



2024

# AGENCY SAFETY PLAN (ASP)



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## A. AGENCY SAFETY PLAN(ASP) RECORD OF REVISION

### RECORD OF REVISION

Version No.	Section/Pages Affected	Reason for Change	Date Issued	Comments
1	All	Development and Implementation	5/6/20	
2	All as Stated	Update and Annual Review	9/23/21	
3	Specific changes as follows: 1. Agency Safety Committee, pgs. 9,11, and 12, Section 2&3 2. Battery Electric Bus (BEB) service. Section 5.3 pg.14 3. OmniConnect Shuttle Services. Section 5.3 pg. 15 4. Epidemic/Pandemic Planning Section 6, pg. 16 5. Safety Performance Targets Table Section 16 pg. 36 6. Charging Station Facilities Inspection and Maintenance, Section 17.4, pg. 38 7. Battery Electric Bus (BEB) Repair and Mechanic Training Section 18.2, pg. 40 8. Battery Electric Bus (BEB) Coach Operator Training Section 19.1, pg., 44	Update and Annual Review to include new FTA regulations of November 2021, and FTA Feb 2022 letter, and updating, services, training, and maintenance to include Battery Electric Buses (BEB).	12/7/22	
4	All as stated	Update and Annual Review	9/27/23	
5	1. Section 5.3 Omnitrans Services (update services and map) 2. Section 12.6 Corrective Actions (update map) 3. Section 18.0 Vehicle Maintenance Program 4. Section 18.2 Battery Electric Bus (BEB) Repair	Update and Annual Review to include minor changes to all sections reviewed, including new maps and updates to flow charts.	12/4/24	

## B. OMNITRANS SAFETY MANAGEMENT PROGRAM

§ 673.23(a) – A transit agency must establish its organizational accountabilities and responsibilities and have a written statement of safety management policy that includes the agency’s safety objectives. *Relevant to ASP- B (1.0 – 2.3)*

### 1.0 Safety Management Policy (SMP)

SMP is the foundation of an agency’s Safety Management System (SMS); it focuses on the SMP elements as stated: (1) Written statement with safety objectives (2) Employee safety reporting program (3) Communication of the SMP throughout the agency and, (4) Establishment of authorities, accountabilities, and responsibilities.

#### 1.1 Accountable Executive Policy Statement

##### **Omnitrans Accountable Executive Policy Statement**

Safety is a core value of Omnitrans, and managing safety is a core business function of the agency. Omnitrans is committed to developing, implementing, maintaining, and continuously improving processes to ensure the safety of its customers, employees, and the public. Omnitrans will use safety management processes to prioritize safety and allocate its organizational resources, people, processes, and technology in balance with its other core business functions. Omnitrans aims to support a robust safety culture, and achieve the highest safety performance level, meeting all established safety standards.

All management levels and employees are accountable for delivering the highest level of safety performance, starting with the Chief Executive Officer/General Manager. Omnitrans is committed to:

**Executive Commitment to Safety:** Executive Management will lead the development of an organizational culture that promotes safe operations and provides appropriate resources to support this core management function through fostering and ensuring safe practices, improving safety when needed, and encouraging effective employee safety reporting and communication. Omnitrans will hold executives, managers, and employees accountable for safety performance.

**Communication & Training:** Employee engagement is crucial to a functioning Safety Management System. Communication systems are in place to enable greater awareness of Omnitrans safety objectives and safety performance targets and provide ongoing safety communication up, down, and across the organization. All management levels must proactively engage employees and work to keep the lines of safety communication honest and open. All employees will be aware of Omnitrans Safety Management System's importance and be trained in safety reporting procedures.

**Responsibility & Accountability:** All management levels will be responsible for delivering safe and quality transit services representing Omnitrans performance of its Safety Management System. Managers take an active role in the Safety Risk Management process and ensure that Safety Assurance functions are supported. Managers are responsible for ensuring that Safety Risk Management is being performed in their operational areas of control to assure that the safety risk associated with safety hazards is assessed

and mitigated. Safety performance is an essential part of performance evaluations for Agency managers and employees.

**Employees & Contractors' Responsibility:** All employees and contractors support safety management by ensuring that hazards are identified and reported.

**Employee Reporting:** Executive management has established several safety reporting system programs as viable tools for employees to voice their safety concerns. All employees are responsible for utilizing these programs as part of the Safety Management System (SMS). No action will be taken against any employee who communicates a safety condition through the Omnitrans safety reporting program unless such disclosure indicates the following: an illegal act, gross misconduct, or negligence, or a deliberate or willful disregard of agency rules, policies, and procedures.

**Performance Monitoring & Measuring:** Omnitrans has established realistic safety performance measures and set safety performance targets to ensure continual safety performance improvement. Managers will verify that the safety risk mitigations put in place are appropriate and effective.

**Review & Evaluation:** Omnitrans will measure SMS performance by analyzing key safety performance indicators, reviewing inspections, investigations, corrective action reports, and auditing the processes that support the SMS. These activities will become the basis for revising or developing safety objectives, safety performance targets, and plans to achieve continuous safety improvement.

Responsibility for making our operations safer for everyone lies with each one of us- from executive management to frontline employees. Each manager is responsible for implementing the SMS in their area of responsibility and will be held accountable to ensure that all reasonable steps are taken to perform activities established as part of the SMS.

The ultimate responsibility for safety at Omnitrans rests with me as the Accountable Executive.

