

**Commercial Vehicle Safety Alliance
Level VI Program 2018 Inspection Report**

**For Inspections in
CY 2015, CY2016, and CY 2017**

Prepared for
U.S. Department of Energy

Prepared by
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Introduction

The Commercial Vehicle Safety Alliance (CVSA), a nonprofit organization of federal, state, and provincial government agencies and representatives from private industry in the United States, Canada and Mexico, is dedicated to improving commercial vehicle safety. The Alliance is comprised of all 50 states, two U.S. territories, twelve Canadian provinces and territories, and Mexico. CVSA promotes an environment free of commercial vehicle accidents and incidents. Its mission is to promote commercial motor vehicle safety and security by providing leadership to enforcement, industry and policy makers. This is accomplished by establishing effective transportation safety standards for motor carriers, drivers, vehicles and inspectors through compliance, education, training and enforcement programs.

Member agencies include state police, highway patrol organizations, public service and utility commissions, departments of transportation, motor vehicle and public safety departments, Canadian provincial governments, the Mexican government and supporting groups such as the U.S. Department of Transportation, the U.S. Department of Energy (DOE), Canadian Transport Officials and more than 500 associate industry members.

CVSA serves as a critical, central point for bringing state/provincial officials together with the truck/bus industries and federal governments in a unique discussion and problem-solving exchange of ideas. Member agencies sign a Memorandum of Understanding (MOU) and recognize and agree to uniform inspection standards and procedures as developed by CVSA. One of the MOU's significant elements is a reciprocity agreement between members to honor inspections conducted by other member agencies authorized to affix the CVSA decal.

The CVSA/DOE Cooperative Agreement

In 1986, the DOE Office of Civilian Radioactive Waste Management (OCRWM) and CVSA entered into a cooperative agreement to develop inspection standards for transporting radioactive materials. This standard became known as the Enhanced North American Standard Inspection for Radioactive Materials or CVSA Level VI inspection program. OCRWM extended the agreement to conduct a pilot study to evaluate the soundness of the procedures, develop training curricula, conduct training, perform inspections and generate statistical data on the inspections. A final report on this phase of the Cooperative Agreement, including the Pilot Study, was issued in October 1999. The *CVSA/DOE Cooperative Agreement Interim Report* was published in October 2002, which updated the program's progress to that point. In 2004 CVSA and DOE began a multiyear program to keep interested parties updated on the progress of the CVSA Level VI inspection program with a focus on DOE radioactive waste shipments to the Waste Isolation Pilot Plant (WIPP) in Carlsbad, New Mexico. At that time the only radioactive materials shipments receiving a CVSA Level VI inspection were those shipped by DOE. There was no regulation for a Level VI inspection of other radioactive material shipments.

HRCQ Radioactive Material Shipments

Effective January 1, 2005, the U.S. Department of Transportation required all vehicles and carriers transporting Highway Route Control Quantities (HRCQ) of radioactive material to obtain a Safety Permit. One of the requirements to obtain the permit requires the carriers to pass a CVSA Level VI inspection prior to the shipment being allowed to travel in the United States. All

HRCQ radioactive material shipments entering into the United States must also pass the CVSA Level VI inspection either at the shipment's point of origin or when the shipment enters the United States.

As a result of this new regulation, CVSA began to receive a large number of inspection forms for CVSA Level VI inspections of other radioactive material shipments. Many of these inspections were for shipments either originating outside the United States or having destinations outside the United States. These shipments and associated inspections involved different trucking companies, vehicles, and drivers as compared to the shipments for DOE. Hence, beginning with the inspection report for CY 2006, CVSA presents and compares Level VI inspection data for both DOE WIPP shipments and other types of DOE and non-DOE shipments (referred to as "non-WIPP shipments").

CVSA Level II and Level III Inspections of En Route Shipments

CVSA guidelines and training to members are that a shipment inspected to the "defect free" level at the point of origin need not be re-inspected to the same degree while en route. Some states have laws or statutes that require all radioactive material shipments to be inspected and/or escorted. It was suggested in previous inspection reports that en route states with these laws choose to complete one of the other CVSA Level inspections and randomly inspect to the CVSA Level VI inspection standard instead of the practice of completing a full CVSA Level VI inspection on each shipment. Implementation of this suggestion was seen in the CY 2006 inspection data. States that previously conducted full CVSA Level VI inspections on all en route shipments were completing more CVSA Level II and Level III inspections in lieu of CVSA Level VI inspections.

A CVSA Level II inspection (also known as the Walk-Around Driver/Vehicle Inspection) includes an examination of the items specified under the North American Standard Inspection but does not require physically getting under the vehicle to inspect. As a minimum, Level II inspections must include examination of: driver's license; medical examiner's certificate and Skill Performance Evaluation Certificate (if applicable); alcohol and drugs; driver's record of duty status as required; hours of service; seat belt; vehicle inspection report (if applicable); brake systems; coupling devices; exhaust systems; frame; fuel systems; lighting devices (turn signals, brake lamps, tail lamps, head lamps and lamps/flags on projecting loads); safe loading; steering mechanism; suspension; tires; van and open-top trailer bodies; wheels and rims; windshield wipers; emergency exits on buses, and Hazardous Materials (HM) requirements as applicable. HM-required inspection items are inspected by certified HM inspectors.

The CVSA Level III inspection (or Driver/Credential Inspection) includes at a minimum an examination of the driver's license; medical examiner's certificate and Skill Performance Evaluation Certificate; driver's record of duty status; hours of service; seat belt; and vehicle inspection report.

States may opt to perform a CVSA Level II or Level III inspection instead of a Level VI inspection on an en route shipment. However, for en route shipments only the Level VI inspection data are considered in this Level VI inspection report.

CVSA Level VI Inspection Report

This is the eighth CVSA Level VI Program inspection report (CY 2015 - CY 2017 Report). It covers inspections conducted in CY 2015, CY 2016, and CY 2017. All previous and current reports may be obtained through CVSA's website at www.cvsa.org. Once on the website, to locate a report, select "Programs" at the top of the page then select the "North American Standard Level VI Inspection Program" link. Next select "News, Updates and Reports" on the left navigation bar and then select the "CVSA/WIPP Updates and Reports" link that subsequently appears.

Previous inspection reports were produced periodically with the most recent report published in July 2016, which covers inspections through CY 2014. The data for these reports were initially obtained from the hardcopy inspection forms submitted by the reporting agencies. Then beginning with the November 2010 report (which covers inspections through CY 2009, but excludes CY 2007), it was decided to obtain data exclusively from the Federal Motor Carrier Safety Administration's (FMCSA's) Analysis & Information (A&I) Online website because by that time almost all agencies were submitting their inspection forms electronically and the capability to retrieve the Level VI inspection data from the A&I Online database became available. However, for that report CY 2007 inspection data were not included as it was determined that a significant number of 2007 inspection forms were not submitted electronically. Beginning with 2008 there is high confidence that almost all Level VI inspection forms are submitted electronically and nearly all inspection data are available on the A&I Online website.

