



## **SAFETY PROGRAM**

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# AMTRAN SAFETY PROGRAM

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## INTRODUCTION

This document sets out AMTRAN's philosophy, policies, procedures and practices concerning safety. It is our plan for the safe operation of our vehicles and safe practices – working and non-working - for AMTRAN's facilities. It represents our best efforts to not take safety for granted. For the sake of our customers, our fellow employees and ourselves we offer the following program.

AMTRAN is committed to safe, reliable and efficient public transportation. It is committed to reducing all types of accidents that could possibly occur on our vehicles and in our facilities. The program presented in this document is designed to move towards that goal.

Accidents benefit no one at AMTRAN. They do not benefit the employee who is injured in the course of his work. They certainly do not benefit AMTRAN which loses the valuable skills and experience of that employee. In fact, we all lose when a colleague has an accident, even if it is unpreventable. Accidents are inconvenient to all concerned – customers late for their work; drivers and supervisors doing paperwork; maintenance people with more work to do – no one is spared. At AMTRAN we realize we can take steps to avoid these situations.

Among the key points of the Safety Program is an emphasis on employee incentives. Operators with "safe" driving records will be recognized and rewarded. Maintenance employees with safe work records will also be recognized and rewarded. The program also contains a formal disciplinary code, which assures fair and equitable consideration of all "accident" situations and provides for progressive disciplinary actions.

This program also details a plan for ongoing awareness and focus on safety-related issues through the continuing functions of a standing Safety Committee and a regular schedule of safety meetings.

All AMTRAN employees are encouraged to read this document carefully. If there are any suggestions for improvement or questions about the various components, employees are encouraged to seek out their Supervisor and discuss the issues.

Sincerely,

Eric Wolf  
General Manager

## PART I

### BUS & SERVICE VEHICLE ACCIDENT PREVENTION PLAN

#### Policies & Procedures

##### *Defensive Driving*

The principles of defensive driving require all operators to anticipate dangerous or accident-causing situation and take steps to minimize the danger of these situations. These principles call for drivers to assume the worst will happen in any given situation. Following the letter of applicable State or local vehicle codes is not sufficient performance. Operators driving skills will be evaluated according to the higher standards of safety and skill called for by defensive driving principles.

The National Safety Council (NSC) defines defensive driving as follows:

*A defensive driver is one who makes allowances for the lack of skill and lack of knowledge on the part of the other driver who recognizes that he has no control over the unpredictable actions of other drivers and pedestrians, nor over conditions of weather and road, and who, therefore, develops a defense against all these hazards. He concedes his right of way and makes other concessions to avoid a collision; he is defensively alert to avoid the accident traps and hazards created by weather, roads, pedestrians and other drivers.*

*Neither icy road, curves, hills, narrow roads, the absence of signs or signals, signals out of order, nor carelessness, recklessness or ignorance on the part of others, relieves the driver in the slightest degree of his responsibility for driving without accident. These are situations likely to be encountered at any time, and we must drive accordingly.*

##### *Accidents and Incidents*

An accident is defined as any occasion in which any part of a vehicle owned by AMTRAN makes contact with another vehicle, person, animal, or object, whether fixed or moving, in which damage, no matter how slight, is done to the AMTRAN vehicle or the object it makes contact with. An accident is also any customer injury that occurs on an AMTRAN vehicle or in immediate proximity to that vehicle.

An incident is defined as any occurrence listed above which does not result in damage to any of the vehicles, objects or persons involved. An incident is further defined as any unusual occurrence involving vehicles or customers. These may be either injury causing (customer falls on the sidewalk at a bus stop) or not. Incidents do not necessarily involve AMTRAN vehicles or customers. These types of incidents would include witnessing hit-and-run collisions or crimes. Incidents could include unusual or threatening conversation with customers, or unusual fare disputes.

### *Accident and Incident Reporting*

An operator involved in an accident or incident must complete a report. The report is to contain the names and addresses of the persons involved, the make and license number of other vehicles involved, names and addresses of all witnesses, and finally a statement by the operator giving factual details relating to the accident/incident. The report is to be filed with the Director of Transportation immediately following the accident or incident, or at the end of the shift on the day of the accident or incident. Supervisors are available to assist in the completion of accident and incident reports.

### *Accident Procedures*

In all accident cases, the situation should be addressed as quickly as possible in order to prevent undue cessation of service or a potential traffic tie-up. In cases of a collision, the operator should first determine if anyone is injured either on the bus or in any other vehicle involved. The operator should then contact the dispatcher on-duty with notification of the accident and await any further instructions. The dispatcher on-duty or Transportation Supervisor is the only individual authorized to make a decision as to the proper procedure for handling an accident or incident. The operator should make every effort to avoid having anyone involved in the accident or incident, including customers, from leaving the scene unless a Transportation Supervisor has instructed the operator otherwise.

The operator is further responsible for securing the names and addresses of all the occupants of the bus; the occupants of any other vehicle involved and detailed information – make, model, year, license plate number – of any other vehicle involved.

Under no circumstances is the operator to make any comments or argue with other drivers or other persons involved in the accident or to make any statements that may unfavorably reflect on AMTRAN, its equipment or personnel.

Operators should give the police only that information required by law. Operators may not discuss any matter relating to an accident with any other person at the scene. No aspect of possible vehicle defect may ever be discussed, and operators may never admit fault. Any person who wishes to discuss any facet of the accident or incident must be referred to a Transportation Supervisor. In no case should an operator discuss an accident that he or she is involved in with any representative of any insurance company unless directed to do so by a Supervisor.

When any accident occurs, the operator will follow the instructions on the accident report form provided to each driver of an AMTRAN bus and/or service vehicle and observe the correct radio procedures for reporting an accident. The following steps, if followed, should provide for adequate handling of an accident and/or emergency situation:

- *Secure the vehicle.*
- *Check customers for injuries.*
- *Advise dispatch. (If radio inoperable find cell phone or public phone after step #6.)*
- *Evacuate vehicle only if necessary.*

- *Assist customers with injuries where appropriate.*
- *Calmly reassure the customers.*
- *Find registration and insurance information.*
- *Make a list of customers & other witnesses.*
- *Cooperate with law enforcement officials.*
- *Do not assign blame or take responsibility for the accident.*
- *Do not talk to the media. (Suggested media response: “Our policy is that all communication with the media goes through the General Manager. I have to go take care of our customers.”)*

### *Assistance to Injured Customers*

In case of an accident in which one or more persons are injured seriously enough to require medical attention, the operator’s first duty is to take care of the injured. The dispatcher on-duty should be notified to send an ambulance. The operator must never leave the scene of the accident until injured persons are taken care of, and until instructions to leave are received from the Transportation Supervisor or dispatcher on-duty.

When persons are injured in any accident or incident involving AMTRAN vehicles, employees must give every assistance that circumstances and training permit. Injured persons should not be moved unless failure to move them would result in further injury or death.

In the unusual case where an injured person is taken to the hospital, doctor’s office, pharmacy or home by another motorist, the operator must secure the name of the motorist, his or her address and the license number of the automobile.

Operators must not promise to send a doctor to the home of a person who has been injured or tell the person they will be “contacted later.” If the injured person insists on going home, they will then be responsible for their own medical treatment.

### *Injuries to Customers*

All injuries to customers during boarding, de-boarding or while riding the bus – no matter how slight – must be reported. The operator must ask for injured customers’ names and addresses, how they feel and how they were injured. In the report, the operator must state how the injury occurred, as well as names and addresses of other customers who may be witnesses.

### *Injuries to Operators*

Any operator sustaining an injury in the course of his or her employment, no matter how slight, must report the injury to the Transportation Supervisor or dispatcher on-duty immediately. If no Supervisor or Dispatcher is on duty at the time of the injury, the injury must be reported to a Transportation Supervisor by telephone as soon as possible. The operator must also fill out a Workplace Injury Report Form as soon as possible after the injury has occurred. See “Workers’ Compensation Policy.”

### *Securing Witnesses*

As many witnesses as possible should be secured for every accident regardless of whether it is serious or slight. Very often it is the accident that seems to be of little consequence which turns out to be the most troublesome.

In securing names either on the street or in the bus, the operator must never ask, "Did you see the accident?" Instead, the operator is to collect the names and addresses of everyone present by asking, "May I have your name for my report please?" Many times persons who did not actually see the accident happen can give valuable pertinent information as to cause or result.

The business of securing names should be done as quickly as possible in order to minimize the time people are delayed. Every effort should be made to avoid the word "witness." An operator must not allow any question of responsibility to influence him or her in the collection of information and the obtaining of names. Securing the maximum number of names as possible, regardless of the circumstances, can help the operator in his or her own report of the accident.

### *Maintenance Special Procedures*

Procedures to follow after an incident/accident that may have been caused by a mechanical failure:

Contact the Director of Maintenance. If not available, contact 2nd Shift Supervisor. Only talk to AMTRAN management personnel: Director of Transportation and/or Transportation Supervisors. The bus will be put inside the garage (if possible) or out of sight of the public until the Director Of Maintenance and /or 2nd Shift Supervisor has cleared it to go back into service. No one is to do any work or repairs to this vehicle until cleared by the Director of Maintenance and/or 2nd Shift Supervisor. Even if there are not enough buses for service - make do with what we have.

Director of Maintenance, 2nd Shift Supervisor or the working foreman must do the following:

Document (who, what, when, where, and why) any and all of the information for this incident/accident. Collect any physical evidence that may pertain to this incident/accident. Find out who worked on this bus last, (i.e. brake problem incident-last insp. / work order done on the brakes). If the supervisor or the working foreman is the person collecting the information above, they are to give the information to the supervisor in charge of the investigation. They are only getting the information together for the investigation, not for making any judgment calls or putting the blame on anyone.

Due to federal regulations, an operator and/or mechanic may be sent for testing.

### *Accident Review Procedures*

The following procedures will be used in reviewing accidents.

1. The Director of Transportation will review the accident and make a determination as to whether the accident was preventable or non-preventable.
2. Consistent with Article 6-a of the collective bargaining agreement, an employee will be notified as to the accident determination within seventy-two (72) hours, exclusive of Saturdays, Sundays, holidays or employee's relief day.
3. Consistent with AMTRAN's Discipline Policy, the employee will have the opportunity to offer a response and has the right to a hearing..

### *Hit & Run*

In the event an operator becomes involved in a hit and run situation with another vehicle, the operator must notify the dispatcher on-duty immediately. Under no circumstances is the operator to move the bus or leave the scene until the operator has been given orders to do so by law enforcement personnel or an AMTRAN Transportation Supervisor.

### *Intersections*

An operator should approach a street intersection with the bus under absolute control, ready to stop instantly. When operating on a street which is not an arterial throughway, more than ordinary caution is necessary. Right-of-way does not mean a thing, especially after an accident. AMTRAN buses will stop at all unprotected intersections. This is called a "Safety Stop."

The operator must not assume that a vehicle crossing or turning in front of the bus is going to continue to move. The operator must reduce the speed of the bus and be ready to stop in case the vehicle ahead should stop.

### *Observance of Traffic Signals*

Vehicles are not to enter intersections unless the operator knows he or she can maneuver the vehicle completely across. The operator must not proceed into an intersection if the vehicle will block a cross street when the signal changes

### *Speed*

It is important that buses be operated on schedule, but it is more important that customers be given a safe comfortable ride. Buses must always be operated at a speed that is consistent with traffic, weather, street conditions and posted speed limits. When operating over rough streets, the speed of the bus should be reduced sufficiently so that customers remain comfortable and are not bumped or jostled.

### *Speed in Yard/Garage*

Personal or Company vehicles being operated inside the yard and/or garage must be limited to a speed of 5 miles per hour inside the garage and 15 miles per hour in the yard.

Vehicles must be brought to a complete stop when exiting the yard and when exiting the garage. Also when exiting the garage, the horn must be blown before proceeding out of the garage.

### *Obscured Vision*

When vision is obscured by fog, rain, sleet, snow, smoke or any other reason, operators must operate their vehicles only at such speed as will permit them to stop within the distance they can see.

### *Pedestrians*

Pedestrians may be a source of danger and must be observed very carefully. The operator must bear in mind that pedestrians have the right of way at all crosswalks. When a pedestrian is crossing a street, it is up to the operator to slow down and make sure the pedestrian is safely out of the way before continuing.

The horn should be used only to warn those persons who are standing at the curb or in a safety zone. Those who have started across a street have the right of way and must be allowed to continue.

It is up to the operator to do the watching and thinking not only for him or herself, but for the pedestrian as well.

### *Sudden Stops*

Sudden stops that result in throwing standing customers must be avoided unless a collision is imminent. Such stops are very apt to cause injury to our customers. If the sudden stop is necessitated by a vehicle cutting in, etc. identification of the vehicle by license number or other means should be noted and reported to the dispatcher on-duty.

Should a sudden stop cause injury to a customer, an accident report must be filed. The report should include the customer's name, address and phone number; a statement of the customer's injuries and a statement from the operator concerning the events leading to the injury.

### *Railroad Crossings*

Railroad crossings are points of known danger and the utmost care and vigilance must be exercised when approaching and crossing them.

Operators approaching a railroad crossing must come to a FULL STOP not less than eight feet from the nearest rail and not more than fifty feet from the nearest rail. While stopped, the entrance door must be opened and the Operator should listen and look in both directions for an approaching train or for signals indicating the approach of a train. The operator of the vehicle may not proceed until it can be done safely.

If a vehicle becomes stalled on a crossing, the operator should request customers to alight and move clear of the track until the vehicle can be restarted and moved clear of the track.

### *Parking Brake*

An operator should never use an open rear door as a “parking brake.” Always use the appropriate parking brake mechanism, (hand or foot brake depending on vehicle type).

### *Backing a Vehicle*

Operators must take every precaution to avoid finding themselves in situations in which they must back their vehicle up. If it is absolutely necessary to back a vehicle, the operator must either (a) go personally to the back of the bus to ensure that there is no object behind the bus, or (b) have another person guide them back. As an added precaution, the horn should be sounded before backing. In all instances, the Transportation Supervisor or dispatcher on-duty must be advised of a backing situation.

### *Traffic Laws*

All operators of any AMTRAN vehicle must be familiar with, and will be held responsible for adherence to, the traffic laws and regulations of the federal, state, and local government. Any questions on pertinent traffic laws should be addressed to a Transportation Supervisor.

### *Right of Way*

AMTRAN vehicles, when operating over the street, have only the rights equal to those possessed by other vehicles on the street. Operators must never take the right of way from another vehicle on the assumption that the driver of the other vehicle will yield.

AMTRAN vehicles must proceed only when it is safe to do so regardless of the right of way. Whether or not a vehicle has the right of way will not be accepted as an excuse for a collision with another vehicle or a pedestrian.

Police and fire department vehicles, ambulances, and other emergency vehicles have an undisputed right of way. On approach of these vehicles as indicated by a flashing light or audible signal, buses will be pulled to the curb if possible. All vehicle doors must be kept closed while emergency vehicles are passing.

Operators will not break through a funeral procession or military convoy with any AMTRAN vehicle.

### *Fire on Vehicle*

At the first indication or suspicion of a fire on a vehicle, proceed as follows:

1. Stop vehicle immediately and evacuate customers as quickly as possible. All customers must be directed to move a safe distance from the vehicle.

2. The master control switch (depending on vehicle type) must be turned off.
3. If it is safe to use the radio, notify the Transportation Supervisor or dispatcher on duty of all details.
4. If the fire cannot be controlled by an extinguisher, the operator should seek to notify the fire department. If use of the radio is not safe, the operator should seek to find access to a telephone and immediately phone the fire department and then the AMTRAN Office.
5. An incident report must be filled out immediately after an incident or at the end of the shift on the day of the incident.

## **Recognition, Incentives & Rewards**

### **Recognition**

AMTRAN recognizes it is a difficult task for operators and maintenance personnel to safely perform their duties on a daily basis. The increased traffic and congestion in the Altoona area is a constant challenge for the professional driver. The limited space and tight parking areas at the AMTRAN garage are not easy to negotiate in a thirty-five foot vehicle. AMTRAN's Safety Program provides for a system of incentives and rewards for exceptional performance.

In recognition of safe vehicle operation records, Safety Certificates will be mailed to employees who achieve yearly safe driving records. The calculation of time period will be based on calendar years (January – December). Copies of these certificates will be added to the employee's personnel file. Recognition will be at one-year intervals.

In addition to this form of recognition, AMTRAN also reserves the right to publicize the safety awards program and as part of the program to use operators' pictures and names.

### **Group Incentives**

When AMTRAN's operators and maintenance personnel as a group have exceptional performance everyone shares in the recognition. The following plan for rewards shall be carried out:

No Preventable Accidents for 30 days (plus increments thereof) – “Coffee and Donuts”

No Preventable Accidents for 60 days - \$10 Gift Certificate for each employee

No Preventable Accidents 90 days - \$15 Gift Certificate & Employee Luncheon

No Preventable Accidents 120 days - \$20 Gift Certificate & Employee Luncheon

No Preventable Accidents 150 days (and every 30 days thereafter) - \$25 Gift Certificate & Employee Luncheon

Gift Certificates are for area restaurants, retail stores and attractions.

Employee luncheons and coffee and donut buffets are the responsibility of Transportation Supervisors and Administrative personnel. Selection of food and hospitality provided will be at their discretion.

### Individual Incentives and Rewards

As individual incentive for safe operation of vehicles, all operators and maintenance personnel are granted extra time off for calendar years without a preventable accident.

Full-time operators and maintenance personnel who have no preventable accidents will be given an additional personal day off. Granting of this extra day off shall be in accordance with all operations policies, work rules and collective bargaining contract stipulations.

Part-time operators and maintenance personnel who have no preventable accidents will be given an additional ½ day off. Granting of this extra ½ day off shall be in accordance with all operations policies, work rules and collective bargaining contract stipulations.

### Definitions

1. A Full-time operator must be full-time for the entire calendar year (January 1 – December 31) and must have performed regular driving duties for at least 1600 hours of the calendar year.
2. Part-Time operators must be on the part-time roster for the entire calendar year (January 1 – December 31), and must have performed regular driving duties for at least 350 hours of the year. Awards received while part-time are not carried forward or counted towards full-time awards.

### Added Incentive – Annual Statewide Bus Roadeo

The Pennsylvania Public Transportation Association (PPTA) currently sponsors an annual statewide bus roadeo. It is a competition where operators test their driving skills on a predetermined road course. This special event attempts to duplicate road hazards which operators face on a daily basis.

AMTRAN operators have participated and done well in roadeos over the years. The Authority wishes to continue this involvement. However, given the expense and time involved, certain criteria are established. To be a participant, an operator may not have had a preventable accident in the twelve-month period prior to the roadeo.