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Accountable Executive  
Erin Rogers, CEO/General Manager

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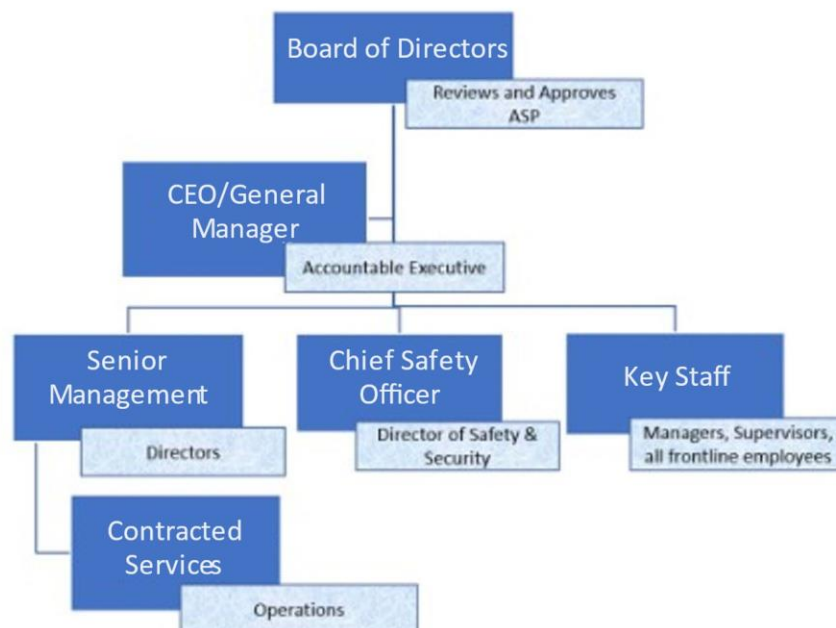
Date

## 2.0 Authorities, Accountabilities, and Responsibilities

§ 673.23(d) – The transit agency must establish the necessary authorities, accountabilities, and responsibilities for the management of safety amongst the following individuals within its organization, as they relate to the development and management of the transit agency's Safety Management System (SMS).

Omnitrans CEO/GM, and all Senior Leadership (Directors) have authority, accountability, and responsibility for the day-to-day implementation and operation of the ASP. The Agency has established the authorities, accountabilities, and responsibilities necessary for its ASP's development and management to reflect the size and complexity of the Agency's operations. Omnitrans has identified below, the authorities, accountabilities, and responsibilities by position for the Accountable Executive, Chief Safety Officer (CSO), Senior Leadership, and Key staff play a substantial role in safety implementation and management of the ASP.

### 2.1 Organizational Chart



### 2.2 Authorities, Accountabilities, and Responsibility by Position

#### **Accountable Executive - Chief Executive Officer/ General Manager (CEO/GM)**

Must understand how the Safety Management System (SMS) works, what it seeks to achieve, the potential benefits it will generate for the Agency and his or her role in the management system operation, and understand significant safety issues that Omnitrans might face during delivery of services.

1. Must allocate adequate resources to develop and maintain the Agency Safety Plan (ASP), Transit Asset Management (TAM) plan and approve the SMS implementation strategy.



2. Is responsible for designating an adequately trained Chief Safety Officer.
3. Supports SMS communication throughout the Agency, including presenting the ASP initially and annually thereafter for Board of Directors approval and certification.

#### **Director of Safety & Security (Chief Safety Officer CSO)**

1. Is responsible for advising executive and senior management on all safety policies and related matters.
2. Interfaces with all Omnitrans departments at all levels of the organization on behalf of ASP and SMS implementation.
3. Is responsible for establishing and implementing policies, procedures, and programs to ensure the Agency is effectively implementing its responsibilities under the ASP.
4. Reports directly to the Accountable Executive to avoid competing priorities from various departments across the agency that may conflict with SMS implementation needs.
5. Will provide procure technical and staffing resources as needed and organize ad hoc support committees or teams for the ASP development, implementation, and monitoring.

#### **Senior Management (Omnitrans Directors)**

1. Responsible for day-to-day implementation and operation of an agency's SMS.
2. Must ensure the incorporation of safety management practices in the Agency's operational areas.
3. Must take ownership of the feasibility and effectiveness of the policies and procedures. Key staff within their departments will support drafting policies and procedures on behalf of their respective departments.
4. Ensure that their staff complies with the SMS processes and procedures, ensure that resources are available to achieve the SMS, and continually monitor their SMS responsibility area.
5. Must designate representatives from Operations, Maintenance, and other revenue service support functions to serve as Key Staff, encourage SMS training for staff, and take ownership of safety management processes and activities as they are implemented.
6. Must implement, monitor, and manage the collection and analysis of safety information; manage hazard identification and safety risk evaluation activities; monitor safety risk mitigations; and provide periodic reports on safety performance.

#### **Agency Safety Committee (ASC)**

1. Regulations as set forth in 49 U.S.C § 5329, and the Bipartisan Infrastructure Law changes to 49 U.S.C § 5329(d) under paragraph (5) state that at minimum, the "Agency Safety Committee, followed by the Board of Directors (or equivalent entity) of the recipient, shall approve the agency safety plan and any updates to the agency safety plan."
2. Shall establish performance targets for the risk reduction program required under paragraph (1)(I) using a 3-year rolling average of the data submitted by the recipient to the national transit database under section 5335.
3. Shall have, at a minimum, responsibility for (I) identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment; (II) identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended; and (III) identifying safety deficiencies for purposes of continuous improvement.

## **Key Staff**

1. Are the individuals who perform the work within the departments and provide input to the Senior Leadership within their departments. Key staff must be assigned by Department Directors and are frontline employees, such as mechanics, coach operators, facilities (managers, supervisors), and safety personnel.
2. Will provide expertise on how to adapt existing departmental practices to work in concert with Safety Management System (SMS). Key staff will identify departmental data and information resources to support SMS decision-making.
3. At the direction of the Chief Safety Officer (CSO), Key Staff shall be organized into SMS Implementation Teams with regular meetings and work sessions. These individuals are familiar with their department's processes and practices and can voice ideas, concerns, and solutions for SMS implementation that align with their practices and duties.
4. All Omnitrans employees must identify and report safety hazards. Employees are the "eyes and ears" of a transit agency in terms of hazard identification. They may be exposed to hazards in the workplace and know firsthand how hazards interfere with Agency systems and operations.