The Analysis & Information (A&I) Online Data Used for this Report

The CY 2015, CY 2016, and CY 2017 inspection data used for this report were retrieved from the Roadside Inspections module of the A&I Online website (<http://ai.fmcsa.dot.gov/SafetyProgram/RoadsideInspections.aspx>) with the Data Source being the FMCSA Motor Carrier Management Information System (MCMIS) data snapshot as of 2/23/2018. That is, the data retrieved are current with the state of the MCMIS on 2/23/2018.

Selected for retrieval were national Level VI inspections for all vehicles for CY 2015, CY 2016, and CY 2017. This generated 226 inspections for CY 2015, 244 inspections for CY 2016, and 610 inspections for CY 2017. There were much fewer inspections in CY 2015 and CY 2016 due to the closure of WIPP from February 2014 to January 2017. The CY 2017 data included 2 duplicate report numbers with identical information. One of the entries was eliminated, resulting in a total of 609 inspections for CY 2017.

One of the critical pieces of information for this report (and the previous reports relying on data from the A&I Online database) is shipment destination, which is not coded for the Level VI inspections in the A&I Online database. Shipment destination would reveal if the inspection is for a WIPP shipment. Therefore, a sequence of logical steps was developed from information that is available from the database to determine the type of shipment as 1) WIPP, 2) DOE but not WIPP, or 3) non-DOE.

The logic used was (A&I Online database field names are in all capital letters):

- 1) If TRUWASTE is checked and the CARRIER NAME/DOT NUMBER is for one of the 2 carriers designated for WIPP shipments, then it is a WIPP shipment.

- 2) If TRUWASTE is not checked and DOE FLAG is checked then it is a DOE shipment but not a WIPP shipment.
- 3) If TRUWASTE and DOE FLAG are both not checked then it is a non-DOE shipment if HRCQ is checked.

Thirty-five inspections for CY 2015, 47 inspections for CY 2016, and 65 inspections for CY 2017 could not be automatically categorized using this logic. From an expert review of information from the A&I Online database and consultation with the agencies that submitted some of the inspection reports, it was possible to assign one of the three shipment types to all but one of these 147 inspections. The one inspection that could not be assigned a shipment type was removed from the analyses. The resulting totals are 226 inspections for CY 2015, 243 inspections for CY 2016, and 609 inspections for CY 2017.

Another critical piece of information for this report (and the previous reports relying on data from the A&I Online database) that is not coded consistently in the A&I Online database for the Level VI inspections is if the violation is an out of service violation and if it is an out of service violation what type of out of service violation, that is, Level VI or NAS (Level I). CVSA had requested that FMCSA address this issue after the 2013 Inspection Report was published and again prior to the 2016 Inspection Report being published. Unfortunately, this issue has not been resolved. In earlier reports that relied on data from the A&I database, an expert review was conducted using information from the A&I database and available inspection forms for each inspection with violations to attempt to code each violation as a Level VI out-of-service violation, a Level I out of service violation, or neither. However, beginning with the July 2016 report (which covers inspections through CY 2014) it was decided to forgo the expert review and use only the information obtained from the A&I database. The only out of service violation information obtainable from the A&I database is whether or not a violation is a Level VI out-of-service violation. Additionally, the A&I database does not include the inspector comments that would be useful to determine if a violation is a Level I out of service violation. Consequently, this report like the July 2016 report (and unlike the earlier reports) does not have statistics on NAS (Level I) out of service violations and out of service violations in general.

The Tables in this Report

The following tables are the same tables used in previous inspection reports in order to maintain consistency. Once a state is added to the table it is never removed for the reason that from one year to the next a state may or may not have an inspection. For WIPP shipments, Texas submitted inspection data for the first time in 2017. For non-WIPP shipments, Arkansas submitted inspection data for the first time in 2016 and Louisiana, Minnesota, and Oklahoma submitted inspection data for the first time in 2017. Note that in this report the states and other agencies (i.e., federal and territorial) submitting inspection data are referred to as “states” in the tables and associated discussions.

Number of Shipments – WIPP

Table 1 identifies the number and type of inspections by state for WIPP shipments in 2017 (there were no shipments to WIPP in 2015 and 2016 due to the WIPP closure). Data from a total

of 331 inspections were submitted by the states during this time period. The largest number of point of origin inspections occurred in Idaho with 93 while the largest number of en route inspections occurred in New Mexico with 112.

**Table 1. WIPP Shipments: Number and type of inspections by state
(January 1, 2017 – December 31, 2017)**

State	Point of Origin	En Route	Point of Destination	Total
Arizona	0	0	0	0
California	0	0	0	0
Colorado	0	89	0	89
Georgia	0	0	0	0
Idaho	93	0	0	93
Illinois	0	0	0	0
Nevada	0	0	0	0
New Mexico	2	112	0	114
Oregon	0	0	0	0
New York	0	0	0	0
Pennsylvania	0	0	0	0
South Carolina	8	0	0	8
Tennessee	13	0	0	13
Texas	12	0	2	14
Washington	0	0	0	0
Wyoming	0	0	0	0
Total	128	201	2	331

Number of Shipments – Non-WIPP

Table 2A identifies the number and type of inspections by state for non-WIPP shipments in 2015. Data were submitted for a total of 226 CVSA Level VI inspections by the states during this time period.

Table 2B identifies the number and type of inspections by state for non-WIPP shipments in 2016. Data were submitted for a total of 243 CVSA Level VI inspections by the states during this time period.

Table 2C identifies the number and type of inspections by state for non-WIPP shipments in 2017. Data were submitted for a total of 609 CVSA Level VI inspections by the states during this time period.

**Table 2A. Non-WIPP Shipments: Number and type of inspections by state
(January 1, 2015 – December 31, 2015)**

State	Point of Origin	En Route	Point of Destination	Total
Arizona	0	7	0	7
California	8	0	0	8
Colorado	0	1	0	1
Florida	0	0	0	0
Georgia	0	0	0	0
Idaho	0	0	0	0
Illinois	2	0	0	2
Indiana	0	0	0	0
Kentucky	0	3	0	3
Maine	0	0	0	0
Maryland	21	0	0	21
Massachusetts	2	0	0	2
Michigan	51	0	0	51
Missouri	3	0	0	3
Nebraska	0	0	0	0
Nevada	0	0	0	0
New Jersey	3	0	0	3
New Mexico	0	32	0	32
New York	27	0	0	27
North Carolina	3	6	0	9
North Dakota	0	0	0	0
Ohio	1	1	0	2
Oregon	0	0	0	0
Pennsylvania	0	0	0	0
Puerto Rico	3	0	0	3
South Carolina	3	0	0	3
Tennessee	1	4	0	5
Texas	1	0	0	1
Vermont	1	0	0	1
Virginia	0	0	0	0
Washington	37	5	0	42
Wisconsin	0	0	0	0
federal	0	0	0	0
Total	167	59	0	226

