

UNITED STATES OF AMERICA

NATIONAL TRANSPORTATION SAFETY BOARD

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Investigation of:

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SHIPBOARD FIRE ABOARD THE *HOËGH*
XIAMEN IN JACKSONVILLE, FLORIDA,
ON JUNE 4, 2020

Accident No.: DCA20FM020

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Interview of: JEFFERY DIXON, Stevedore
SSA Atlantic

Jacksonville, Florida

Wednesday,
June 10, 2020

APPEARANCES:

MARCEL L. MUISE, Marine Accident Investigator
National Transportation Safety Board

JOSEPH PANAGIOTOU, Fire and Explosion Investigator
National Transportation Safety Board

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U.S. Coast Guard, Sector Jacksonville

LT [REDACTED] [REDACTED] Investigator
U.S. Coast Guard, Sector Jacksonville

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MARK THOMPSON, Attorney
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TODD BAIAD, Attorney
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(On behalf of Grimaldi Deep Sea)

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I N T E R V I E W

(12:00 p.m.)

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2
3 LTJG [REDACTED] All right, good afternoon, everyone. It's
4 approximately noon on June 10th, 2020. We're here to conduct
5 interviews with the longshoreman stevedore company, Atlantic SSA
6 [sic], who loaded the vessel *Hoëgh Xiamen* on June 3rd and 4th.
7 With us here, we are going to be interviewing Mr. Jeffery Dixon.

8 We'll go around the table here, introduce ourselves,
9 we'll ask all the parties on the phone to introduce themselves,
10 and then we'll commence with the interview.

11 Like I said, my name's LTJG [REDACTED] [REDACTED] with the Coast
12 Guard, an investigator here in Jacksonville.

13 MR. [REDACTED] Good morning. I'm [REDACTED] [REDACTED] investigator in
14 Jacksonville.

15 LT [REDACTED] [REDACTED] [REDACTED] investigator at Jacksonville.

16 MR. MOSELY: Jim Mosely, Jr. for vessel interest, Hoëgh.

17 MR. BAIAD: Todd Baiad for SSA Atlantic.

18 MR. DIXON: And of course me, Jeffery Dixon.

19 LTJG [REDACTED] I think on the phone we'll start with NTSB.
20 If you could introduce yourselves, please?

21 MR. MUISE: This is Marcel Muise, the investigator-in-charge
22 for the NTSB, Office of Marine Safety.

23 MR. PANAGIOTOU: This is Joseph Panagiotou, NTSB, Office of
24 Research and Engineering.

25 MR. MOSELY: What? Joseph who?

1 LTJG [REDACTED] Could you say that again, sir?

2 MR. PANAGIOTOU: Joseph Panagiotou, NTSB, Office of Research
3 and Engineering. I'm a fire protection engineer, so I deal with
4 fire investigations.

5 LTJG [REDACTED] Understood.

6 The representative for Grimaldi next, please.

7 MR. THIEL: This is Eric Thiel on behalf of Grimaldi Deep
8 Sea.

9 LTJG [REDACTED] And then what's your --

10 MR. [REDACTED] Mark Thompson at HFW.

11 LTJG [REDACTED] And then if Mr. Thompson could introduce
12 himself, please?

13 MR. THOMPSON: Mark Thompson, HFW. We're the London
14 solicitors for vessel interests.

15 LTJG [REDACTED] Okay, great. I believe --

16 MR. MOSELY: What's his name?

17 LTJG [REDACTED] The witness?

18 MR. MOSELY: Yeah.

19 LTJG [REDACTED] Jeff Dixon.

20 MR. MOSELY: Jeff Dixon.

21 LTJG [REDACTED] All righty. And with that, I believe everyone
22 has introduced themselves. So we'll start with Mr. Dixon.

23 INTERVIEW OF JEFFERY DIXON

24 BY LTJG [REDACTED]

25 Q. So, first of all, could you please just kind of explain your

1 role during the loading process of the *Hoëgh Xiamen*?

2 A. I was the lead stevedore, so basically, I just set up the
3 ship and ordered the labor for it and did the game plan.

4 Q. Okay. And were you present for -- what days were you present
5 for loading of the vessel?

6 A. The Wednesday and the Thursday, both days.

7 Q. So Wednesday and Thursday. On Thursday, June 4th, can you
8 recall at approximately what time the loading started and stopped?

9 A. On which day?

10 A. Thursday, June 4th?

11 A. 8 o'clock, and we finished at 6 minutes till 1500.

12 Q. So that would be 1454?

13 A. Yeah.

14 Q. Okay. Can you just tell me a little bit about the cargo, the
15 condition, what it was, how it was brought onto the vessel?

16 A. Well, it's a normal West Africa ship.

17 Q. Okay.

18 A. So you have forklifts, runners, and tows.

19 Q. Tows.

20 A. That's it.

21 Q. Okay. And when you say runners, what exactly do you mean?

22 A. Self-driven, self-powered.

23 Q. Self-driven? And tows, you mean vehicles that were towed
24 onto the vessel?

25 A. Yes, needed assistance.

1 Q. Okay. And what were the general quality of the vehicles that
2 were brought on?

3 A. It varies from car to car.

4 Q. Okay.

5 A. So, I mean, obviously, a forklift to something that, you
6 know, it's a nicer car.

7 Q. Right. Understood. And the vessel -- or I mean, excuse me,
8 the vehicles which were towed onto the vessel, why were you -- why
9 were those towed onto the vessel?

10 A. I mean, I don't particularly know why.

11 Q. Okay.

12 A. You know, I'm not a mechanic.

13 Q. Right.

14 A. But I just know they were towed.

15 Q. Okay, but those ones could not be driven themselves onboard?

16 A. Right. Right.

17 Q. Okay, that's what I was getting at. Prior to loading, is
18 the -- are you involved at all with checking the vehicles before
19 they're loaded on, or any of the checks prior to that?

20 A. No. I mean, all I do is I get a list. I don't work in the
21 terminal, so I don't --

22 Q. Understood. The vessels that you load on, so you don't check
23 the quantity of gasoline in the tanks or anything like that?

24 A. (No audible response.)

25 Q. Okay.

1 MR. MOSELY: If you could answer out loud.

2 MR. DIXON: No.

3 BY LTJG [REDACTED]

4 Q. Okay. Sorry, I lost my train of thought. So the day of --
5 okay, so when you were loading vehicles on, did you note any
6 vehicles that were maybe leaking any fluids, gasoline, lube oils,
7 anything like that?

8 A. No, I don't recall none. I mean, but, you know, it was
9 weather.

10 Q. And when you say weather, you mean it was --

11 A. Raining.

12 Q. It was raining that day?

13 A. Yeah.

14 Q. Okay. Speaking with the ship's crew, when they --
15 occasionally, they will send a car back off the ship. Could you
16 describe that process when that happens?

17 A. If they have an issue with it, we'll take it off.

18 Q. Okay. And is there any checks and balances with that? Do
19 you have to ask a supervisor if that's okay or anything like that?

20 A. No. I mean, if it comes off, it comes off.

21 LTJG [REDACTED] Okay.

22 BY LT [REDACTED]

23 Q. That day -- this is Lieutenant [REDACTED] That day, speaking of
24 vessels that were -- or vehicles that were turned back, right, to
25 your knowledge, were any cars denied by the vessel's crew either

1 day?

2 A. No.

3 Q. For those 2 days that the cars were being loaded, was there
4 any kind of order to the loading process aboard that vessel?
5 Meaning, did you guys load a certain deck that day, a certain deck
6 the other day?

7 A. Yes.

8 Q. Can you explain that?

9 A. So the port captain gives us his game plan, and then we just
10 follow it accordingly. So we start at one deck and move down to
11 the next.

12 Q. Okay. So, on that Wednesday, what did you guys -- what deck
13 did you guys start with?

14 A. I mean, depending on what cargo, I mean, you would work --
15 you're working three decks at once.

16 Q. Okay. So both days, would you say, to the best of your
17 knowledge, you were loading vehicles on the 7th and 8th deck?