## **2.3 Contractor/Sub-Contractor Responsibilities**

1. Contractors shall:
  - a. Cooperate with Agency audits, inspections, and reviews activities conducted by Omnitrans, including the review of practices and documents and any findings resulting from internal or other audit/inspection activities will be assigned a corrective action, and the contractor is required to address assigned corrective actions as stated in the inspection findings. All corrective actions and issues are to be documented by the Purchased Transportation Administrator.
  - b. Provide Omnitrans with reports on incidents, accidents and identify hazards as delineated in the contract or Omnitrans Standard Operating Procedures (SOPs). The report will identify trends or concerns to Omnitrans. The Director of Safety and Security will investigate and provide corrective actions to address abnormal trends involving safety concerns.
  - c. Institute policies for the safety and protection of the environment and persons who may encounter hazardous materials used at any Omnitrans property. Omnitrans shall approve these policies and practices. They must be in accordance with the requirements of Cal OSHA CCR Title 8 OSHA regulations in 29 CFR Part 1910(CCR) and environmental Title 22, Division 4.5.
  - d. Update training programs and testing as needed to ensure all federal, state, and local regulations are adhered to as required. Ensure employees are properly trained and provide the training reports to Omnitrans Safety Department as outlined in contracts and other agreements with Omnitrans.
  - e. Contract service operators shall implement an ASP and Security Program Plan (SPP). The contractor's Agency Safety Plan (ASP) will be submitted to Omnitrans annually as required.

The plans shall attest to the following:

1. The adoption and implementation of an Agency Safety Plan (ASP), a Safety Management Systems (SMS) by established standards outlined in federal, state, and local regulations, including 49 CFR Part 673.

2. A statement must be signed by an officer or person directly responsible for managing the Contractor/Sub-Contractor attesting to compliance with federal, state, and local regulations.
2. Omnitrans Contract Project Managers will ensure contractor/sub-contractor compliance by:
  - a. Reporting findings of any audits to Omnitrans within one business day (immediate notification is required if imminent danger exists) of completion of the review containing the following:
    - Identification of the findings, including a detailed description of any deficiency.
    - Required corrective action and a schedule for implementation of the corrective action to be taken for each deficiency.
    - Any required suspension of service should Omnitrans determine the service's continued operation, or a portion thereof poses an immediate danger to public safety.
    - If the Contractor/Sub-Contractor fails to correct the specific deficiency(ices) in accordance with federal, state, and local regulations and the established implementation schedule, Omnitrans Chief Administrative Officer (CAO) will initiate actions to issue a notice to review the contract.
    - Maintenance Technical Trainers work with contractors to ensure all vehicle repair personnel are adequately trained and certified as detailed in industry standards and Original Equipment Manufacturer (OEM) training programs. All training is maintained in the Technical Training Safety Files.

### **3.0 Plan Development, Approval, Modifications, Review and Updates**

§ 673.11 (a)(1) and Bipartisan Infrastructure Law changes to 49 U.S.C § 5329(d)–Agency Safety Plan and subsequent updates must be signed by the Accountable Executive and approved by Omnitrans Agency Safety Committee followed by the Board of Directors or an Equivalent Authority.

#### **3.1 Development and Approval**

The responsibility for modifications, revisions, implementing, and distributing the ASP resides with the CSO. Responsibility for control and update of this ASP is vested with Omnitrans CEO/GM.


This ASP is a living document subject to update or revision as needed to meet the evolving safety needs of the Agency. The ASP shall be reviewed annually.

#### **3.2 Modifications, Review and Updates**

§673.11(a)(5) – Each transit agency must establish a process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan (ASP).

The CEO/GM, CSO, and the Agency Safety Committee will conduct annual reviews of the ASP and submit a revised document to the BOD each subsequent year. All revisions will be reviewed and approved by the CEO/GM and CSO. Final review and approval will be done by the Agency Safety

Committee followed by the Board of Directors approval.

<b>Name of Entity That Drafted This Plan</b>	Omnitrans	
<b>Signature by the Accountable Executive</b>	<b>Signature of Accountable Executive</b>	<b>Date of Signature</b>
		
<b>Approval by the Board of Directors or an Equivalent Authority</b>	<b>Name of Individual/Entity That Approved This Plan</b>	<b>Date of Approval</b>
	Omnitrans Board of Directors	
	Omnitrans Agency Safety Committee	
	<b>Relevant Documentation (title and location)</b>	
<b>Review and Approval by the Agency Safety Committee</b>	20232 ASP Versions Located on the P drive of Omnitrans Public Safety Folder	
<b>Certification of Compliance</b>	<b>Name of Individual/Entity That Certified This Plan</b>	<b>Date of Certification</b>
	Maurice Mansion via FTA Grants and Assurances	4/2022
	<b>Relevant Documentation (title and location)</b>	

Revisions and updates will be issued as necessary and will supersede previous pages or editions. The CSO will convene a committee represented by Senior Leadership to review the current plan and make any necessary changes, additions, or deletions as necessary or when Omnitrans:

1. Determines its approach to mitigating safety deficiencies is ineffective.
2. Makes significant changes to service delivery.
3. Introduces new processes or procedures that may impact safety.
4. Changes or re-prioritizes resources available to support SMS.
5. Significantly changes its organizational structure.

All revisions will be noted in the revision record at the beginning of the document. If any modification requires a change in process, a notice will be disseminated to appropriate personnel explaining the; 1) Document change, 2) reason for the change and, 3) its impact on any job functions. Omnitrans employee will be notified of a substantially revised plan by an email from the CSO.