**Table 2B. Non-WIPP Shipments: Number and type of inspections by state
(January 1, 2016 – December 31, 2016)**

State	Point of Origin	En Route	Point of Destination	Total
Arizona	0	1	0	1
Arkansas	1	0	0	1
California	6	0	0	6
Colorado	0	0	0	0
Florida	1	0	0	1
Georgia	0	0	0	0
Idaho	0	0	0	0
Illinois	1	0	0	1
Indiana	0	0	0	0
Kentucky	0	3	0	3
Maine	0	0	0	0
Maryland	16	0	0	16
Massachusetts	3	0	0	3
Michigan	44	0	0	44
Missouri	4	0	0	4
Nebraska	3	0	0	3
Nevada	1	0	0	1
New Jersey	4	0	0	4
New Mexico	1	34	0	35
New York	39	0	0	39
North Carolina	1	0	0	1
North Dakota	1	0	0	1
Ohio	1	0	0	1
Oregon	0	0	0	0
Pennsylvania	0	0	0	0
Puerto Rico	3	3	0	6
South Carolina	1	0	0	1
Tennessee	5	6	0	11
Texas	2	0	0	2
Vermont	2	0	0	2
Virginia	1	0	0	1
Washington	45	10	0	55
Wisconsin	0	0	0	0
federal	0	0	0	0
Total	186	57	0	243

**Table 2C. Non-WIPP Shipments: Number and type of inspections by state
(January 1, 2017 – December 31, 2017)**

State	Point of Origin	En Route	Point of Destination	Total
Arizona	0	0	0	0
Arkansas	0	0	0	0
California	5	0	0	5
Colorado	0	0	0	0
Florida	0	0	0	0
Georgia	0	0	0	0
Idaho	1	0	0	1
Illinois	0	0	0	0
Indiana	0	0	0	0
Kentucky	0	3	0	3
Louisiana	1	0	0	1
Maine	0	0	0	0
Maryland	14	0	0	14
Massachusetts	0	0	0	0
Michigan	40	0	0	40
Minnesota	3	0	0	3
Missouri	3	0	0	3
Nebraska	1	0	0	1
Nevada	0	0	0	0
New Jersey	3	0	0	3
New Mexico	0	21	0	21
New York	44	33	0	77
North Carolina	3	0	0	3
North Dakota	1	0	0	1
Ohio	2	0	0	2
Oklahoma	0	1	0	1
Oregon	0	0	0	0
Pennsylvania	0	0	0	0
Puerto Rico	2	3	0	5
South Carolina	3	1	0	4
Tennessee	6	4	0	10
Texas	3	1	0	4
Vermont	2	0	0	2

State	Point of Origin	En Route	Point of Destination	Total
Virginia	0	1	0	1
Washington	72	0	0	72
Wisconsin	0	0	0	0
federal	1	0	0	1
Total	210	68	0	278

Number of Violations

Table 3 (WIPP shipments: CY 2017) and Tables 4A, 4B, and 4C (non-WIPP shipments: CY 2015, CY 2016, and CY 2017, respectively) identify the number and type of violations found by state. The first column displays the number of inspections that identified violations and the second column displays the number of violations identified during those inspections. The other columns display the number of non out-of-service violations and out-of-service violations if known. For this report, only information on Level VI out-of-service violations is known. Information that is unknown is indicated in the tables by an “*”.

Table 3 includes a total of 2 inspections identifying 2 violations during CY 2017. Neither of the 2 violations were CVSA Level VI out-of-service violations.

Table 3. WIPP Shipments: Number and type of violations found listed by state and type of inspection (January 1, 2017 – December 31, 2017)

State	Type of Inspection	Number of Inspections Identifying Violations	Number of Violations Identified	NOT Out-of-Service Violations	Out-of-Service Violations		
					NAS	Level VI	Total
Arizona		0	0	0	0	0	0
California		0	0	0	0	0	0
Colorado	En Route	1	1	*	*	0	*
Georgia		0	0	0	0	0	0
Idaho	Point of	1	1	*	*	0	*
Illinois		0	0	0	0	0	0
Nevada		0	0	0	0	0	0
New Mexico		0	0	0	0	0	0
Oregon		0	0	0	0	0	0
South		0	0	0	0	0	0
Tennessee		0	0	0	0	0	0
Washington		0	0	0	0	0	0
Total		2	2	*	*	0	*

Table 4A includes a total of 6 inspections identifying 9 violations during CY 2015. Of those 9 violations 3 were CVSA Level VI out-of-service violations.

Table 4B includes a total of 22 inspections identifying 33 violations during CY 2016. Of those 33 violations 13 were CVSA Level VI out-of-service violations.

Table 4C includes a total of 20 inspections identifying 28 violations during CY 2017. Of those 28 violations 15 were CVSA Level VI out-of-service violations.

The appendices to this report contain lists of the violations for WIPP and non-WIPP shipments by year. Note that the data are listed as reported by the A&I Online database and therefore there is no information on NAS (Level I) out-of-service violations.

Table 4A. Non-WIPP Shipments: Number and type of violations found listed by state and type of inspection (January 1, 2015 – December 31, 2015)

State	Type of Inspection	Number of Inspections Identifying Violations	Number of Violations Identified	NOT Out-of-Service Violations	Out-of-Service Violations		
					NAS	Level VI	Total
Arizona		0	0	0	0	0	0
California		0	0	0	0	0	0
Colorado		0	0	0	0	0	0
Georgia		0	0	0	0	0	0
Idaho		0	0	0	0	0	0
Illinois		0	0	0	0	0	0
Maryland		0	0	0	0	0	0
Massachuset		0	0	0	0	0	0
Michigan	Point of	1	1	0	0	1	1
Missouri		0	0	0	0	0	0
Nevada		0	0	0	0	0	0
New Jersey		0	0	0	0	0	0
New Mexico		0	0	0	0	0	0
New York		2	3	*	*	1	*
North	En Route	1	2	*	*	1	*
Puerto Rico		0	0	0	0	0	0
Ohio		0	0	0	0	0	0
South		0	0	0	0	0	0
Tennessee		0	0	0	0	0	0
Vermont		0	0	0	0	0	0
Virginia		0	0	0	0	0	0
Washington	Point of	2	3	*	*	0	*
Total		6	9	*	*	3	*

Table 4B. Non-WIPP Shipments: Number and type of violations found listed by state and type of inspection (January 1, 2016 – December 31, 2016)

State	Type of Inspection	Number of Inspections Identifying Violations	Number of Violations Identified	NOT Out-of-Service Violations	Out-of-Service Violations		
					NAS	Level VI	Total
Arizona		0	0	0	0	0	0
California	Point of	1	1	0	0	1	1
Colorado		0	0	0	0	0	0
Georgia		0	0	0	0	0	0
Idaho		0	0	0	0	0	0
Illinois		0	0	0	0	0	0
Maryland		0	0	0	0	0	0
Massachuset		0	0	0	0	0	0
Michigan	Point of	2	2	*	*	0	*
Missouri	Point of	1	1	0	0	1	1
Nebraska	Point of	1	1	0	0	1	1
Nevada		0	0	0	0	0	0
New Jersey		0	0	0	0	0	0
New Mexico	En Route	1	1	*	*	0	*
New York	Point of	5	9	*	*	3	*
North		0	0	0	0	0	0
Puerto Rico	Point of	1	1	*	*	0	*
	En Route	2	3	*	*	0	*
Ohio		0	0	0	0	0	0
South		0	0	0	0	0	0
Tennessee	Point of	1	2	*	*	1	*
	En Route	3	4	*	*	3	*
Texas	Point of	1	5	*	*	2	*
Vermont	Point of	1	1	*	*	0	*
Virginia		0	0	0	0	0	0
Washington	En Route	2	2	*	*	1	*
Total		22	33	*	*	13	*