18 A. No.

19 Q. Okay. Can you elaborate on that, please?

20 A. How you mean, like -- we worked 8 Day 1, Day 2, and then 7
21 just Day 2.

22 Q. And when you load those cars -- let's kind of focus on Deck 8
23 for just a minute. When you guys loaded those cars, is there a
24 certain way that you load, like stern to stem, aft/inboard,
25 anything like that?

1 A. Flow-stowed it. So start where you come up to the ramp, like
2 doing a toilet (ph.), so those would be the first to come out. So
3 you start it -- if you're familiar with the ramp, and then you
4 just do a circle.

5 Q. Okay. So, just so everybody on the phone understands,
6 basically, you're coming up the ramp and then making an entire
7 circle around to where the vehicle comes to the back side of the
8 ramp?

9 A. Yeah.

10 Q. Okay. And then for the majority of that, would you say,
11 would it be out more towards the inboard, then?

12 A. It would have been starboard to port.

13 LT [REDACTED] Okay.

14 BY LTJG [REDACTED]

15 Q. And then as far as lashing and securing the vehicles, who is
16 responsible for that? Is it the stevedores or the crew?

17 A. We're responsible, but they check after it.

18 Q. Okay. So, saying that, what guidance or information are you
19 given about how to lash the vehicles down?

20 A. I have information from Grimaldi about how -- their
21 procedures on lashing.

22 Q. Okay, so Grimaldi provided the procedures?

23 A. Yes.

24 Q. And did they provide that through the port captain?

25 A. I received an email, yes.

1 LTJG [REDACTED] Okay. Thank you.

2 BY LT [REDACTED]

3 Q. Are the stevedores at all responsible for -- when the cars
4 are parked on the vessel, do they do any checks other than lashing
5 them down or, like, checking for the condition of the vessel, if
6 there's any leaks or anything out of the ordinary? Or is it more
7 just a vessel gets -- a car gets parked and it gets lashed down,
8 and then that's it?

9 A. Basically, I mean, if something's out of the ordinary, but, I
10 mean --

11 Q. I mean, if something was out of the ordinary, in your role,
12 are you responsible for all the stevedores that are -- you're the
13 team captain for everybody else?

14 A. Yes.

15 Q. So did you receive any reports of anything out of the
16 ordinary either day, that you recall?

17 A. I don't recall.

18 Q. Okay. And just to clarify on your position, so are you also
19 bringing vehicles on, or are you just kind of staying in one spot,
20 ensuring that the loading's -- like, what location are you at?

21 A. I'm at the aft ramp.

22 Q. And is anybody with you at the aft ramp?

23 A. I have the two checkers at the tick station, but I'm, like,
24 in between them two.

25 Q. Okay, the two checkers are?

1 A. I don't recall who they are, but they just check the cargo
2 off.

3 Q. Okay. And how are they doing that?

4 A. Tick sheets.

5 Q. So are they just confirming VIN numbers, things like that, on
6 the vehicle?

7 A. Yes.

8 Q. And those folks are employed with who, the tick -- the
9 checkers?

10 A. I guess that's ILA.

11 Q. If you'd kind of back up real quick, too, for your folks that
12 are bringing the cars onboard the vessel, do they have any kind of
13 checklist, or do they do any kind of check-offs before bringing
14 the vehicles onboard?

15 A. I mean, our main concern -- I mean, we don't -- there's no
16 checklist, per se. So, I mean, I don't know what you're looking
17 for there.

18 Q. Well, so would they do any kind of, like, walk-around of the
19 vessel, looking at the condition of the vessel, or maybe open up a
20 trunk, open up a cargo space and make sure that -- just the
21 general condition of --

22 A. You mean the car?

23 Q. The vehicle itself, yes.

24 A. I mean, yeah. I mean, you give it a visual inspection, but
25 that's about the extent of it. I mean, if it needs to be boosted

1 off, that's about it.

2 Q. There's no requirement for them to access any of the spaces,
3 like trunks or anything like that?

4 A. No.

5 LTJG [REDACTED] Kind of continuing with that, if any of the
6 cars were -- if the crew rejected any of the cars, would your
7 stevedores have to report that to you, or would they -- or is
8 that -- or is the responsibility delegated down to them?

9 MR. DIXON: I mean, they would mention it to me.

10 LTJG [REDACTED] Okay.

11 LT [REDACTED] Compared to the normal, let's just say the
12 normal -- you said this was a West Africa RORO, West Africa cargo.
13 Compared to the normal vessel of that type, cargo of that type,
14 was this a pretty standard vessel, in your opinion? Did anything
15 jump out as out of the ordinary about the cargo that was being
16 loaded?

17 MR. DIXON: No.

18 LT [REDACTED] All right.

19 LTJG [REDACTED] And I apologize if I asked this already, but
20 for the cars that specifically have to be towed or driven on,
21 there's no checks of the gas levels, correct? Like, if a
22 stevedore got in a car, turned on the car, the gas tank was at
23 full, would they still drive it onto the vessel?

24 MR. DIXON: Yes.

25 BY LT [REDACTED]

1 Q. You had mentioned -- at the very beginning, we asked who was
2 responsible for, like, getting the vessels -- vehicles prepped and
3 ready for loading, and you said that was the terminal side?

4 A. Yes.

5 Q. Do you know who specifically? A certain company or --

6 A. It's Horizon Terminals.

7 Q. Okay. So, when you show up a day to do a loading, your sole
8 responsibility is to coordinate with the port captain, execute
9 this plan of getting the vehicles, whatever they are, safely onto
10 the vessel, driven on by your team?

11 A. Yes.

12 LT [REDACTED] Driven, towed, forklifted.

13 LTJG [REDACTED] [REDACTED]

14 BY MR. [REDACTED]

15 Q. I guess, in general, before we pass it over to the NTSB, is
16 there anything of interest that you feel we didn't ask and we
17 should know that you saw or observed, either day of loading?

18 A. Not really.

19 Q. Real quick, though, before we go on, do you have much
20 interaction with the crew of the vessel?

21 A. Just when we was trying to get blowers on.

22 Q. Blowers?

23 A. Yeah, the ventilation.

24 Q. Okay, what was that interaction?

25 A. I was at the aft ramp, and I was yelling up because they were

1 having issues with the ventilation downstairs.

2 Q. Okay. And the issue was a lack of ventilation downstairs?

3 A. Yes. Yes.

4 Q. And which decks would those be?

5 A. I think they were having issues on 3, 8, and 11.

6 Q. All right, and then were they, to the best of your knowledge,
7 were they able to overcome those issues and get the ventilation
8 working on those decks?

9 A. I mean, I don't really know. I know that they were talking
10 about it, but I never heard the interaction between the stevedores
11 on the deck and the chief.

12 LT [REDACTED] Is that pretty typical for you to have to work
13 with the crew to discuss ventilation, either -- I guess, down here
14 in Florida it's not an issue, but like, ventilation not being on,
15 you have to request more ventilation?

16 MR. DIXON: It depends vessel to vessel, you know?

17 LT [REDACTED] Okay.

18 MR. DIXON: Some crews are better than others.

19 MR. [REDACTED] Saying that, would you say this crew seemed to
20 be an experienced crew, one better than the other? And again, we
21 totally understand this is opinion based, with your knowledge and
22 background.

23 MR. DIXON: You know, it had its language barrier, so I mean,
24 that's the only thing I had a problem with. You know, maybe they
25 misunderstood me, you know, or I misunderstood them.

1 BY LT [REDACTED]

2 Q. When did the ventilation complaints or issues come up? Was
3 that early on? Was that on the 3rd, or both days?

4 A. Yeah, I think it was just mainly the first day but --

5 Q. Okay.

6 A. -- I mean, there -- I don't really know the whole story with
7 that.

8 Q. But you stopped hearing about it?

9 A. Yes.

10 LTJG [REDACTED] All right, I think the Coast Guard is done
11 with our line of questioning, if the NTSB would like to take over.

12 And, sir, they're on the phone there, so maybe just point
13 yourself there.

14 MR. MOSELY: And if we could all speak up because there's air
15 conditioning and stuff and it's hard to hear.

16 MR. MUISE: Okay. Thank you.

17 This is Marcel Muise with the NTSB. And just to familiarize
18 you, the NTSB is an independent agency, and we're conducting a
19 parallel investigation with the Coast Guard. At this stage of the
20 investigation, we kind of get together and do the (indiscernible)
21 part of it together, and then we'll go our separate ways and do
22 our own analysis and produce our own report.