The revised plan will be disseminated by one or more of the following methods: delivered as a hard copy, posted on the intranet, emailed to each relevant operating entity, or available through a request from the CSO. Contracted Service providers will deliver a copy of their safety plan to Omnitrans CSO for review to ensure safety processes are being followed.

#### 4.0 **Safety Plan Documentation, Rules, and Procedures Review**

§ 673.31– At all times, a transit agency must maintain documents that set forth its Agency Safety Plan, including those related to the implementation of its Safety Management System (SMS) and results from SMS processes and activities. A transit agency must maintain documents included in the whole, or by reference, that describe the programs, policies, and procedures that the agency uses to carry out its Public Transportation Agency Safety Plan. These documents must be made available upon request by the Federal Transit Administration or other Federal entity or a State Safety Oversight Agency having jurisdiction. A transit agency must maintain these documents for a minimum of three years after they are created

#### 4.1 **Rules and Procedures Documentation**

1. Omnitrans maintains SharePoint and Trackit for document storage that sets forth its ASP, including those related to implementing its Safety Management System (SMS) and results from SMS processes and activities. Documents that will be maintained are those documents that describe the ASP, including those related to implementation and results from safety and security processes and activities.
2. Omnitrans maintains documents included in whole or by reference that describe the programs, policies, and procedures the agency uses to carry out its ASP. These documents will be made available upon request by the Federal Transit Administration. Omnitrans maintains these documents for a minimum of three years after they are created.
3. All relevant existing documentation that describes safety and security processes, procedures, and other information will be referenced directly as to the name and location of those documents to reduce the need to summarize processes and activities already described elsewhere.
4. Omnitrans coordinates and promotes vehicle maintenance and operational safety through multiple initiatives, procedures, and processes.

5.0

<b>Transit Agency Name</b>	Omnitrans		
<b>Transit Agency Address</b>	1700 West 5 <sup>th</sup> Street, San Bernardino CA 92411		
<b>Name and Title of Accountable Executive</b>	Erin Rogers, CEO/General Manager		
<b>Name of Chief Safety Officer or SMS Executive</b>	TBD, Director of Safety, Security and Regulatory Compliance		
<b>Mode(s) of Service Covered by This Plan</b>	Bus Transit	<b>List All FTA Funding Types (e.g., 5307, 5310, 5311)</b>	5307, 5310, 5339 and 5309
<b>Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)</b>	Fixed Route Bus Mode, Non-Fixed Route Bus Mode		
<b>Does the agency provide transit services on behalf of another transit agency or entity?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	<b>Description of Arrangement(s)</b>
<b>Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided</b>			

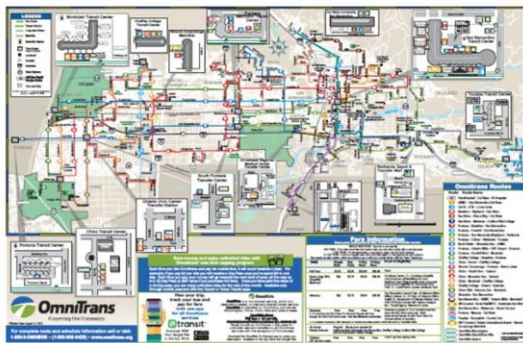
## **Transit Agency Information and System**

### **5.1 System Description**

Omnitrans is a public transit agency serving the San Bernardino Valley that connects our community with coordinated and sustainable transit service. Omnitrans currently operates local express and bus rapid transit fixed-route service, microtransit, and paratransit service.

Established in 1976 through a joint powers agreement Omnitrans, as of the end of FY2022, carried nearly 5 million passengers on its system throughout its approximately 465-square mile service area, covering 15 cities and portions of the unincorporated areas of San Bernardino County. Significant destinations within the Omnitrans service area includes transportation centers, medical centers, educational facilities, shopping malls, business parks, and community centers.

### **Service Routes**



**Routes and Schedules** <https://omnitrans.org/plan-a-trip/routes-schedules/>

### **5.2 Board of Directors**

Omnitrans is a Joint Powers Authority (JPA) administered by a Board of Directors, made up of the Mayor or Council Member from each member-City and four Supervisors of the County of San Bernardino. Each City and the County has one designated and one alternate Board Member.

**5.3 Omnitrans Services** The system has a fleet of 155 buses, and a workforce of 501 employees. There are 136 CNG 40 foot-buses, and 15 CNG 60-foot articulated buses. In addition to the CNG buses the system includes 4 electrical buses with 9 electric charging stations, and 4 Fuel Cell buses and plans for a small-scale Hydrogen dispenser in East Valley. The electrical buses are being utilized throughout Omnitrans service area and have a range of approximately 140 miles; each takes about four hours to charge at one of Omnitrans' two transit facilities; the San Bernardino Station located at 1700 West 5th Street in San Bernardino has two buses and 5 charging stations, the Montclair Station is located at 4748 Arrow Highway in Montclair and has 2 buses, and 4 charging stations. The Fuel Cell buses are currently being fueled at Foothill Transit's Pomona Yard, while the fuel station for East Valley is underdevelopment. In addition, there is a charger in each facility shop. Omnitrans' multi-modal approach to its provision of services is detailed below:**Fixed Route**

As of 2022, Omnitrans fixed-route service consists of 26 convenient routes. Fixed route service



includes Freeway Express services, Contracted fixed routes, and Bus Rapid Transit (BRT) Fixed Route. Omnitrans fixed-route service area covers 15 cities and portions of the unincorporated areas of San Bernardino County to major destinations such as transportation centers, medical centers, educational facilities, shopping malls, business parks, and community centers.

Fixed routes, including freeway express, are operated with 40-foot buses. BRT service is operated with 60-foot buses. Contracted fixed route vehicles are operated with 29-foot cutaways. Omnitrans traditionally operates 15- to 75-minute headways. One freeway express route operates during peak hours only.

