

Standard Operating Procedures

Approval:	Don Miller	Approval Date:	04/29/2015
Author:	Larry Killingsworth	Creation Date:	04/29/2015
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POLICY

It is the Policy of GP Cedar Springs that all trailers must pass a comprehensive safety and integrity inspection before being dropped in the trailer pool or put to a dock to be loaded. It is the Policy of GP Cedar Springs that Paper Transport Inc. will be responsible for conducting the trailer inspections and ensuring that all inspections are documented on the trailer inspection sheet. Any trailer that does not meet the outlined guidelines will be rejected and fully documented.

PROCEDURE

All trailers entering the facility must stop at the Drop Yard Inspection Station and be inspected. The Gate Clerk will follow the outlined procedure when conducting the inspections:

GUIDELINES

- The Gate Clerk must ensure that they have all required PPE before conducting the inspection.
- All inspections will be documented on the trailer inspection form.
- Any rejected trailer will be documented on the rejected trailer form.
- The Gate Clerk will ensure that the tractor is shut off and that the driver is at the back of the trailer before approaching the trailer.
- The driver is responsible for opening the trailer doors. The Gate Clerk will remain at a safe distance until the door is opened.
- The Gate Clerk will instruct the driver that they must remain at the base of the ladder stairs or dock while the Gate Clerk is inside inspecting the trailer. The driver will be responsible for ensuring his/her trailer is cleaned and acceptable for loading. Brooms and shovels will be provided for the cleaning process.
- All trailers that pass inspection must slide the tandems back before entering the facility.
- **UNDER NO CIRCUMSTANCES WILL THE GATE CLERK RECOMMEND OR CONTACT ANYONE TO REPAIR THE TRAILER. THIS IS THE DRIVER'S RESPONSIBILITY.**

The following Key Trailer components pose the greatest risk of failure. The Gate Clerk must pay special attention to detail when inspecting these components:

- **Base Side Rails**
- **Top Rail**
- **Cross-members**

Basic Guidelines for Critical Repairs to Top and Bottom Side Rails:

- Three-piece rail splices are NOT acceptable. To state this in another way, there can be only ONE splice or repair patch made in the entire run of either a top or base rail.
- If a section of rail must be removed due to damage, a new section must extend from the area of the repair all the way to either the front or rear of the trailer. Thus, there is only ONE splice.
- The area of the splice must have both an outer and inner reinforcement plate (backing plate).
- Welded repairs must also be reinforced with a reinforcement plate.
- Bottom rails that have a replaced section in the front of the trailer MUST extend to the center-line of the landing gear legs.
- Fasteners should consist of 3/8" diameter hard bucking rivets or S.A.E. grade 5 stainless steel carriage bolts of the same diameter.

Reinforcement Plates for Sectional Repairs – Top & Bottom Rails:

- For the outer top or bottom rail the section must be a minimum of 48" in length, 2 ½" in height, and 1/8" thick bar stock, centered on the repair.
- For the inner top or bottom rail the section must be a minimum of 18 ½" in length, 3 ½" in height, and 1/8" thick bar stock, centered on the repair.
- Rivets holes should match the original holes or if new holes are required should be on 2" centers.

Cross-members:

There are no recognized or acceptable repairs that can be made to cross-member sections. If split, cracked, etc. the cross-member should be removed and replaced with a new section that runs the entire width of the trailer.

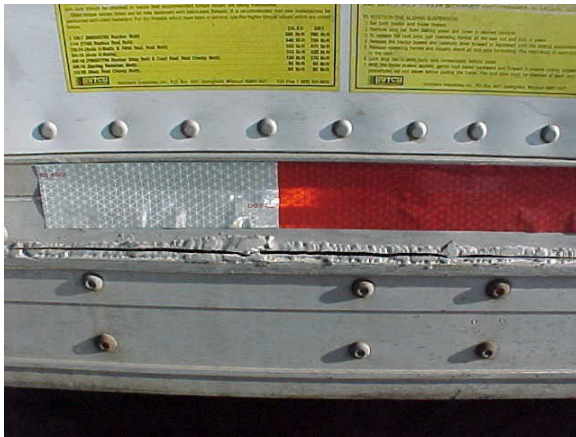
SIDE RAILS AND BASE RAIL DEFECTS



This picture illustrates defects at the point where the side skin and base rail are joined. There are several missing rivets at various sections within an area of a few feet. This unit is a candidate for rejection and should be rejected if: (1) the missing hardware (rivets) is from the attachment to the base rail and (2) the unit is used for heavy hauling.

The trailer could be used for light loads (drums of ink or single stacked loads of finished product) provided the loading/unloading is done by hand (ink drums) or by using light weight trucks (walkers).

Heavier loads could be unloaded if a support jack is used to support the trailer bed during the unloading process. After unloading, the trailer IS NOT to be reloaded and the hauler is to be advised of the defect and our rejection. (Refer to the additional information and illustrations shown later in the document.)