Table 4C. Non-WIPP Shipments: Number and type of violations found listed by state and type of inspection (January 1, 2017 – December 31, 2017)

State	Type of Inspection	Number of Inspections Identifying Violations	Number of Violations Identified	NOT Out-of-Service Violations	Out-of-Service Violations		
					NAS	Level VI	Total
Arizona		0	0	0	0	0	0
California	Point of	1	2	*	*	1	*
Colorado		0	0	0	0	0	0
Georgia		0	0	0	0	0	0
Idaho		0	0	0	0	0	0
Illinois		0	0	0	0	0	0
Kentucky	En Route	1	1	0	0	1	1
Maryland		0	0	0	0	0	0
Massachuset		0	0	0	0	0	0
Michigan		0	0	0	0	0	0
Missouri	Point of	1	1	0	0	1	1
Nebraska		0	0	0	0	0	0
Nevada		0	0	0	0	0	0
New Jersey		0	0	0	0	0	0
New Mexico	En Route	1	1	0	0	1	1
New York	Point of	3	4	0	0	4	4
	En Route	2	2	*	*	1	*
North		0	0	0	0	0	0
Puerto Rico	En Route	2	3	*	*	0	*
Ohio	Point of	1	1	*	*	0	*
South		0	0	0	0	0	0
Tennessee	Point of	1	1	*	*	0	*
Texas		0	0	0	0	0	0
Vermont	Point of	1	1	0	0	1	1
Virginia	En Route	1	2	*	*	0	*
Washington	En Route	4	5	*	*	4	*
federal	Point of	1	4	*	*	1	*
Total		20	28	*	*	15	*

Percentage of Inspections with No Violations and Violations

Table 5 (WIPP shipments: CY 2017) and Tables 6A, 6B, and 6C (non-WIPP shipments: CY 2015, CY 2016, and CY 2017, respectively) identify the percentage of inspections having no violations or violations, listed by state and type of inspection.

For WIPP shipments in CY 2017 two states reported violations found. The percentage of violations is 1.1 percent for en route inspections for Colorado and for point of origin inspections for Idaho. Tables 6A, 6B, and 6C show that for non-WIPP shipments the percentages tend to be higher than for WIPP shipments for inspections finding violations.

Table 5. WIPP Shipments: Percentage of inspections having no violations or violations listed by state and type of inspection (January 1, 2017 – December 31, 2017)

State	Type of Inspection	Number of Inspections	No Violations	Violations
Arizona		0	0.00%	0.00%
California		0	0.00%	0.00%
Colorado	En Route	89	98.88%	1.12%
Georgia		0	0.00%	0.00%
Idaho	Point of Origin	93	98.92%	1.08%
Illinois		0	0.00%	0.00%
Nevada		0	0.00%	0.00%
New Mexico	Point of Origin	2	100.00%	0.00%
	En Route	112	100.00%	0.00%
New York		0	0.00%	0.00%
Oregon		0	0.00%	0.00%
Pennsylvania		0	0.00%	0.00%
South Carolina	Point of Origin	8	100.00%	0.00%
Tennessee	Point of Origin	13	100.00%	0.00%
Texas	Point of Origin	12	100.00%	0.00%
	Point of	2	100.00%	0.00%
Washington		0	0.00%	0.00%
Wyoming		0	0.00%	0.00%

Table 6A. Non-WIPP Shipments: Percentage of inspections having no violations or violations listed by state and type of inspection (January 1, 2015 – December 31, 2015)

State	Type of Inspection	Number of Inspections	No Violations	Violations
Arizona	En Route	7	100.00%	0.00%
California	Point of Origin	8	100.00%	0.00%
Colorado	En Route	1	100.00%	0.00%
Florida		0	0.00%	0.00%
Georgia		0	0.00%	0.00%
Idaho		0	0.00%	0.00%
Illinois	Point of Origin	2	100.00%	0.00%
Kentucky	En Route	3	100.00%	0.00%
Maine		0	0.00%	0.00%
Maryland	Point of Origin	21	100.00%	0.00%
Massachusetts	Point of Origin	2	100.00%	0.00%
Michigan	Point of Origin	51	98.04%	1.96%
Missouri	Point of Origin	3	100.00%	0.00%
Nebraska		0	0.00%	0.00%
Nevada		0	0.00%	0.00%
New Jersey	Point of Origin	3	100.00%	0.00%
New Mexico	En Route	32	100.00%	0.00%
New York	Point of Origin	27	92.59%	7.41%
North Carolina	Point of Origin	3	100.00%	0.00%
	En Route	6	83.33%	16.67%
North Dakota		0	0.00%	0.00%
Ohio	Point of Origin	1	100.00%	0.00%
	En Route	1	100.00%	0.00%
Oregon		0	0.00%	0.00%
Pennsylvania		0	0.00%	0.00%
Puerto Rico	Point of Origin	3	100.00%	0.00%
South Carolina	Point of Origin	3	100.00%	0.00%
Tennessee	Point of Origin	1	100.00%	0.00%
	En Route	4	100.00%	0.00%
Texas	Point of Origin	1	100.00%	0.00%
Virginia		0	0.00%	0.00%
Vermont	Point of Origin	1	100.00%	0.00%
Washington	Point of Origin	37	94.59%	5.41%
	En Route	5	100.00%	0.00%
Wisconsin		0	0.00%	0.00%

State	Type of Inspection	Number of Inspections	No Violations	Violations
FMCSA		0	0.00%	0.00%

Table 6B. Non-WIPP Shipments: Percentage of inspections having no violations or violations listed by state and type of inspection (January 1, 2016– December 31, 2016)

State	Type of Inspection	Number of Inspections	No Violations	Violations
Arizona	En Route	1	100.00%	0.00%
Arkansas	Point of Origin	1	100.00%	0.00%
California	Point of Origin	6	83.33%	16.67%
Colorado		0	0.00%	0.00%
Florida	Point of Origin	1	100.00%	0.00%
Georgia		0	0.00%	0.00%
Idaho		0	0.00%	0.00%
Illinois	Point of Origin	1	100.00%	0.00%
Kentucky	En Route	3	100.00%	0.00%
Maine		0	0.00%	0.00%
Maryland	Point of Origin	16	100.00%	0.00%
Massachusetts	Point of Origin	3	100.00%	0.00%
Michigan	Point of Origin	44	95.45%	4.55%
Missouri	Point of Origin	4	75.00%	25.00%
Nebraska	Point of Origin	3	66.67%	33.33%
Nevada	Point of Origin	1	100.00%	0.00%
New Jersey	Point of Origin	4	100.00%	0.00%
New Mexico	Point of Origin	1	100.00%	0.00%
	En Route	34	97.06%	2.94%
New York	Point of Origin	39	87.18%	12.82%
North Carolina	Point of Origin	1	100.00%	0.00%
North Dakota	Point of Origin	1	100.00%	0.00%
Ohio	Point of Origin	1	100.00%	0.00%
Oregon		0	0.00%	0.00%
Pennsylvania		0	0.00%	0.00%
Puerto Rico	Point of Origin	3	66.67%	33.33%
	En Route	3	33.33%	66.67%
South Carolina	Point of Origin	1	100.00%	0.00%
Tennessee	Point of Origin	5	80.00%	20.00%
	En Route	6	50.00%	50.00%
Texas	Point of Origin	2	50.00%	50.00%