### **sbX**

The sbX Greenline is San Bernardino County's first-ever bus rapid transit passenger service, which offers quick, convenient, and comfortable transportation to major destinations in the cities of San Bernardino and Loma Linda, including downtown San Bernardino, Cal State San Bernardino, and the Loma Linda VA Hospital. The sbX fleet consists of 15 deluxe 60-foot articulated vehicles powered by environmentally friendly compressed natural gas, with 16 art-inspired stations at key destinations along the 16-mile route, dedicated bus-only lanes, traffic signal prioritization, and bike racks. Service Currently runs weekdays every 15 minutes during peak hours, and at a 20-minute headway during non-peak. The service span is approximately 20 hours of service during the week and 17 hours on Saturdays. The next planned sbX route is the West Valley Connector Corridor, the Purple Line. The San Bernardino County Transportation Authority is managing the West Valley Connector construction.

### **OmniRide**

Accessed through the OmniRide On-Demand app, OmniRide is a reservation-based, on-demand, shared transit service (like Uber or Lyft), providing local service in Chino/Chino Hills, Upland, and Bloomington. When booking a trip, the app guides customers to the closest "virtual stop" for pick-up (typically a nearby intersection). An OmniRide vehicle will arrive within 15 minutes for pick-up and proceed to another virtual stop close to the customers requested drop-off point.

### **Omnitrans Access Service**

Omnitrans' OmniAccess Service is an Americans with Disabilities Act (ADA) mandated public transportation service for people unable to independently use the fixed-route bus service for all or some of their trips. OmniAccess provides curb-to-curb service to complement the Omnitrans fixed-route bus system and is available during the same time periods that fixed-route service operates. The Access service area is up to 3/4 mile on either side of an existing bus route.

### **Mobility Services**

The Mobility Services Team provides additional mobility solutions to support services for seniors and persons with disabilities. The Volunteer Driver Program, which provides mileage reimbursement for persons with disabilities or seniors who are unable to use public transportation, and the Taxi Ride & Uber Ride Programs which allows eligible residents in the Omnitrans service area to purchase taxi vouchers and Uber Ride fares at a discounted price.

### **OmniConnect Shuttle Services**

OmniConnect Shuttles provides service between Ontario International Airport (OIA) and Cucamonga Station (Rancho Cucamonga Metrolink), and between the San Bernardino Transit Center and downtown San Bernardino. The service started 2022 with ONT Connect (Route 380),

a new shuttle service. ONT Connect connects passengers directly between the Metrolink Station and OIA seven days a week.

A second OmniConnect Shuttle “SB Connect “started service in the fall of 2022 and provides connecting service for Arrow Rail and Metrolink travelers from the San Bernardino Transit Center to downtown courts, County offices, and the San Bernardino Government Center.

### **Future Service: West Valley Connector Corridor**

The San Bernardino Valley will experience growing traffic congestion and one million more people by 2030. Omnitrans is working in partnership with the San Bernardino Transportation Authority to improve mobility in the region with the second, state-of-the-art bus rapid transit system. The West Valley Connector Corridor is the next segment in this system. The project goals are:

1. Respond to growth in Fontana, Rancho Cucamonga, Ontario, Montclair, and Pomona
2. Provide faster, more attractive transit service on Holt Blvd./Route 61 and Foothill Blvd./Route 66 corridors
3. Support the cities’ development plans
4. Connect to major activity centers:
  - Ontario Mills, Ontario International Airport
  - Victoria Gardens
  - Various K-12 schools and businesses
    - Pomona (Metrolink Riverside Line), Rancho Cucamonga (Metrolink San Bernardino Line)

## **6.0 Epidemic/Pandemic Emergency Planning and Response Procedure**

49 U.S.C § 5329, Bipartisan Infrastructure Law changes to section (d) Public transportation agency safety plan. Each recipient or State, as described in paragraph (3), shall certify that the recipient or State has established a comprehensive agency safety plan that includes, at a minimum...(D) strategies to minimize the exposure of the public, personnel, and property to hazards and unsafe conditions, and consistent with guidelines of the Centers for Disease Control and Prevention or a State health authority, minimize exposure to infectious diseases...

### **6.1 Purpose**

Omnitrans follows CDC guidance as well as state/local public health authorities on how best to slow the spread of this disease and to protect workers, customers, clients, and the general public. Omnitrans will check for the most current information from the California Department of Public Health (CDPH) including guidance documents, Health Orders, and Executive Orders from the Governor’s Office and county and local health departments, and follow the most current information. Some provisions of Cal/OSHA’s emergency regulation may be suspended, or more stringent requirements may need to be implemented based on updated guidance and orders from the CDPH and the Governor’s Office through the issuance of updated or new Executive Orders and county or local health department regulations. Omnitrans procedure 802-40, Epidemic/Pandemic Emergency Planning and Response Procedure outlines Omnitrans response and planning procedures to recover from an Epidemic/Pandemic Emergency.



## **7.0 Employee Safety Reporting Processes (ESRP)**

§ 673.23(b) – A transit agency must establish and implement a process that allows employees to report safety conditions to senior management, protections for employees who report safety

### **7.1 Processes and Procedures**

Omnitrans has set forth the following processes and procedures that leverage firsthand knowledge to alert management to safety concerns through:

1. Agency Safety Committee
2. WeTIP Hotline and QR code
3. TrackIt accident/incident/near miss and employee reporting forms and QR code.
4. Safety and Security online web-based reporting of; incidents, near misses, and occurrences
5. Text a Tip: See Something, Say Something Program
6. Other Form-based reporting systems
7. Direct reporting to management
8. Observations of operations
9. Inspections and Audits
10. Governmental sources (FTA, National Transportation Safety Board (NTSB), state or regional oversight)
11. Customer and public feedback or complaints from Customer Service Hotlines

### **7.2 Non-Punitive Reporting Policy**

Omnitrans is committed to the safest transit operating standards possible. Omnitrans must have uninhibited reporting of all incidents, near misses, and occurrences that may compromise our operations' safe conduct to achieve this. To this end, every employee is responsible for communicating any information that may affect transit safety integrity. Such communication must be completely free of any form of reprisal.

