

Section 4.13 Towable Trailer Safety

1. Scope

This section establishes safety requirements for towable trailer safety at all Reclamation facilities and operations.

2. General Requirements

Qualified personnel must operate towable trailers in compliance with this section, applicable Department of Transportation (DOT) regulations, and Occupational Safety and Health Administration (OSHA) Standards 29 CFR 1910 and 29 CFR 1926.

3. Responsibilities

a. Area, Facility, and Powerplant Managers

- Shall ensure that competent personnel inspect all towable trailers as required by this section.
- Shall designate competent personnel as towable trailer instructors.

b. First-Line Supervisors

- Shall ensure that training is provided to employees assigned to operate towable trailers and ensure that employees are proficient and qualified, as required by this section.
- Shall have a process for ensuring only trained and qualified employees operate towable trailers.

c. Employees

- Shall obtain and complete all training and evaluations for all towable trailers the employee is assigned to operate, as required by this section.
- Shall inspect and perform maintenance on all towable trailers, as appropriate and as required by this section.
- Shall meet the DOT licensing requirements for on-highway operations and possess a current commercial driver's license (CDL) where applicable.
- Shall comply with applicable operating instructions, limitations, regulations, and written safety programs and plans.

4. Training Requirements

a. Initial

The initial training program requirements must consist of the following:

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Chapter 4: Task-Based | Section 4.13 Towable Trailer Safety

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- a review of the owner’s manual or competent trainer-prepared operational manual/handout based on information from the manufacturer, instructions by lecture, discussions, interactive computer learning, videos, or written material,
- practical, hands-on training that includes demonstrations performed by the trainer, and
- practical hands-on exercises performed by the trainee under direct observation of the trainer. Trainers shall complete a proficiency evaluation of each operator after the training.
- training will be conducted on the type of towable trailer the trainee will operate.

b. Required Towable Trailer Curriculum

All Bureau of Reclamation (BOR) employees who conduct trailer-related activities shall complete, at a minimum, the areas listed below:

- correctly sizing tow trailers to tow vehicles
- gross vehicle weight rating (GVWR) and gross vehicle combined weight rating (GVCWR) calculations.
- matching trailer couplers with hitches on tow vehicles
- ensuring the shank of the hitch ball will handle the load of the trailer
- inspection requirements for towable trailers before use
- properly coupling the tow trailer to the hitch on the tow vehicle
- proper use of safety chains
- required towable trailer lighting (brake lights, turn signals, running lights) and reflector requirements, based on the length of the trailer
- proper connection of breakaway brakes (if the towable trailer is equipped as such)
- synchronizing brake systems between the brake-equipped towable trailer and the tow vehicle
- proper towable trailer loading and unloading
- proper cargo securement methods (tie downs, binders, ratchet binders, load locks, and other methods) for towable trailers and tow vehicles.
- proper driving techniques to consider when pulling a towable trailer
- hands-on driving and backing course with towable trailer and vehicle to demonstrate proficiency.

Note: Employees who have already completed the training outlined above, such as an employee with a current CDL who can produce a copy of the curriculum, are not required to re-accomplish the training.

c. Proficiency Qualification

Towable trailer safety training shall follow the manufacturers’ requirements for safe, proficient operation.

Reclamation Safety and Health Standards—2024 Edition

Chapter 4: Task-Based | Section 4.13 Towable Trailer Safety

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d. Lack of Proficiency

Anyone observing an operator who demonstrates a lack of proficiency when operating a towable trailer shall immediately intervene and notify the supervisor or their designee of the situation. Employees shall receive refresher training whenever an operator has been observed using a towable trailer unsafely.

e. Recordkeeping

- Training Documentation. The training provider shall document initial training on all towable trailers to include the name of the training organization if one is used; instructor's name and signature; operator's name; date of the training; the type of towable trailer being used in the evaluation; proficiency of operation; and any attachments included in the training.
 - This RSHS includes Appendix 4.13-A: Operator Training Documentation Form, for use as training documentation. If the training provider uses another tool to document training, it shall capture the required information listed in this paragraph.
- Records. The first-line supervisor shall ensure that all records are kept in the Department of the Interior's approved repository and managed following the Information Management Handbook referenced in the Reclamation Manual Directive and Standard, Information Management (RCD 05-01).

5. Hazardous Environmental Conditions (Weather/Other)

Operators shall not operate towable trailers when hazardous environmental conditions (weather/other) will not allow for the safe operation of the equipment.

6. Personal Protective Equipment (PPE)

Operators shall wear appropriate PPE while utilizing towable trailers per the manufacturer's requirement or the hazard assessment.

7. Other Safety Equipment

Any additional safety equipment used during the operation of towable trailers must not impede or restrict the operation of the original safety equipment installed by the manufacturer.