23 We're not a law enforcement agency or a regulatory agency,
24 but we will produce some recommendations, if any, that could --
25 those can go to the Coast Guard or to local agencies or the

1 vessel's owner. But that's our role here, is as an independent
2 investigative agency. Any questions for me about the NTSB before
3 I start?

4 MR. DIXON: No.

5 MR. MOSELY: Can you speak up a little bit?

6 MR. DIXON: No.

7 BY MR. MUISE:

8 Q. Okay. So, after the specific questions about Decks 7 and 8,
9 if you can recall -- and if you can't, that's okay, too -- but my
10 understanding is Deck 7 is also the mooring gear deck, and there's
11 a door on the starboard side aft, I believe, that goes up to the
12 vehicle decks. Do you remember if the doors stay open at all?

13 A. I didn't work that deck, so I don't know.

14 Q. Okay. Do you remember where the designated smoking area was?

15 A. As far as -- I don't know that there was one on the ship.

16 Q. Did you see any of the crew smoking onboard?

17 A. No, not -- I don't have no knowledge of that.

18 Q. How about your own crew, do they smoke onboard?

19 A. I don't -- no, I don't have no knowledge of that, either.

20 No, I wasn't seeing.

21 Q. Do you remember seeing any damage on the interior of the
22 vehicles decks? Again, that's Decks 7 and 8. Any cable trays
23 (ph.) that were damaged or lighting that was damaged?

24 A. I didn't -- I wasn't on the deck, so I wouldn't know.

25 Q. Okay. How about any -- is there any other sources of fuel,

1 maybe, like a pallet of rags or a pallet of mooring line stored on
2 those decks?

3 A. I have no knowledge of that. I wasn't on that deck.

4 Q. Okay. The ventilation issues, were they supply issues or
5 exhaust issues? Again, specifically Deck 8 if you could.

6 A. I mean, I wasn't on them decks, so I really can't answer that
7 question, probably, correctly. So I don't know what the -- if it
8 was supply or vent.

9 Q. Okay. Regarding the cars, does the shipper store all their
10 cargo inside the cars, inside the vehicles, either the trunk or in
11 small vans?

12 A. I don't know the answer to that question, either.

13 Q. Okay. Who is the shipper for the -- I mean, who owns these
14 vehicles?

15 A. I don't know.

16 Q. And my last questions was, I believe the ship was going to
17 Baltimore, but looking at the loading plan, I don't see any areas
18 that were designated for cars beyond Jacksonville. Can you
19 clarify that for me? Do you know if this ship was going straight
20 from here to Africa or if it was going to Baltimore next?

21 A. I mean, I was told Baltimore.

22 MR. MUISE: Okay. All right. That's all the questions I
23 have.

24 Joe, do you have anything?

25 MR. PANAGIOTOU: No, I do not have any questions. Thank you,

1 [REDACTED]

2 LTJG [REDACTED] You're welcome.

3 So I guess we'll move on to the attorneys now?

4 All right. So at this point, we'll move on. There are three
5 designated parties-in-interest, and we'll give their attorneys an
6 opportunity to cross-examine. I think for the, just descending
7 order today, I think maybe we'll start with Mr. Mosely.

8 MR. BAIAD: I'm not going to have anything.

9 LTJG [REDACTED] And obviously, the attorney representing you
10 won't have any, and then we'll go to Mr. Thiel on the phone, if
11 everyone's agreeable to that.

12 MR. BAIAD: That's fine.

13 MR. MOSELY: I'll go next, then.

14 BY MR. MOSELY:

15 Q. Mr. Dixon, what is your official position with SSA?

16 A. Stevedore.

17 Q. Stevedore? Were you the head stevedore on this project, on
18 this occasion?

19 A. Yes, sir.

20 Q. And SSA loads other cars, vehicles besides the Hoëgh
21 vehicles?

22 A. Yes.

23 Q. And are some of those vehicle new vehicles?

24 A. Yes.

25 Q. But this is not a new vehicle load, this is all what we call

1 POV, personally-owned vehicles?

2 A. Yes.

3 Q. And these vehicles are all in different condition; isn't that
4 right?

5 A. Yes.

6 Q. And are all these vehicles stored in the open, on the Port
7 Authority premises here in Jacksonville?

8 A. Yes.

9 Q. Are any of them brought in by truck or otherwise to the Port
10 Authority premises on the day of loading, or are they all stored
11 here on the Blount Island premises?

12 A. What do you mean?

13 Q. Like, while you're loading the vessel here, is there, like, a
14 car or truck that comes up with a bunch of vehicles that you
15 offload directly from the truck?

16 A. To the ship?

17 Q. To the ship.

18 A. No.

19 Q. Do you know how long those vehicles exist at the JPA premises
20 before loading?

21 A. No.

22 Q. Do you have any information as to SSA, how you all may look
23 at the vehicles, examine them for any additional cargo that may be
24 onboard, any leaky fuel systems or anything like that? Does SSA
25 do any of that?

- 1 A. I mean, can you rephrase the question?
- 2 Q. Yeah. I'm just trying to find out what type of exam does SSA
3 do on these vehicle when they load them?
- 4 A. I mean, I don't really understand the question here. I
5 mean --
- 6 Q. Okay. Does SSA --
- 7 A. We don't receive the cargo.
- 8 Q. And it goes through Horizon?
- 9 A. Yes.
- 10 Q. And then they do an inspection of the vessel -- or of the
11 vehicles?
- 12 A. Yes, I guess. I don't know.
- 13 Q. You don't know?
- 14 A. No, I don't know.
- 15 Q. Does Horizon produce any document to SSA for you to review?
- 16 A. No, not for this shipping company. I don't think so.
- 17 Q. Did you see any document from Horizon that talked about any
18 of the condition of the cargo?
- 19 A. No.
- 20 Q. And do we know if we were provided anything to SSA by Horizon
21 as to other matters that may be stored in the vehicle or gas
22 levels or leaky fuel systems or anything like that?
- 23 A. No.
- 24 Q. Explain to me how SSA is set up. You employ ILA labor?
- 25 A. Yes.

- 1 Q. And that includes checkers?
- 2 A. Yes.
- 3 Q. And lashers?
- 4 A. Yes.
- 5 Q. And operators of equipment?
- 6 A. Yes.
- 7 Q. And also drivers who can drive the vehicles on there?
- 8 A. Yes.
- 9 Q. Anybody else that I did not mention? Headers?
- 10 A. Yeah.
- 11 Q. And who works directly under you for SSA?
- 12 A. The other stevedores.
- 13 Q. Okay. Were they out there that day?
- 14 A. Yes.
- 15 Q. And who was that?
- 16 A. I mean, where or --
- 17 Q. Who was --
- 18 A. -- on the ship or what?
- 19 Q. I'm not talking about ILA labor --
- 20 A. Right.
- 21 Q. -- but I'm talking about SSA personnel like yourself that
- 22 were out there working particular vessel that day -- those two
- 23 days.
- 24 A. You had Tamon Surh.
- 25 Q. Damon?

- 1 A. Tamon.
- 2 Q. Tamon.
- 3 A. Tamon Surh.
- 4 Q. Sir, S-i-r?
- 5 A. S-u-r-h.
- 6 Q. S-u-r-h. Okay.
- 7 A. Chad Mavromat.
- 8 Q. Chad Mavromat?
- 9 A. Um-hum.
- 10 Q. Okay.
- 11 A. Casey Potter.
- 12 Q. Casey Potter? Okay.
- 13 A. And you had Roy Hendrix.
- 14 Q. Roy Hendrix.
- 15 A. Daniel Kapke (ph.).
- 16 Q. Daniel, what's his last name?
- 17 A. Kapke.
- 18 Q. Kapke?
- 19 A. Kapke.
- 20 Q. K-a-p --
- 21 A. Don't ask me.
- 22 Q. Okay. All right.
- 23 A. I don't know if that's all of them or not, but that's all I
- 24 can remember right now.
- 25 Q. Okay. Did all of those people report to you?