Omnitrans will not take disciplinary action against any employee who witnesses an accident, incident, or occurrence involving transit safety. This policy shall not apply to information received by Omnitrans from a source other than the employee, or which involves an illegal act, or a deliberate or willful disregard of promulgated regulations or procedures.

Omnitrans methods of collecting, recording, and disseminating information obtained from transit safety reports have been developed to protect, to the extent permissible by law, the identity of any employee who provides transit safety information.

Omnitrans urges all employees and contractors to practice the SMS transit safety procedures outlined in this ASP to help the Agency become a leader in providing transit riders and employees with the highest level of transit safety.

#### **Incident Reporting Plan**

1. That under no circumstance will employees be retaliated against for the act of reporting safety-related information.
2. What to report, what not to report, and how to report.
3. Describe employee behaviors that may result in disciplinary action (and therefore, are excluded

from protection.

4. What managers should do when employees report safety concerns. How reports are documented.
5. How employees will receive feedback about the results of their reports.

## **8.0 Emergency Management Program**

Natural and human-made events can impact transit operations at any time and place. Life safety is and will always be the top priority during emergency response efforts. This section reviews the key elements of Omnitrans emergency preparedness. Full details on the safety system, and security emergency management programs can be found in Omnitrans System Safety and Emergency Response Plan (SSERP), the Security Emergency Response Plan (SERP) and the Hazard Mitigation Plan (HazMIT).

All on-scene emergency response activities will utilize the Incident Command System (ICS). Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS) are components of ICS to create a framework that enhances coordination between responders and resources from various entities (state, local, non-governmental agencies, and volunteers).

### **8.1 Meetings with External Agencies**

Omnitrans participates in the following external meetings and provides training with external first responder agencies:

1. San Bernardino County Operational Area OES
2. City of Ontario Emergency Preparedness
3. HP3-Health Care Preparedness, Planning and Partnerships
4. City of Redlands Disaster Council
5. Inland Valley Emergency Communications Service (IVECS)
6. Chino Valley MET-NET

### **8.2 Planning Responsibilities**

Omnitrans and its contractors can be valuable resources for assisting first responders at the incident scene or managing emergency resources by sharing their subject matter expertise and problem-solving skills. Their understanding of incident response and coordination with first responders is critical for managing transit incidents while keeping life safety a top priority.

Omnitrans Safety & Security Department administers the System Safety Emergency Response Plan (SSERP), and the Security Emergency Response Plan (SERP) which guides employees to execute a well-organized, informed, and efficient response to critical incidents should one occur, and to reduce or mitigate resulting impacts.

### **8.3 Revision and Distribution of Emergency Response**

Omnitrans Safety & Security Department is responsible for managing and distributing the SSERP and SERP emergency preparedness procedures. These are living documents, available for review to staff and contractors. Comments and revisions may be submitted to the Safety & Security Department for evaluation and inclusion in the next plan iteration. The plan will be updated as needed and reviewed at annually.

## **C. DRUG AND ALCOHOL PROGRAM**

### **9.0 Purpose**

This section applies to safety-sensitive employees and contractors connected with Omnitrans system services. Omnitrans shall require all operations and maintenance contractors to submit to a comprehensive drug and alcohol policy (including appropriate training) that conforms to FTA's requirements in 49 CFR Parts 40 and 655 testing programs for all subject personnel. Third-party contractors employing safety-sensitive employees must submit an FTA compliant plan to Omnitrans before conducting any work or services on Agency property.

The purpose of this program is to assure worker fitness for duty and to protect our employees, passengers, and the public from the risks posed by using alcohol and prohibited drugs. The Agency has developed and implemented a drug and alcohol testing program designed to help prevent accidents and injuries resulting from the misuse of alcohol and illegal drugs by employees who perform safety-sensitive functions. Omnitrans Drug and Alcohol Policy will be attached in a separate document.

## **D. ENVIRONMENTAL MANAGEMENT**

### **10.0 Purpose**

Public transportation plays a vital role in confronting environmental challenges. Omnitrans requires all industrial, maintenance, support, and construction activities of the Agency to comply with applicable federal, state, and local environmental protection laws, standards, and regulations. These include applicable requirements of the:

1. United States Environmental Protection Agency (USEPA)
2. California Environmental Protection Agency (CalEPA)
3. Certified Unified Program Agencies (CUPA)
4. Resource Conservation and Recovery Act (RCRA)
5. Department of Toxic Substances Control Act (DTSC)
6. Clean Water Act (CWA)
7. South Coast Air Quality Management District (SCAQMD)
8. California State Water Resources Control Board (CSWRCB)
9. Prevention, Control, and Countermeasure (SPCC)
10. Noise Control Act (NCA)
11. California Air Resources Board (ARB)
12. The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
13. Emergency Planning and Community Right-To-Know Act (EPCRA)
14. Pollution Prevention Act and Superfund Amendments and Reauthorization Acts (SARA)
15. Medical Waste Management Act, Public Health San Bernardino California

Omnitrans maintains a Storm Water Pollution Prevention Plan for its East and West Valley facilities and the contractor-occupied facility located on I Street San Bernardino. Omnitrans will identify any potential sources of pollution that may reasonably affect the quality of stormwater discharges from the construction site. Specific environmental management procedures are included as attachments. Design review and substantial completion inspections ensure that all Omnitrans facilities are designed and constructed according to the applicable environmental laws and regulations.