8. Safe Practices

a. Speeds

Operators will not operate towable trailers above posted speed limits or at speeds greater than those reasonable and safe, considering weather conditions, traffic, road conditions, type and

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Chapter 4: Task-Based | Section 4.13 Towable Trailer Safety

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condition of equipment, and manufacturer's recommendations. Operators must always maintain control of the towable trailer and be able to stop within the clear-sight distance.

b. Attaching and Detaching Trailers

Employees shall not stand or walk between a towable trailer and the towing vehicle, except when hooking or unhooking the trailer or loading/unloading supplies in/out of the tow vehicle. Ensure the tow vehicle is in park with the parking brake set when hooking or unhooking the trailer or loading/unloading supplies in/out of the tow vehicle or trailer.

c. Unattended at Night

Towable trailers left on publicly accessible roadways overnight should comply with the respective elements of the Manual on Traffic Control Devices (MUTCD), 2009 Edition, which is incorporated by reference in 29 CFR 1926.200(g)(2). Where work is in progress off a roadway, equipment shall be delineated by signs, cones, lights, reflectors, or lighted/reflective barricades to identify the location of the equipment.

d. Unauthorized Riding

Operators shall not allow employees to ride in or on towable trailers except for the launching and loading of watercraft.

e. Securing Loads

Trained operators shall ensure that the towable trailer being used is rated to handle the weight of the cargo safely and shall properly distribute, chock, tie-down, or otherwise secure the load. Recheck the load periodically, but at a minimum in the first 50 miles of travel and then again, every three hours or 150 miles, whichever comes first. Road conditions may warrant more frequent inspections.

f. Wheel Chocks

Operators shall use 2-wheel chocks for each vehicle or trailer where there is a possibility that the vehicle will move or shift because of roadway conditions or loading or unloading of the vehicle or trailer.

g. Trailer Lights

Operators shall ensure that all required towable trailer lights are operational and illuminated during travel to increase visibility.

9. Inspection Requirements

a. Initial Inspection

The towable trailer driver shall conduct a pre-trip inspection on the towable trailer and tow vehicle before use, following the operator's manual. Recheck these items periodically during stops on the trip, paying close attention to heat buildup in bearings, brakes, and tires. If no

Reclamation Safety and Health Standards—2024 Edition

Chapter 4: Task-Based | Section 4.13 Towable Trailer Safety

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operator's manual exists for the trailer, use Appendix 4.13-B: Operator's Towing Pre-Trip Safety Inspection Checklist, for your pre-trip inspection form.

b. Annual Inspection

A qualified technician/mechanic trained to a competent level must inspect welds, structural components, and the general towable trailer for safety and serviceability at intervals not exceeding 12 months or sooner if the manufacturer requires a more frequent inspection process. Document trailer inspections on Reclamation Form 7-1776B Maintenance Requirements, Appendix 4.13-C.

c. Removal from Service

The operator or maintenance technician must remove towable trailers from service whenever an unsafe condition is detected. No employee may place the unsafe towable trailer back into service until it has been repaired, tested, or inspected to ensure that the equipment is safe to operate.

d. Repair Shutdown

The operator must shut down and secure towable trailers from any accidental release of hazardous energy (see RSHS Section 1.13, Control of Hazardous Energy, Lockout/Tagout) while making repairs or adjustments unless the operation is essential to making the adjustments or repairs. All energy isolation devices shall be used during the repair process if required.

e. Blocking

The operator or maintenance technician shall block, or crib towable trailer parts suspended or held aloft by cables, hydraulic cylinders, slings, ropes, hoists, jacks, or manufacturer-supplied hazardous energy control devices, or lower the equipment or parts to a supporting surface before permitting employees to work in, under, or between pieces of equipment or parts.

f. Brake Repair

The operator or maintenance technician shall use a vacuum with a high-efficiency particulate air filter to clean asbestos-lined brake assemblies. The operator or maintenance technician shall not use compressed air for cleaning asbestos-lined brake assemblies. Operators shall refer to RSHS Section 2.02, Asbestos, paragraph 2.02.5.(b)(2), Prohibited Work Practices if working on asbestos-lined brake assemblies.

▲ RSHS Appendix A: Definitions

RSHS Appendix A ([Definitions](#)) is available to print at:
<https://www.usbr.gov/safety/rshs/index.html>.

▲ RSHS Appendix B: Additional References and Citations

RSHS Appendix B ([Additional References and Citations](#)) is available to print at: <https://www.usbr.gov/safety/rshs/index.html>.

Appendix 4.13-A: Operator Training and Proficiency Documentation Form—Towable Trailers

Appendix 4.13 A ([Operator Training and Proficiency Documentation Form](#)) is available to print at: <https://www.usbr.gov/safety/rshs/index.html>.

Appendix 4.13-B: Operator’s Towing Pre-Trip Safety Inspection Checklist

Appendix 4.13-B ([Operator’s Towing Pre-Trip Safety Inspection Checklist](#)) is available to print at: <https://www.usbr.gov/safety/rshs/index.html>.

Appendix 4.13-C: 7-1776B—Trailer Annual Preventive Maintenance Checklist

Appendix 4.13-C (Reclamation Form [7-1776B—Trailer Annual Preventive Maintenance Checklist](#)) is available to print at: <https://teamssp.bor.doi.net/printanddup/forms/7Forms/7-1776B.pdf>.