State	Type of Inspection	Number of Inspections	No Violations	Violations
Virginia	Point of Origin	1	100.00%	0.00%
Vermont	Point of Origin	2	50.00%	50.00%
Washington	Point of Origin	45	100.00%	0.00%
	En Route	10	80.00%	20.00%
Wisconsin		0	0.00%	0.00%
FMCSA		0	0.00%	0.00%

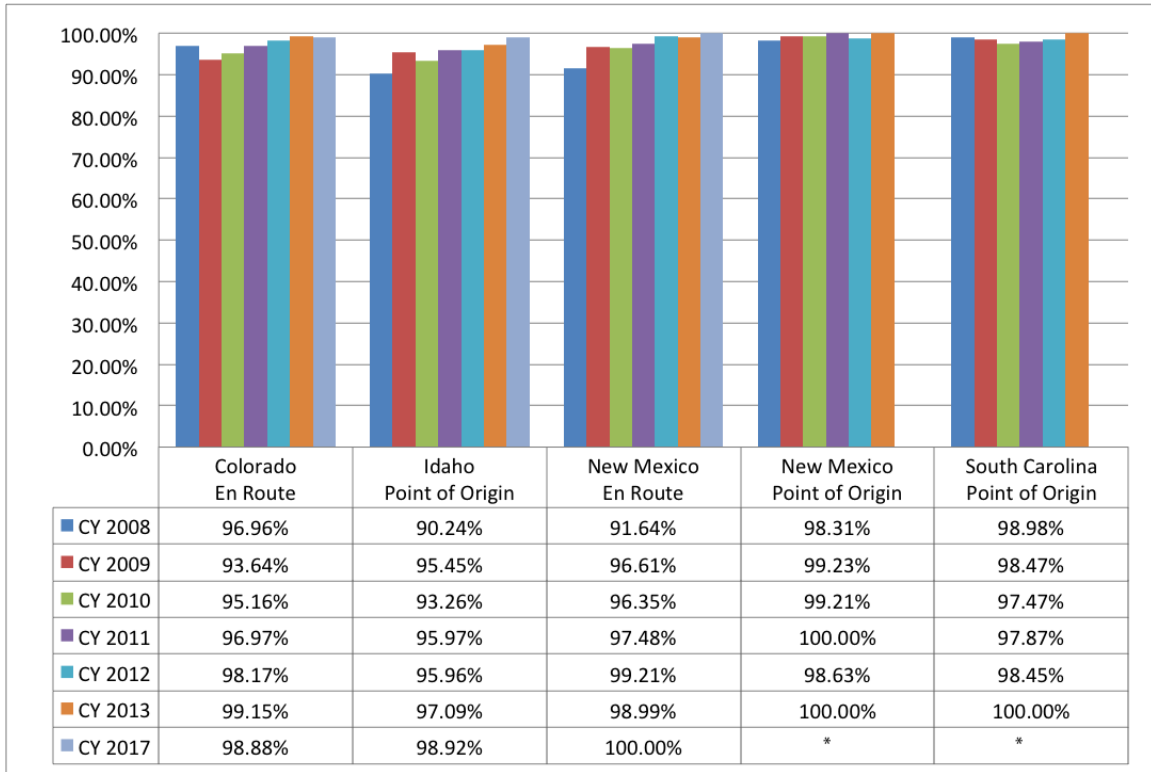
Table 6C. Non-WIPP Shipments: Percentage of inspections having no violations or violations listed by state and type of inspection (January 1, 2017– December 31, 2017)

State	Type of Inspection	Number of Inspections	No Violations	Violations
Arizona		0	0.00%	0.00%
Arkansas		0	0.00%	0.00%
California	Point of Origin	5	80.00%	20.00%
Colorado		0	0.00%	0.00%
Florida		0	0.00%	0.00%
Georgia		0	0.00%	0.00%
Idaho	Point of Origin	1	100.00%	0.00%
Illinois		0	0.00%	0.00%
Kentucky	En Route	3	66.67%	33.33%
Louisiana	Point of Origin	1	100.00%	0.00%
Maine		0	0.00%	0.00%
Maryland	Point of Origin	14	100.00%	0.00%
Massachusetts		0	0.00%	0.00%
Michigan	Point of Origin	40	100.00%	0.00%
Minnesota	Point of Origin	3	100.00%	0.00%
Missouri	Point of Origin	3	66.67%	33.33%
Nebraska	Point of Origin	1	100.00%	0.00%
Nevada		0	0.00%	0.00%
New Jersey	Point of Origin	3	100.00%	0.00%
New Mexico	En Route	21	95.24%	4.76%
New York	Point of Origin	44	93.18%	6.82%
	En Route	33	93.94%	6.06%
North Carolina	Point of Origin	3	100.00%	0.00%
North Dakota	Point of Origin	1	100.00%	0.00%
Ohio	Point of Origin	2	50.00%	50.00%
Oklahoma	En Route	1	100.00%	0.00%

State	Type of Inspection	Number of Inspections	No Violations	Violations
Oregon		0	0.00%	0.00%
Pennsylvania		0	0.00%	0.00%
Puerto Rico	Point of Origin	2	100.00%	0.00%
	En Route	3	33.33%	66.67%
South Carolina	Point of Origin	3	100.00%	0.00%
	En Route	1	100.00%	0.00%
Tennessee	Point of Origin	6	83.33%	16.67%
	En Route	4	100.00%	0.00%
Texas	Point of Origin	3	100.00%	0.00%
	En Route	1	100.00%	0.00%
Virginia	En Route	1	0.00%	100.00%
Vermont	Point of Origin	2	50.00%	50.00%
Washington	Point of Origin	72	94.44%	5.56%
Wisconsin		0	0.00%	0.00%
FMCSA	Point of Origin	1	0.00%	100.00%

In the fifth inspection report (covering Level VI inspections conducted in CY 2008 and CY 2009) it is stated that the percentages of inspections of WIPP shipments with no violations found for almost all states increased over time, meaning fewer and fewer inspections were finding violations. This was also noted in the sixth inspection report (covering the CY 2010 - CY 2012 time frame) and the seventh inspection report (covering CY 2013 and CY 2014, but considered only the CY 2013 inspections of WIPP shipments due to the WIPP closure in 2014). For CY 2017 the trend continues as only 2 states had one inspection that found one violation. Figure 1 shows the percentages of inspections of WIPP shipments with no violations found for CY 2008 – CY 2017 for those states with more than 50 inspections in each year. Data for 2014-2016 are not included in Figure 1 due to the WIPP closure from February 2014 to January 2017.