### **10.1 Responsibilities**

Directors, Managers, and Supervisors of Maintenance and Operations at each facility are assigned collateral duties responsible for ensuring compliance with applicable environmental regulations. The

CSO is responsible for providing technical advice to the Directors, Managers, Supervisors, and employees for ensuring regulatory compliance.

## **E. HAZARDOUS MATERIALS MANAGEMENT PROGRAM**

### **11.0 Purpose**

Omnitrans is committed to achieving excellence in providing a healthy and safe working environment and supporting environmentally sound practices in Agency activities. This section outlines the Omnitrans hazardous materials program developed to ensure that adequate safeguards are in place to prevent exposure to dangerous materials for employees, contractors, passengers, and the general public and to minimize environmental damage. All Agency activities are to ensure applicable health, safety, environmental protection laws, and regulations are followed. All employees, vendors, and contractors are subject to this section. They must comply with appropriate local, state, and federal laws pertaining to environmental protection and the use, handling, purchase, store, and transport of hazardous materials. Areas of responsibilities include:

1. Clean Water Act (CWA)
2. South Coast Air Quality Management District (SCAQMD)
3. California State Water Resources Control Board (CSWRCB)
4. Prevention, Control and Countermeasure (SPCC), spill response, cleanup, and investigation
5. Environmental compliance Inspections of facilities
6. Storm Water Management; stormwater pollution prevention plan (SWPPP)
7. Spill Prevention Control and Countermeasure (SPCC)

### **11.1 Responsibilities**

1. Omnitrans Director of Safety & Security shall:
  - a. Develop and Maintain the CUPA Business Plans
  - b. Develop, implement, evaluate, report, and document all materials associated with the Hazardous Materials Management Program.
  - c. Perform inspections to ensure that hazardous materials and waste are identified, labeled, evaluated, inventoried, handled, managed, and monitored in compliance with applicable regulations to minimize risk to staff, customers, and visitors and their impact on the environment.
  - d. Provide the protocol for reporting and investigating hazardous materials spills, releases, and exposures to provide the appropriate and effective response and prevent reoccurrences.
  - e. Ensure that employees are oriented and trained on the proper procedures to protect themselves from exposure to hazardous materials.
  - f. Oversee the maintenance of the Hazardous Materials Inventory and master file of Safety Data Sheets (SDS) by updating and maintaining the Chemical Inventory Program on Omnitrans intranet located in the Safety and Security Section.
2. The Directors of Safety & Security and Maintenance/Facilities shall collaborate to:
  - a. Ensure the effectiveness of the engineering and administrative controls with environmental air monitoring surveys and work procedure analyses.
  - b. Ensure that mandated licenses and permits are maintained in compliance with applicable law and regulations and the granting regulatory agency requirements.
  - c. Conduct periodic assessments of the Agency's hazardous materials generation and storage areas and evaluate dangerous materials handling procedures. Inspections are conducted of

all departments at least quarterly to ensure compliance with applicable regulations and hazardous materials policies. Reports of significant problems and recommendations are forwarded to the appropriate Department Director.

3. Department Directors, Managers, and Supervisors shall:

- a. Provide emergency procedures that prescribe specific precautions, equipment, and protective equipment to be utilized in response to hazardous materials spills, releases, and exposures.
- b. Monitor and ensure compliance with applicable hazardous materials and hazardous waste procedures. Implement the Hazardous Materials and Waste Management Plan.
- c. Ensure hazardous materials and waste are correctly handled, contained, stored, and labeled as required by applicable federal, state, and local regulations.
- d. Develop and implement department-specific procedures concerning the use of hazardous materials in their departments.
- e. Maintain compliance with the Hazard Communication standard by ensuring current Safety Data Sheets (SDS) are available and that staff has been adequately trained regarding the use of hazardous materials within their department.
- f. Ensuring an annual physical Chemical Inventory has been completed by their department.
- g. Ensure that all hazardous materials purchased are pre-approved by the Safety & Security Department staff before delivery to any Omnitrans properties.
- h. Ensure that contractors are following Omnitrans Hazardous Materials and Waste Management Procedures.

4. Omnitrans Procurement Department shall:

- a. Coordinate with the Safety & Security Department staff to review all potential Request for Proposal (RFP) or contracts containing hazardous materials to verify each contract is environmentally compliant.
- b. Coordinate with Safety & Security Department staff to ensure RFP's follow all applicable local, state, and federal environmental regulations as required.

5. Employees are responsible for the following:

- a. Maintaining familiarity with Omnitrans and work site-specific Safety Procedures regarding the safe handling of hazardous materials and understand their specific responsibilities.
- b. Attend training sessions, as required.
- c. Maintaining familiarity with site-specific safety procedures and response procedures for hazardous materials spills and exposures.
- d. Maintaining awareness of hazards both within their department and elsewhere in the facility. Report hazards to their supervisor or the Safety & Security Department staff.
- e. Maintaining familiarity with Hazard Communication Program and understand the content and purpose of a Safety Data Sheet (SDS).

## F. OMNITRANS SAFETY RISK MANAGEMENT

§ 673.25(a) – A transit agency must develop and implement a Safety Risk Management process for all elements of its public transportation system. The Safety Risk Management process must be comprised of the following activities: safety hazard identification, safety risk assessment, and safety risk mitigation.

## **12.0 Safety Risk Register**

Omnitrans may utilize a Safety Risk Register as an information management tool to document the Agency's Safety Risk Management (SRM) and Safety Assurance activities. It will be managed through the Trackit system to record the hazards identified by the Agency, the potential consequences associated with these hazards, initial safety risk ratings, new mitigations implemented to eliminate or minimize the risk associated with the hazard, revised safety risk rating, and mitigation monitoring measures and activities to ensure the implementation and effectiveness of mitigations.