- 1 A. Yes.
- 2 Q. And what were their positions?
- 3 A. It varies. Some would be on the decks of the ship, some
4 would be in the terminals.
- 5 Q. Okay, let's start with the terminal. Who would be in the
6 terminal?
- 7 A. Roy.
- 8 Q. Okay.
- 9 A. I think Daniel Kapke was in the terminal.
- 10 Q. Okay.
- 11 A. I can't think who else was in the terminal that day. I think
12 Fred, Fred Mason was in the terminal, too.
- 13 Q. I didn't have that name. Fred Mason?
- 14 A. Yeah.
- 15 Q. Okay. And when you're in the terminal, what kind of job are
16 you doing?
- 17 A. You just make sure the longshoremen get in the right, correct
18 cars, you know, onto the ship.
- 19 Q. In other words, you're going to the right location on Blount
20 Island terminal to get the right cars to put on this ship so they
21 don't get cars that go on another ship?
- 22 A. Correct. We're designated.
- 23 Q. So I guess Mr. Suhr, Mr. Mavromat, and also Mr. Patton [sic]
24 were on the vessel?
- 25 A. Yes.

1 Q. Where would they be located?

2 A. Tamon Suhr was forklifts, so that would have been Decks 3 and
3 5.

4 Q. Okay.

5 A. Casey Potter was on runners, so that would have been Deck 11.
6 And Chad was on tows, which was Deck 8.

7 Q. And who had Deck 7?

8 A. It was a combined effort of Casey Potter and Chad.

9 Q. And I think if I understand what you said earlier, that Deck
10 7 was on the Wednesday -- excuse me, on Thursday only; is that
11 right?

12 A. Yes.

13 Q. And so, on Thursday, on Deck 7, you were towing vehicles up
14 there and driving them up to that deck?

15 A. Correct.

16 Q. On Deck 8, if we can focus on Deck 8, you did that on
17 Wednesday and Thursday last week; is that right?

18 A. Correct.

19 Q. And were those all -- were they runners, tows, or forklifts?

20 A. Runners and forklift -- I mean, tows and runners.

21 Q. They were tows and runners. And what that means, from my
22 understanding, is that some of those vehicles were towed onboard
23 the ship and towed to that location; is that right?

24 A. Yes.

25 Q. And some were driven up to that location?

1 A. Yes.

2 Q. And is there any policy, or do you have a policy personally
3 with people that were working for you, that when someone drives a
4 vehicle onboard a ship and it has more than, let's say, an eighth
5 of a tank, that they're supposed to report that somehow?

6 A. Personally?

7 Q. Yeah.

8 A. I never heard that.

9 Q. Does SSA have that?

10 A. I've never heard that.

11 Q. If someone drives a vehicle onboard the vessel and it has,
12 let's say, half a tank, there's no method for the longshoremen to
13 report that to SSA or the ship?

14 A. I never recall none of that. I mean, I don't understand what
15 you're asking, really.

16 Q. Has anyone ever reported that a car had more than half a tank
17 in the -- or any certain level of gas in a car they drove up?

18 A. I never recall anybody ever saying anything about that.

19 Q. How many years have you worked for SSA?

20 A. Twenty-four.

21 Q. So in that 24-year period, no one's ever reported that to
22 you?

23 A. Huh-uh. No.

24 Q. What about cars that are being towed? Is there any checking
25 by SSA of gas levels and things such as that?

- 1 A. I don't understand the question.
- 2 Q. For cars that are going to be towed onboard, is there any
3 method or inspection as to the level of gas in those cars by SSA?
- 4 A. I still don't understand. You're saying that --
- 5 Q. What don't you understand?
- 6 A. Because they're being towed.
- 7 Q. Yeah. So does anyone look to see if there's any gas in the
8 tank when they're being towed?
- 9 A. How would you do that?
- 10 Q. Turning it on.
- 11 A. It's being towed.
- 12 Q. So there is none?
- 13 A. It's got no power to it. That's why I don't understand how
14 we'd determine that.
- 15 Q. Well, let me ask the question this way: You've never seen
16 any inspection for fuel on a car that's being towed?
- 17 A. Right.
- 18 Q. Because it's being towed. And I heard you answer the
19 question that there's no method to inspect the trunk or the
20 interior of the car as to other things that may be in there by
21 SSA?
- 22 A. No. I mean, we don't, yes.
- 23 Q. You don't look at that?
- 24 A. No.
- 25 Q. So there's no inspection sheet or anything like that that we

1 could look at and see what was in these cars before they got on
2 there?

3 A. No.

4 Q. The cars that are towed, are they in varying -- are they in
5 differing condition? In other words, some look fairly new and
6 some may be that they were just in an accident?

7 MR. BAIAD: Are you talking about this day or --

8 MR. MOSELY: Any time.

9 MR. BAIAD: I mean, that's a fairly broad question. You can
10 answer if you understand.

11 MR. DIXON: What was the question again?

12 BY MR. MOSELY:

13 Q. Yeah, cars, generally -- in your 24-years experience, cars
14 that are being towed, are they in different conditions? Some look
15 good, some look like they've been in a car accident?

16 A. I mean, pertaining to West Africa?

17 Q. Yeah.

18 A. Yes.

19 Q. And on these two days, on Wednesday and Thursday, when you
20 were loading vehicles on Decks 7 and 8, were the cars that were
21 being towed that you observed, were they in different conditions?

22 A. Yes.

23 Q. Can you describe those conditions for me, of the cars being
24 towed?

25 A. I mean, I don't really understand, I mean, what you're

1 looking for. I mean, you --

2 Q. All right. Did some of these cars being towed look like they
3 had recently been in an accident of some sort?

4 A. Yes.

5 Q. Damage to the door or the front end or the rear end,
6 something like that?

7 A. Yes.

8 Q. Did some of these cars, were they missing wheels, front
9 wheels?

10 A. On the tows?

11 Q. Um-hum.

12 A. No.

13 Q. They all had wheels?

14 A. Yeah. I mean, they're gonna have to.

15 Q. Did some of the cars being towed, were you aware one way or
16 the other if they were leaking oil?

17 A. I was not aware.

18 Q. Okay. But did you inspect -- did SSA ever inspect any of
19 these cars being towed to see if there was any oil leakage?

20 A. No.

21 Q. What about the cars that are brought on -- we have the tows,
22 we've got the runners. Did any of the runners that day, Wednesday
23 and Thursday of last week, have any difficulty getting started,
24 needed jumps or something?

25 A. That were on the perimeters?

- 1 Q. Um-hum.
- 2 A. Yes.
- 3 Q. Can you tell us how many of those cars needed assistance in
4 getting turned on?
- 5 A. I don't know. I don't know that.
- 6 Q. But you were aware of that?
- 7 A. Yes.
- 8 Q. Do you all make a record of which cars had difficulty getting
9 started?
- 10 A. No.
- 11 Q. You just get it started and put it on the ship?
- 12 A. Yes.
- 13 Q. You said you had the interaction with some of the crew, the
14 language was different. I can appreciate that. Are you the
15 person that's responsible for meeting with the crew once the
16 vessel arrives?
- 17 A. No.
- 18 Q. Are you the person responsible for meeting with the crew
19 before loading the vessel?
- 20 A. No.
- 21 Q. Who is?
- 22 A. That would be the port captain.
- 23 Q. Okay, that would be with Grimaldi?
- 24 A. Yes.
- 25 Q. Are you the senior person for SSA to meet with the crew?

1 A. I do have an interaction with them, but we just give them the
2 ship log -- I mean, the people log.

3 Q. Okay. Tell me about your interaction. You interact with the
4 crew when? Tell me about that. The vessel was here Wednesday,
5 and Thursday was the fire, so when did you first interact with the
6 crew?