### Milestone Reward Program

As an additional reward for safe vehicle operation and safe work practices full and part-time operators and maintenance personnel will be given the following milestone achievement rewards. These rewards are to be given during the milestone year only – not annually.

- \$50 gift certificate – 5 non-consecutive years without a preventable accident,

- \$100 gift certificate – 10 non-consecutive years without a preventable accident,
- \$200 gift certificate – 15 non-consecutive years without a preventable accident,
- \$300 gift certificate – 20 non-consecutive years without a preventable accident,
- \$400 gift certificate – 25 non-consecutive years without a preventable accident.

### **Discipline Process**

Based upon the total information available, the Director of Transportation shall make a decision to classify the accident in one of the following categories.

Accident – Non-Preventable, Work Damage, Vandalism, Unknown

Accident - Preventable

#### **An Employee charged with Non-Preventable Accident:**

No action will be taken against the employee.

#### **An Employee Charged with a Preventable Accident:**

Will be notified in writing, with a copy inserted in the individual's personnel file.

Will be advised of the effect of this charge on the individual's work record.

May be counseled as to what was done wrong and how to improve.

Has usual rights/protection on suspension and termination afforded employees under the current Collective Bargaining Agreement.

### **Disciplinary Action**

Preventable accidents or incidents will subject operators to disciplinary action up to and including termination. It is the intent of AMTRAN that discipline for preventable accident/incidents be used as a tool to make operators more aware, safety conscious and better drivers. The steps in administering discipline are shown below; however, AMTRAN may apply discipline in any order, depending upon severity of the accident/incident and/or degree of neglect.

#### 1. **Step One**

First preventable accident/incident: written warning.

#### 2. **Step Two**

Second preventable accident/incident within one year of the first: written warning and.

#### 3. **Step Three**

Third preventable accident/incident within one year of the second: written warning, suspension, plus notification that one more preventable accident/incident within the following 12 months will result in termination.

4. Step Four

Fourth preventable accident/incident within one year of the third: termination.

5. Step Five

Fourth preventable accident/incident more than one year and less than two years after the third: written warning, suspension, plus notification that one more preventable accident/incident within 18 months will result in termination.

Operators must stay free from preventable accidents/incidents for three years after receiving discipline under Step Five above in order to start over at Step One. An operator who has a fifth preventable before three years has elapsed will begin the discipline process at Step Five.

Written notification shall be given to all concerned parties at each step of this disciplinary process.

### **Process for Determining Preventable/Non-Preventable Accidents**

This section on Preventable and Non-Preventable Accidents is the heart of the AMTRAN Safety Program. It requires that the immediate supervisor, the Director of Transportation and the operator review all factors of an accident to reach a final determination on preventability. In essence, it is a *process for both parties to learn how to prevent accidents*. Further, using the definitions of preventability which are outlined below, it is a fair and equitable method of judging the safety performance of AMTRAN's professional operators and maintenance personnel.

Professional drivers are expected to drive in a manner to prevent accidents in spite of weather or road hazards, traffic conditions or the other fellow's faulty driving and failure to obey traffic regulations.

Calling an accident preventable is based on whether or not the accident could have been prevented or avoided by AMTRAN's driver, not who was primarily responsible or at fault.

One of the most critical events in the safety program is the determination of preventability once an accident has occurred. AMTRAN's Director of Transportation - in consultation with the General Manager and the Transportation Supervisors - has the responsibility for the classification of each reported accident – whether a vehicle, passenger, pedestrian or fixed object accident – as either preventable or non-preventable.

## Preventability – Definitions

### *PREVENTABLE*

An accident which occurred while an AMTRAN or AMTRAN-permitted vehicle was engaged in AMTRAN business and which reasonably could have been prevented by the operator thereof, will be classified as “preventable”.

The decision as to preventability of an accident is to be based on whether or not the driver exercised prudent and careful judgment in his attempt to apply defensive techniques and actions, regardless of any legal rights (such as right-of-way at intersection) to which he may have been entitled under any prevailing Vehicle Code.

This rule imposes on each driver the positive duty of doing all that can be done, under the particular circumstances, to avoid an accident. The driver is expected to drive carefully, to anticipate potential hazards, and to make every effort to avoid accidents. If the driver fails to take all reasonable precautions to avoid an accident, the accident should be classified as “preventable” regardless of the question of primary responsibility.

### *NON-PREVENTABLE*

An accident which occurred while an AMTRAN or AMTRAN permitted vehicle was engaged in AMTRAN’s business and where the employee did exercise good judgment and used every defensive means to avoid the accident will be classified as “non-preventable.” No violations of standard safe driving practices may have been involved. Proper use of the vehicle as prescribed by AMTRAN and departmental policies must be considered.

### *WORK DAMAGE*

When it is determined that a driver of an AMTRAN or AMTRAN permitted vehicle has exercised reasonable care and judgment, but because of the nature of the work assignment an unusual circumstance beyond control of the driver materially contributes to the accident, or where it is necessary for the driver to perform driving operations not common to everyday practice and an accident results, it may be classified as “work damage.” (*Prime example: windshield damaged by rock thrown by other persons.*)

### *VANDALISM*

When damage to a vehicle or other property occurs as a result of a malicious act by person or persons unknown, it may be classified as “vandalism.” (*Prime example: projectile thrown through window of parked AMTRAN vehicle.*)

### *UNKNOWN*

When damage to a vehicle or other property occurs and responsibility cannot be determined, such accidents which cannot be classified in one of the above categories,

shall be classified as “unknown.” It is expected that this classification will be rarely used. Every effort shall be made to determine the cause of each accident.

### National Safety Council Standards

A preventable accident is any accident in which the driver failed to do everything that could reasonably have been done to avoid it. By contrast, a non-preventable accident is any accident in which the driver has done everything that could have been done to avoid it.

### Determination Criteria

The criteria listed below will assist in making the preventable/non-preventable decision.

#### *INTERSECTIONS*

It is the responsibility of professional drivers to approach, enter and cross intersections prepared to avoid accidents that might occur through the action of other drivers. Complex traffic movement, blind intersections, or failure of the “other driver” to conform to law or traffic control devices will not automatically discharge an accident as “non-preventable even though the professional driver has not violated traffic regulations. The driver’s failure to take precautionary measures prior to entering the intersection is a factor to be studied in making a decision. When a professional driver crosses an intersection and the obvious actions of another driver indicates possible involvement either by reason of his excess speed, crossing his lane in turning, or coming from behind a blind spot, the decision based on such analysis should be preventable.

#### *BACKING*

Practically all backing accidents are preventable. A driver is not relieved of his responsibility to back safely when a guide is involved in the maneuver. A guide cannot control the movement of the vehicle; therefore, a driver must check all clearances for himself.

#### *FRONT – END COLLISIONS*

Regardless of an abrupt or unexpected stop of the vehicle ahead, a driver can prevent front-end collisions by maintaining a safe following distance at all times. This includes being prepared for possible obstructions on the highway, either in plain view or hidden by the crest of a hill or the curve of a roadway. Overdriving headlights at night is a common cause of front-end collisions. Night speed should not be greater than that which will permit the vehicle to come to a stop within the forward distance illuminated by the vehicle’s headlights.

#### *REAR – END COLLISIONS*

Investigation often discloses that drivers risk being struck from behind by failing to maintain a margin of safety in their own following distance. Rear-end collisions preceded

by a roll-back, an abrupt stop at a grade crossing, when a traffic signal changes, or when the operator fails to signal a turn at an intersection, should be charged preventable. Failure to signal intentions or to slow down gradually should also be considered preventable.

### *PASSING*

Failure to pass safely indicates faulty judgment and the possible failure to consider important factors a driver must observe before attempting the maneuver. Unusual actions of the driver being passed or of oncoming traffic might appear to exonerate a driver involved in a passing accident; however, the entire passing maneuver is voluntary and the driver's responsibility.

### *BEING PASSED*

Sideswipes and cut-offs involving a driver while they are being passed are preventable when the driver fails to yield to the passing vehicle by slowing down or moving to the right where possible.

### *LANE ENCROACHMENT*

A safe driver is rarely a victim of entrapment by another operator when changing lanes. Similarly, entrapment in merging traffic is an indication of unwillingness to yield to other vehicles or to wait for a break in traffic.

Blind spots are not valid excuses for lane encroachment accidents. Drivers must make extra allowances to protect themselves in areas of limited sight distances.

“Squeeze plays” causing involvement with parked cars, pillars, and other road structures, can be prevented by dropping back when it is apparent that the other driver is forcing the issue or contesting a shared portion of the road.

### *GRADE CROSSINGS*

Collisions with fixed rail vehicles, occurring at grade crossings, in traffic, in a rail yard, switch area, or on private property are the responsibility of the driver to prevent. When a vehicle is parked across a rail siding, the driver must first determine if it is safe and permissible and, furthermore, must stand by in case conditions change by the movement of rail cars during the parking interval.

### *OPPOSING VEHICLES*

It is extremely important to check the action of AMTRAN's driver when involved in a head-on or sideswipe accident with a vehicle approaching from the opposite direction. Exact locations of vehicles, prior to and at the point of impact, must be carefully verified. Even though an opposing vehicle enters the drivers' traffic lane, it may be possible for a driver to avoid the collision. For example, if the opposing vehicle was in a passing maneuver and the driver failed to slow down, stop, or move to the right to allow the vehicle to re-enter its own lane, the driver has failed to take action to prevent the

accident. Failure to signal the opposing driver by flicking the headlights, or sounding the horn should also be taken into account.

### *TURNING*

Turning movements, like passing maneuvers, require the most exacting care by any driver. “Squeeze plays” during left or right turns involving other vehicles, scooters, bicycles, or pedestrians are the responsibility of the driver making the turn. Failure to signal, to properly position the vehicle for the turn, to check the rearview mirrors, to check pedestrian lanes, or to take any other defensive action should be considered. Sudden turns by other operators should be carefully examined. You may take precautionary action from tip-offs from the other vehicle immediately preceding the incident. U-turns by an AMTRAN driver that result in a collision are preventable.

### *PASSENGER ACCIDENTS*

Passenger accidents in any type of vehicle are preventable when they are caused by faulty operation of the vehicle. Even though the accident did not involve a collision of the vehicle, it must be considered preventable when the operator stops, turns, or accelerates abruptly. Emergency action by the AMTRAN operator to avoid a collision that results in passenger injury will be checked to determine if proper driving prior to the emergency would have eliminated the need for the evasive maneuver.

### *PEDESTRIANS*

Traffic regulations and court decisions generally favor the pedestrian hit by a moving vehicle. An unusual route of a pedestrian at mid-block or from between parked vehicles does not necessarily relieve a driver from taking precautions to prevent such accidents. Whether speed limits are posted or the area is placarded with warning signs, speed too fast for conditions may be involved. School zones, shopping area, residential streets, and other areas with special pedestrian traffic must be traveled at reduced speeds commensurate with the particular situation. Young and inexperienced drivers generally operate bicycles, motor scooters, and similar equipment. The driver who fails to reduce their speed when this type of equipment is operated within their sight-distance has failed to take the necessary precautions to prevent an accident. Keeping within posted speed limits is not necessarily taking the proper precaution when unusual conditions call for voluntary reduction of speed.

### *FAILURE TO ADJUST FOR CONDITIONS*

Adverse weather conditions are not a valid excuse for being involved in an accident. Rain, snow, fog, sleet, or icy pavements have never caused an accident. These conditions merely increase the hazards of driving. Failure to adjust driving to the prevailing weather conditions should be cause for deciding an accident preventable. Failure to use safety devices provided by AMTRAN should be cause for a preventable decision when it is reasonable to expect the driver to use such devices.

### *ALLEYS, DRIVEWAYS, AND PLANT ENTRANCES*

Accidents involving traffic originating from alleys, driveways, plant entrances, and other special intersecting locations should be carefully analyzed to determine what measures the driver might have taken to avoid the accident. Failure to slow down, sound a warning or to yield to the other driver can be considered cause to judge such an accident “preventable”.

#### *FIXED OBJECTS*

Collisions with fixed objects are preventable. They usually involve failure to check or properly judge clearances. New routes, resurfaced pavements under viaducts, marquees projecting over traveled section of road and similar situations are not, in themselves valid reasons for excusing a driver from being involved. The driver must be constantly on the lookout for such conditions and make the necessary allowances.

#### *CUSTOMER BOARDING & DE-BOARDING*

When a driver picks up or discharges passengers at unusual locations or in unusual circumstances, the driver shall be responsible for using extra caution.

#### *PARKING*

Unconventional parking locations, including double parking, failure to put out warning devices, etc., generally constitute evidence for judging an accident preventable.

Rollaway accidents from a parked position normally should be classified preventable. This includes failure to turn wheels toward the curb to prevent vehicle movement.

#### *MECHANICAL FAILURE*

Any accident caused by mechanical failure that reasonably could have been detected by the driver but went unheeded should be judged preventable. It is the driver’s responsibility to report unsafe vehicle conditions for repairs and to obtain immediate repairs where continued operation might result in an accident. When mechanical difficulties occur unexpectedly during a trip, and the operator, upon discovery, fails to check with AMTRAN for emergency instructions prior to an accident, the accident is preventable.

An accident caused by mechanical failure that results from abusive driving should be considered preventable.

#### *NON-COLLISION*

Many accidents, such as overturning, or running off the road may result from emergency action by the driver to preclude being involved in a collision. Examination of his driving procedure prior to the accident may reveal speed too fast for conditions or other factors. The driver’s actions prior to involvement should be examined for use of defensive driving practice.

#### *MISCELLANEOUS*

Unusual situations resulting in damage to the vehicle, other property or injury to persons, are preventable when the operator's action or inaction is evidenced. Accidents resulting from improper use of doors or interlock systems and passenger accidents resulting from passengers hanging out of windows are preventable by the driver.

#### Preventability – Final Determination

In addition to the foregoing basic criteria, the Director of Transportation, Transportation Supervisors and the General Manager will apply specific criteria to specific accidents in determining whether an accident should be classified preventable or non-preventable.

In reviewing accidents, specific information is provided which can contribute to the prevention of similar accidents in the future and assist the prevention program.

Remedial measures involve the analysis of individual accidents, identification of causes, both direct and contributory, and either elimination of these causes or reduction of their effect. The first step in applying remedial measures is to determine whether the cause was one over which the employee had control. In other words, is it reasonable to expect that the accident should have been prevented by the driver's actions.

So that these case judgments can be made throughout in a uniform and equitable manner, the following general guidelines may be applied:

- a. Preventability in a vehicle safety program differs from legal liability for the accident. It is conceivable that an employee could be free from legal liability yet, by AMTRAN's standards, be clearly responsible for the occurrence of an accident. It is also possible that either party could have prevented the accident. The final test is whether or not there was any reasonable way in which the employee could have avoided the accident regardless of the fault of the other party.
- b. Since this type of case judgment is actually a specialized area of performance evaluation, it should be dealt within much the same way as the other areas. It can not be automated or decided by formula - it is primarily a matter of judgment. The best that would be hoped for is the development of guidelines, which focus attention of all parties on the same areas when this judgment is made.
- c. It will be a rare instance when one of the guidelines alone will be sufficient to decide the cause. Rather, they should be viewed as an entirety, each contributing to a degree that is appropriate in the particular case.

AMTRAN has developed the following guidelines in order to assist in the final judgment of whether a specific accident should be determined preventable or non-preventable:

#### *Who Was the Striking Party?*

Disregarding for the moment which vehicle had the right-of-way or whether an unusual obstruction existed, did the AMTRAN employee strike another party or object or was the employee struck by another vehicle? Every person driving an AMTRAN vehicle is

expected to be in control of the vehicle at all times. All other points being equal, if the driver did the striking, the driver had control over avoiding the collision.

*Were Any Laws Violated?*

Are there clear indications that either party was violating a law? Obviously the best evidence would be any citation issued. However, there may be causes where no enforcement officer was witness to the accident, but where there is evidence (other than the allegations of the parties involved) that clearly indicates that one or the other was violating the law.

*Was There Any Proven Mechanical Failure?*

This factor needs to be considered from two standpoints: First, employees involved in accidents may make allegations of vehicular failure of AMTRAN vehicles. This should be investigated to determine as nearly as possible whether failure actually occurred. Secondly, if it was proven to be an actual failure, did the employee know about the condition prior to the accident, or could it have been disclosed by a reasonable inspection of the vehicle.

An employee can be negligent for failing to inspect equipment properly as well as for failing to operate it properly.

*Was there Any Violation of AMTRAN Policy?*

Was the employee making an appropriate use of the vehicle and was it being used with proper authorization? If not, did this in any way contribute to creating a hazard or precipitating the accident?

*Were There Visible and Operative Street Signs and Signals?*

Were required signs and signals missing, obstructed or inoperative? If this was the case, did the employee exercise an even greater amount of care than they would normally?

*Had the Employee Been Trained in the Proper Use of the Equipment?*

Lack of adequate training does not excuse an employee from the exercise of care and good judgment. However, it is reasonable to hold even more accountable the employee who has undergone training in which has exposed them to defensive driving concepts and techniques. Assuming the employee passed the driving portion of such training, then they have demonstrated knowledge of and ability to use the given technique or skill. It may then raise the question of why these were not used.

*Did the Employee Exercise Good Judgment?*

This may not be considered a separate standard, but rather one overriding or incorporating all the others. In any case, it is most difficult to apply. It should consider such factors as the past record of the employee. Has he/she had similar incidents

recently? Has he/she been counseled or warned about his/her driving performance? Because of recent training, traffic citations, incidents, accidents, or Authority actions, should the employee be expected to exercise greater care than usual?

### Preventability - Additional Considerations, Interpretations and Examples

#### *INTERSECTIONS*

- Did our operator approach the intersection at a speed safe for the conditions?
- Was he/she prepared to stop before entering the intersection?
- At a blind corner, did he/she pull out slowly, ready to shift his/her right foot to the brake pedal?
- Did he/she make sure the other driver would stop for a traffic light or stop sign?
- Did he/she obey all traffic signs?
- Did he/she signal well in advance of his/her change in direction?
- Did he/she turn from the proper lane?
- Was he/she alert for the turns of other vehicles?
- Did he/she refrain from jumping the starting signal or riding through the caution light?
- Did he/she avoid overtaking and passing in the intersection?

#### *REAR END COLLISIONS*

- Was our operator maintaining the safe following distance: namely, one car length for every ten miles per hour of travel? (Distance should be double at night and double again in wet weather.)
- Was he/she keeping his/her eyes and mind ahead of the car ahead?
- Did he/she approach the green traffic light cautiously, expecting the operator ahead to stop suddenly on the signal change?
- Did he/she keep out of railroad tracks?
- Did he/she keep from skidding?

