National Transportation Safety Board
Office of Highway Safety
Washington, DC 20594

HWY24MH013

HAZARDOUS MATERIALS ATTACHMENT

Brenntag Load Securement SOP

(4 Pages)

Subject: Load Securement

PURPOSE	Brenntag Great Lakes is committed to carrying out each delivery to our customer sites with the highest regard for the safety of its employees, customers, and the general public. The purpose of this procedure is to explain the recommended practices for loading and securing from movement of packages, drums, and totes on our flatbed or van trailers for safe transportation in compliance with 49 CFR §393.100-393.106 and for appropriately segregated according to 49 CFR §177.848(e). Also refer to BGL HM 126 F training and PowerPoint on Haz-Mat compliance.
RESPONSIBILITY	VP of Operations, Regulatory Compliance Manger (QSHE), Transportation Manager, Drivers, and Warehouse Personnel
REFERENCES	N/A
PROCEDURE	See Below

1.0 Scope:

Improper loading and inadequate load securing, pose extreme risk of exposure to hazardous materials and the potential for severe financial losses. All employees involved in loading and transporting product have an obligation to understand and comply with the components of this procedure for load securement, and to ensure safe transportation of all products.

2.0

Responsible Individuals	Actions or Responsibilities
VP of Operations	• Maintain a safe load securement program which embodies the proper attitudes toward safety and environmental protection.
Regulatory Compliance Manager (QSHE)	• Periodically audit facilities for compliance.
Transportation Manager	• Train employees on requirements of load securement.
Drivers and Warehouse Personnel	• Become familiar with all load-securing equipment for operation and application. • Follow recommended practices.

VAN TRAILERS - Packaged and Drummed Product for Shipment

4.0 Equipment Specifications:

4.1 All Brenntag van trailers should be equipped with three E-Track rails installed at 18", 22" & 58", measured to bottom of the E-Track from trailer floor.

4.2 E-Track bars should be rated at a minimum of 2500 lbs.

4.3 Ratchet straps should be rate at 3500 lbs.

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4.4 All equipment should be inspected prior to use. Worn or damaged equipment must not be used and must be replaced immediately. (This is why two straps at the rear of the load is BGL's best practice)

5.0 Procedure:

5.1. All pallets of solid powder material should be shrink-wrapped to prevent movement on or off the pallet. Shrink wrap is the "Best Practice" but banding can be used, provided proper tension is applied and care is taken to prevent product damage.

5.2. Load securement measures may be applied every second pallet row (or 8 feet), at a minimum. Circumstances may dictate greater frequencies. Dunnage may also be needed.

5.2.1. Load securement measures should be applied after every row of totes if no dunnage is used.

5.2.2. If a void space is used to distribute weight, an E-Track bar and a ratchet strap must be applied prior to (forward of) the void. An E-Track bar must also be applied directly following (behind) the void prior to the next product row.

5.3. Singling out of totes or pallets of material in the center of the van must be avoided.

5.3.1. "Best Practice" incorporates securing the product to one side of the van with two ratchet straps at different levels.

5.3.2. An acceptable alternative incorporates the use of dunnage to one side of the pallet and the use of an E-Track or ratchet strap to secure the row.

5.3.3. Single drums must be secured to the wall utilizing a ratchet strap.

5.4. Before leaving the yard and after each delivery, driver is to assure that the pallet jack, drum dolly and any other equipment is secured in the trailer.

5.5. Two ratchet straps should be applied behind the final row of product; the van trailer doors, alone, are not sufficient securement.

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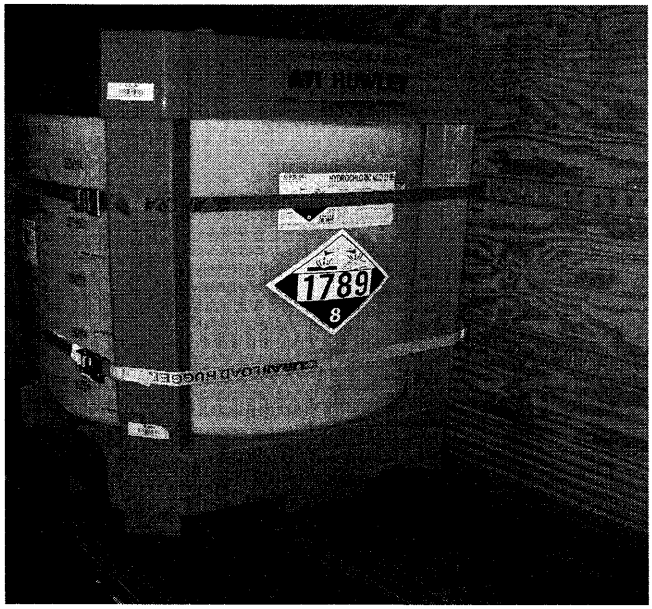
6.0 References photos for packaged drum and tote product for shipment on a VAN trailers.



SUMMARY	To explain the recommended practices for loading and securing from movement of packages, drums, and totes on our flatbed or van trailers for safe transportation in compliance with 49 CFR §393.100-393.106			
REVISION LOG	**Date**	**Revision#**	**Description of Change**	**Approved By**
	2/12/2024	0	New Procedure	Mike Schick

Add additional revision log rows when this is updated (do not delete previous line items)

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