7 A. Only on Wednesday, when I gave them the men's list.

8 Q. You said men's list?

9 A. Men's list.

10 Q. What's that?

11 A. It's a list of the longshoremen coming onboard.

12 Q. Okay. Did you discuss loading or the cargo or anything like
13 that?

14 A. No.

15 Q. Any other discussions?

16 A. Just that ventilation, but that was later in the morning.

17 Q. Okay. And do you remember who it was that you spoke to?

18 A. No.

19 Q. Do you remember what rank they were?

20 A. No.

21 Q. Besides the ventilation and providing the men's list, did you
22 have any other discussion with the ship's crew?

23 A. Just on the last day, with the port captain present.

24 Q. Okay. And that's the port captain from Grimaldi?

25 A. Yes.

- 1 Q. And what is his name?
- 2 A. Mike Lewis.
- 3 Q. And what was that discussion about?
- 4 A. Just telling, I guess, the ship person on the back that lines
5 was at 1700, completion at 1500.
- 6 Q. You had the discussion that, at 1500, the load was completed?
- 7 A. Yes.
- 8 Q. Did you pass off any paperwork or anything at that time?
- 9 A. No, that was Mike Lewis talking to them.
- 10 Q. Did you personally observe any of the ship's crew at any time
11 checking lashing at any of the decks?
- 12 A. No.
- 13 Q. Tell me about the -- we have some other types of vehicle that
14 we mentioned. We've got forklifts. What are those?
- 15 A. Those are inoperable vehicles.
- 16 Q. Can you describe what they look like? Were they wrecks?
- 17 A. Yeah, pretty much.
- 18 Q. Could you drive those on a highway?
- 19 A. No.
- 20 Q. And why not?
- 21 A. Because they're inoperable.
- 22 Q. Let me ask you, were any of those ones that were towed -- or
23 excuse me, taken up there by forklift, did they appear to be in
24 proper shape visually, just looking at them from a distance?
- 25 A. I don't recall.

1 Q. Are any of these cars that are taken aboard the vessel
2 wrecks?

3 A. Yes.

4 Q. What percentage of the vehicle that you loaded in
5 Jacksonville would you consider wrecks?

6 A. I don't have no -- even have an educated guess on that.

7 Q. What percentage of vehicles loaded on Deck 8 would you
8 consider wrecks?

9 A. I really wouldn't know that answer, either.

10 Q. Can you tell us what percentage of vehicles were towed onto
11 Deck 8?

12 A. I don't know. I don't have a percentage on that, but I know
13 most of them cars were probably towed up there.

14 Q. On Deck 8?

15 A. Yes.

16 Q. Most of them. You couldn't break it down into percentages,
17 but you'll just say most; is that fair?

18 A. Yeah.

19 Q. Did any of those -- how were those vehicles lashed when they
20 were towed up there? Were they lashed the normal way, or was
21 there special consideration given?

22 A. I think it's the normal way.

23 Q. Do you know?

24 A. No. I mean, I don't see why, unless there's nothing to lash
25 to -- I mean, I don't know how for each individual car, but it

1 should be the normal way.

2 Q. If you load a vehicle onboard the vessel, and it leaks oil
3 while you're lashing it, is there a procedure whereby SSA is made
4 aware of that situation?

5 MR. BAIAD: Can you repeat the question, please?

6 MR. MOSELY: Yeah.

7 BY MR. MOSELY:

8 Q. If you load a vehicle on the vessel, and the vehicle is
9 leaking oil, is there a method where the ILA labor that is working
10 on the vessel can notify SSA?

11 A. Yes.

12 Q. What do they do?

13 A. They would tell the stevedore.

14 Q. They would tell you?

15 A. No, they won't tell me, they'd tell the stevedore in that
16 deck.

17 Q. Okay. And so, they would tell, in this instance, they would
18 tell either Chad Mavromat or Casey Potter or Tamon Suhr?

19 A. Yes.

20 Q. Do you know if that happened on this loading of this vessel?

21 A. I was not made aware.

22 Q. If those fellas are made aware of any leak of oil, would you
23 eventually be made aware?

24 A. I don't know. Not necessarily. I mean, I don't know what
25 you're asking there.

1 Q. Have you ever -- are you aware of any vehicle that was
2 leaking oil that just remained on the vessel after SSA knew about
3 it?

4 A. I don't know the answer to that, no. I mean --

5 Q. If a vehicle is removed from the vessel, is there a document
6 that SSA fills out?

7 A. A cut list.

8 Q. A cut list?

9 A. Yes.

10 Q. Was there a cut list for this particular vessel?

11 A. Yes.

12 Q. Were there any vehicles listed on that cut list?

13 A. Yes.

14 Q. How many?

15 A. I think 44.

16 Q. There were 44 vehicles?

17 A. Yes.

18 Q. Were any of those 44 vehicles taken onboard the vessel and
19 then removed and then got on the cut list?

20 A. No.

21 Q. All of those vehicles on the cut list just never made it to
22 the vessel?

23 A. Yes.

24 Q. And what was the reason for those vehicles, generally
25 speaking -- there's 44, I'm not going to make you go through each

1 and every one.

2 A. Space.

3 Q. The space onboard?

4 A. Yes.

5 Q. Any of those vehicle that were cut based upon condition?

6 A. Yes.

7 Q. How many?

8 A. I think it was nine.

9 Q. And what was the condition of those vehicles that warranted
10 them being placed on the cut list?

11 A. They turned to forklifts.

12 Q. They what?

13 A. Turned to forklifts.

14 Q. They turned the forklifts?

15 A. Yes.

16 Q. What does that mean?

17 A. It means, for one reason or another, they were inoperable to
18 drive.

19 Q. Okay.

20 A. Or tow.

21 Q. Just a little bit more detail. When you say turn the
22 forklifts, is it because they're too heavy and the forklift
23 couldn't handle it or --

24 A. No, they turned to forklifts. That means they were either a
25 runner or a tow, but they became inoperable or unsafe to run, so

1 they were cut.

2 Q. Okay. But you can still load them onboard the vessel if
3 they're a forklift vehicle, right?

4 A. Right.

5 Q. So why would those vehicles not be loaded on if you could
6 still get them on there with the forklift?

7 A. Because they were -- they didn't have enough space for
8 forklifts. And then they don't -- when something turns to a
9 forklift, they don't load it.

10 Q. Okay. Is there any condition that you would found on a
11 vehicle that would cause it not to be loaded on the vessel by SSA?

12 A. I mean, I don't understand what you're saying here. I
13 mean --

14 Q. I'm just trying to see -- well, in 24 years, have you ever
15 not loaded a vehicle onboard a vessel due to its condition?

16 A. Yes.

17 Q. When?

18 A. Oh, I can't recall.

19 Q. What was the reason?

20 A. One reason or another. I don't know. I mean, I can't
21 recall, but I know that we ain't loaded certain things.

22 Q. Okay, but what are those reasons why you would not load a
23 vehicle onboard a vessel?

24 A. I mean, the last one I can recall was just dirt on it.

25 Q. Dirt?

1 A. Yeah. Or clay or something.

2 Q. Is there a standard that SSA has that you're aware of as the
3 head stevedore that you would not load a vehicle on a vessel for
4 certain things?

5 A. I mean, I don't see what you're asking. I mean, on West
6 Africa or --

7 Q. Yeah, West Africa.

8 A. I mean, West Africa, I mean, I still don't understand what
9 you're trying to get at there.

10 Q. What I'm trying to get at, is there any reason you look at a
11 vehicle going to West Africa and you would say, we can't load this
12 because? Are there any guidelines SSA gives you?

13 A. I mean, no. I mean --

14 Q. Do you have the authority to not load a vehicle because you
15 feel it's not appropriate?

16 A. Yes.

17 Q. And what's your authority based on?

18 A. I mean, I don't know what you're asking, really. I mean, I
19 don't know what you're trying to get at.

20 Q. Why would you not load a vehicle? We obviously heard too
21 much dirt, but why would you not load a vehicle for West Africa
22 trade, to what extent?

23 A. If it caught fire in the yard.

24 Q. Okay, caught fire in the yard. Okay. Anything else?

25 A. I mean, that's pretty much -- I mean, I really don't

1 understand, because they're all at various levels.