#### *BACKING INCIDENTS*

- Was it necessary to back?
- Did our operator have to park so close to the car ahead as to require backing to leave the parking space?
- Was it necessary to drive into the narrow street, dead end alley or driveway from which he backed if he/she could not see where he/she was backing?
- Did he/she try to get someone to guide him? The committee may find that an accident/incident is the result of an act or an omission on the part of an employee other than the operator, such as giving improper directions, opening a door improperly, etc.
- Did he/she look all around the vehicle before getting in?
- Did he/she back immediately after looking?
- Did he/she look to the rear without depending on the rear view mirror?
- If the distance was long, did he/she stop, get out, and look around occasionally?
- Did he/she back slowly?

- Did he/she judge his/her backing clearance accurately?

#### *PEDESTRIANS*

- Did he/she drive through congested sections expecting that pedestrians would step in front of his/her vehicle?
- Was he/she prepared to stop?
- Did he/she keep as much clearance between his/her vehicle and parked cars as safety permitted?
- Did our operator refrain from passing vehicles that had stopped to allow pedestrians to cross?
- Did he/she refrain from jumping the starting signal or riding through the caution light?
- Was he/she aware of groups of children, and was he/she prepared to stop if one ran into the street?
- Did he/she give all pedestrians the right-of-way?
- Did he/she refrain from passing a school bus, which was stopped, and showing a flashing red light?

#### *PULLING AWAY FROM THE CURB*

- Did our operator look to the front and rear for approaching and overtaking traffic immediately before starting to pull out?
- Did he/she look back rather than depend upon rear view mirrors?
- Did he/she signal before pulling away from the curb?
- Did he/she start out only when his/her action would not require traffic to change its speed or direction in order to avoid him/ her?

#### *SKIDDING*

- Was our operator driving a speed safe for conditions of weather and road?
- Was he/she keeping at least twice the safe following distance for dry pavement – one car length for every ten miles per hour of speed?
- Were all of his/her actions gradual?
- Was he/she expecting frost on bridges, in gutters, ruts, etc.?

#### *PARKED*

- Was our operator parked on the right side of the road?
- Was it necessary to park near the intersection?
- Did he/she have to park on the traveled part of the highway, on the curb or on the hill?
- Where required, did he/she warn traffic by flag or flare?
- Did he/she park parallel to the curb?
- Was it necessary to park so close to an alley or directly across from a driveway?

#### *ALL OTHERS*

- Did our operator do everything to avoid the incident or accident?

- Was his/her speed safe for conditions?
- Did he/she obey all traffic signals?
- Was his/her vehicle under control?
- Had he/she followed his/her routine?

### **Accident Handling/Investigation Procedures – Transportation Supervisors**

When any accident occurs that involves an AMTRAN vehicle, the Transportation Supervisor on duty is responsible, at a minimum, for the following:

- Determine location.
- Determine if other vehicles were involved.
- Determine if there are any injuries – operator, customers, others.
- Determine/initiate emergency response if required.
- Get a supervisor to the scene.
- Switch out equipment if necessary.
- Contact General Manager (if appropriate).
- Arrange for the damaged vehicle to be removed from the accident scene.
- Quarantine the damaged vehicle inside the garage and out of sight.
- Alert operator’s family.

If media response is required, the suggested media response: “Our policy is that all communication with the media goes through the General Manager.”

In the event of an accident with serious injuries or fatalities:

- Phone management staff for “Red Alert.”
- Alert union leadership.
- Alert insurance company.

When any accident occurs that involves an AMTRAN vehicle, the Supervisor at the scene is responsible, at a minimum, for the following:

- Alert dispatch when you are arriving on the scene.
- Secure the vehicle.
- Check on operator condition.
- Move operator to protected area (company car or van).
- Check on customers & others.
- Make a list of customers & witnesses.
- Identify law enforcement in charge.
- Make a close observation of the accident scene.
- Take photographs.
- Determine D&A testing.
- Do not assign blame or take responsibility for the accident.
- Debrief General Manager.

If media response is required the suggested media response: “Our policy is that all communication with the media goes through the General Manager.”

When any accident occurs that involves an AMTRAN vehicle, the General Manager or Acting General Manager is responsible, at a minimum, for the following:

- Do not go to the scene of the accident.
- Determine if a Red Alert went out.
- Get a report from the supervisor who was at the accident scene.
- Secure release forms from supervisor.
- Initiate accident investigation.
- Determine whether to contact the FTA's National Response Center.
- Talk to the Chairman of the Board of Directors if necessary.
- Alert remaining board members.
- Make a statement to the media.
- Follow up with a more complete press release (that same day if possible).

### Investigation Techniques

Whenever a serious accident occurs (any accident that causes major damage to either an AMTRAN vehicle and/or another vehicle or involves any bodily injury), the Director of Transportation or the Transportation Supervisor on duty and/or a designated substitute shall go to the scene of the accident. The Supervisor and/or a designated substitute shall collect all pertinent information and prepare a report with pictures, appropriate measurements, and evidence if possible.

The following are guidelines for a thorough accident investigation. Special attention should be given to proper measurement and photography of skid and gouge marks. Both of these types of "road scars" should be recorded as soon as possible. They tend to disappear quickly and are subject to alteration. Gouge marks may indicate points of impact; and skid marks, measured properly, may provide an accurate method to determine the speed of vehicles involved in the accident. Even photographs taken after the involved vehicles are no longer in their original resting place may be valuable if the debris and skid marks have not been altered or obliterated. Vehicle locations should be marked before the vehicles are moved and marks should be noted. Pictures of vehicles or other objects involved should also include road and environmental conditions.

The investigator will record observations about all factors which may have an effect on the accident, such as:

#### *PERSONS*

- Name
- Address
- Telephone Number
- Operator's license – state of issue, expiration, special class of operation, restrictions
- Date of birth
- Description of injury, if any

#### *LAMPS*

- On or off

- Shorts or faulty circuits
- Cleanliness
- Switch position
- Filament status
- Correct bulb

#### *TIRES*

- Blow out (before, during, after)
- Tread wear/cuts/abuse
- Cord damage by rim
- Unmatched tires and sizes (radial/belted/bias/etc.)

#### *WEATHER*

- Rain
- Snow
- Temperature
- Ice
- Sleet/hail
- Lightning/thunder
- Wind
- Glare
- Darkness (to include sunrise and sunset)

#### *EQUIPMENT*

- Make, model and year
- Serial number, fleet number
- Registration number, state, and expiration – seating capacity
- Insurance carrier – policy number, date of expiration or policy record, agent's or claims representative's telephone number

#### *ROADSIDE OBSTACLES*

- Trees
- Utility poles
- Rocks
- Sign supports
- Light supports
- Narrow bridges

#### *PAVEMENT SURFACE*

- Potholes
- Crown on highway
- Low shoulders – soft shoulders
- Surface texture – drag factor
- Inconsistent surface
- Elevated manhole covers
- Missing manhole covers

#### *ROADWAY GEOMETRY*

- Curves – super elevation – roadside bank or curves

- Lane width
- Changes in lane or road width
- Shoulders
- Guard rails
- Curbs
- Grades

*CONSTRUCTION ZONES*

- Advance warning
- Equipment
- Signage
- Barricades
- Visibility (dust, etc.)

*RAILROAD CROSSING*

- Sight distance
- Warning devices
- Crossing procedure
- Encroaching traffic

*LIGHTING*

- Glare
- Transition
- Confusion (arrows or directional traffic control)

*SIGNAGE*

- Advance warning
- Confusing message
- Visibility
- Uniformity

**Drug & Alcohol Testing Requirements**

AMTRAN’s Substance Abuse Policy document details all AMTRAN rules concerning drugs and alcohol. AMTRAN’s policy applies to all safety-sensitive AMTRAN employees, paid part-time employees, contract employees and contractors when they are on transit property or when performing any transit-related safety-sensitive function. A safety-sensitive function is any duty related to the safe operation of mass transit service including the operation of a revenue service vehicle (whether or not it is in revenue service), dispatch and maintenance of a revenue service vehicle or equipment used in revenue service, security personnel who carry firearms, and any other employee who holds a Commercial Driver’s License. The purpose of this section is to reiterate portions of that policy with direct bearing on Part I of AMTRAN’s Safety Program.

AMTRAN’s Substance Abuse Policy states (Section 6.0) that, “All safety-sensitive employees shall be subject to testing prior to employment, for reasonable suspicion [and] following an accident...” The requirements for post-accident testing are as follows:

“All safety-sensitive employees will be required to undergo urine and breath testing if they are involved in an accident with an AMTRAN transit vehicle (regardless of whether or not the vehicle is in revenue service) which results in a fatality. This includes all surviving safety-sensitive employees that are operating the vehicle and any other employee whose performance could have contributed to the accident. In addition, a post accident test will be conducted if an accident results in injuries requiring immediate transportation to a medical treatment facility; or one or more vehicles incurs disabling damage; unless the employee can be completely discounted as a contributing factor to the accident. The accident definition may include some incidents where an individual is injured even though there is no vehicle collision. Additionally, AMTRAN reserves the right to require employee urine and breath testing after any accident involving an AMTRAN vehicle.

“Following an accident, the safety-sensitive employees will be tested as soon as possible, but not to exceed eight hours for alcohol testing and 32 hours for drug testing. Any safety-sensitive employee involved in an accident must refrain from alcohol use for eight hours following an accident or until he/she undergoes a post-accident alcohol test. Any safety-sensitive employee who leaves the scene of the accident without justifiable explanation prior to submission to drug and alcohol testing will be considered to have refused the test and their employment will be terminated. Employees tested under this provision will include not only operations personnel, but also any other covered employee whose performance could have contributed to the accident.”

Further:

“Disabling damage means damage which precludes departure of any vehicle from the scene of an accident in its usual manner in daylight after simple repairs. Disabling damage includes damage to vehicles that could have been operated but would have been further damaged if so operated, but does not include damage which can be remedied temporarily at the scene of the accident without special tools or parts, tire disablement without other damage even if no spare tire is available or damage to headlights, turn signals, horn, mirrors or windshield wipers that makes them inoperative.”

Prior to post accident testing, the Director of Transportation or Transportation Supervisor on duty is required to complete a Post-Accident Documentation Summary Form (example attached in Appendix). This form is to be turned into the Designated Employer Representative within 24 hours of the accident.

### **Record Keeping**

Collection and proper retention of evidence will contribute greatly to the success of any reconstruction effort. Preservation of the evidence’s integrity will contribute to its successful integration into any accident investigation. AMTRAN is committed to full data collection designed to advance the vehicle safety program.

Currently, a record is made of every reported accident – regardless of whether or not the accident is determined to be preventable or non-preventable. These records are also made whether or not the accident is claimable under current insurance carrier guidelines. Each individual accident report is kept in its own file. These files are kept in the Dispatch Office. Normally these files are kept for ten years. Each file typically contains an investigation report, a copy of the insurance claims form, any notes or correspondence associated with the accident and sometimes a copy of the police report. In addition to the individual files, there is also a summary report listing all accidents and their dispositions.

Accident records are the property of AMTRAN and, with the exception of the formal claim notification for the insurance carrier, will not be released without consent of the General Manager.

### **Fatigue Management Plan**

Driver fatigue is a safety issue of special concern to all companies operating commercial vehicles operating entities. AMTRAN is no exception. Under current U.S. Federal hours-of-service (HOS) regulations, commercial motor vehicle drivers may drive up to 10 hours after a mandatory 8-hour off-duty period. Though these regulations do not legally pertain to municipal public transit providers, they none-the-less suggest good guidelines. Driver fatigue caused by long or irregular schedules, or by other stress, increases the likelihood of accidents.

Most nations also have laws which govern driving times and rest periods and require drivers to maintain logbooks indicating hours worked and rest periods taken. The maximum amount of time that Commercial Motor Vehicle drivers operating in U.S. interstate commerce may drive their vehicles is specified in Title 49, Code of Federal Regulations, in Part 395. The U.S. regulations were originally developed in 1935 by the Interstate Commerce Commission (ICC) to counteract perceived unsafe driver scheduling practices. In 1967, the ICC's responsibilities concerning Commercial Motor Vehicle drivers and vehicle safety were transferred to the Bureau of Motor Carrier Safety (now OMC) of the FHWA, an agency within the U.S. Department of Transportation (DOT).

The DOT conducted three studies on driver fatigue between the 1970s and the present. None resulted in changes being made to the Federal hours of service regulations. However, driver fatigue has continued to be a major industry and public safety concern. The 1995 FHWA-sponsored Truck and Bus Safety Summit, attended by over 200 national leaders in highway safety, including a large contingent of drivers, identified driver fatigue as the top priority safety issue. Accordingly, the fatigue issue dominates current FHWA-sponsored human factors research on commercial motor vehicle driving safety.

AMTRAN recognizes that there is no quick fix and no single solution to the fatigue issue. Sleep is the principal countermeasure to fatigue. All drivers need to ensure that they obtain adequate sleep. Drivers must also be afforded the opportunity to obtain adequate sleep. While AMTRAN is not legally bound to adhere to the Federal regulations concerning fatigue management for interstate commerce, AMTRAN scheduling supervisors will make every effort to ensure adequate recovery time is provided for in an individual operator's schedule.

### **Insurance Claim Reporting Procedures**

AMTRAN's Director of Transportation is responsible for assuring that all accident claims are properly reported to the current insurance carrier. Current accident claims reporting procedures as well as sample claims reporting forms are contained in the Claims Reporting Manual appended to this document.

### **National Transit Database Accident Reporting Procedures**

The National Transit Database (NTD) is the Federal Transit Administration's (FTA's) primary national database for statistics on the transit industry. Recipients of FTA Urbanized Area Formula Program grants are required by statute to submit data to the NTD.

AMTRAN Transportation Supervisors are responsible for reporting NTD data concerning Safety and Security. There are two types of data reported. Informational data – Incident Mode Service, Ridership Activity and Security Configuration – are reported annually. Incident Reports are filed quarterly. The Major Incident Report provides detailed information on the most severe safety and security incidents to the NTD. The Non-Major Summary Report provides information on less severe safety and security related incidents. This report summarizes the number of safety incidents (such as vehicle collisions, fires and minor customer injuries) and the number of security incidents that have occurred in a fixed number of categories.

Copies of these reports can be accessed through the NTD system by AMTRAN Administrative personnel. Hard copies of these reports are also retained in a file in the Transportation Department office.

## PART II

### WORK AREAS & FACILITIES ACCIDENT PREVENTION PLAN

#### Policies & Procedures

##### Commitment to Safe Working Conditions

Safety is a key value of AMTRAN's culture. It is not simply a priority or condition for operation. Safety is an implicit part of everything we do and in all circumstances.

The main goal of the policies and procedures set out in this part of this document is to motivate ourselves and fellow employees to behave safely at all times. We will endeavor to create and control the workplace environment so as to provide healthy and safe conditions for our employees, our customers, and visitors. It is our belief that through this commitment, we will achieve superior levels of customer service, satisfaction and loyalty.

Safety must become an individualized ideal; that is, safety must be considered each persons individual responsibility. Only when each person within the organization can say that *I* am responsible for my own as well as my fellow worker's safety, will safety actually be an integral part of AMTRAN's corporate culture.

AMTRAN is committed to minimizing risk associated with the possible injuries to employees and the general public. Risk is the potential for physical or psychological harm to employees and/or the general public. Risk Management is the identification and positive control of those risks. Therefore, it is the AMTRAN's policy to identify and address risks associated with all phases of our operation, and to manage those risks to minimize harm to employees and the public.

AMTRAN is committed to minimizing risk while complying with all applicable local, Commonwealth, and federal laws. AMTRAN will cooperate with law enforcement officials in complying with and enforcing all applicable laws and regulations

AMTRAN's Directors of Transportation and Maintenance – along with the support of the entire administrative staff - will be primarily responsible and accountable for carrying out an effective risk management program. They will be specifically responsible and accountable for identifying and managing risk within their departments. They will be responsible and accountable for the development of policies and procedures necessary to manage risks; purchasing of equipment to reduce risks; providing necessary training; implementing improvements in the work environment; and measuring all efforts to ensure their effectiveness. The Directors will perform these duties in concert with corporate policies and practices regarding risk management which will be defined in this document and in AMTRAN's Policies and Procedures document.

Each employee has the responsibility for his or her own welfare as well as the welfare of other employees and the general public during the performance of their duties. AMTRAN

encourages all employees to take an active interest in managing risks by establishing dialogues with department Directors and Supervisors to define risks; act responsibly and adhere to departmental and corporate policies concerning risk management; and help fellow employees minimize risk for themselves and others. Successful risk management requires the involvement of all employees and effective communication between them and management. AMTRAN expects the active participation of each employee in this process.

### Personal Protective Equipment

Personal Protective Equipment (PPE) includes all clothing and other work accessories designed to create a barrier against workplace hazards. PPE should not be used as a substitute for other hazard controls or safe workplace practices. Employees must be aware that use of PPE does not eliminate a potential hazard. Employees will be trained in the proper use and policies regarding PPE in AMTRAN facilities and work areas.

AMTRAN desires to protect employees from hazards of processes, the environment, chemical or radiological hazards, mechanical hazards or irritants which may be capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.

AMTRAN staff will periodically conduct hazard assessments of workplace areas to determine what if any hazards are present which indicate the use of PPE is necessary. If such hazards are determined to be present or likely to be present, AMTRAN will select the types of PPE that will protect employees from the identified hazards, communicate selection decisions to each affected employee, train employees in proper use and fit of selected PPE. All selected PPE will be maintained free from defects and will be replaced if necessary. Defective or damaged PPE will not be used. All selected PPE will comply with appropriate American National Standards Institute (ANSI) standards.

Per AMTRAN's Training Program record-keeping standards, all completed training concerning the proper use of PPE will be documented to the employees training file.

