



Standard Operating Procedure

For

**Reporting and Handling of Potential Container Switch
(Dray-Off) Incidents**

SOP for Reporting Potential Dray-Off Incidents

PURPOSE: This Standard Operating Procedure (SOP) is prepared to promote compliance with the Port of Los Angeles (Port) Clean Truck Program (CTP) by involving the general public in reporting potential dray-off incidents through a standard procedure.

BACKGROUND: The Port has a tariff that requires licensed motor carriers (LMC) to use Clean Truck Program (CTP) compliant trucks to carry cargo to and from Port terminals and on Port property. The marine terminal operators check the trucks coming in and out of Port terminals for compliance, however, the Port has received reports of violations where an LMC uses a Clean Truck Program (CTP) compliant truck to pick up or drop off a container to and from a port's terminal but switches the container from the compliant "clean" truck to a non-CTP compliant "dirty" truck outside of the terminal. The non-CTP compliant truck either originates the trip and hands off the container to a compliant truck just before terminal entry, or receives the container from a compliant truck after it has left the terminal gate and completes the trip by delivering the container to its final destination. This practice, referred to as a "dray-off" according to the California Air Resources Board (CARB), was also observed in other California ports.

As a result, the Port revised its tariff to make the act of switching cargo from compliant to non-compliant trucks a violation of the Clean Truck tariff, punishable as a criminal misdemeanor.

GOALS: The following are the goals of public reporting potential dray-offs to the Port:

- (1) To serve as a deterrent to potential offenders; and
- (2) To assist the Port in finding potential violations to aid enforcement.

POTENTIAL DRAY-OFF REPORTING AND HANDLING PROTOCOLS

(1) Potential Dray-off Reporting Parties

In general, three parties are the most likely source of reports regarding suspicious dray-off activities: ordinary citizens, other truck drivers, and trucking companies.

(2) Webposting and Outreach of Reporting Hotlines and Email Address

The Port will provide instructions on how to report a possible dray-off on its website (www.portoflosangeles.org) under the Clean Truck Program tab. Additionally, if you are witnessing a suspected dray-off in progress please call the Port Police dispatch immediately at (310) 732-3500;

or,

If you have information as to the location of dray-offs or complaints regarding this type of activity please do not hesitate to contact the following:

- Contacting the CTP help line at 1-866-721-5686; or
- Emailing ctp@tetrattech.com; or
- Using Port's Twitter link -CTP_TRUCK_Tweet .

Finally, the Port will make outreach efforts to notify the business and residential communities about the availability of the reporting hotline and email address via an eBlast and press release.

(3) Handling In-coming Reporting Calls

3.1 Port Police

The Port Police dispatch receiving calls regarding complaints of a suspicious dray-off incident will immediately notify officer(s) on-duty to investigate and to carry out enforcement.

3.2 Helpline

The helpline attendant receiving calls regarding complaints of a suspicious dray-off incident should collect the relevant information and properly document the information in the phone record sheet. The information to be collected should include, but not be limited to:

- (1) Contact information
 - Name of the person filing the report. (Note: If the reporter is not willing to provide his/her name, then record as an “anonymous caller”)
 - Telephone number
 - Email address
 - If the person reporting the incident is a truck driver or trucking company, record company’s information
- (2) Date and time of the call
- (3) Location of the observed incident– address/street name and nearby cross street
- (4) Truck information (if available)
 - License plate
 - Trucking Company
 - Description of the truck(s) – color, shape, make, etc. and any obvious characteristics.
 - Description of the container – name, size
- (5) Description of the incident, such as switching container and the truck(s) involved – the truck unloading container/cargo and the truck receiving the container/cargo
- (6) If possible, ask the person reporting the incident to provide a snap shot of the incident

3.3 Establishing a Case File

- (1) Tetra Tech CTP staff maintains close contact with helpline staff to monitor reporting activity and the email inboxes (ctp@tetrattech.com and pola@tetrattech.com) for any incoming message that includes the forwarded emails from Port’s Twitter link.
- (2) As soon as an incident is reported, Tetra Tech CTP staff will identify trucks involved in the incident in PDTR to obtain the following information and establish a case file:
 - Truck
 - Registered Owner
 - LMC Point of Contact

3.4 Notify Port Police

- (1) Tetra Tech will collect reporting information and notify Port Police.
- (2) Port Police will carry out enforcement banning dray-offs activities by issuing a citation.
- (3) If necessary, the Port will suspend repeat offender’s agreement and deny them the access to the Port’s terminals.

Figure 1 illustrates the processes of reporting and handling of dray-off incidents.

Figure 1. Dray-off Incident Diagram Reporting and Handling Flow

