Upcoming CVSA Inspection Bulletin  
Securement of Luger Containers on Vehicles

During the past several years, the Institute of Scrap Recycling Industries, Inc. (ISRI) has been working tirelessly with ISRI members, luger manufactures, and other common interest groups such as the National Waste Recycling Association (NWRA) and the ANSI Z245 Committee (administered by NWRA) to develop standards for luger truck container securement that would be adopted by the Commercial Motor Vehicle Safety Alliance (CVSA) and the Federal Motor Carrier Safety Administration (FMCSA). The attached timetable clearly illustrates the hard work and due diligence that was exhibited by ISRI, its members and common interest groups.

In November of 2019, ISRI, NWRA, and the ANSI SC1 Luger Subcommittee presented the ANSI Luger Guidance to CVSA and FMCSA, as a result of the presentation FMCSA suggested through discussion that a licensed professional engineer (PE) perform calculations on loaded and unloaded luger boxes to determine the level of cargo securement necessary to meet the performance requirements outlined in 49 CFR 393.102 and (a)(2). Knowing the level of cargo securement necessary may allow ISRI (on behalf of its members) to request to alter the amount of cargo securement necessary by addressing 49 CFR 393.102(c) Equivalent Means of Securement, based on the results of PE evaluation of luger box cargo securement performance requirements. Because luger box transport is not a commodity specific item of cargo, general cargo securement rules currently apply to 49 CFR 393.100-114.

Per FMCSA’s suggestion, two PE studies were scheduled for March of 2020 (prior to CVSA’s April 2020 meeting), but due to COVID-19, and other extenuating circumstances all the meetings were postponed. ISRI recently submitted a request to CVSA for an extension to perform the PE studies. In response to the request, CVSA decided to move forward with the existing tiedown guidance that meets the general commodity requirements. The tiedown guidance will be presented during CVSA’s Annual Conference scheduled 08/29/20 - 09/02/20. Any on-road enforcement should take place immediately thereafter. If at any point PE studies are completed, they will be added to the guidance bulletin following a CVSA committee discussion.

The following CVSA excerpt on securing luger containers to vehicles will be included in their inspection bulletin: Luger container vehicles do not have an integral securement system. They are designed to pick up the box and transport it on a flat deck of the truck and/or trailer. The chains and hydraulic pins are not part of the cargo securement system, they are used in the loading, offloading, and tipping of the box. These containers must be secured as per the general commodity requirements.

NOTE: THIS PHOTO REPRESENTS AN EXAMPLE OF NON-COMPLIANCE
The box must be secured for length and weight and requires the number of tiedowns to satisfy both requirements (e.g., one tiedown for every 10 feet or portion thereof plus an additional tiedown in the first 10 feet if not against a front end structure; the aggregate working load limit of the tiedowns must meet half the weight of the container and load). Luger box securement should be at fixed longitudinal mid-section between the lugs on the side of the luger container. Any method is acceptable, but this may be achieved by using a tightening device (chains or straps) connected directly to the sides or top of the container. The tightening device shall be anchored he vehicle on the other end.

NOTE: DRIVER STANDING AT GROUND LEVEL USING A CHEATER BAR TO SECURE STRAPS TO THE CONTAINER

NOTE: DO NOT STAND OR CLIMB ON EQUIPMENT TO SECURE STRAPS TO THE LUGER CONTAINER
PER CVSA GUIDANCE: STRAPS AND THE LUGER LIFTING CHAINS MUST BE PROPERLY SECURED TO THE LUGER CONTAINER PRIOR TO DRIVING. NOTE: THE PHOTO ABOVE SHOWS ONLY ONE OF THE TWO STRAPS THAT ARE REQUIRED. ONE STRAP IS REQUIRED ON EACH SIDE OR A CONTINUOUS STRAP CAN BE USED.

If you have any questions or require any assistance, please contact ISRI’s Transportation Safety Director, Commodor Hall.