The following general guidelines for PPE use are incorporated into this safety plan:

#### Head protection

*Employees will wear protective helmets when working in areas where there is potential for injury to the head from falling objects. Protective helmets will comply with the ANSI Z89.1 – 1989 standard.*

#### Eye and Face protection

*Employees will use appropriate eye and face protection when exposed to hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors or potentially injurious light radiation.*

*Employees will use eye protection that provides side protection when there is a hazard from flying objects. Detachable side protectors are acceptable.*

*Employees who wear prescription lenses while working in operations that involve eye hazards will wear eye protection that incorporates the prescription in its design. As an alternative, they may use eye protection which can be worn over the prescription lenses provided such protection does not disturb the proper position of the prescription or protective lenses.*

*Eye and face PPE will be distinctly marked to facilitate identification of the manufacturer.*

*Each employee will use PPE with filter lenses that have a shade number appropriate for the work being performed for protection from injurious light radiation.*

*Protective eye and face devices will comply with ANSI Z87.1-1989 standard.*

#### Arm and Hand protection

*Employees will wear hand/arm protection when working in an area or with materials that would cause harm to arms hands or fingers. Only approved types of gloves will be permitted to be worn by employees. Approved types include, but are not limited to:*

*Leather – which will have Kevlar thread and single leather construction. These are meant to provide resistance to cuts, abrasions, burns and some punctures.*

*Chemical Resistant – which will provide protection against most chemical exposures. AMTRAN will verify manufacturers recommendations regarding the types of chemicals that apply prior to issuing these types of gloves to employees. TYVEK – commonly used in painting applications because they can be disposed of after use.*

*Welder's Gloves – consisting of a leather material resistant to higher than normal temperatures. A gauntlet will cover the entire arm to the elbow in order to provide protection against slag drops.*

#### Foot and Leg protection

*Employees will wear protective footwear (safety shoes/boots) when working in areas where there is a danger of foot injuries due to falling or rolling objects, objects piercing the sole or where such employees feet are exposed to electrical hazards.*

*Protective footwear will comply with the ANSI Z41-1991 standard. Safety shoes and boots will provide both impact and compression protection.*

#### Torso protection

*Employees will wear torso protection consisting of aprons used to protect the body from flying hot metal fragments created during welding or cutting, corrosive or caustic chemical splashes or intense heat. Apron material selection will be based on anticipated exposure.*

*Certain tasks may require the use of safety vests to provide a higher level of visibility for employees working near moving traffic or in reduced light conditions. Vests will utilize iridescent colors and incorporate reflective stripes.*

### Hearing protection

*Employees will utilize hearing protection devices when average noise levels equal or exceed 90 decibels measured on the A-scale (dBA). Employees who have experienced a standard threshold shift, or any employee who is exposed to an 8-hour TWA of 86dBA or greater and has not yet had a baseline audiogram must wear hearing protection.*

*AMTRAN will provide hearing protection devices for employees required to use them. Devices will either be ear plug types or ear muff type. Devices provided will have a noise reduction rating appropriate to the noise level.*

### Respiratory Protection

*Applies to AMTRAN operations in which potential employee exposure to an oxygen deficient atmosphere exists or to breathing air contaminated with harmful dusts, fogs, fumes, mists, gases, smoke or vapors. AMTRAN will establish procedures which ensure employees maximum protection for potential respiratory exposures in which the levels of contaminants can not be further reduced through engineering or administrative controls.*

*AMTRAN will institute feasible engineering and/or work practice controls as the primary means of maintaining exposures within permissible limits. As an added measure of employee protection, certain operations and activities will require those employees to be medically qualified, fit-tested and trained for respirator use. Operational activities which fall in this category may include spray painting, welding in confined spaces, and/or sandblasting.*

*Only those individuals determined by a physician to be medically able to wear respiratory protection equipment will be issued a respirator and be allowed to perform work requiring the use of a respirator.*

### Bloodborne Pathogens

The Bloodborne Pathogens Standard requires employers, who meet specific criteria, to implement an exposure control plan, designed to protect employees from exposure to human blood, blood contaminated body fluids and potentially infectious materials. The standard is aimed at the prevention and reduction of diseases such as the Hepatitis B virus (HBV) and Human Immunodeficiency virus (HIV), both of which are transmitted through pathogens present in human blood.

The purpose of the Bloodborne Pathogens Program is to establish guidelines and the implementation of appropriate safety programs to assure that safety practices are in place to minimize human exposure to materials contaminated with blood or other potentially infectious substances within the work place. Exposure incidents would include, but are not limited to, exposure of eyes or mucous membranes through splashes, or the piercing

of the skin by needle sticks. All departments of AMTRAN are included within the Program.

### *Exposure Potential*

Some employees may be part of groups which are at times remote from emergency medical services. In such remote settings, it is not an expectation that these employees would serve as "first responders" in performing first aid to injured passengers or co-workers. In these instances, first aid training and the expectation of providing first aid to injured passengers or co-workers is not a required or expected part of job duties. For the purpose of AMTRAN's Bloodborne Pathogen Exposure Control Plan, such an expectation does not exist and is not a written part of the job description. These employees, therefore, are not in an increased risk group.

Employees who receive first aid training primarily for their own benefit and are not expected to perform first aid as part of their job, are at low risk. Such employees may at times perform first aid on a voluntary basis as "Good Samaritans." Since they are not required to do this as part of their jobs, they would not be considered in the increased occupational risk group. However, if these employees should become exposed at work even through voluntary actions, they would still be covered by parts of AMTRAN's Bloodborne Pathogen Exposure Control Plan dealing with exposure treatment and post-exposure monitoring. In addition, first aid training for all groups should cover the issue of BBP exposure and preventive measures.

### *Maintenance Employees*

Employees responsible for building and coach maintenance are considered low risk for encountering potentially infectious materials.

### *Other Exposure Settings*

In general, most full-time employees should be considered in the low risk group. Individual judgment may need to be used by the safety officer and General Manager in designating which users should be considered in the increased risk group. These will be determined on a case-by-case basis. General educational information on the risks of BBP will be given to all employees. Those employees who feel they are at increased risk for occupational exposure to BBP are encouraged to discuss this with their supervisor or safety officer. In addition, managers and safety officers should be asked to identify increased risk worker groups or individuals not included in the above categories. These situations should be discussed with the General Manager and individual decisions made on whether such employees should be included in the increased risk group.

### *Definitions*

1. Bloodborne Pathogens are pathogenic microorganisms present in human blood which can cause disease in humans. These pathogens include, but are not limited

to, Hepatitis B virus (HBV) and human immunodeficiency virus (HIV or AIDS Virus).

2. Other Potentially Infectious Materials are defined as the other types of body fluids and tissues, besides blood, that are potentially capable of causing disease. The OSHA Standard specifically defines these to include: semen, vaginal secretions, fluid from internal body spaces (such as spinal or synovial fluids), any body fluid visibly contaminated with blood, and all body fluids where it is difficult or impossible to differentiate between body fluids. Also included are any human tissues other than intact skin (unless the tissue has been fixed by histology procedures) and tissue cultures and potentially infected experimental animals used in medical research. The Standard does not specifically include tears, vomit, urine, or feces on this list unless visibly contaminated with blood. In disposing of tears, vomit, urine, and feces these need not be treated as hazardous materials as long as they are not contaminated with blood. It should be mentioned here that a number of serious human diseases can be transmitted by urine, feces, etc. even in the absence of blood. While such transmissions are not covered by the Standard unless contaminated with blood, they should still be handled and disposed of in an appropriate manner.

3. Engineering Controls means control measures that isolate or remove the bloodborne pathogens from the workplace. These might include such things as special containers for disposal of contaminated needles or self-sheathing needles.

4. Exposure Incident is defined as the specific contact of blood or other potentially infectious material with a person's eye(s), mouth, other mucous membrane, non-intact skin, or by parenteral contact (i.e., by a puncture wound or cut with a contaminated object).

5. Personal Protective Equipment includes items an individual employee may use to prevent contamination by potentially infectious material. In the case of bloodborne pathogens, such personal protective equipment might include gloves, eye protection or face shield, masks covering the mouth, and protective clothing.

6. Sharps are defined as all sharp items that have become contaminated with potentially infectious materials. Sharps include all hypodermic needles, IV catheters, scalpel blades, and other sharp instruments considered as potentially infective and must be handled with extreme care to prevent accidental injuries.

7. Universal Precautions are defined as the standard precautions all persons should use to prevent contact with blood or other potentially infectious materials whenever these situations occur or are anticipated. These may involve standard work practices and the use of personal protective gear such as gloves.

8. Occupational Exposure means reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties. The determination of potential exposure is made without regard to whether the employee uses personal protective gear such as gloves.

### *Engineering and Work Practices*

Engineering and work practice controls shall be used to eliminate or minimize employee exposure. Where occupational exposure remains after institution of these controls, personal protective equipment shall be used.

### *Universal Precautions*

Universal Precautions should be used by all employees whenever the potential for exposure to blood borne pathogens exists. Employees should adhere rigorously to the infection control precautions noted in this section in order to minimize the risk of exposure to blood and other body fluids. Other potentially infectious materials (as defined in Definitions) shall be considered potentially infectious materials. All protective equipment needed to protect workers will be supplied, cleaned, disposed of, repaired, or replaced by the Company. Eating, drinking, smoking, applying cosmetics or lip balm, and handling contact lenses are prohibited in areas where there is a reasonable likelihood of occupational exposure to bloodborne pathogens. Food and drink shall not be kept in refrigerators, freezers, shelves, cabinets, or on counters where blood or other potentially infectious materials are present.

### *Use of Gloves*

Gloves are to be worn when it can be reasonably anticipated that an employee's hands may be in contact with blood or other potentially infectious materials, including touching contaminated items or surfaces. Gloves should be located at appropriate locations for easy access. Hands should be washed immediately after possible contact with blood and/or body fluids as well as before putting on and after taking off the gloves when possible. Sinks should be available at all locations. Where sinks are not available, antiseptic wipes will be provided.

Gloves must be of appropriate material, latex or vinyl, if necessary, and appropriate size for workers. Any time gloves are contaminated with blood and/or other body fluids, the gloves must be changed and disposed of as noted below.

### *Use of Masks, Eye Protection, and Face Shields*

Masks, eye protection, and face shields shall be worn whenever splashes, spray, spatter, or droplets of blood may be generated and eye, nose, or mouth contamination can be reasonably anticipated.

### *Handling contaminated clothing and linens*

Contaminated clothing and linens should be placed in a plastic bag and appropriately labeled. Gloves should always be worn when handling any biohazard container. If the employee has his/her own blood on himself/herself, the employee will be allowed to launder his/her clothing at home. Any other person's

blood or other potentially infectious material on the employee's clothing will require that the clothing be disposed of as infectious waste.

### *Cleaning Blood and/or Body Fluid Spill*

**Note:** Only those employees who have been trained to respond to these types of events will be allowed to perform such tasks. The following procedures should be followed for cleaning up blood or body fluid spills:

1. Area of the spill shall be cordoned off to prevent the accidental spread of body fluids.
2. Vinyl or latex gloves must be worn.
3. An appropriate germicide or bleach solution should be prepared. A germicide solution is the cleaning solution of choice. If a bleach solution is used it can be prepared with 800 ppm NACIO solution (i.e., standard household chlorine bleach) by mixing a quarter cup (60ml) with one gallon of water. The bleach solution should only be used on hard floors. Do not use this solution on carpet. Bleach should be made fresh; never hold more than one day's worth unless stored in an airtight container in a cool dark place.
4. Remove any large pieces of glass or other particulate material. Do not pick up material with hands. Use a plastic scoop to remove this matter. A tongue depressor, or some other type of disposable tool, may be used to maneuver pieces onto scoop. Particulate matter and tongue depressor/tool should be placed in a puncture proof and splatter proof container. The scoop should be cleaned after use.
5. Carefully remove the body fluids from the spill surface with gauze sponges. When a sponge becomes saturated, replace it. With a new one. Do not wring out fluids. All soiled sponges are placed in a puncture resistant splatter proof container.
6. Once body fluids have been removed from the area, the bleach solution is used to decontaminate the area. This is done by starting two inches outside the spill and moving into the center of the spill by making a series of overlapping concentric circles with a sponge. The area is allowed to air dry and the process is repeated. The soiled sponges are placed in a biohazard container. Red bags displaying the biohazard symbol will be used to hold material other than sharps.
7. All materials used in the cleanup are placed in a holding area until they can be sterilized or disposed of. Disposal services should be provided by a qualified waste hauler.
8. All material to be sterilized with usual procedures except for sharps containers. The bleach solution may be disposed of in a sanitary sewer, although large quantities may be harmful to septic systems. The scoop should be cleaned with a bleach solution.

### *Exposure Incident*

An exposure incident refers to a specific eye, mouth, other mucous membrane, non- intact skin, or parenteral contact with blood or other potentially infectious material resulting from the performance of an employee's duties.

1. Have the employee thoroughly wash the affected area. Supervisor will immediately management and the company specified doctor or medical clinic. The employee should be taken to the clinic for post-exposure treatment.
2. All employees who have been identified as having been exposed to possible BBP will be offered Hepatitis B vaccine at no cost. All counseling and post exposure monitoring will be coordinated by company specified doctor. AMTRAN will provide appropriate documentation to be made part of the employee's permanent personnel record.

### *Training*

All employees will receive some training in BBP risks and what the plan covers. Employees felt to be at increased risk will be contacted by their supervisor. The training will also state gloves and masks should be used by anyone who voluntarily chooses to perform first aid. A description of the BBP exposure control plan will be presented at a formal two-hour training session semi-annually.

### *Record Keeping*

AMTRAN will establish and maintain an accurate record for each employee with occupational exposure in accordance with the standard. All medical records are to be kept confidential and not disclosed or reported to any person within or outside the workplace without the employee's expressed written consent, except as required by law. In accordance with the standard, each record is to be maintained for at least the duration of employment, plus 30 years.

### Work Environment

Slips, trips and falls constitute a majority of general industry accidents. It is AMTRAN's intention to encourage workplace procedures and to structure workplace conditions so as to protect employees from these types of accidents.

### *Housekeeping*

All places of employment, passageways, storage areas and service areas shall be kept clean and orderly and in a sanitary condition. All stairways, ladders, passageways and gangways are to be kept free from materials, supplies and obstructions at all times. Tools, materials and debris should not be strewn about in a manner which may cause tripping or other hazards. Tools and supplies should be located near work areas where they will be used. Discarded lunch bags, paper cups, cans and any other trash should be removed from work areas at least daily. Food and food containers shall not be immediately present in designated work areas. All spills of any nature shall be marked, blocked of and cleaned up immediately.

### *Walking & Working Surfaces*

Passageways/walkways for employees shall be clearly defined. All work areas shall have adequate and defined means of ingress and egress. All emergency exit aiseways will be specially marked with readily visible markings. Defined walkways shall be kept as dry as possible at all times.

Covers, nets, and/or guardrails shall be provided to protect personnel from the hazards of open pits. Load rating limits for floor/loading areas shall be posted. All flights of stairs with more than four risers shall have properly rated stair railings or hand rails.

All work areas and passageways shall be properly illuminated before employees can begin work. The intensity/brightness of lights shall be as uniform throughout working areas as possible. Lighting shall be sufficient to provide a safe working environment and comfortable vision. Emergency exits shall be clearly marked and illuminated and shall have emergency additional emergency illumination separate from the non-emergency lighting system.

### *Ladder Safety*

Ladders must be regularly and frequently inspected. All defective ladders (weakened, broken, or missing steps, broken side rails, etc.) must be tagged, removed from service and reported to the immediate supervisor immediately. Ladders and scaffolds must be strong enough for intended use. Check with the immediate supervisor if the strength is questionable. Metal ladders are not to be used near energized electrical circuits. Ladders must not be placed in front of doors which open toward the ladder and the supporting point should be approximately  $\frac{1}{4}$  of the ladder length. Portable ladders, when in use, must be firmly placed, held, tied, or otherwise secured to prevent slipping or falling.

Employees shall use only AMTRAN-owned ladders. Do not use chairs, boxes, etc. as ladders. Do not use ladders as scaffold platforms. Do not use portable straight ladders without a non-skid base. Only AMTRAN employees are authorized to use AMTRAN-owned ladders.

Do not place a ladder against an unsafe support. Never put spliced ladders together to make a longer ladder. When using step ladders, be certain the legs are fully spread. Do not use step ladders as straight ladders. When using a step ladder longer than 10 feet, another person must hold the ladder. Have both hands free when ascending or descending ladders. Only one employee is to use a ladder at a time. If two employees are need for the job, use another ladder.

Do not climb to the top of a ladder. Do not go higher than the second step from the top. Do not climb straight ladders higher than the third step from the top. When dismounting a ladder from an elevated position, be certain the side rails extend at least 3 feet above the dismount position or that grab bars are present.

## *Machine Safeguarding*

A wide variety of mechanical motions and actions may present hazards to employees. AMTRAN will identify pieces of equipment which are used during the scope of employment for each job description. Proper techniques for using equipment will be established and appropriate safeguarding will be maintained. Appropriate safeguarding shall: prevent contact with dangerous moving parts; be not easily removed or disabled; protect employees from falling or flying objects; create no new hazards; create no interference with operation; and, allow for safe lubrication/maintenance.

### Training

Proper-use and maintenance training shall be provided for each piece of machinery which is used by an employee in the performance of their job duties. Safe operating instructions will be posted near each type of hazardous machinery, where possible. Training logs of completed training will be maintained - per AMTRAN's Training Program – for each employee.

If, at any time an employee is observed by a supervisor using equipment in an unsafe manner, the employee shall not be permitted to continue using the equipment until they have received instruction on the proper use of the equipment.

### Maintenance

Maintenance of all tools, machinery and ladders will be performed according to a pre-determined schedule. Machinery shall be cleaned and lubricated according to manufacturer specifications.

## *Hand Tools/Power Tools*

The greatest hazards posed by hand tools and power tools result from misuse and improper maintenance. All employees shall be shown proper techniques for using and maintaining hazardous hand tool and power tools.

If, at any time an employee is observed by a supervisor using hand tools or power tools in an unsafe manner, the employee shall not be permitted to continue using the tools until they have received instruction on the proper use of the tools.

All hand and power tool or similar equipment, whether furnished by AMTRAN or the employee, shall be maintained in a safe condition. When power operated tools are designed to accommodate guards, they shall be equipped with such guards when in use. Belts, gears, shafts, pulleys, sprockets, chains, etc. or any moving parts of equipment shall be guarded if such parts are exposed to contact by employees or otherwise pose a hazard. Employees operating such equipment and exposed to the hazards of falling, flying, abrasive, or splashing objects, or

exposed to harmful dusts, fumes, mists, vapors, or gasses will be provided with appropriate PPE.

The handles of tools such as hammers, picks, etc. should be checked for cracks and splits. Sledgehammers, picks, shovels, axes and other tools which are swung require that their users be properly positioned to avoid striking other workers behind or around them.

### Wrenches

Wrenches should be pulled and not pushed. Jaw corrugations and threads on adjusting screws should be sharp and clean to prevent slips. Wrenches should not be forced with a hammer.