Figure 1. WIPP Shipments: Percentage of inspections with no violations found for states with more than 50 inspections in each year



*No data since less than 51 inspections for the year

Percentage of Point of Origin and En Route Inspections with No Violations and Violations

Table 7 shows the overall percentage of inspections having no violations and violations at the point of origin and en route for WIPP shipments for CY 2017.

Tables 8A, 8B, and 8C show the overall percentage of inspections having no violations and violations at the point of origin and en route for non-WIPP shipments for CY 2015, CY 2016, and CY 2017, respectively.

For WIPP shipments, there continues to be a general trend over time in a higher percentage of inspections finding no violations. For non-WIPP shipments the percentages are noticeably higher than for WIPP shipments for inspections finding violations.

Table 7. WIPP Shipments: Percentage of point of origin and en route inspections with no violation and with violations (January 1, 2017 – December 31, 2017)

Inspection Location	Number of Inspections	No Violations	Violations
Point of Origin	128	99.22%	0.78%
En Route	201	99.50%	0.50%

Table 8A. Non-WIPP Shipments: Percentage of point of origin and en route inspections with no violation and with violations (January 1, 2015 – December 31, 2015)

Inspection Location	Number of Inspections	No Violations	Violations
Point of Origin	167	97.01%	2.99%
En Route	59	98.31%	1.69%

**Table 8B. Non-WIPP Shipments: Percentage of point of origin and en route inspections with no violation and with violations
(January 1, 2016 – December 31, 2016)**

Inspection Location	Number of Inspections	No Violations	Violations
Point of Origin	186	92.47%	7.53%
En Route	57	85.96%	14.04%

**Table 8C. Non-WIPP Shipments: Percentage of point of origin and en route inspections with no violation and with violations
(January 1, 2017 – December 31, 2017)**

Inspection Location	Number of Inspections	No Violations	Violations
Point of Origin	210	93.81%	6.19%
En Route	68	89.71%	10.29%

Comparison with Non-WIPP Shipments and Federal Motor Carrier Safety Administration Data

Table 9 is the comparison of WIPP and non-WIPP CVSA Level VI inspections for CY 2017 (there are no data for CY 2015 and CY 2016 because of the WIPP closure during those years). Note that due to the lack of identification of Level I out-of-service violations in the A&I Online database there are no statistics on NAS (Level I) out of service violations and out of service violations in general (indicated in the tables by a “-”). Continuing a trend found in previous years, the percentages of inspections finding violations and the Level VI out of service rates are considerably larger for non-WIPP shipments than for WIPP shipments.

Table 10 allows comparison of CVSA Level VI inspection information reported under the WIPP transportation program to roadside inspection data for CY 2017 from the Federal Motor Carrier Safety Administration (FMCSA).

Of the 2 WIPP inspections in CY 2017 that found violations, there were no Level VI out-of-service violations. Due to the lack of identification of Level I out of service violations in the A&I Online database there are no statistics on NAS (Level I) out-of-service violations and out-of-service violations in general.

There continues to be a trend over time towards lower percentages of violations found and lower Level VI out-of-service rates for CVSA Level VI inspections of WIPP shipments. For non-WIPP shipments the percentages over time of violations found remains between 4% and 11% and the Level VI out of service rates over time are typically below 5%. With the exception of the 2017 non-WIPP Level VI out-of-service rate, these percentages are considerably lower than those reported by FMCSA for roadside and hazardous materials inspections during the same time periods.

The data collected over the past decade continues to show a trend of significantly low percentage of violations discovered, much lower than the collective data for the commercial vehicle industry.

It is CVSA’s opinion that DOE, WIPP, the states, the carriers, and other interested parties are to be commended for the more than seventeen years of hard work and dedication that have gone into the WIPP shipping program and inspections that continue to show progress and improvement. It is important to keep up this dedication to continue insuring that the WIPP shipping campaign is as safe as possible.

Table 9. WIPP Shipments in CY 2017: Comparison with Non-WIPP shipments

CVSA Level VI Inspection Data for WIPP Shipments (January 1, 2017 – December 31, 2017)				
Inspection Activity	Number	Percent	Level I OOS Percent	Level VI OOS Percent
Number of Inspections	331			
With no Violations	329	99.40%		
With Violations	2	0.60%		
Driver OOS* Rate	-	-	-	0.00% (N=0)
Vehicle OOS Rate	-	-	-	0.00% (N=0)
CVSA Level VI Inspection Data for Non-WIPP Shipments (January 1, 2017 – December 31, 2017)				
Inspection Activity	Number	Percent	Level I OOS Percent	Level VI OOS Percent
Number of Inspections	278			
With no Violations	258	92.81%		
With Violations	20	7.19%		
Driver OOS* Rate	-	-	-	0.00% (N=0)
Vehicle OOS Rate	-	-	-	5.40% (N=15)

*OOS = Out-of-Service

Table 10. 2017 FMCSA inspection data

FMCSA Roadside Inspection Data for the Year 2017*			FMCSA HAZMAT Inspection Data for the Year 2017*		
<i>Inspection Activity</i>	<i>Number</i>	<i>Percent</i>	<i>Inspection Activity</i>	<i>Number</i>	<i>Percent</i>
Number of Inspections	3,453,380		Number of Inspections	199,834	
With no Violations	1,437,877	41.64%	With no Violations	N/A***	N/A
With Violations	2,015,503	58.36%	With Violations	N/A	N/A
Driver OOS** Rate [†]	171,038	5.12%	OOS Rate	7,928	3.97%
Vehicle OOS Rate [†]	493,330	20.73%			

†The number of inspections is a combination of some Driver, some Vehicle, and some combination of both. The OOS Rate is for this subgroup of all inspections.

*Data Source: FMCSA Motor Carrier Management Information System (MCMIS) February 23, 2018 data snapshot from <http://ai.fmcsa.dot.gov/SafetyProgram/RoadsideInspections.aspx>

**OOS = Out of Service

***N/A = Data not available

Overall CVSA Level VI Program – WIPP Shipments

Table 11 is a summary of the Level VI inspection program for WIPP shipments through December 31, 2017 (excluding the CY 2007 data for reasons discussed at the beginning of this report). Since March 24, 1999, there have been 22,844 CVSA Level VI inspections analyzed. Of these inspections, 94.10 percent found no violations, a slight increase from the 94.02 percent in the seventh (CY 2013 and CY 2014) inspection report. The Level VI out of service rate for vehicles slightly decreased from 1.11 percent in the seventh inspection report to 1.09 percent for this report. The Level VI driver out-of-service rate remains essentially the same at 0.01 percent. Note that due to the lack of identification of Level I out-of-service violations in the A&I Online database there are no statistics on NAS (Level I) out of service violations and out-of-service violations in general (indicated in the table by a “-”).