2 Q. Can you describe how the vehicles on forklifts are driven
3 on -- or were taken on the vessel?

4 A. On trailers.

5 Q. And how does that work? Take me through that.

6 A. You've got a trailer with a truck. You load the car on the
7 trailer.

8 Q. Okay, how do you load the car on the trailer?

9 A. Forklift.

10 Q. Okay. Are there certain forklifts that have that capability?
11 These aren't just normal forklifts; I assume these are pretty
12 large forklifts?

13 A. You've got different sizes.

14 Q. Okay. And how does the forklift raise the vehicle to get it
15 onto the trailer?

16 A. From underneath it.

17 Q. And then do some of these -- and is there a forklift, also,
18 on the vessel, too?

19 A. Yes.

20 Q. And again, it gets underneath the vehicle and lifts it up and
21 places it down?

22 A. Yes.

23 Q. Do you know, is there a sheet of paper or document that shows
24 which forklifts and which tows were used in this particular
25 operation?

1 A. Load list.

2 Q. A load list? And how does it identify that equipment?

3 A. I ain't 100 percent sure who sends the paperwork out, but I
4 think it's provided by the shipper.

5 Q. Okay. But I'm talking about equipment that SSA uses with the
6 forklifts. Is it SSA equipment, the forklifts and the tow trucks
7 and the trailer that you described?

8 A. Yes.

9 Q. If we all wanted to go look at that equipment here tomorrow,
10 how would we know which equipment was used on this vessel?

11 A. Well, I guess you'd have to get with the mechanics.

12 Q. Is there any document that shows what equipment was used for
13 the loading of this vessel?

14 A. I don't know the answer to that question.

15 Q. Is there any procedure for disconnecting batteries on the car
16 before loading on the vessel?

17 A. That's terminal.

18 Q. That would be Horizon?

19 A. Yes.

20 Q. And if something is found in the trunk of the car while
21 moving it or inside the interior of the car, is there a procedure
22 for something that's done by SSA in that regard?

23 A. I don't know what you're asking again. I'm sorry.

24 Q. Say an ILA longshoreman gets in, and there's something that's
25 rattling around in the trunk. Is there a procedure whereby it's

1 inspected and something is done with that, or is it just loaded on
2 the vessel?

3 A. We don't inspect trunks.

4 Q. Does SSA keep a record of vehicles that were on fire in the
5 terminal?

6 A. I notify Horizon Terminals.

7 Q. Have you ever seen a vehicle go up in fire that was just
8 sitting out there in the terminal?

9 A. Not that I can recall.

10 Q. So if we break this down with -- on Decks 7 and 8, 7, there
11 were vehicles that were driven onboard?

12 A. Correct.

13 Q. Then 8 was a combination, but most of them were towed?

14 A. Yes.

15 Q. And the other decks that you loaded that day, on Wednesday
16 and Thursday, in Jacksonville, which decks were those?

17 A. They was 11 and 10, 5 and 3.

18 Q. So, we have 5 -- excuse me, we have 3, 5, 7, 8, 10, 11?

19 A. Correct.

20 Q. And the vehicles on 10 and 11, was that a combination of
21 towed, runners, and forklift?

22 A. Runners.

23 Q. Those were all runners?

24 A. Um-hum.

25 Q. And on Deck 3, what were those?

- 1 A. Forklifts and a few runners.
- 2 Q. And Deck 5?
- 3 A. Forklift and high-heavy. We had high-heavy on 3, too.
- 4 Q. 5 is the biggest deck with the biggest head space, right?
- 5 A. Yes.
- 6 Q. So, when you say high-heavy, those are the ones that are
- 7 bigger?
- 8 A. Yes.
- 9 Q. Is there any inspection of the cargo on the deck by anybody
- 10 once the deck is loaded? For instance, let's say you complete
- 11 loading Deck 8. Does one of the stevedores go through and check
- 12 everything before leaving that deck?
- 13 A. The lashing.
- 14 Q. He just checks the lashing?
- 15 A. Yes.
- 16 Q. Does he check the deck to see if there's any oil on the deck
- 17 from any of the vehicles?
- 18 A. Not to my knowledge, but I don't know.
- 19 Q. Does he do anything else other than just check the lashing to
- 20 make sure lashing was done?
- 21 A. Just make sure the lashing and -- he's the last one off.
- 22 Q. Were you aware of any lighting problems onboard the vessel
- 23 while you were loading it?
- 24 A. No.
- 25 Q. Were you aware of any of the ramps not operating properly?

1 A. No.

2 Q. Were there any -- you mentioned ventilation, that they fixed
3 that, made sure it was properly ventilated, but were there any
4 other problems onboard the vessel that you're aware of?

5 A. Not to my knowledge.

6 MR. MOSELY: Now I think I'm done.

7 LTJG [REDACTED] All right, thank you, sir.

8 Mr. Thiel, are you still on the line?

9 MR. THIEL: I am.

10 LTJG [REDACTED] All right, sir, if you have any questions, now
11 would be your time.

12 MR. THIEL: Okay. Thank you. I'll go ahead and start.

13 BY MR. THIEL:

14 Q. First of all, just as far as the SSA employees that you had
15 on the vessel, I just wanted to make sure I got these names right.
16 The first one was Chad. What's his last name?

17 A. Mavromat.

18 Q. And what was his title?

19 A. Stevedore.

20 Q. Was he a head of a gang or what was his role?

21 A. He was doing the tows.

22 Q. So he was in charge of tows. Did he have a gang of
23 longshoremen that were under him working the tows?

24 A. Yes.

25 Q. Okay. Then you said the other person on the vessel was Casey

1 Potter?

2 A. Yes.

3 Q. What was his role?

4 A. He was doing the runners.

5 Q. All right. And then I believe you said there was one more;
6 is that right?

7 A. Yes.

8 Q. And who else was on the vessel?

9 A. I think there was a couple more, but I can only remember
10 Tamon Suhr.

11 Q. And what was his role?

12 A. Forklifts, high-heavy.

13 Q. So who or which stevedores or longshoreman was responsible
14 for lashing the vehicles?

15 A. They all were.

16 Q. Okay. So is it correct to say that, for instance, Casey, who
17 had the runners, the people working for him would drive the cars,
18 park the cars, and then lash the cars? Is that correct?

19 A. Negative.

20 Q. All right. What was incorrect about that?

21 A. You have separate lashers.

22 Q. Okay. So there's a separate group of people that do the
23 lashing?

24 A. Correct.

25 Q. Who did they work for?

- 1 A. The same gang.
- 2 Q. Did they have a different header?
- 3 A. No, the same header.
- 4 Q. The same header. Okay. So you had a group of drivers, and
5 then a group of lashers; is that correct?
- 6 A. Correct.
- 7 Q. All right. Were there any other groups?
- 8 A. What do you mean?
- 9 Q. Like, was there a group that would direct people on where to
10 go or a group to disconnect batteries or flags, anything of that
11 nature?
- 12 A. Yes, yes.
- 13 Q. All right, what other groups were there?
- 14 A. You've got the spotters and you had the battery disconnectors
15 and flag --
- 16 Q. Any others?
- 17 A. Flagmen.
- 18 Q. And flagmen? Okay. So for -- just so I understand this, so
19 Casey's the stevedore, he's doing the runners. Working for him,
20 he would have groups of lashers, drivers, spotters, battery
21 disconnectors, and flaggers; is that correct?
- 22 A. Correct.
- 23 Q. For his runners. And then the same would be true for, say,
24 for instance, Chad, with the tows?
- 25 A. Correct.

1 Q. All right. Were there any other groups that I didn't just
2 mention?

3 A. Just the high-heavy.

4 Q. All right. But for the high-heavy guys, they would have -- I
5 believe you said his name was Tamon. He would have the same
6 groups working for him, for the high-heavy group?

7 A. Right.

8 Q. Okay. So I know you mentioned earlier that the lashers were
9 provided instructions on how to lash the vehicles from Grimaldi;
10 is that right?

11 A. Yes.

12 Q. And when you said they were provided in instructions, they
13 were just told how many lashings for each car or vehicle?

