18/20 with manufacturers, Wisconsin state patrol, associations, and motor carriers. Did rear acceleration 5g test, lateral securement 5g test, and forward securement 8g tests, option 1 and option 2. An engineering study was conducted for ACE Brothers and provided to Vehicle Committee.

Question from Canadian member whether testing was done on downward force as Canada requires 2g and also whether there was testing for maneuverability and stability. Answer, the pins do not provide downward pressure. No performance testing was done on stability. Canada was not prepared to accept the equivalent means in Canada, so the bulletin was amended to ensure that the equivalent means information on pages 7 and 8 currently, only apply to the U.S.

Because lugger containers are not in the commodity specific US rules it must be secured under the general provisions. Lugger containers was added into the Roll on Roll off container inspection bulletin and shown to committee for consideration. Discussion on different options and explanation of all of the additions into the inspection bulletin. Discussion that there was minimal movement, but it was not enough movement to affect maneuverability or stability. The bulletin that was done last year had the tie downs for lugger boxes. That is still an option, but with the testing possibly add more information into the bulletin for other options of tiedowns that meet the equivalent means. Canada not ready at this point to accept the alternate means. Will have wording reflect that it is US options only.

There were two options of bulletins presented to provide two different ways of explaining the information and the committee unanimously voted on the second option. Motion passed unanimously, no abstentions, Item closed. Bulletin will be sent to Training committee to see if they would like any videos to go with the bulletin.