Table 11. Review of entire CVSA Level VI Inspections for WIPP shipments

CVSA Level VI Inspection Data for WIPP Shipments (March 24, 1999 – December 31, 2006 and January 1, 2008 – December 31, 2017)				
<i>Inspection Activity</i>	<i>Number</i>	<i>Percent</i>	<i>Level I OOS Percent</i>	<i>Level VI OOS Percent</i>
Number of Inspections	22,844			
With no Violations	21,496	94.10%		
With Violations	1,348	5.90%		
Driver OOS* Rate	-	-	-	0.01% (N=2)
Vehicle OOS* Rate	-	-	-	1.09% (N=249)

*OOS = Out-of-Service

Conclusions

Data for this report were obtained electronically from the A&I Online website. As noted in the previous CY 2008 – CY 2009, CY 2010 – CY 2012, and CY 2013 - CY 2014 reports, there continues to be deficiencies with this data source with respect to producing this report. The shipment origin and destination are not identified, Level I out of service violations are not identified, and inspector comments are not provided. Some of the statistics given in past reports are not included in this report due to this lack of information available from the A&I Online website. Shipment origin and destination, type of out of service violation, and inspector comments are data items on the inspection form and CVSA again recommends that these items be made available on the A&I Online website.

In the process of reviewing the available data from the A&I Online website, CVSA again noted deficiencies in the reporting of inspection data similar to those found in the previous inspection reports. For example, there were 2 duplicate report numbers with identical information, one report with insufficient information to categorize the shipment type, and inconsistent reporting of shipments as TRU waste, DOE, or HRCQ. These issues suggest a continuing need for care in submitting inspection data and additional emphasis for inspector training and inspection review at the state level to insure correct data are being submitted to SAFETYNET. CVSA will continue to provide Level VI inspectors with the information to address these issues.

Even with the limitations described above there are sufficient data to conclude that the violation rates from Level VI inspections, particularly for WIPP shipments remain very low over time. The ultimate goal of the CVSA Level VI inspection program is and will continue to be the safe and uneventful shipments of radioactive materials from point of origin to destination. The data shows a continuing trend of a low percentage of violations and out of service violations at the point of origin. The data also continues to show a significantly low number of violations and out of service violations from en-route Level VI inspections. Many states that are required to conduct an en-route inspection have chosen to exercise their option and conduct a Level II or Level III inspection in lieu of a complete Level VI en-route inspection. This information has been verified during Level VI Peer Reviews conducted over the past 13 years. The states, carriers, DOE, and private industry can be proud of their continued safety program excellence as supported by the overall reduction of the violation rates. The program should continue to strive for low out-of-service rates, which ultimately lead to a low number of incidents. WIPP shipments continue to be one of the safest commercial truck shipments today.

Appendix A

List of WIPP Shipment Violations - CY 2017

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Semi-Trailer	8/16/2017	Fort Collins Poe Sb	En Route	393.205C - Wheel Fasteners Loose And/Or Missing		
Semi-Trailer	9/13/2017	Inl	Point of Origin	393.48A - Inoperative/Defective Brakes		

* The A&I Online database does not provide information on NAS (Level I) out of service violations

Appendix B

List of Non-WIPP Shipment Violations - CY 2015

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Driver	3/2/2015	Orleans (Wellesley Island)	Point of Origin	395.3A2/R - 14 Hour Rule Violation (Property)		
Driver	3/2/2015	Orleans (Wellesley Island)	Point of Origin	395.3A1/R - 11 Hour Rule Violation (Property)		
Driver	4/20/2015	Blue Water Bridge	Point of Origin	383.23A2 - Operating A Cmv Without A Cdl		Y
Driver	6/1/2015	Orleans (Wellesley Island)	Point of Origin	395.8E - False Report Of Drivers Record Of Duty Status		Y
Semi-Trailer	4/30/2015	Battelle Blvd	Point of Origin	393.55D3 - No Or Defective Abs Malfunction Indicator For Towed Vehicles On Vehicles Manufactured After February 2001		
Semi-Trailer	8/21/2015	Mt. Airy Weigh Station S	En Route	393.9 - Inoperable Required Lamp		
Semi-Trailer	8/21/2015	Mt. Airy Weigh Station S	En Route	393.75A3 - Tire-Flat And/Or Audible Air Leak		Y
Truck Tractor	4/30/2015	Battelle Blvd	Point of Origin	393.55D2 - Cmv Manufactured On/After 3/1/2001 Not Equipped With Abs Malfunction Circuit / Lamp From Towed Vehicle In Cab.		
Truck Tractor	5/21/2015	Hanford	Point of Origin	393.55D1 - Cmv Not Equipped With Abs Malfunction Circuit Or Signal (Truck-Tractor Mfg On/After 3/1/1997; Straight Truck Mfg On/After 3/1/1998)		

* The A&I Online database does not provide information on NAS (Level I) out of service violations

Appendix C

List of Non-WIPP Shipment Violations - CY 2016

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Driver	6/20/2016	Orleans (Wellesley Island)	Point of Origin	395.3A3-PROP - Driving Beyond 11 Hour Driving Limit In A 14 Hour Period. (Property Carrying Vehicle)		
Driver	6/20/2016	Orleans (Wellesley Island)	Point of Origin	395.3A2-PROP - Driving Beyond 14 Hour Duty Period (Property Carrying Vehicle)		
Driver	7/30/2016	Blue Water Bridge	Point of Origin	387.7F - No Proof Of Financial Responsibility (Mcs-90 Or Mcs-82) - Foreign Carriers		
Driver	7/30/2016	Blue Water Bridge	Point of Origin	387.7F - No Proof Of Financial Responsibility (Mcs-90 Or Mcs-82) - Foreign Carriers		
Intermodal Chassis	4/5/2016	Fm-1472 In Webb Co. (408-440)	Point of Origin	393.45B2UV - Brake Hose Or Tubing Chafing And/Or Kinking Under Vehicle		
Intermodal Chassis	4/5/2016	Fm-1472 In Webb Co. (408-440)	Point of Origin	393.201A - Frame Cracked / Loose / Sagging / Broken		Y
Intermodal Chassis	4/5/2016	Fm-1472 In Webb Co. (408-440)	Point of Origin	393.45UV - Brake Tubing And Hose Adequacy Under Vehicle		Y
Intermodal Chassis	4/5/2016	Fm-1472 In Webb Co. (408-440)	Point of Origin	393.45DLUV - Brake Connections With Leaks Under Vehicle		
Intermodal Chassis	4/5/2016	Fm-1472 In Webb Co. (408-440)	Point of Origin	396.3A1 - Inspection, Repair And Maintenance Of Parts & Accessories		
Intermodal Chassis	6/23/2016	Isla Grande, Pr	En Route	390.21H3 - Iep Failing To Mark/Identify Equipment With "Usdot" Number As Required.		
Intermodal Chassis	9/1/2016	Isla Grande, Pr	En Route	390.21H3 - Iep Failing To Mark/Identify Equipment With "Usdot" Number As Required.		