14 A. Yes. Yes.

15 Q. Okay, they didn't tell you actually how to do it, right?

16 A. Right, right.

17 Q. Were you provided any -- or how were the drivers provided
18 instructions from SSA?

19 A. I don't understand the question.

20 Q. Okay. Are the drivers -- first of all, they're all ILA
21 longshoremen, right?

22 A. Correct.

23 Q. All right. Are they given any training?

24 MR. BAIAD: When? At what point? For what?

25 MR. THIEL: Well, prior to the time they began driving the

1 vehicles on board.

2 MR. BAIAD: I mean, are you asking if SSA gives the --
3 (Simultaneous speaking.)

4 MR. THIEL: -- (indiscernible) driver's license.

5 MR. BAIAD: I mean, are you asking if SSA trains the ILA
6 employees? Is that the question?

7 MR. THIEL: Yes. Yes.

8 MR. BAIAD: You can answer if you know.

9 MR. DIXON: I don't know what's being asked.

10 BY MR. THIEL:

11 Q. All right, I'll broaden it. Does SSA provide any training to
12 the ILA members that are involved in moving vehicles aboard a car
13 carrier?

14 A. Still, I mean, I don't understand where you're going with it.
15 I don't get it. I mean --

16 Q. I'm just asking if SSA provides the ILA longshoremen any
17 training on how to do their jobs.

18 MR. BAIAD: If you know.

19 MR. DIXON: I mean, I don't, I don't -- it depends, I guess.

20 BY MR. THIEL:

21 Q. Well, let's go back to the lashers that you mentioned. You
22 said that Grimaldi provides instructions on the numbers of lashes
23 for the vehicles, correct?

24 A. Correct.

25 Q. How do the lashers then understand those procedures? Does

1 SSA train them, or are they given the guidelines? How does that
2 work?

3 A. They're given the guidelines.

4 Q. Is that via a safety meeting or a pre-load meeting?

5 A. Or by their header. By the stevedore on the deck and the
6 header on the deck.

7 Q. So would they do it the day of loading?

8 A. Correct.

9 Q. Okay. So we talked about lashers. Are the drivers provided
10 any type of instruction by SSA?

11 A. The direction to drive them.

12 Q. All right, just told where to drive them, what deck to go to?

13 A. Correct.

14 Q. All right. What about spotters, are they provided any
15 procedures or instructions by SSA?

16 A. They get a load plan.

17 Q. Okay, who provides them the load plan?

18 A. The port captain for Grimaldi.

19 Q. Okay. And then they basically direct the cars to the
20 appropriate location according to the load plan; is that correct?

21 A. Correct.

22 Q. All right. For the battery disconnect team, are they
23 provided guidance?

24 A. Correct.

25 Q. Who are they provided guidance by?

1 A. Instructions that were given to us by Grimaldi.

2 Q. So you receive the instructions from Grimaldi and then
3 instruct the longshoremen what to do? Is that correct?

4 A. What was the question there?

5 Q. That -- okay. You're provided the battery disconnect
6 instructions from Grimaldi; that's what you said, right?

7 A. Right.

8 Q. And then the longshoremen are instructed in those procedures,
9 correct?

10 A. Correct.

11 Q. Is that done on the day of loading, similar to the lashers?

12 A. I don't know when it was taken care of.

13 Q. Okay. Do you know who provides those instructions to the
14 longshoremen?

15 A. I don't, I don't. I think it would probably be the
16 mechanics.

17 Q. So are the guys that are disconnecting the batteries, are
18 they mechanics?

19 A. I don't know. I don't know the answer to that question.

20 Q. Okay. Do you know if anyone -- or who is responsible for the
21 disconnecting of the batteries in accordance with the procedures?

22 A. That's the mechanic department.

23 Q. All right. Is that a separate department that goes onboard
24 the vessel?

25 A. Yes.

- 1 Q. And that's an SSA department?
- 2 A. Yes.
- 3 Q. And who is in charge of the mechanic department?
- 4 A. I guess Jeff Nettles.
- 5 Q. You said Jeff, what was his last name?
- 6 A. Nettles.
- 7 Q. Nettles?
- 8 A. Yes.
- 9 Q. And was he onboard the vessel at all?
- 10 A. I don't know the answer to that question.
- 11 Q. Okay. Do you know what his title is?
- 12 A. No, I really don't.
- 13 Q. Okay. And then the group of flagmen, who provides them with
- 14 instructions?
- 15 A. They get their same instructions from the header and the deck
- 16 stevedores.
- 17 Q. And I'm assuming they're working with the spotters; is that
- 18 correct?
- 19 A. Not really.
- 20 Q. No? So what's the difference between what the flagmen do and
- 21 what the spotters do?
- 22 A. Spotters put the cars in stow. Flagmen keep the ramps going
- 23 fore and aft. So you've got people flagging people up and down
- 24 the ramps.
- 25 Q. Okay. What were the ventilation issues on Decks 3, 8 and 11?

- 1 A. I don't really know. I don't know if it was not enough or --
2 I know it was something to that extent, but I really don't know.
- 3 Q. Who notified you that there was some issue?
- 4 A. I just heard chatter on the radio.
- 5 Q. So you have a radio when you're in the load process?
- 6 A. Correct.
- 7 Q. Who else has radios?
- 8 A. Everybody. Stevedore-wise. Stevedore-wise.
- 9 Q. (Indiscernible) each individual longshoreman or just SSA
10 people?
- 11 A. Just SSA people.
- 12 Q. All right. Are there any communications on that radio with
13 the vessel's crew?
- 14 A. No.
- 15 Q. All right, so it's just internal to SSA?
- 16 A. Yes.
- 17 Q. So it would be you and then the headers?
- 18 A. Just the ship foreman and the stevedores.
- 19 Q. Who's the ship foreman?
- 20 A. ILA.
- 21 Q. Who was it in this instance?
- 22 A. Troy Butler.
- 23 Q. So, when you say ILA, he wasn't employed by SSA; is that
24 right?
- 25 A. What was that again?

- 1 Q. Was he employed by SSA then?
- 2 A. He was ILA.
- 3 Q. Okay. Did you go on the vessel at all?
- 4 A. Just on the main deck.
- 5 Q. And that would be -- is that Deck 5?
- 6 A. Correct.
- 7 Q. And why did you go onboard?
- 8 A. I don't recall now.
- 9 Q. And if I understood you earlier, before, you only had a few
10 conversations with the vessel's crew?
- 11 A. Correct.
- 12 Q. I didn't hear what -- you said the last one occurred around,
13 I believe it was 1500, on the second day. What was that
14 conversation about?
- 15 A. Just letting him know when the line's out and completion
16 time.
- 17 Q. All right. And was that completion time 1500?
- 18 A. Correct.
- 19 Q. When was the first time you became aware that there was a
20 fire?
- 21 A. It must have been 40, 45 minutes after the ship was complete.
- 22 Q. Were you still there?
- 23 A. Correct.
- 24 Q. Were you on the dock or in the office? Where were you?
- 25 A. Horizon Terminals.

1 Q. And Horizon Terminals is a separate company from SSA?

2 A. Correct.

3 Q. And did you hear the report of a fire on the radio?

4 A. No.

5 Q. And how did you find out about it?

6 A. Somebody drove up and told me.

7 Q. Can you tell me what, prior to the vessel arrival, what role
8 SSA has with regard to the vehicles that are going to be brought
9 onto the vessel?

10 MR. MOSELY: Can you repeat the question?

11 BY MR. THIEL:

12 Q. Okay. Prior to the vessel arrival, what does -- what, if
13 any, role does SSA have with regard to the vehicles that are going
14 to be placed on the vessel?

15 A. We just make up tick sheets and assemble it.

16 Q. What sheets?

17 A. Tick, tick, tick sheets, you know, tick-off sheets.

18 Q. T-i-c-k?

19 A. Yes.

20 Q. What's a tick sheet?

21 A. We assign the car a number and then, on assembly, the clerk
22 writes the number on the little color dot so we know we're getting
23 the right car for a ship.

24 Q. Okay. When you're doing this, are the vehicles already
25 pre-staged for loading?

1 A. Yes.

2 Q. All right. Does SSA do the pre-staging, or is that the
3 terminal?

4 A. Terminal.

5 Q. Okay. So then you just look at the pre-staging and then,
6 basically, assign the car a number for the deck that it's going to
7 be loaded on in accordance with the stow plan; is that fair?