### Chisels

Heads shall be clean and free from mushrooming. Mushroomed heads shall be re-ground. A sponge rubber pad should be used over knuckles. Always use chisels of the proper size and drive with a hammer of sufficient weight for the job.

### Steel Hammers

Shall not be used on hardened steel surfaces. Do not use claw hammers and crow bars to snap metal bands.

### Cutters

Use correct size cutters for bands, wire rods and bolts. Always wear safety glasses or goggles when cutting. Cut materials straight across and keep one gloved hand over the ends of wire or bands that could fly loose.

### Files

Shall not be used as pries or punches and should have handles over the tang.

### Power-Operated Hand Tools

Electric power-operated tools shall either be of the approved double-insulated type or ground plug connected. Using electric cords for hoisting or lowering tools shall not be permitted. Pneumatically driven nailers, staplers or similar equipment that has automatic fastener feed will have a safety device on the muzzle to prevent accidental discharge.

## *Electrical Hazard Prevention*

Electrical accidents are caused by a combination of three possible factors – unsafe equipment and/or installation, unsafe workplace environments, and unsafe work

practices. There are various ways of protecting employees from the hazards caused by electricity. These include: insulation, guarding, grounding, electrical protective devices and safe work practices.

Electrical equipment shall be free from recognized hazards that are likely to cause physical harm. They shall be suitable for installation and use, adequately protected and durable, adequately insulated and appropriate to intended usage as to type, size, voltage, current capacity and specific use.

For each piece of electrical equipment, a disconnecting means – such as a switch used to disconnect the conductors of a circuit from the source of current – shall be present and legibly marked to indicate its purpose, unless it is located and arranged so as the purpose is evident. Live parts of electrical equipment operating at 50 volts or more shall be guarded against accidental contact by approved cabinets or other forms of approved enclosures. Entrances to rooms or other guarded locations containing exposed live parts shall be marked with conspicuous warning signs forbidding unqualified persons to enter.

No grounded conductor may be attached to any terminal or lead so as to reverse designated polarity. A grounding terminal or grounding-type device on a receptacle, cord connector or attachment plug may not be used for purposes other than grounding. When plugs, receptacles and connectors are used in an electrical branch circuit, correct polarity between the ungrounded (hot) conductor, the grounded (neutral) conductor and the grounding conductor must be maintained.

Flexible cords and cables shall be approved and suitable for conditions of use and location. Flexible cords and cables may not be used as a substitute for fixed wiring, where run through holes in walls and ceilings or floors, where attached to building surfaces or where concealed behind walls ceilings or floors. Flexible cords shall be used only in continuous lengths without splice or tap. Flexible cords shall be connected to devices and fittings so that strain relief is provided which will prevent pull from being directly transmitted to joints or terminal screws.

### *Lockout/Tagout*

These procedures apply to both AMTRAN employees and contract personnel. Contractors' tags and procedures may vary; however, the same level of control must be met by the contractor's program.

The purpose of these procedures is to establish the minimum requirements for the lockout/tagout of hazardous energy. They shall be used to insure that before an employee performs any servicing or maintenance activities where the unexpected start-up or release of any form of stored energy could occur and cause injury, all such potentially hazardous energy shall be isolated and locked out and/or tagged out. The forms of energy which must be controlled are: Electrical, Mechanical, Hydraulic, Pneumatic, Chemical, Thermal or Other Energy Sources. "Other" Energy Sources Include Fluids and Gases, Water Under Pressure, Gravity, etc.

A specific, written lockout/tagout (energy control) procedure shall be established for each type of equipment, machine or vehicle. Lockout/tagout shall be performed only by authorized employees who are performing servicing or maintenance. Whenever replacement or major repair, renovation or modification of a machine, equipment or vehicle is performed and whenever new machines or equipment are installed, energy-isolating devices for such machines or equipment shall be designed to accept a lockout device. When only a tagout device is used, the tagout device shall be attached at the same location as the lockout device would have been attached in a position that will be immediately obvious to anyone attempting to operate the equipment. The tagout attachment device shall be non-reusable, attached by hand, self-locking, have no less than 50 pounds of unlocking strength and have basic characteristics of being at least equivalent to a one-piece nylon cable tie.

Lockout/tagout devices shall: be standardized at the location; not be used for any other purpose; be readily identifiable by size, shape or color; be durable and capable of withstanding environmental effects (i.e. not paper); and indicate the identity of authorizing employee applying device.

Specific procedures shall be utilized during shift or personnel changes to insure continuity of lockout/tagout protection. Only the authorized employee who applied the device may remove the device. The device should only be removed by someone else after verifying that the individual who applied the device is not at the facility. Insure that the authorized employee has knowledge that the device has been removed before he/she resumes work at the facility. If more than one authorized employee is performing service or maintenance, each authorized employee who is performing service or maintenance shall attach a personal lockout/tagout device before beginning work. If there is a possibility of re-accumulation of stored energy to a hazardous level, verification of isolation shall continue until servicing is complete or until possibility of accumulation no longer exists.

### Training

Each authorized employee shall receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control. Each affected employee shall be instructed in the purpose and use of the energy control procedure.

All other employees who work in an area where energy control procedures may be utilized shall be instructed in the purpose and use of the energy control procedures.

Retraining shall be provided for all authorized and affected employees whenever there is a change in their job assignments, a change in machines, equipment or processes that present a new hazard, or when there is a change in the energy control procedures. Retraining shall also be provided

when the periodic inspection indicates inadequacies in the employee's knowledge or use of the energy control procedures.

#### Affected Employees

An employee whose job requires him/her to operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed.

#### Authorized Employee

A person who locks out or tags out machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes an authorized employee when that employee's duties include performing servicing or maintenance covered under this section.

#### Capable of Being Locked Out

An energy-isolating device is capable of being locked out if it has a hasp or other means of attachment to which or through which, a lock can be affixed, or it has a locking mechanism built into it. Other energy-isolating devices are capable of being locked out, if lockout can be achieved without the need to dismantle, rebuild or replace the energy-isolating device or permanently alter its energy control capability.

#### Energized

Connected to an energy source or containing residual or stored energy.

#### Energy-Isolating Device

A mechanical device that physically prevents the transmission or release of energy, including but not limited to the following: a manually-operated switch by which the conductors of a circuit can be disconnected from all ungrounded supply conductors and, in addition, no pole can be operated independently; a line valve; a block; and any similar device used to block or isolate energy. Push buttons, selector switches and other control circuit type devices are not energy-isolating devices.

#### Energy Source

Any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal or other energy. "Other" energy sources include fluids and gases, water under pressure, gravity, etc.

## Lockout

The placement of a lockout device on an energy-isolating device, in accordance with an established procedure, ensuring that the energy-isolating device and the equipment being controlled cannot be operated until the device is removed.

## Lockout Device

A device that utilizes a positive means such as a lock, either key-or combination-type, to hold an energy-isolating device in the safe position and prevent the energizing of a machine or equipment. Included are blank flanges and bolted slip blinds.

## Normal Production Operations

The utilization of a machine or equipment to perform its intended production function.

## Servicing and/or Maintenance

Workplace activities such as constructing, installing, setting up, adjusting, inspecting, modifying, and maintaining and/or servicing machines or equipment. These activities include lubrication, cleaning or un-jamming machines or equipment and making adjustments or tool changes, where the employee may be exposed to the unexpected start-up of the equipment or a release of hazardous energy.

## Tagout

The placement of a tagout device on an energy-isolating device, in accordance with an established procedure, to indicate that the energy-isolating device and the equipment being controlled may not be operated until the tagout device is removed.

## *Confined Spaces*

A confined space is any work area that is large enough and configured such that an employee may physically enter it to perform work, has a limited or restricted means for entry or exit and is not designed for continuous employee occupancy. A permit-required confined space contains or has the potential to contain any serious, acute hazard including any airborne contaminant at or above its Occupational Exposure Limit concentration. A non-permit confined space does not have the potential to contain a serious, acute threat.

AMTRAN will identify, designate and mark all confined spaces in all work areas and determine if they are permit-required or non-permit required. If a space is deemed permit-required clear procedures will be established concerning permit

preparation and entry qualifications Only qualified employees will be permitted to enter designated confined spaces and precautions for entry will be established.

### *Ergonomics*

As far as possible, AMTRAN work environments shall be configured so as to minimize any mismatch between the physical requirements of the job and the physical capacity of the employee. The following ergonomic principles shall be applied whenever possible to individual work tasks:

1. Keep everything within easy reach
2. Work at proper heights
3. Reduce excessive force
4. Work in a good posture
5. Reduce excessive repetition
6. Minimize fatigue
7. Minimize direct pressure
8. Provide adjustability and change of posture
9. Provide clearance and access
10. Maintain a comfortable environment
11. Enhance clarity
12. Improve work organization

### Materials Handling & Storage

#### *Flammable & Combustible Liquids*

There are two primary hazards associated with flammable and combustible liquids with a flash point below 200 degrees Fahrenheit: explosion and fire. It is AMTRAN's intent to minimize the danger from the hazards through safe storage and handling procedures of such liquids. A combustible liquid is any liquid having a flash point at or above 100 degrees Fahrenheit (including all defined classes of such liquids). A flammable liquid is any liquid having a flash point below 100 degrees Fahrenheit (including all defined classes of such liquids).

Storage areas for combustible or flammable liquids shall not be located near heated pipes or areas exposed to sunlight or other sources of heat and shall be located away from employee areas.

Appropriate and approved containers shall be provided for the storage of all flammable liquids and they shall be stored separately from other materials in locked and clearly identified cabinets.

Cabinets containing flammable liquids should be clearly marked FLAMMABLE – KEEP FIRE AWAY.

### *General Storage*

Tools and supplies shall be located near work areas where they will be used. And storage areas for supplies shall be easily reached by employees. Large pieces of material or equipment shall be kept in designated storage areas.

Storage space shall be designated near working areas for storing supplies, tools and infrequently used equipment and space shall be provided for racks, bins, and shelves.

Appropriate stepladders shall be provided as necessary to aid employees in reaching stored materials which are not easily accessible.

### *Cleaning Up Spills - General*

Maintenance personnel are responsible for knowing correct safety procedures for the containment and mitigation of any fluid spills or overflows (motor oil, fuel, antifreeze fluid, etc.) that occur in any AMTRAN facility. *(Refer also to AMTRAN PPC Plan appended to this document.)*

### Welding & Brazing

Welding operations shall be performed only by persons of proven competency. Welding apparatus shall be inspected according to a pre-determined schedule by a qualified employee. Defective equipment shall be immediately removed from service, repaired and/or replaced.

Gas cylinders shall be handled with appropriate precautions. Valve protection caps shall be in place when cylinders are not in use. Cylinders shall at all times be secured in an upright position against toppling or accidental dislodgement. Cylinder valves shall be opened only with hand wheels or tools specifically designed for that purpose. Cylinder valves shall be closed when not in use. Oxygen cylinders in storage shall be separated from fuel-gas cylinders or combustible materials (especially oil or grease) a minimum distance of 20 feet.

Where arc welding and cutting operations are being performed in the vicinity of other workmen or the public, fire resistant screens shall be provided to shield them from the welding rays or flashes. No welding, cutting or heating shall be done where the application of flammable paints or the presence of other flammable compounds or heavy dust concentrations creates a hazard. Suitable fire extinguishing equipment shall be immediately available in the work area and shall be maintained in a state of readiness for use.

### Traffic Laws

All employees in charge of any AMTRAN vehicle must be familiar with, and will be held responsible for adherence to, the traffic laws and regulations of the Commonwealth of Pennsylvania and the municipalities served by AMTRAN. Any questions on pertinent

traffic laws should be addressed to the Director of Maintenance or the Transportation Supervisor on-duty.

#### Speed in Yard/Garage Area

Personal or Company vehicles being operated inside the yard and/or garage must be limited to a speed of five miles per hour inside the garage and 15 miles per hour in the yard.

Vehicles must be brought to a complete stop when exiting the yard and when exiting the garage. Also when exiting the garage, the horn must be blown before proceeding out of the garage.

Care must be exercised to avoid starting a bus with someone under or working on the vehicle. In addition, a vehicle in the garage may not be started or moved without permission of the Maintenance Department Supervisor on-duty.

#### Unauthorized Driver

No person may be permitted to operate the vehicle except the operator in charge, a student driver, a mechanic, or a supervisory official.

Employees are permitted to operate only those vehicles on which they are qualified by AMTRAN. Qualified employees are not to take over equipment controls from an employee assigned to the vehicle unless the operator on duty on that vehicle is incapacitated.

### **Recognition, Incentives & Rewards**

#### Recognition

AMTRAN recognizes that the importance of workplace safety goes beyond safe vehicle procedures and safe driving techniques. AMTRAN's facilities – especially its garage and other maintenance facilities – present certain potential hazards that call for policies which encourage and reward safe working procedures and habits.

#### Incentive/Reward Program

AMTRAN's Safety Program provides for a system of incentives and rewards for exceptional performance.

In recognition of safe working practices, Safety Certificates will be mailed to employees who achieve injury-free workplace records. The calculation of time period will be based on calendar years (January – December). Copies of these certificates will be added to the employee's personnel file. Recognition will be at five-year intervals.

In addition to this form of recognition, AMTRAN also reserves the right to publicize the workplace safety awards program and as part of the program to use employee's pictures and names.

## Incentives

When AMTRAN's operators and maintenance personnel demonstrate exceptional workplace safety habits those behaviors will be recognized and rewarded. The following plan for rewards shall be carried out:

Full-time employees who have no workplace injuries for one calendar year will be given a \$50.00 gift certificate. Granting of this reward shall be in accordance with all operations policies, work rules and collective bargaining contract stipulations.

Part-time employees who have no workplace injuries for one calendar year will be given a \$25.00 gift certificate. Granting of this reward shall be in accordance with all operations policies, work rules and collective bargaining contract stipulations.

## Definitions

1. A Full-time employee must be full-time for the entire calendar year (January 1 – December 31) and must have performed regular duties for at least 1600 hours of the calendar year.
2. Part-Time employees must be on the part-time roster or a part-time schedule for the entire calendar year (January 1 – December 31), and must have performed regular duties for at least 350 hours of the year. Awards received while part-time are not carried forward or counted towards full-time awards.

## Milestone Reward Program

As an additional reward for safe vehicle operation and safe work practices full and part-time operators and maintenance personnel will be given the following milestone achievement rewards. These rewards are to be given during the milestone year only – not annually.

- \$50 gift certificate – 5 non-consecutive years without a preventable accident,
- \$100 gift certificate – 10 non-consecutive years without a preventable accident,
- \$200 gift certificate – 15 non-consecutive years without a preventable accident,
- \$300 gift certificate – 20 non-consecutive years without a preventable accident,
- \$400 gift certificate – 25 non-consecutive years without a preventable accident.

## Discipline Process

Based upon the total information available, the Director of Maintenance shall make a decision to classify a workplace incident or accident in one of the following categories.

Non-Preventable

Preventable

### A Non-Preventable Workplace Incident or Accident:

No action will be taken against the employee.

### A Preventable Workplace Incident or Accident:

The employee will be advised of the effect of this finding on the individual's work record...

The employee may be counseled as to what was done wrong and how to improve...

The employee may receive additional training on a specific piece of equipment or a specific procedure...

The employee retains the usual rights/protections against suspension and termination afforded employees under the current Collective Bargaining Agreement.

### Disciplinary Action

Preventable accidents or incidents will subject operators to disciplinary action up to and including termination. It is the intent of AMTRAN that discipline for preventable accident/incidents be used as a tool to make operators more aware, safety conscious and better drivers. The steps in administering discipline are shown below; however, AMTRAN may apply discipline in any order, depending upon severity of the accident/incident and/or degree of neglect.

#### 1. Step One

First preventable accident/incident: written warning.

#### 2. Step Two

Second preventable accident/incident within one year of the first: written warning.

#### 3. Step Three

Third preventable accident/incident within one year of the second: written warning, suspension plus notification that one more preventable accident/incident within the following 12 months will result in termination.

#### 4. Step Four

Fourth preventable accident/incident within one year of the third: termination.

## 5. Step Five

Fourth preventable accident/incident more than one year and less than two years after the third: written warning, suspension, plus notification that one more preventable accident/incident within 18 months will result in termination.

Operators must stay free from preventable accidents/incidents for three years after receiving discipline under Step Five above in order to start over at Step One. An operator who has a fifth preventable before three years has elapsed will begin the discipline process at Step Five.

Written notification shall be given to all concerned parties at each step of this disciplinary process.

### **Accident Handling Procedures – All Employees**

#### *Injuries to Employees*

Any employee sustaining an injury in the course of his or her employment, no matter how slight, must report the injury to their supervisor immediately. If no supervisor is on duty at the time of the injury, the injury must be reported to a supervisor by telephone as soon as possible. The employee must also fill out a Workplace Injury Report Form as soon as possible after the injury has occurred. The full receipt of worker's compensation benefits may depend on timely and proper reporting of injuries and the completion of a Workplace Injury/Incident Report. *Refer also to AMTRAN's "Workers' Compensation Policy."*

### **Accident Handling/Investigation Procedures**

It will be the responsibility of the Directors of Transportation and Maintenance and the Transportation and Shift Supervisors to oversee and document accident reporting and investigation throughout AMTRAN. They, along with the General Manager will be responsible for informing employees of these policies and insuring that all accidents are reported on the appropriate forms and investigated. All departments will use the accident/incident reporting forms attached to this policy.

Any injury to an employee, no matter how minor, and any injury to a member of the general public which occurs on or within AMTRAN facilities, or as a result of AMTRAN employee/equipment activities, must be reported on these forms. All "near misses" or non-injury/non-damage incidents should also be reported. All information requested must be provided on the form. The form must be completed and turned in to the Director of Transportation, Director of Maintenance, On-Duty Transportation Supervisor or On-Duty Shift Supervisor immediately following the accident or incident, or at the end of the shift on the day of the accident or incident. This procedure will be followed for every accident/incident which occurs to insure that they are documented properly and that they are investigated and used by management for identifying and eliminating risks associated with them.

When an accident occurs, the Director of Transportation, Director of Maintenance, On-Duty Transportation Supervisor or On-Duty Shift Supervisor must inform the AMTRAN Administrative Assistant that an accident has occurred and initiate an investigation of the accident

### *Accident Investigation Procedures*

As soon after the accident/incident is reported as is possible, the Director or on-duty Supervisor should visit the accident site and interview any witnesses or fellow employees with knowledge of the occurrence. The investigating Director or Supervisor shall be prepared to fully cooperate with representatives of our insurance companies and other officials involved in the accident investigation.

