



Manhole Cover Inspection Policy

Philadelphia, PA

HWY23FH014

(3 pages)



Fuel Tanker Manhole Cover Inspection Policy

This policy covers the proper inspection of the company's Fuel Tanker Manhole Covers.

Definition:

Manhole Cover-

The top of Fuel Tankers are fitted with roll-over devices (Manhole Covers) that in the event of a rollover will seal the aperture. The danger on the top of the tanker is that the expansion and contraction of the fuel mean that each compartment must be able to breathe (or the pressure in the tank could fracture it catastrophically). Each compartment of a Fuel Tanker has a Manhole Cover.

Background-

The liabilities caused by leakage from the manhole cover of fuel tanker. In a recent 2021 incident, a Fuel Tanker was steam cleaned and the Manhole Covers were open to air-dry the tanker before use. When time came to secure the Manhole Covers, one cover was not secured properly. It was not caught by the driver's Pre-Trip inspection because it is company policy NOT to allow drivers to climb up or on the top of a Fuel Tanker. The Manhole Cover had been left completely unsecured, allowing leakage and causing an environmental spill.

Risk Assessment-

An incident such as the one described above could continue to happen again if not addressed. In this case, investigation shows this was because of a disregard for the safety procedure and lack of multiple inspections.

Control Measures-

Manhole Cover inspections are mandatory by Penn Tank Line's Company Shops, Company Drivers and Independent Contractors (IC).

Company Shops-

- Routine maintenance on the fuel tanker will include the required Manhole Cover securement check.
- Any Fuel Tanker that returns from an outside vendor will include the required Manhole Cover securement check by the company shop.

Company Drivers and Independent Contractors-

- As part of the driver/IC Pre-Trip inspection on the Fuel Tanker, the driver/IC is required to check Manhole Covers for securement.
- Company Policy does not allow the driver/IC to climb onto the top of the fuel tanker. **In order to complete this task, the driver/IC will use a 3 point stance to step onto the deck plate of the tractor, using a telescopic mirror to look from the front to the rear of the top of the fuel tanker and confirm all manhole covers are secured.**
- Report to dispatch or shop immediately for instructions if a manhole cover is found unsecured.

Exceptions-

In certain instances a person will be permitted to climb on to the top on the tank.

- Routine maintenance completed by company mechanic.
- Repair completed by company mechanic.
- An approved specialized function that requires a driver or IC.
- With approval of the Risk Department.
- With the approval of the Director of Maintenance.

Corrective Action/Disciplinary Policy-

The company strives to employ drivers, mechanics, and staff and to contract with operator/affiliates who choose to work safety. When an employee or operator/affiliate makes an initial, non-routine error in their normal, safe work practices, the company's willing to work with its people through training, education and discussion to change the incorrect behavior. However, when unresolved trends in such errors or behavior failures are recognized, the company intends to move quickly to discharge and permanently disqualify the employee or operator/affiliate. Inspection of equipment is not only Federal Regulation, it is Penn Tank Lines Policy. Failing to perform this inspection will be addressed through the company's progressive point system.