8 A. I don't understand that.

9 Q. Okay. When you say you assign the car a number and a color,
10 is that so that when it's being loaded, everyone knows where it's
11 going on the vessel?

12 A. Not necessarily.

13 Q. All right, can you explain that for me then?

14 A. The terminal puts a color dot on the car. They, they --

15 Q. Okay, what does that color represent?

16 A. Just for that vessel.

17 Q. Okay, so the color is for the vessel?

18 A. Right.

19 Q. All right. And then what do you do?

20 A. Then, when we assemble it, we just put a number on the dot of
21 the car that it's connected to, or the tick sheet.

22 Q. Okay. And then what does that number correlate to as far as
23 your documentation goes?

24 A. Just the car it belongs to. So, if you looked at a list and
25 you looked at that tick number, that would correlate on our list

1 with a car.

2 Q. Okay. All right. And then, from my understanding, what you
3 were asked before -- I won't go into it again -- there's no
4 inspection that SSA does of those vehicles prior to the time
5 they're being put on the vessel; is that correct?

6 A. Correct.

7 MR. THIEL: All right. Thanks. I don't have any further
8 questions.

9 LTJG ██████████ All right. At this time --

10 MR. MOSELY: Just one follow up if I could add, too.

11 LTJG ██████████ Okay. Mr. Mosely?

12 BY MR. MOSELY:

13 Q. Yeah, you talked about this tick sheet. Is there any way to
14 know which cars are on which deck? Do you have any document that
15 says numbers, you know, 1 through 8 are on Deck 7, or something
16 like that?

17 A. No.

18 Q. There's no document -- there's no way you could recreate
19 which automobiles are on which deck on this vessel?

20 A. No. I mean, I have a general idea, but I couldn't tell you
21 what specific vehicles are where.

22 Q. And is there any document which would lay all that out?

23 A. What do you mean?

24 Q. Is there something that SSA has that's a written sheet of
25 paper, a report that lays out where all those -- which vehicles

1 were on which deck?

2 A. Which specific vehicles? I mean, I don't understand what
3 you're trying to get at.

4 MR. BAIAD: He's just trying to ask if there's a piece of
5 paper that identifies which specific cars are on which specific
6 location on the ship.

7 MR. DIXON: No, I don't --

8 MR. BAIAD: There's not.

9 MR. MOSELY: Not in SSA's possession, correct?

10 MR. BAIAD: It doesn't exist. Not that it's not in our
11 possession, it just does not exist.

12 BY MR. [REDACTED]

13 Q. Real quick back to the battery disconnectors?

14 A. Yeah.

15 Q. Are all the vehicles onboard disconnected? Are the batteries
16 on all vehicles disconnected?

17 A. I know they -- I think there was a few that wasn't.

18 Q. Okay. And do you know why they -- I guess, is that policy?
19 Is that, like, a process that you guys have for the disconnecting
20 of the batteries?

21 A. I think they're identified.

22 Q. All right. So there will be a sheet that says we'll have
23 vehicles on, to disconnect the batteries on that particular
24 vehicle?

25 A. I don't know what --

1 Q. So by that -- you said those vehicles are identified as far
2 as the ones that need to be disconnected, the battery be
3 disconnected; is that right?

4 A. I mean, they're all disconnected.

5 Q. Okay. All right. So all the vehicles that go onboard, the
6 batteries are disconnected, but there were a couple that weren't?

7 A. Okay, one question at a time, okay. So all vehicles --
8 what's the question again?

9 Q. All the vehicles that go onboard the vessel, are those
10 batteries disconnected?

11 A. Yes and no.

12 Q. Yes?

13 A. They're supposed to have the batteries disconnected. I mean,
14 or they -- let me rephrase the question. Yes, the batteries are
15 disconnected.

16 Q. Okay, but you said no, so some of them may not be?

17 A. For one reason or another, yes.

18 Q. Can you just gives us examples of why they may not be
19 disconnected? And it doesn't necessarily have to be for this
20 particular vessel, just in general, I guess.

21 A. The battery's under the seat, battery's under the trunk, hood
22 inoperable.

23 LTJG [REDACTED] Are you done with, [REDACTED]

24 MR. [REDACTED] Yeah.

25 MR. MOSELY: I've got one follow up.

1 BY MR. MOSELY:

2 Q. So the vehicles that are driven up onboard the vessel, they
3 disconnect those batteries once they're driven onboard the vessel?

4 A. Yes.

5 Q. Who does that? The person who drove it on the vessel?

6 A. No, the mechanics.

7 Q. So is there a mechanic on all of these decks? Is there a
8 mechanic assigned to each deck, or is there a mechanic for the
9 whole vessel?

10 A. No, they have, like, battery brigades.

11 Q. Okay. And so, once a vehicle is driven on the deck, that
12 battery brigade must disconnect that battery?

13 A. Correct.

14 Q. If he does not disconnect that battery, does he make a note
15 of some sort and let you know?

16 A. I think they put the -- I don't know how they did it on this
17 last ship, but they're identified with caution tape.

18 Q. Were there any vehicles on Decks 7 or 8 that were identified
19 with caution tape?

20 A. I don't recall right now.

21 Q. Do you have any document which would show that there were
22 vehicles identified with caution tape?

23 A. Yes.

24 Q. What would those be called?

25 A. Battery disconnect sheet.

1 Q. And does that battery disconnect sheet list those vehicle
2 that the batteries were disconnected or that there were problems?

3 A. It just lists the number on that deck that wasn't
4 disconnected.

5 Q. So, just to understand this, when a vessel comes into port
6 and there's vehicles to be unloaded, do they have to go hook up
7 all the batteries?

8 A. No.

9 Q. No? Okay. Why is that?

10 A. I don't know.

11 Q. So why do they disconnect these batteries when they're
12 outbound, but they're not ever disconnected when the vessel
13 arrives here?

14 MR. BAIAD: If you know.

15 MR. MOSELY: If they're being discharged --

16 MR. DIXON: I mean, I don't know. I don't know.

17 MR. MOSELY: I've never heard of a car carrier coming into
18 port with vehicles to be discharged in other ports where they have
19 to go -- they have to connect the battery before the vessel -- the
20 vehicle is driven off.

21 MR. BAIAD: Do you understand his question?

22 MR. DIXON: No.

23 MR. MOSELY: I've never heard of a crew onboard a vessel to
24 connect batteries before the vehicles could be discharged. Is
25 that true?

1 MR. BAIAD: If you know.

2 MR. DIXON: I don't necessarily know that, you know.

3 BY MR. MOSELY:

4 Q. Who gives you all the instruction to disconnect these
5 batteries?

6 A. Grimaldi.

7 Q. Anything else disconnected besides batteries?

8 A. That's it.

9 Q. Anything else done when you open up the hood to disconnect
10 the battery?

11 A. Just to disconnect and put a -- what is that? I don't even
12 know what it's called. I can't think of it right now, but it's a
13 cover over the negative terminal.

14 MR. MOSELY: All right.

15 LTJG ██████████ You're done.

16 MR. DIXON: All right. Thank you.

17 LTJG ██████████ Hold on one second.

18 MR. DIXON: Oh, okay.

19 LTJG ██████████ It's 1:15 on June 10th, 2020, and this
20 concludes the interview with Mr. Jeffery Dixon.

21 Thanks very much for your cooperation.

22 MR. DIXON: Thank you.

23 (Whereupon, the interview was concluded.)

24

25

CERTIFICATE

This is to certify that the attached proceeding before the

NATIONAL TRANSPORTATION SAFETY BOARD


IN THE MATTER OF: SHIPBOARD FIRE ABOARD THE *HOËGH*
XIAMEN IN JACKSONVILLE, FLORIDA,
ON JUNE 4, 2020
Interview of Jeffery Dixon

ACCIDENT NO.: DCA20FM020

PLACE: Jacksonville, Florida

DATE: June 10, 2020

was held according to the record, and that this is the original,
complete, true and accurate transcript which has been transcribed
to the best of my skill and ability.


Lisa Fuerstenberg
Transcriber