All accidents must be investigated to determine if they are preventable in the future. Each report prepared by the investigating Director or Supervisor shall include a determination of preventability as well as suggested changes to be implemented for preventability.

Accident investigation guidelines and hazard assessment forms are appended to this document to assist Director and Supervisors in effectively investigating these events and determining causation factors.

### **Record Keeping**

AMTRAN's Administrative Assistant maintains active and historical files of all employee injury reports and all subsequent non-confidential medical information as well as files tracking active and historical Worker's Compensation Claims. "Near-miss" and other incident reports involving employees are kept in active files by the Directors of Maintenance and Transportation. Non-employee accident and incident files are maintained according to the guidelines outlined in Part I of this document.

### **Drug & Alcohol Testing Requirements**

AMTRAN's Substance Abuse Policy document details all AMTRAN rules concerning drugs and alcohol. AMTRAN's policy applies to all safety-sensitive AMTRAN employees, paid part-time employees, contract employees and contractors when they are on transit property or when performing any transit-related safety-sensitive function. A safety-sensitive function is any duty related to the safe operation of mass transit service including the operation of a revenue service vehicle (whether or not it is in revenue service), dispatch and maintenance of a revenue service vehicle or equipment used in revenue service, security personnel who carry firearms, and any other employee who holds a Commercial Driver's License. As such, the entire policy is a "safety" document. The purpose of this section is to reiterate portions of that policy with direct bearing on Part II of AMTRAN's Safety Program.

AMTRAN's Substance Abuse Policy states (Section 6.0) that, "All safety-sensitive employees shall be subject to testing prior to employment, for reasonable suspicion [and] following an accident..." The requirements for post-accident testing are as follows:

“All safety-sensitive employees will be required to undergo urine and breath testing if they are involved in an accident with an AMTRAN transit vehicle (regardless of whether or not the vehicle is in revenue service) which results in a fatality. This includes all surviving safety-sensitive employees that are operating the vehicle and any other employee whose performance could have contributed to the accident. In addition, a post accident test will be conducted if an accident results in injuries requiring immediate transportation to a medical treatment facility; or one or more vehicles incurs disabling damage; unless the employee can be completely discounted as a contributing factor to the accident. The accident definition may include some incidents where an individual is injured even though there is no vehicle collision. Additionally, AMTRAN reserves the right to require employee urine and breath testing after any accident involving an AMTRAN vehicle.

“Following an accident, the safety-sensitive employees will be tested as soon as possible, but not to exceed eight hours for alcohol testing and 32 hours for drug testing. Any safety-sensitive employee involved in an accident must refrain from alcohol use for eight hours following an accident or until he/she undergoes a post-accident alcohol test. Any safety-sensitive employee who leaves the scene of the accident without justifiable explanation prior to submission to drug and alcohol testing will be considered to have refused the test and their employment will be terminated. Employees tested under this provision will include not only operations personnel, but also any other covered employee whose performance could have contributed to the accident.”

Further:

“Disabling damage means damage which precludes departure of any vehicle from the scene of an accident in its usual manner in daylight after simple repairs. Disabling damage includes damage to vehicles that could have been operated but would have been further damaged if so operated, but does not include damage which can be remedied temporarily at the scene of the accident without special tools or parts, tire disablement without other damage even if no spare tire is available or damage to headlights, turn signals, horn, mirrors or windshield wipers that makes them inoperative.”

Prior to post accident testing, the Director of Transportation or Transportation Supervisor on duty is required to complete a Post-Accident Documentation Summary Form (example attached in Appendix). This form is to be turned into the Designated Employer Representative within 24 hours of the accident.

## **PART III**

### **SAFETY AWARENESS PLAN**

#### **Safety Awareness**

The promotion of safety awareness is an essential ingredient to the success of a safety program. Safety must be heralded in all aspects of the work environment, with enough variety provided to retain employees' interest.

#### **Safety Committee**

A standing Safety Committee shall be established and maintained consisting of no less than four (4) Supervisors/Administrative personnel and four (4) members of ATU Local 801. As far as possible, the latter representation shall be composed of two (2) operators and two (2) maintenance employees.

Non-supervisory/administrative members shall serve a term of not more than two years as members of the Safety Committee and shall be required to rotate off the Committee for at least one term.

The Safety Committee shall meet at least quarterly over the course of each calendar year. The actual scheduling of the meetings will vary depending on other AMTRAN business and company-wide priorities.

The Safety Committee shall be primarily responsible for:

1. Setting the agenda for company-wide safety meetings;
2. Establishing topics for safety-related presentations and training;
3. Suggesting topics for safety-related postings, pay-roll stuffers and other safety media;
4. Bringing to the forefront hazardous conditions in the workplace and along the routes of the bus system;
5. Conducting hazard assessments of AMTRAN working areas;
6. Suggesting improvements to AMTRAN's Safety Program;
7. Drug awareness & education efforts as per the Substance Abuse Policy.

#### **Safety Promotion Materials**

AMTRAN will provide forms of media that emphasize safety performance, weather conditions and everyday safety advice.

Safety posters depicting dangerous bus driving practices, such as following too closely, improper turns, bad weather driving, sudden or rough stops, failure to "curb" for boarding/alighting passengers, excessive speed, etc., as well as hazardous work practices such as improper lifting techniques, absence of appropriate PPE, improper use of ladders, etc. may be provided and changed regularly. In addition, monthly calendars and/or newsletters with safety messages may be distributed.

## **Safety Updates, Payroll Stuffers, Memos and The “White Board”**

To maintain safety awareness, statistics of interest to operators may be updated monthly and posted in the operator’s lounge. Further, the “accident” traffic signal will be kept up-to-date: green – no accident; yellow – non-preventable accident and red – preventable accident.

Periodic memos highlighting safety issues may be issued and posted in the operator’s lounge area and in the maintenance office and lounge areas. Also, periodic payroll stuffers concerning employee safety will be issued to all employees in their pay envelopes.

The “White Board” located directly to the right of the operators dispatch window, will be utilized for safety messages. Immediate emergency concerns including the day’s weather conditions – if anticipated to adversely affect operations; any hazardous road conditions and/or road works; any emergency re-routings, etc. will be posted and updated frequently. Also, in the winter months, snow routes will be highlighted.

## **Safety Meetings**

Company-wide safety meetings will take place at least semi-annually. All employees will be encouraged to attend. The safety meetings will normally take place in the evenings. Employees will be paid to attend. Food and refreshments may be provided. The meeting will follow a flexible format and will be no longer than two hours in length. Safety meetings may be scheduled for one or two evenings, depending on the contents of the meeting. The meetings will follow a general format but will include a feature on safety, a review of AMTRAN’s safety performance and a question and answer session.

## **Safety Program Changes or Termination**

AMTRAN reserves the right to unilaterally modify, add to, delete from, or terminate the safety program at any time.

## **PART IV**

### **LIFE SAFETY PROGRAM**

#### **Facility Emergency and Evacuation Procedures**

##### Introduction

For the purposes of this document, an emergency is defined as: any unplanned event that can cause deaths or significant injuries to AMTRAN's employees, customers or the public; or that could shut down or disrupt AMTRAN operations, cause physical or environmental damage, or threaten AMTRAN's financial standing or public image. Obviously, numerous events can be considered "emergencies," including:

- Fire
- Hazardous materials incident
- Flood or flash flood
- Winter storm
- Communications failure
- Prolonged power failure
- Explosion

Each event must be addressed within the context of the impact it has on the company and the community. What might constitute a nuisance to a large industrial facility could be a "disaster" at AMTRAN.

In an emergency, all personnel should know:

- What is my role?
- Where should I go?
- Emergency escape procedures and routes
- Procedures for employees who perform or shut down critical operations before an evacuation
- Procedures to account for all employees, visitors and contractors after an evacuation is completed
- Rescue and medical duties for assigned employees
- Procedures for reporting emergencies
- Names of persons or departments to be contacted for information regarding the policy

##### Direction and Control

Someone must be in charge in an emergency. The system for managing resources, analyzing information and making decisions in an emergency is called direction and control.

## Emergency Management

Ultimate responsibility for the management of an emergency situation at AMTRAN falls to the General Manager.

In the General Manager's absence, emergency management will follow AMTRAN's normal chain of command. (*See Incident Control and Red Alert procedures.*)

The general responsibilities for Emergency Management are as follows:

- Determine short and long-term effects of the emergency
- Approve facility evacuation order
- Approve order for partial or complete shutdown of operations
- Interface with outside organizations and the media
- Issue press releases

## Incident Command

The AMTRAN Director of Transportation and/or the AMTRAN Director of Maintenance assume primary responsibility for front-line management of an emergency incident at the AMTRAN Administration Facility and Bus Garage.

In the absence of these Directors, the following chain of command will be instituted:

1. General Manager
2. Transportation Supervisor on duty
3. Maintenance Supervisor on duty
4. Director of Business Development
5. Director of Staff & Customer Relations

Incident command consists of tactical planning and execution, determining whether outside assistance is necessary and relaying requests for internal or external resources through Emergency Operations.

During an incident, the responsible director has the authority to:

- Assume Command
- Assess the Situation
- Determine Appropriate Response
- Activate Resources
- Order an Evacuation
- Order a "Red Alert"
- Oversee All Incident Response Activities

## Declare the Incident “Over”

AMTRAN’s Red Alert procedures are to be incorporated into the incident command function. The purpose of Red Alert is to have as many management personnel as possible at the AMTRAN Offices or the Emergency Control Center in the aftermath of a serious incident (including an accident with serious injuries or fatalities). If Incident Command issues a “Red Alert,” the following procedures are implemented:

The dispatcher/supervisor in operations will phone the first priority list.

First Priority:

- Director of Transportation
- General Manager
- Director of Maintenance
- All Transportation Supervisors

The dispatcher/supervisor in transportation will then call one of the following. The first live person that the dispatcher talks to will telephone the remainder of the list.

Next Priority:

- Director of Staff & Customer Services
- Director of Business Development
- Director of Finance
- Administrative Assistant
- Accounting Assistant

The message should be “This is Tony from AMTRAN calling for John at 9:45 p.m. This is a Red Alert.” Don’t ask questions. Don’t give out information. Leave the message and hang up.

Everyone should let his or her families know what an AMTRAN Red Alert is. If you cannot respond to the Red Alert, call AMTRAN and leave a message on the acting General Manager’s voice mail.

“Red Alert” procedures are described in full in AMTRAN’s *Serious Accident Procedures* (Attachment D). If the “Red Alert” involves an emergency incident at the AMTRAN Administration Facility and/or Bus Garage, the person in charge of incident command will relay the information on where senior staff are to meet (*see Emergency Operations*).

### Emergency Operations

AMTRAN’s operational and communications center is housed within the AMTRAN Bus Garage. In the event that an incident makes the AMTRAN Operations facility and Bus Garage inaccessible, emergency operations will shift to the Blair County 911 center located at 6<sup>th</sup> Avenue & 4<sup>th</sup> Street, Altoona.

Before exiting the operations/communications center, if possible, the person in charge of incident command should secure the available portable radios and cell phones as well as the facility site map, staff directory and building security system information. These should be taken to the 911 center.

### Security

The AMTRAN Operations Facility and Bus Garage are equipped with an ADT Safewatch Pro Security and Fire Detection System. This system is designed to secure and protect the facilities in cases of unauthorized intrusion or fire. The City of Altoona Police Department certifies the system on annual basis. ADT conducts an on-site test of the system quarterly and the system is remotely tested by ADT on a daily basis. The system is equipped with back-up emergency battery power.

Detection devices for unauthorized intrusion have been installed on all doors in both the Administration Building and the Bus Garage. These devices are normally activated by the second shift maintenance supervisor at the end of second shift. The security system is accessed via control panels. One panel is located in the Bus Garage and another in the Administration Building.

In the case of an unauthorized intrusion, a loud alarm is sounded in both buildings along with flashing strobe lights. The alarm is automatically transmitted to the ADT Security Center, which in turn transmits the alarm to the City of Altoona Police and Fire Departments.

Numerous detection devices installed in both buildings achieve smoke/fire detection. If smoke or fire is detected, a loud, intermittent alarm sounds in both buildings simultaneously. The strobe lights flash as well. As in the case of unauthorized intrusion, both the City of Altoona Police and Fire Departments are signaled by a transmission from the ADT Control Center.

Both the ADT Control Center and the Altoona Police Department are supplied with a list of names and telephone numbers on an annual basis. Currently, the Director of Maintenance is the first notified in the event of an unauthorized intrusion or a fire alarm. When notified, the Director is responsible for getting to the Administration Building/Bus Garage. The priority contact list continues with the Director of Transportation, the Transportation Supervisors and the General Manager – in that order.

Initial response to any emergency will entail isolation and securement of the incident scene. If possible, the discoverer should attempt to secure the scene and control access, but no one should be placed in physical danger to perform these functions. Basic security measures include:

Closing doors and windows (*except garage doors if incident originates in garage areas*)

Establishing temporary barriers with furniture after people have been safely evacuated

Dropping containment materials (absorbent pads, etc.) in the path of leaking materials

Closing file cabinets, desk drawers and safe doors  
Employing a fire extinguisher (if properly trained)

Only trained personnel are authorized to perform advanced security measures. In the cases of fire or unauthorized intrusion, only the responding police and fire personnel are so authorized. In addition, once response has been initiated, access to the Bus Garage and the Administration Building is limited to persons directly involved in the response.

### Response Coordination

The first responding AMTRAN supervisor is responsible for coordination of responding agencies. Once the nature of the emergency is determined, the responsible supervisor determines if the automatic notification of the security provider as well as the police and fire departments has taken place.

Responding units will utilize either driveway entrance onto the AMTRAN property. Which entrance used will be dictated by the nature of the emergency. Responding fire trucks will generally use the lower entrance – nearest 5<sup>th</sup> Avenue and 34<sup>th</sup> Street – because of the location of the fire hydrant (refer to site map). Responding agencies should identify and report to the coordinating supervisor.

Once the agencies respond, it is the coordinating supervisor's responsibility to turn control of the incident site over to the officer(s) in charge. That supervisor should be prepared to accurately identify who is responding and who is in charge of the responding agencies.

At present, the only special protocol in place with responding agencies involves the City of Altoona Fire Department. Fire Department personnel have been provided access to a "knox box" located outside the dispatch office entrance. This box contains keys which provide access to all to both the Administrative Building and Bus Garage. In the event of a response after hours, the Department has immediate access to the buildings.

The coordinating supervisor should also keep track of which organizations are on-site and how the responding outside agencies are coordinating the response. This will help increase personnel safety and accountability, and prevent duplication of effort.

The responding supervisor is also responsible for making sure that a log detailing the actions taken during the emergency is kept. This log should track what has happened, what decisions are made and any deviations from policy that takes place. The time that each event takes place should be logged.

### Communication

In the event of a serious emergency at the AMTRAN Administration Facility and Bus Garage, maintaining/restoring communications with AMTRAN employees and their families, AMTRAN's customers, responding agencies and the general public will be of the utmost importance.

## Contingency Plan

In the event of an evacuation of the AMTRAN facilities, the coordinating supervisor is responsible for assuring that the following items are taken off site:

- all cell phones,
- at least one fully charged two-way portable radio, and
- a master list of employees addresses/phone numbers,
- list of phone numbers for media outlets
- list of phone numbers of area businesses

The coordinating supervisor should determine if it is possible to take at least one service vehicle off site. All AMTRAN service vehicles are equipped with two-way radios. Should the base station become inoperable, the two-way radio in the off site vehicle will serve as a temporary base station until either emergency command is set up at the County 911 Center or the event is declared over. If, due to the nature of the emergency and in the supervisor's judgment, no service vehicle is easily and safely accessible, priority should be given to securing an operable portable radio rather than the service vehicle.

AMTRAN operators operating buses in service should be notified as soon as possible as to the nature and severity of the emergency. In the case of facility evacuation and base station shutdown, the procedure for normal communications will be determined first by the coordinating supervisor, then by the Director of Transportation. Once the temporary base of operations is established at the 911 center, normal communications will be conducted from there.

Depending on the nature and severity of the emergency, the AMTRAN bus routes that serve AMTRAN's Administrative Facility may need to be re-routed. Also, those operators scheduled for relief at AMTRAN's bus garage may be required to wait for relief at another point. These alternate relief points will be determined by the coordinating supervisor or the Director of Transportation as the need arises.

Cell phones should be used to communicate to employees who are scheduled to report for duty to the Bus Garage. These employees should be directed to report to alternate points such as the downtown Transit Center.

## Emergency Communications

In the event of an evacuation of the AMTRAN Administrative facility, normal communications will be disrupted. Once the contingency plan is initiated, communication priority will be as follows:

1. Coordinating Supervisor/ with Emergency Responders
2. Coordinating Supervisor or Transportation Director with On-duty Employees
3. Coordinating Supervisor or Transportation Director with Off-duty Employees
4. Emergency Operations with Customers, Neighbor Businesses & General Public
5. Emergency Operations with Employees Families
6. General Manager or Acting General Manager with Media

Communication protocols for the foregoing are as follows:

- 1) The Coordinating Supervisor is responsible for direct communications with any responding agency. Presumably this communication will take place “face-to-face” at the emergency site. Two-way radios with the frequency designated by the responders may also be used.
- 2) The Coordinating Supervisor or the Transportation Director (if on-site) is responsible for contacting all the operators on duty at the time of the emergency via two-way radio to inform them of initiation of Emergency Operations. Also, as needed, those operators operating on routes that may need re-routed away from the AMTRAN Administration Facility and Bus Garage will be contacted. If, for any reason, two-way radio communication is unavailable, the Coordinating Supervisor/Director of Transportation will use a cell phone to send the first available off-duty employee to the downtown Transit Center with a cell phone, thereby establishing a communications link with operators on duty.
- 3) The Coordinating Supervisor or Transportation Director (or their designee) is responsible for contacting off-duty employees who may be scheduled to report for duty to the AMTRAN Bus Garage. These employees will be instructed to relieve at alternative relief points.
- 4) After evacuation of facilities is accomplished and emergency operations conditions have been established, the Director of Transportation, or his designee, is responsible for notifying/warning neighboring businesses of the potential for harm to their facilities. In the case of emergencies at the AMTRAN Administrative Facility and Bus Garage, those notified will, at a minimum, be:
  - Altoona Area School District – Maintenance
  - A Plus Printing.The Director of Transportation, or his designee, is also responsible for contacting WRTA radio station and WTAJ television station and releasing the number of one of the AMTRAN cell phones for use by customer’s and the general public to call for information and potential schedule changes. The Director of Transportation, or his designee, should refer all other media questions concerning the emergency incident to the General Manger or acting General Manager (*see below*).
- 5) After a reasonable assessment of the status of all on-duty employees is made, the Director of Transportation, or his designee, is responsible for insuring that families have been contacted concerning the status of their on-duty family members. An effort should be made to contact all on-duty employee’s families *before* incident reports/information is released to the media. In the event that an on-duty employee has been seriously injured or a fatality has occurred, responsibility for contacting the family shall fall to the General Manager or acting General Manager.
- 6) Within twelve (12) hours of the initiation of emergency operations, the General Manager or acting General Manager is responsible for releasing a statement to all media outlets on AMTRAN’s master list of contacts. Should media attempt to get a statement before that time, only the General Manager or acting General Manager shall make a statement. (*Refer to AMTRAN’s Serious Accident Procedures – Attachment D – for guidelines on making this statement.*)

## Life Safety

In the event an evacuation of the AMTRAN Administration Facility and Bus Garage, protection of employees, customers and any visitors to the facilities is the highest priority.