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Intermodal Chassis	9/1/2016	Isla Grande, Pr	En Route	396.17C - Operating A Cmv Without Proof Of A Periodic Inspection		
Semi-Trailer	2/12/2016	Sc33 Bow Hill (Poe)	En Route	393.9TS - Inoperative Turn Signal		Y
Semi-Trailer	4/19/2016	Rest Area At State Line	En Route	393.75C - Tire-Other Tread Depth Less Than 2/32 Of Inch Measured In 2 Adjacent Major Tread Grooves		Y
Semi-Trailer	4/19/2016	Roadside	En Route	393.75A2 - Tire-Tread And/Or Sidewall Separation		Y
Semi-Trailer	4/19/2016	Roadside	En Route	392.2WC - Wheel (Mud) Flaps Missing Or Defective		
Semi-Trailer	6/23/2016	Broken Bow	Point of Origin	393.48A - Inoperative/Defective Brakes		Y
Semi-Trailer	7/9/2016	Orleans (Wellesley Island)	Point of Origin	393.45B2 - Brake Hose Or Tubing Chafing And/Or Kinking		Y
Semi-Trailer	7/18/2016	Orleans (Wellesley Island)	Point of Origin	393.45 - Brake Tubing And Hose Adequacy		
Semi-Trailer	7/18/2016	Orleans (Wellesley Island)	Point of Origin	393.45 - Brake Tubing And Hose Adequacy		
Semi-Trailer	8/13/2016	Orleans (Wellesley Island)	Point of Origin	393.48A - Inoperative/Defective Brakes		
Semi-Trailer	8/18/2016	Sc54 Plymouth(Poe)	En Route	393.19 - Inoperative/Defective Hazard Warning Lamp		
Semi-Trailer	8/23/2016	Tva	Point of Origin	393.25F - Stop Lamp Violations		Y
Semi-Trailer	10/29/2016	Orleans (Wellesley Island)	Point of Origin	393.126C3 - Front And Rear Of Loaded Intermodal Container Not Secured Independently When Transported On Vehicle Other Than Container Chassis		Y
Semi-Trailer	12/8/2016	Rest Area	En Route	393.25F - Stop Lamp Violations		Y
Truck Tractor	4/4/2016	1401 Morgan Circle, Tustin	Point of Origin	393.45B2 - Brake Hose Or Tubing Chafing And/Or Kinking		Y

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Truck Tractor	6/27/2016	Derby Port Of Entry	Point of Origin	393.95A - No/Discharged/Unsecured Fire Extinguisher		
Truck Tractor	7/7/2016	Vega Alta, Pr	Point of Origin	396.5B - Oil And/Or Grease Leak		
Truck Tractor	7/9/2016	Orleans (Wellesley Island)	Point of Origin	393.11 - No Or Defective Lighting Devices Or Reflective Material As Required		
Truck Tractor	7/9/2016	Orleans (Wellesley Island)	Point of Origin	393.45B2 - Brake Hose Or Tubing Chafing And/Or Kinking		Y
Truck Tractor	8/16/2016	Mo 163 S/O 740	Point of Origin	396.3A1DSCB - Center Bearing (Carrier Bearing) Cracked / Loose / Broken / Missing		Y
Truck Tractor	8/23/2016	Tva	Point of Origin	393.45 - Brake Tubing And Hose Adequacy		
Truck Tractor	8/24/2016	Sp District 6 Gallup Poe	En Route	396.5B - Oil And/Or Grease Leak		

* The A&I Online database does not provide information on NAS (Level I) out of service violations

Appendix D

List of Non-WIPP Shipment Violations - CY 2017

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Driver	6/17/2017	Isla Grande, Pr	En Route	177.817A - No Or Improper Shipping Papers (Carrier)		
Driver	12/18/2017	Point-Of-Origin	Point of Origin	395.22A - Operating With A Device That Is Not Registered With Fmcsa		
Intermodal Chassis	10/20/2017	Port Of Everett	Point of Origin	396.3A1 - Inspection, Repair And Maintenance Of Parts & Accessories		
Intermodal Chassis	10/20/2017	Port Of Everett	Point of Origin	393.201A - Frame Cracked / Loose / Sagging / Broken		Y
Intermodal Chassis	12/29/2017	Sc33 Bow Hill (Poe)	Point of Origin	393.9 - Inoperable Required Lamp		Y
Semi-Trailer	4/11/2017	Oakland Area	Point of Origin	393.45D - Brake Connections With Leaks Or Constrictions		
Semi-Trailer	5/25/2017	Orleans (Wellesley Island)	Point of Origin	393.104F3 - Loose Or Unfastened Tiedown.		Y
Semi-Trailer	5/25/2017	Orleans (Wellesley Island)	Point of Origin	393.104F3 - Loose Or Unfastened Tiedown.		Y
Semi-Trailer	8/14/2017	Tva Watts Bar	Point of Origin	393.25E - Lamp Not Steady Burning		
Semi-Trailer	10/5/2017	Catlettsburg	En Route	393.75A3 - Tire-Flat And/Or Audible Air Leak		Y
Semi-Trailer	10/5/2017	Orleans (Wellesley Island)	En Route	393.9 - Inoperable Required Lamp		
Semi-Trailer	11/4/2017	At White'S Truck Stop	En Route	393.9 - Inoperable Required Lamp		
Semi-Trailer	11/4/2017	At White'S Truck Stop	En Route	392.2IRP - Irp Apportioned Tag Or Registration Violation		
Semi-Trailer	11/15/2017	Mo 163 S/O 740	Point of Origin	393.45DLUV - Brake Connections With Leaks Under Vehicle		Y
Truck Tractor	2/22/2017	Sp District 6 Gallup Poe	En Route	393.45 - Brake Tubing And Hose Adequacy		Y
Truck Tractor	4/11/2017	Oakland Area	Point of Origin	393.45B2 - Brake Hose Or Tubing Chafing And/Or Kinking		Y

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Truck Tractor	4/24/2017	Derby Welcome Center	Point of Origin	393.48A - Inoperative/Defective Brakes		Y
Truck Tractor	5/25/2017	Orleans (Wellesley Island)	Point of Origin	393.75A - Flat Tire Or Fabric Exposed		Y
Truck Tractor	6/12/2017	Orleans (Wellesley Island)	Point of Origin	393.45UV - Brake Tubing And Hose Adequacy Under Vehicle		Y
Truck Tractor	6/17/2017	Muelle San Juan	En Route	177.817A - No Or Improper Shipping Papers (Carrier)		
Truck Tractor	6/17/2017	Isla Grande, Pr	En Route	396.17C - Operating A Cmv Without Proof Of A Periodic Inspection		
Truck Tractor	7/28/2017	Orleans (Wellesley Island)	En Route	393.45UV - Brake Tubing And Hose Adequacy Under Vehicle		Y
Truck Tractor	9/23/2017	Matson Steamship Terminal	Point of Origin	172.602B - Form And Manner Of Emergency Response Information		
Truck Tractor	9/23/2017	Matson Steamship Terminal	Point of Origin	393.201A - Frame Cracked / Loose / Sagging / Broken		Y
Truck Tractor	9/23/2017	Matson Steamship Terminal	Point of Origin	177.817A - No Or Improper Shipping Papers (Carrier)		
Truck Tractor	9/23/2017	Matson Steamship Terminal	Point of Origin	393.45B2 - Brake Hose Or Tubing Chafing And/Or Kinking		
Truck Tractor	10/20/2017	Port Of Everett	Point of Origin	396.3A1B - Brakes (General) Explain:		Y
Truck Tractor	10/20/2017	Port Of Everett	Point of Origin	393.75B-OOS - Tire-Front Tread Depth Less Than 2/32 Of Inch On A Major Tread Groove		Y

* The A&I Online database does not provide information on NAS (Level I) out of service violations