The picture to the left illustrates a separation at the side rail and base rail sections of a trailer related to a faulty weld.

This is a critical flaw and the trailer should be **rejected** without regard to the material being unloaded.

BASE RAIL REPAIR EXAMPLES



The picture to the left illustrates an acceptable repair to the base rail.

The stock material is of similar type, width and strength and all rivets (black heads) are solid and intact.

The outer (exterior) backing plate must be a minimum of 4 feet in length with a minimum width of 3 1/2" and a minimum of 1/8" thick.

The rivet pattern matches the holes (spacing) of the original rail and is adequate. There must also be an inner backing (reinforcement) plate that is a minimum of 18 1/2" x 2 1/2" x 1/8". This trailer can be loaded.



The unit to the left shows what appears to be a repair but is actually a reinforcement plate used to assist the transfer of the trailer when shipped via flatbed railcar (intermodel).

However, note that the side panels show obvious abuse as you can see the dents, ripples and bowing of the side panels.

When you see visible evidence of abuse it is extremely important that the structural components of the trailer be given a more thorough inspection.

TOP RAIL – STRUCTURAL REPAIR



This picture illustrates a repair made to the top rail of a trailer. The repair is of similar or like material as the original material and has all rivets intact. A sealer (not visible) was used for weather-proofing. This is a good attempt at a sound structural repair but to meet the minimum criteria for an acceptable repair, the length of the outer patch should be no less than 4' in length. Given the rivet pattern, this backing plate appears to be approximately 12" in length. If the length of the outer plate met the minimum length AND had an adequate inner plate, the repair would be acceptable. As shown, this is

not as adequate repair. The hauler is to be advised of the defect.



A repair was also made to the top rail of this unit; but, instead of using similar material only a short" piece of metal was used to correct the separation in the top rail.

This is an INSUFFICIENT repair and should result in the rejection of the unit. Again, if necessary, the unit could be unloaded with the proper use of trailer jacks but MUST NOT be reloaded. The hauler is to be advised of the defect.

CROSS MEMBER STRUCTURAL DEFECTS



The pictures above illustrate structural failures in the cross-members of a trailer. These defects require the rejection of the trailer regardless of the material being loaded/unloaded or equipment used.

TRAILER SUPPORT JACKS



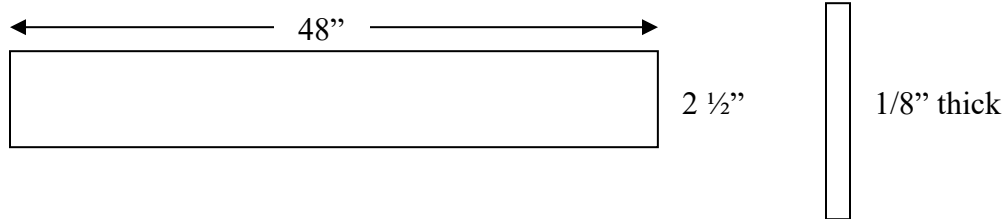
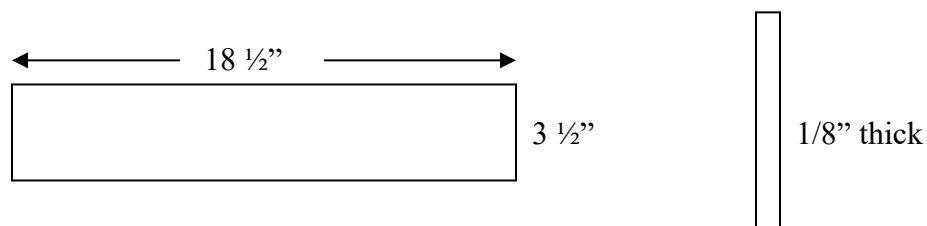
The pictures above illustrate the use of trailer support jacks. These jacks can be used to provide



temporary support for a trailer with an inadequate repair when it becomes necessary to unload a product; i.e., baled waste paper. Once unloaded, the trailer IS NOT to be reloaded.

Rail Reinforcement Plates

There is no federal standard covering trailer repairs and the dimensions of reinforcement plates used to affect repairs made to the base or top rail. However, the generally accepted standards for reinforcement plates are shown below and are based upon a review of standards used by several trailer repair companies.

Outer Rail Reinforcement Plate:**Inner Rail Reinforcement Plate:****Rivet and Rivet Spacing:**

Rivet spacing should match the spacing on the original trailer or be on 2" centers. Rivets used to secure the plates should be 3/8" hard bucking rivets or S.A.E. minimum grade 5 hex head stainless steel carriage of the same diameter. Bolts should be secured with flat washers and lock nuts with caulking added for weather-proofing.

Notes:

1. The drawings above were not drawn to scale.
2. Rivets used to repair the outer "skin" to their vertical brackets will generally be with 1/4" or 3/16" rivets. The 3/8" rivets mentioned above pertain to base and top rail repairs that involve reinforcement plates.