The following conditions are most likely to create a situation that would require an evacuation of the AMTRAN Administration Facility and Bus Garage:

- Fire
- Severe Gas Leak
- Severe Hazardous Material Spill
- Severe Fumes Not Readily Identifiable

In any of these cases, the normal chain of command is followed in determining who has the authority to order an evacuation (*see "Incident Command" above*). An evacuation order will be given either by physically visiting all three operational areas (*Administration Building, Dispatch/Team Lounge area and Maintenance Supervisors Office*) or via intercom on the internal telephone system.

Note: All normal on-site tests of the warning system are announced to people in the building before the test. Therefore, if the alarm sounds it should always trigger a complete evacuation of all personnel.

## Evacuation Procedures

The Director of Transportation or the Transportation Supervisor on duty is responsible for overseeing the evacuation of the Dispatch Area and the Team Lounge. It is this person's responsibility to account for all employees, customers and visitors who may be in these areas at the time an evacuation is ordered. It is assumed that this person will have immediate access to the daily assignment sheet and will be able to determine quickly who is scheduled to be at the facility at the time.

The Director of Maintenance or the Maintenance Supervisor on duty is responsible for overseeing the evacuation of the Bus Garage. This includes all areas of the Garage except the Dispatch area and the Team Lounge. It is this person's responsibility to account for all employees, customers and visitors who may be in the Garage at the time an evacuation is ordered. It is assumed that this person will have immediate access to the work assignment sheets and will be aware of the location of all on-duty maintenance employees.

The Director of Maintenance or the Maintenance Supervisor on duty has the additional responsibility of securing the fuel pump in the event an evacuation is ordered. That person must make sure the fuel pump connecting the external fuel storage tanks to the internal pump at the fuel island is turned off. Normally this pump is turned off when fueling is not taking place. However, it is imperative that this be checked and secured during an evacuation. Directions for turning off the pump are posted at fuel island.

The Administrative Assistant is responsible for overseeing the evacuation of the Administrative Facility. It is this person's responsibility to account for all employees, customers or visitors who may be in the Administrative Facility when an evacuation is ordered.

Evacuation routes for the three work areas of the Administration Facility and Bus Garage are detailed on the site evacuation map (*Attachment E*). This site evacuation plan is also posted prominently in the Administration Facility, the Dispatch/Team Lounge area, the maintenance office/main shop area and the service/bus storage area.

All evacuation routes should be kept clear of obstruction at all times. All emergency exits are to be kept unlocked and clear from obstruction at all times. (*See site map for locations.*)

#### Assembly Area and Accountability

When the AMTRAN Administration Facility and Bus Garage are evacuated, all personnel should proceed to the Columbia Park Ball Field adjacent to the AMTRAN facilities across Crescent Road. The assembly point will be in the home plate area or in the covered dugout if the weather is inclement. This area is away from the fuel storage tanks and away from the most likely route and entrances to the facilities that would be utilized by emergency response units.

It is the responsibility of the evacuation leaders (i.e. Transportation Supervisor, Maintenance Supervisor, Administrative Assistant) or their appointed designees to account for all personnel in the assembly area. In no event are personnel to leave the area until they have been accounted for and instructed to do so by Incident Command.

#### Training - Drills and Information

AMTRAN will conduct at least two evacuation drills per calendar year. All efforts will be made to include potential responding emergency units in these drills.

All AMTRAN employees will receive a copy of evacuation procedures and will be required to provide written testimony that they have received this information.

#### Property Protection

AMTRAN has established procedures for fighting fires and containing spills and has on hand equipment and structures to effect property protection in the event of an emergency.

#### Protection Systems

- Fire Protection – smoke alarms and fire extinguishers are placed throughout both buildings (*see site map Attachment E*). The maintenance area is equipped with two separate fireproof cabinets for the storage of flammable materials. The fueling station is equipped with a shutoff/fire protection system and warning devices.

- Hazardous Materials Handling – AMTRAN employs a comprehensive *Preparedness, Prevention and Contingency Plan* for the disposition, handling and emergency procedures for all hazardous materials.
- Document and Valuable Materials Protection – There are three safes – two in the Dispatch area of the Bus Garage and one in the Finance Office in the Administration Facility. All are fireproof.
- Emergency Power Generation – AMTRAN has two portable 3 horsepower power generator. The primary purpose of this generator is to provide emergency power to the fuel pumping station in the event of a prolonged power interruption. This generator would not be capable of providing power for any but the most basic levels necessary for comprehensive operations.

### Records Preservation

The AMTRAN facilities each have a vault that is capable of withstanding all but the most intense fires or explosions. These safes contain some important financial and operational documents. However, at this time there are no formal listings of contents. Nor are there any plans in place to determine what, if any documents should be put into the safes in the event of an evacuation.

Records preservation is however accomplished electronically. Both the Finance Director and the Director of Staff and Customer Relations take system back-up CD's off-site on a daily basis. At any given time, the most electronically stored information that would be lost would be only 24 hours worth of transactions.

Finally, AMTRAN processes an off-site safe deposit box containing some valuable documents.

### Public Information

If an emergency forces an evacuation of the AMTRAN facilities, the community will want to know the nature of the incident, whether the public's safety or health is in danger, what is being done to resolve the problem and what was done to prevent the situation from happening.

The following audiences may be affected by an emergency and statements will be directed toward them through available media or directly. Statements will be made to:

- The general public – through media releases
- The media – through written and verbal statements made by the General Manager
- Employees – (*Emergency Management*)
- Contractors and suppliers – once communications are restored – staff will create a phone list of primary recipients who will be notified within 72 hours of the emergency shutdown
- Customers – (*Emergency Management*)

- Regulatory agencies – as part of recovery and restoration of services, the Federal Transit Administration – Region III, Pennsylvania Department of Transportation – Bureau of Public Transportation and local funding partners will be notified as to the extent and long term effects of the emergency – within 30 days of the event.

### Media Relations

In an emergency, the media are the most important link to the public. When providing information to the media during an emergency designated AMTRAN personnel

Will:

- Give all media equal access to information.
- When appropriate, conduct press briefings and interviews.
- Try to observe media deadlines.
- Escort media representatives to ensure safety.
- Keep records of information released.
- Provide press releases when possible.

Will Not:

- Speculate about the incident.
- Permit unauthorized personnel to release information.
- Cover up facts or mislead the media.
- Place blame for the incident.

Press releases about facility-generated emergencies should describe who is involved in the incident and what happened, including when, where, why and how.

### Bus Emergency and Evacuation Procedures

In the event that an evacuation of your bus is required, you, the operator must assert and assume the leadership role. It is essential that the operator remains **COMPOSED**. Passengers are a lot less likely to panic, if they feel that the operator has control of the situation – and CONTROL of the situation begins with having a plan.

Circumstance of immediate evacuation:

- A. Leaking Fuel Caused By Accident
- B. ANY Smoke In Passenger Compartment
- C. Existing Fire
  - (1) Tire Fires
  - (2) Fires Caused By Accident

### Steps Of Evacuation Plan

1. Compose Yourself – Assume The Role Of Coordinator Of The Evacuation

2. Stop Bus – Off To The Side Of The Road, If Possible.
3. Apply Parking Brake, Put Transmission In Neutral.
4. Open Front And Rear Doors If Possible, Dump Air To Doors(s)
5. Shut Off Master Switch.

NOTE: REMEMBER THAT IF YOU SHUT OFF THE IGNITION THE RADIO MAY NOT WORK.

6. Visually Assess the situation
  - (1) Are You Upright, On Your Side, Or On Your Roof?
  - (2) If You Are On Your Side Or Roof, What Do You Do?
  - (3) What is the status Of the Fire or Smoke?
  - (4) What is the Condition Of Your Passengers?
  - (5) Are There Any Handicapped Passengers Or Passengers In Wheelchairs?
  - (6) Do You Have People Who Can Assist You?
  - (7) What Is The Condition Of Your Vehicle?
  - (8) What Exits Are Available?

IN ALL CASES, DO NOT FIGHT THE FIRE – EVACUATE:

7. Throw The Radio Microphone Out The Drivers Window
8. Ask The Capable, Uninjured Passengers to Assist The Less capable Passengers Off Of The Bus To a Safe Distance From The Bus. Be Calm, Clear And Concise.
9. Don't Hurt Yourself In Your Evacuation, Know Your Physical Limitations. Ask For Help When You Need It.

#### ORDER OF EVACUATION:

- A. Release Passengers From Seat Belts
  - B. Lead Passengers To A Usable Exit
  - C. Help Passengers in Wheelchairs To The Floor And Drag Them By The Armpits Or Shirts To The Nearest Usable Exit.
10. Verify That All Passengers Have Been Evacuated
  11. Call Dispatch.
  12. Place Warning Devices, If Possible.
  13. Provide Support To Passengers.

## PART V

### ENVIRONMENTAL SAFETY PROGRAM

#### Hazardous Materials Procedures

##### Hazard Communications

It is the intent and commitment of AMTRAN to provide a safe and healthy environment for its employees. It is important that employees be aware of chemicals or hazardous substances that can affect their health or create hazards. AMTRAN has established a Preparedness, Prevention and Contingency Plan (PPC Plan) to help insure a safe and healthy environment for all employees.

The PPC Plan establishes a comprehensive strategy of chemical information dissemination flowing from the manufacturer to AMTRAN and ultimately to the using employees. The plan is intended to cover health hazards and physical hazards. Employees who are potentially exposed to such hazards are covered under the plan and the policies of AMTRAN.

The PPC Plan is part of a comprehensive program designed to provide chemical information to employees for their protection and well-being. As such, the plan requires the ongoing cooperation and understanding of all employees for its continued success. The information about hazardous chemicals and substances is provided to all potentially exposed employees through a variety of measures including: Material Safety Data Sheets, chemical lists, container labels, placards, signs, training and education. Employees are instructed that any questions or concerns about the plan are to be brought to the attention of their supervisor.

The PPC Plan contains specific provisions regarding the MSDS program, the labeling program, the information and training program, and non-routine task hazard warning and training. Methods are established which are to be used to inform contractors and their employees of hazardous chemicals they may be exposed to while they are in any of AMTRAN's facilities. The plan also details what information is available to employees and where such information is stored.

##### Preparedness, Prevention and Contingency Plan

##### Description of Activity

1. Description of the Industrial or Commercial Activity

AMTRAN is the Public Transportation Authority providing bus service to the greater Altoona area. The AMTRAN facility performs routine passenger transportation, vehicle maintenance, and equipment cleaning operations. All vehicle maintenance, fueling, and equipment cleaning operations are performed inside the facility's bus garage. Potential discharges from inside the garage cannot contact storm water.

2. Description of Existing Emergency Response Plan

AMTRAN’s emergency response plan is contained in the Evacuation Policy and Procedures for the AMTRAN Administration Facility and Bus Garage document dated March 2002. The document details all procedures for emergency management, communications, evacuation, response coordination and preparation for any incident that could potentially shut down AMTRAN operations and/or require evacuation of AMTRAN’s primary operating facilities.

3. Material and Waste Inventory

Appendix A contains a listing of chemicals currently or previously used on-site. Also included in Appendix A are the Material Safety Data Sheets (MSDS) for each of these chemicals.

4. Pollution Incident Report

In October, 1994 a minor fuel leak occurred in the old underground storage tank. This spill was cleaned up in 1994 when the old storage tank was replaced with the current tank.

5. Implementation Schedule of Plan Elements Not Currently In Use

All plan elements are in place and are being implemented. The history of the facility shows that there have been very few incidents that resulted in the possible contamination of storm water.

Description of How Plan is Implemented by Organization

1. Organizational Structure of Facility for Implementation

Implementing and maintaining the P.P.C. Plan will be the responsibility of the PPC committee. This committee will be comprised of the Coordinator (the facility’s Maintenance Director), and two employees from each shift (one regular and one alternate). Other AMTRAN personnel will be given committee seats as required.

2. List of Emergency Coordinators

<u>NAME</u>	<u>POSITION</u>	<u>OFFICE #</u>	<u>HOME #</u>
Gary Williams	Maintenance Director	944-4074	940-5743
Eric Wolf	General Manager	944-4074	472-4658

3. Duties and Responsibilities of the Coordinator

The main duties and responsibilities of the Coordinator are as follows:

Duties:

- 1.) Identification of materials and wastes handled (materials inventory).
- 2.) Identification of potential spill sources (risk assessment).
- 3.) Establishment of spill-reporting procedures.
- 4.) Establish visual inspection program.
- 5.) Review past incidents and spills and countermeasures utilized.
- 6.) Provide coordination needed to implement the goals of the P.P.C. Plan.
- 7.) Coordinate activities for spill cleanup, notify required authorities.
- 8.) Establish training and education program for installation personnel.

Responsibilities:

1. Periodic review and evaluation of the Plan.
2. Institute appropriate changes at regular intervals.
3. Review new construction and process changes related to the P.P.C. Plan.
4. Evaluate the effectiveness of the P.P.C. Plan.
5. Make recommendations to management on related matters.

Authority:

1. Will have the authority and responsibility for developing, implementing and maintaining the P.P.C. Plan.

4. Chain of Command

<u>NAME</u>	<u>POSITION</u>	<u>OFFICE #</u>	<u>HOME #</u>
Eric Wolf	General Manager	944-4074	472-4658
Gary Williams	Maintenance Director	944-4074	940-5743
Flash Quarry	Transportation Dispatcher	944-4074	942-0501
Carleen Illig	Transportation Dispatcher	944-4074	943-0664

This list, along with the notification procedure will be posted on bulletin boards or in other conspicuous locations around the facility.

Spill Leak Prevention and Response

1. Pre-release Planning

All vehicle maintenance, fueling, and equipment operations are performed inside the bus garage. The garage has impervious, concrete floors; therefore, all materials that could potentially spill on the floor could easily and readily be contained and collected within the confines of the garage. In addition, all drainage from inside the garage is collected in sanitary sewer drains, preventing any possible contact with storm water.

The AMTRAN bus garage can be divided into four (4) potential spill/leak areas. These are: Maintenance, Fueling, Wash, and Parts Room.

#### Maintenance Area

The maintenance area consists of four (4) bus bays, tool bench/tool storage areas, and various chemical storage areas. Any potential spills in the Bay No. 1 Pit, if not immediately contained, would be pumped to the Oil-Water Separator and then to the sanitary sewer. Any spills in the rest of the maintenance area, if not immediately contained, would flow through the floor drains to the Oil-Water Separator and then to the sanitary sewer. Waste from the Oil-Water Separator is pumped to a holding tank and is disposed of properly. A spill or leak in the Maintenance area would have no possible contact with stormwater.

#### Fueling Area

Contained in the fueling area are two fuel pumps and miscellaneous automotive cleaning fluids. Any leaks or spills in this area, if not immediately contained, would flow to the floor drains, to the Oil-Water Separator and then to the sanitary sewer. Waste from the Oil-Water Separator is pumped to a holding tank and is disposed of properly. A spill or leak in the fueling area would have no possible contact with the stormwater.

#### Wash Area

The wash area consists of an automatic bus wash. Miscellaneous automotive cleaning and lubricating fluids are found in this area. All wash-water and chemicals used in the bus wash flow through the floor drains to the Oil-Water Separator and then to the sanitary sewer. Waste from the Oil-Water Separator is pumped to a holding tank and is disposed of properly. A spill or leak in the Wash area would have no possible contact with stormwater.

#### Parts Room

The parts room contains automotive replacement parts and various cleaning fluids, lubricants, and solvents. Any leaks or spills in this area, if not immediately contained, would flow through the floor drains to the sanitary sewer. A spill or leak in this area would have no possible contact with storm water.

Adjacent to the bus garage are the only areas with the potential to contaminate storm water. The first is the underground storage tank transfer station. If a rupture of the transfer line occurs, diesel fuel could spill to the ground and potentially enter a stream during a precipitation event. Pollution Incident Prevention procedures utilized in this area consist of monitoring the transfer of diesel fuel from the truck to the storage tank. Should a rupture of the transfer line

occur, the delivery driver will immediately terminate the transfer operation. Absorbent booms will be placed to contain the spill and all contaminated soil will be removed and properly disposed of.

The second potential spill/leak area is the parking area adjacent to the garage. Since buses are frequently parked here, any leaks would contact the pavement and could potentially migrate to a stream during a precipitation event. To prevent a possible leak or spill, buses will be inspected during routine maintenance operations.

## 2. Material Compatibility

Chemicals will be stored in containers that are compatible with their contents. Material storage practices will be observed so that mixtures of materials will not produce effects which could be harmful to human health and the environment, such as (1) mixtures that would produce heat or pressure (2) those that would result in fire or explosion, (3) mixtures that could result in violent reaction, (4) mixtures that could produce toxic ducts, mists, fumes, or gases, or (5) mixtures that produce flammable fumes or gases. To reduce the probability of these reactions occurring, the following chemical storage guidelines should be followed.

### Chemical Storage Guidelines

1. Chemicals should be stored away from sources of heat.
2. Chemicals should be stored so that they don't freeze.
3. Chemicals should be stored in dry locations.
4. Chemical containers should be stored at ground level. Containers should only be stacked on top of each other when they contain the same chemical.
5. Chemical storage areas should be designed to contain liquid spills within that storage area. This could be accomplished by sealing floor drains, constructing curbing, and by other appropriate measures.
6. Flammable materials (solid and liquid) should be stored in fireproof containers or lockers.
7. Adequate ventilation should be provided to remove hazardous vapors resulting from open containers, leaks, or chemical reaction or decomposition.
8. Thorough cleaning of storage vessels and equipment before reuse should be standard practice to ensure that there is no residual incompatible with the next or later materials used.
9. Containers should be appropriately labeled.

## 3. Inspection and Maintenance

Qualified personnel will conduct daily visual inspections of chemical storage areas for evidence of leaks, spills, and container damage. Any leak or spill inside the bus garage, if not immediately contained, could potentially flow to the floor drains; however, any spills occurring in the maintenance, fueling, or wash areas that reach the drains will first pass through the Oil-Water Separator prior to being routed to the sanitary sewers. Any spills occurring in the Parts Room that reach

the drains would be directly routed to the sanitary sewers. Since all of the drains within the building discharge to the sanitary sewer, no storm water monitoring program is necessary.

During the fuel unloading operations, AMTRAN personnel will monitor the transfer operations to assure that, should a rupture of the transfer line occur, pumping would terminate immediately.

#### 4. Preventative Maintenance

To prevent spills and the inadvertent mixing of incompatible materials, only authorized personnel will use and store chemicals. Storage areas and their heating systems will be checked periodically to insure that these areas are kept clean, dry, and safe in order to prevent potential releases, fires, or explosions.

The Oil-Water Separator was put into use in September, 1995. The Separator will be cleaned quarterly or more frequently if necessary. Wastes will be removed by a licensed disposal company.

#### 5. Housekeeping Procedures

To promote good housekeeping and safety, AMTRAN personnel will be instructed on proper chemical storage methods and proper procedures for cleaning up spills. The following good housekeeping practices should be followed:

- a.) Neat and orderly storage of chemical products will be maintained through the bus garage. Drip pans or similar containment devices will be provided and used wherever such products are dispensed. Any small spill will be promptly contained and removed.
- b.) Signs, placards, and similar notices will be posted alerting personnel to danger.
- c.) A regular garbage pick up and disposal system will be utilized.
- d.) Maintenance of dry, clean floors by use of brooms, power sweepers, etc. will be standard procedure.
- e.) Employee interest in good housekeeping will be encouraged through instruction, notices and postings.
- f.) Proper walkway spacing will be maintained between containers and drums.
- g.) Since oil and other lubricants are regularly used inside the bus garage. Absorbent material, blankets, etc. will be strategically placed in areas of potential spill locations. Personnel responsible for lubrication duties will be instructed to be constantly on the alert for oil spills and will be charged with the duty to clean up any spills discovered.
- h.) Buses will be regularly inspected and maintained in good working order.
- i.) Records will be kept on all repairs that are performed on each bus.

6. Security

The facility is manned from 5:00 am until 11:00 pm Monday through Friday, 6:30 am to 10:00 pm on Saturday and 10:00 am until 8:00 pm on Sundays. The garage is locked at all other times.

7. External Factor Planning

External factors such as power outages and adverse weather conditions, etc., are not expected to produce any instances resulting in a spill or discharge which would effect the public health and safety or the environment.

8. Employee Training Program

A training program will be given to all employees at the facility who work in the bus garage. The Emergency Coordinator will instruct the employee to read the plan and then will answer any questions that the employee has to ensure that they are thoroughly familiar with all of its elements. In addition, the Emergency Coordinator will familiarize the employee with the location and operation of emergency response equipment.

Countermeasures

1. Countermeasures to be Undertaken by Facility

When a spill occurs, all available employees should respond as follows:

1. Identify the material.
2. Use proper Personal Protective Equipment.
3. Locate and stop the leak.
4. Contain any material that has leaked.
5. Report spill to Emergency Coordinator.
6. Collect the material that has leaked.
7. Properly dispose of clean up material.

The specific procedures to be followed in the event of spills less than and greater than 10 gallons are as follows:

SMALL SPILL RESPONSE PROCEDURE

(Inside the Garage, Less than 10 Gallons)

1. Locate the Spill Response Kit.
2. Determine what product is involved in the spill.
3. Determine the amount of product spilled.
4. Determine the Personal Protective Equipment necessary to perform the clean up.
5. Attempt to stop or control the spill at the source of the leak.
6. Contain the spill material using an absorbent material over the area of the spill.

7. Isolate the spill area by setting up a barricade using posts and rope or tape.
8. Allow oil to drain to the oil water separator.
9. Spread the loose absorbent material over the remainder of the spill.
10. Stir the loose absorbent and spillage with a stick, or any device that can be used as a stirrer, to ensure proper mixing.
11. Shovel the remaining material into the recovery drum. Also place used booms and any used plastic sheeting used in the cleanup in the drum. Add additional absorbent to the drum if free oil is observed in the drum. Immediately cap the recovery drum when it is full.
12. When the cleanup is completed, remove Personal Protective Equipment, clean items, such as respirators, and put them back in the Oil Spill Response Kit. A new drum will be needed if the original one now contains spillage.
13. Perform an inventory of the contents of the Oil Spill Response Kit.
14. Replace absorbent materials, plastic sheeting, gloves, pants, jackets, and any other inventory deficiency items so that the Oil Spill Response Kit is fully stocked.
15. Return the Oil Spill Response Kit to its normal storage location.

**LARGE OIL SPILL RESPONSE PROCEDURE**  
(Inside the Garage, Greater Than 10 Gallons)

1. Locate the Spill Response Cart.
2. Determine what product is involved in the spill.
3. Determine the amount of product spilled.
4. Determine the protective clothing including pants, jacket, boots, and gloves that will be required by all employees working with the spill.
5. Attempt to stop or control the spill at the source of the leak.
6. Contain the spill material using absorbent material and booms on the area of the spill.
7. Isolate the spill area by setting up a barricade using posts and rope or tape.
8. Allow oil to drain to the oil water separator.
9. Spread the loose absorbent material over the remainder of the spill.
10. Use absorbent booms and/or plastic sheeting to keep oil from entering sumps, drains, sewer systems, or any body of water.
11. Stir the loose absorbent and spillage with a stick, or any device that can be used as a stirrer, to ensure proper mixing.
12. Where applicable, pump or dip oil that is contained in puddles into recovery drums. Immediately cap drums when they are full.
13. Collect oil in small puddles by spreading loose absorbent material on them. Absorbent should be added until no traces of free oil remain on the surface.
14. Spread loose absorbent on oil that is floating on water in stagnant pools or puddles. The absorbent will float on water so it is added until no traces of free oil remain on the surface.

15. The loose absorbent material spread on the spill in steps 12 and 13 should solidify into a rubber-like solid material after an hour. It can then be shoveled or otherwise placed in recovery drums. Add additional absorbent to the drum if free oil is observed on the surface of the solidified absorbent. Immediately cap recovery drums when they are full.
16. Collect remaining contaminated and used containment materials (plastic sheeting, absorbent booms, protective clothing, etc.) and place in recovery drums when they are full.
17. Clean items such as tools, respirators, shovels, etc., and return them to the spill cart. Drum all cleaning rags, solvents, etc.
18. Number and properly label all recovery drums and check that all drum lids are tightly secured.
19. Secure and store all filled or partially filled recovery drums under the supervision of the Emergency Coordinator.
20. Complete the Spill Report and distribute within five (5) working days of the spill.
21. Return Spill Response Cart to its normal storage location.
22. Perform an inventory of the contents of the Spill Response Cart.
23. Replace any inventory deficiency items.

**SMALL SPILL RESPONSE PROCEDURE**  
(Outside the Garage, Less than 10 Gallons)

1. Locate the Spill Response Kit.
2. Determine what product is involved in the spill.
3. Determine the amount of product spilled.
4. Determine the Personal Protective Equipment necessary to perform the clean up.
5. Attempt to stop or control the spill at the source of the leak.
6. Contain the spill material using an absorbent material over the area of the spill.
7. Isolate the spill area by setting up a barricade using posts and rope or tape.
8. Spread the loose absorbent material over the remainder of the spill.
9. Stir the loose absorbent and spillage with a stick, or any device that can be used as a stirrer, to ensure proper mixing.
10. Shovel the remaining material into the recovery drum. Also place used booms and any used plastic sheeting used in the clean-up in the drum. Add additional absorbent to the drum if free oil is observed in the drum. Immediately cap the recovery drum when it's full.
11. When the cleanup is completed, remove personal protective equipment, clean items, such as respirators, and put them back in the Oil Spill Response Kit. A new drum will be needed if the original one now contains spillage.
12. Perform an inventory of the contents of the Oil Spill Response Kit.

13. Replace absorbent materials, plastic sheeting, gloves, pants, jackets, and any other inventory deficiency items so that the Oil Spill Response Kit is fully stocked.
14. Return the Oil Spill Response Kit to its normal storage location.

LARGE OIL SPILL RESPONSE PROCEDURE  
(Outside the Garage, Greater Than 10 Gallons)

1. Locate the Spill Response Cart.
2. Determine what product is involved in the spill.
3. Determine the amount of product spilled.
4. Determine the protective clothing including pants, jacket, boots, and gloves, that will be required by all employees working with the spill.
5. Attempt to stop or control the spill at the source of the leak.
6. Contain the spill material using absorbent material and booms on the area of the spill.
7. Isolate the spill area by setting up a barricade using posts and rope or tape.
8. Contain material by digging dikes.
9. Use absorbent booms and/or plastic sheeting to keep oil from entering sumps, drains, sewer systems, or any body of water.
10. Stir the loose absorbent and spillage with a stick, or any device that can be used as a stirrer, to ensure proper mixing.
11. Where applicable, pump or dip oil that is contained in puddles into recovery drums. Immediately cap drums when they are full.
12. Collect oil in small puddles by spreading loose absorbent material on them. Absorbent should be added until no traces of free oil remain on the surface. Then shovel contaminated material into the recovery drum. Also place used booms and any used plastic sheeting in the drum. Add additional absorbent to the drum if free oil is observed in the drum. Immediately cap the recovery drum when it's full.
13. The loose absorbent material spread on the spill in steps 12 and 13 should solidify into rubber-like solid material after an hour. It can then be shoveled or otherwise placed in recovery drums. Add additional absorbent to the drum if free oil is observed on the surface of the solidified absorbent. Immediately cap recovery drums when they are full.
14. Solid surfaces (concrete, asphalt, etc.) will be thoroughly washed and rinsed twice with an approved solvent. Used rags, solvent, and other cleaning materials will be placed in recovery drums. Add loose absorbent to the drum if there are any traces of liquid solvent. Immediately cap the recovery drums when they are full.
15. Collect remaining contaminated and used containment materials (plastic sheeting, absorbent booms, protective clothing, etc.) and place in recovery drums when they are full.

NOTE: Depending on the spill situation, consideration should be given to leaving temporary dikes and sweeps on creeks in place until post sampling data indicates that the spill area is decontaminated to acceptable levels.

16. Clean items such as tools, respirators, shovels, etc., and return them to the spill cart. Drum all cleaning rags, solvents, etc.
17. Number and properly label all recovery drums and check that all drum lids are tightly secured.
18. Secure and store all filled or partially filled recovery drums under the supervision of the Emergency Coordinator.
19. Complete the Spill Report and distribute within five (5) working days of the spill.
20. Return Spill Response Cart to its normal storage location.
21. Perform an inventory of the contents of the Spill Response Cart.
22. Replace any inventory deficiency items.

### Response to Fire and/or Explosion

The AMTRAN bus garage and office building can be easily accessed by fire fighting and other emergency vehicles and equipment.

If a fire should occur in either of these areas, activation of the alarm system will be the first priority in order to allow other staff and visitors to exit the facility. After this initial step, concentration will be placed on preventing the fire from spreading. If a fire is discovered in its early stages and is fairly small, the fire fighting effort will be carried out by AMTRAN personnel with portable fire extinguishers until the fire is out or until outside assistance arrives. If a fire occurs and is not discovered in its early stages, the facility personnel will call 911 and let the local fire department respond. Fire fighting will not be done at the risk of injury to AMTRAN personnel.

Because fire is always a potential hazard in spills of flammable materials, possible sources of ignition will be eliminated. Vehicular traffic and work in the area will cease until the spill is contained and safe conditions are restored. (Refer to AMTRAN document: *Evacuation Policy and Procedures for the AMTRAN Administration Facility and Bus Garage* for further information concerning fire emergency response.)

### FOLLOW-UP ACTIVITIES

- 1.) Prevention of the recurrence or spread of fires, explosions, and releases:
  - a.) Actions to prevent the recurrence or spread of fires, explosions, and releases include stopping processes, collecting and containing wastes, and recovering or isolating containers. In addition, the Emergency Coordinator will monitor valves, pipes, and other equipment for leaks, pressure buildup, gas generation, or ruptures.

- 2.) Storage and treatment of released material:
  - a.) Immediately after an emergency, the Emergency Coordinator will make arrangements for treatment, storage, or disposal of recovered waste, contaminated soil, surface water, or any other contaminated material.
- 3.) Incompatible wastes:
  - a.) The Emergency Coordinator will ensure that wastes which may be incompatible with the released material are treated, stored, or disposed of until cleanup procedures are completed.
- 4.) Post emergency equipment maintenance:
  - a.) After an emergency event, all emergency equipment will either be cleaned so that it is fit for use or it will be replaced. Before operations are resumed, an inspection of all safety equipment will be conducted.
- 5.) External reporting:
  - a.) If the emergency coordinator determines that the installation has had an emission, discharge, fire or explosion which could threaten human health or the environment, he must immediately notify the applicable local authorities and indicate if evacuation of local areas may be advisable; and immediately notify the Department of Environmental Protection by telephone at 717-787-4343 and the National Response Center at 800-424-8802 and report the following:
    - 1.) Name of the person reporting the incident
    - 2.) Name, address and permit number of the facility.
    - 3.) Phone number where the person reporting the spill can be reached.
    - 4.) Date, time, and location of the incident.
    - 5.) A brief description of the incident, nature of the materials or wastes involved, extent of any injuries, and possible hazards to human health or the environment.
    - 6.) The type and estimated quantity of the materials or wastes spilled.
    - 7.) The extent of contamination of land, water, or air, if known.
    - 8.) A brief description of what parts of the plan are being implemented to alleviate the emergency.
  - b.) Within 15 days after the incident, the facility must submit a written report on the incident to the Department. The report must include the following:
    - 1.) Name, address, and telephone number of the individual filing the report.
    - 2.) Name, address, and telephone number of the facility.
    - 3.) Date, time, and location of the incident.

- 4.) A brief description of the circumstances causing the incident.
- 5.) Description and estimated quantity by weight or volume of materials or wastes involved.
- 6.) An assessment of any contamination of land, water, or air that has occurred due to the incident.
- 7.) Estimated quantity and disposition of recovered materials or wastes that resulted from the incident.
- 8.) A description of what actions the installation intends to take to prevent a similar occurrence in the future.
- 9.) Notify the agency that cleanup is completed and ready for inspection.

2. Countermeasures to be Undertaken by Contractors

No arrangements have been made with any local response agencies or hospitals concerning the emergency services they will provide.

3. Internal and External Communications and Alarm System

Telephone communications are used to contact local police, fire departments, and other emergency response personnel.

An ADT fire and security alarm system is used at the facility.

4. Evacuation Plan for Installation Personnel

All exits in the bus garage are clearly marked. If an emergency situation occurs, the employees should exit the building through the closest exit. All employees should meet at a predetermined location on AMTRAN property.

5. Emergency Equipment Available for Response

Spill Response Kits and Fire Extinguishers are strategically located near potential spill/release areas so personnel can easily respond to a spill situation. Spill kits and a Spill Response Cart will be located as indicated on the Floor Plan located at the front of this PPC Plan.

The Spill Containment Kits contain the following:

1. Personnel Protective Equipment
  - (a) Chemical Resistant Gloves
  - (b) Goggles
  - (c) Rubber Boots
2. Absorbent Material
  - (a) Oil Absorbent Boom (3" x 48")
  - (b) Loose Oil Absorbent

3. Miscellaneous Items
  - (a) Shovel
  - (b) Broom
  - (c) Drum
  
2. Absorbent Material
  - (a) Oil Absorbent Boom (3" x 48")
  - (b) Loose Oil Absorbent
  
3. Miscellaneous Items
  - (a) Plastic Sheeting
  - (b) Hand Scoops
  - (c) Broom
  - (d) Barricade Tape (100 feet)
  - (e) Shovels

Emergency Spill Control Network

1. Arrangements with Local Emergency Response Agencies

Primary notification to: Altoona Fire Department Haz-Mat Response Team through agreement and approval from the Blair County Emergency Management Association.

2. **Notification Lists**

Pennsylvania Department of Environmental Protection	946-7290
Pennsylvania Emergency Management Agency	(717)783-8150
	1-800-442-7362
Blair-Altoona Emergency Management Agency	940-5900
Pennsylvania Fish Commission	832-3161
Chemical-Oil Spills Clean Up-National Response Center	1-800-424-8802
Blair County Emergency Response Agency	944-5001
Pennsylvania State Police	1-800-932-0602
(Hotline)	696-0261
(Local)Altoona Hospital	946-2011
Mercy Hospital	944-1681
City of Altoona Police	949-2489
(Emergency)	911
City of Altoona Fire Department	949-2230
(Emergency)	911
AMED Ambulance Service	911
Altoona City Authority Water Treatment Plant	944-2320

3. Downstream Notification Requirement for Storage Tanks

Not applicable.

The facility does not have aggregate aboveground storage tank facilities greater than 21,000 gallons of regulated substances.

### **Underground Storage Tank Procedures**

#### Current Certification

Attached – Appendix B

#### Tank Description/Safety and Monitoring Procedures

Attached – Appendix B

### **Storm Water Control Procedures**

#### Current Storm Water Permit

Attached – Appendix C

#### Storm Water Management Practices

Non-stormwater discharges from within the AMTRAN bus garage stormwater discharges from outside the facility are kept separated. All discharges from within the garage from areas such as bathrooms, maintenance, and wash areas are directed to the city sanitary sewer system and are treated at the Altoona Wastewater Treatment Plant. All stormwater runoff from the garage roof, parking lot, and other outdoor areas is directed to the city storm sewer system which eventually discharges to Mill Run.

#### Sediment and Erosion Protection

The above surface at AMTRAN is nearly flat and almost completely covered by pavement or by the bus garage. The remaining ground surface areas have well established vegetation including trees and grass. For these reasons there is no significant potential for soil erosion at this site.

#### Additional Requirements for EPCRA, Section 313 Facilities

Not applicable.

The AMTRAN facility is not classified as a EPCRA, Section 313 Facility.

#### Certification for Non-Stormwater Discharges and Signatory Requirements

Not applicable.

The AMTRAN site is composed of an office building and a bus garage both of which are surrounded by pavement. All vehicle maintenance, fueling, and equipment operations are performed inside the garage. All drainage originating from inside the garage is collected

in sanitary sewers and routed to a wastewater treatment plant. In this system, discharges from inside the facility have no potential contact with storm water. Therefore, no testing is required.