### **12.1 Purpose**

Omnitrans Safety Risk Register is implemented into the Trackit database. The Agency Safety Committee will be the primary users of this register. Users will receive training on the process. The register will serve a dual purpose:

- It will provide Directors and Managers with an ongoing, up-to-date picture.
  - a) the overarching safety concerns that the Agency faces during transit service delivery and supporting operations, and
  - b) the controls (safety risk mitigations) put in place to address them, and
- It allows personnel involved in the agency's Safety Management System (SMS) to:
  - a) formally document hazards, potential consequences of the hazards, safety risk assessment results, and anticipated safety risk mitigations, and
  - b) track the status of implemented safety risk mitigations.

Omnitrans Safety Risk Register will include the following processes for managing safety risk:

- a) Hazard Identification,
- b) Risk Assessment, and
- c) Risk Mitigation.

### **12.2 Hazard Identification**

§ 673.25(b)(1) – A transit agency must establish methods or processes to identify hazards and consequences of the hazards.

§ 673.25(b)(2) – A transit agency must consider, as a source for hazard identification, data and information provided by an oversight authority and the FTA.

Through safety data acquisition, analysis, and coordination by the CSO, and with support from Operations and Maintenance, hazards will be identified regularly. The system's physical and functional characteristics to be analyzed are Omnitrans operations, maintenance, facilities, procedures, employee practices, and Contractor/Sub-Contractor oversight.

Knowledge of how the individual system elements interface with each other is essential to the hazard identification effort. Hazards will be identified through:

Daily tasks and routine activities conducted by Omnitrans staff and Contractor/Sub-Contractor.

1. Inspections and observations conducted by Departmental Directors and Managers and the CSO.



2. Internal inspection, audit, and records reviews.
3. External audits conducted by regulatory agencies.
4. Design reviews where representatives of Safety and Security and Procurement, Operations and Maintenance participate.
5. Hazard analysis and special reports prepared by consultants, Agency employees, contractors, and suppliers.
6. Hazards that develop as a result of accidents/incidents.
7. Information obtained from other transit agencies.

Specific Goals:

1. Utilize Trackit database as a reporting system to capture errors, hazards, and near misses providing a reporting and management process that is simple to use and accessible to all personnel.
2. Proactively identify all the significant hazards and assess the risks related to current activities.
3. Implement a safety reporting system that provides feedback to the reporter of any actions taken (or not taken) and, where appropriate, to the rest of the organization.
4. Implement a process for performing safety audits/investigations to identify underlying causes and potential hazards for existing and future operations.
5. Define a process whereby safety reports are acted on promptly.
6. Apply hazard identification processes that are ongoing and involve all key personnel.
7. Train all personnel responsible for investigating investigation techniques.
8. Apply causal/contributing factors to all investigations (why it happened, not just what happened), and as needed, apply a Root Cause Analysis (RCA).
9. Documentation of all hazards identified will be stored in Trackit and kept available for future reference.
10. Use the results of the investigation of incidents and accidents as a source for hazard identification in the system.

### 12.3 Risk Assessment

§ 673.25(c)(1) – A transit agency must establish methods or processes to assess the safety risks associated with identified safety hazards.

§ 673.25(c)(2) – A safety risk assessment includes assessing the likelihood and severity of the consequences of the hazards, including existing mitigations, and prioritization of the dangers based on the safety risk.

Omnitrans will use the sample risk matrix described below to assess the severity and probability (likelihood) of the consequences of hazards and prioritize the hazards based on the safety risk. The Safety Risk Register will be stored and maintained in the TrackIt database.

Hazard Severity is the measure of the consequence the hazard presents. The greater the potential hazard consequence, the more severe the risk. The probability that a result associated with a given danger will occur will be described in potential occurrences per unit of time, events, population items, or activity. Employees are encouraged to immediately address hazards that may be quickly resolved, such as a trip hazard that may be easily moved.

Hazards that require more extensive measures for resolution will be elevated to Directors, Managers,

or Safety & Security Department staff for corrective action. Directors, Managers, Supervisors, and Safety & Security staff are encouraged to conduct appropriate investigations to determine the potential risk as evaluated through examining factual data. The severity and probability of the hazard will be categorized as one of the following:

1. **Catastrophic** – Death or system loss (often called a Category I)
2. **Critical** – Severe injury, severe occupational illness, or major system damage (or Category II)
3. **Marginal** – Minor injury, minor occupational illness, or minor system damage (or Category III)
4. **Negligible** – less than a minor injury, occupational illness, or system damage (or Category VI)

#### **MATRIX 1: SEVERITY OF THE CONSEQUENCE**

<b>CATEGORY NAME</b>	<b>LEVEL</b>	<b>CHARACTERISTICS</b>
Catastrophic	1	It could likely result in death, permanent total disability, severe property damage, or irreversible environmental damage.
Critical	2	It could likely result in permanent partial disability, injuries, or occupational illness that may result in hospitalization or significant reversible property/environmental damage.
Marginal	3	It could likely result in injury or occupational illness resulting in one or more lost workdays(s), moderate reversible property/environmental damage.
Negligible	4	It could likely result in injury or illness, not resulting in a lost workday, minimal property/ environmental impact.



### Hazard Frequency (probability) Categories

The hazard consequence occurrence probability, or frequency of occurrence, represents a qualitative judgment of the relative likelihood of occurrence of an accident caused by an uncorrected or uncontrolled hazard as a result of an event or series of events. All identified hazards are assigned one of five probability levels, as provided in the Hazard Frequency Categories chart below:

Hazard probability is a subjective measure of the likelihood that a specific hazard will occur and will be categorized as follows:

- a. **Frequent**-likely to occur frequently or continuously (weekly 200K miles)
- b. **Probable**-Will occur several times in the life of an item (monthly 800K miles)
- c. **Occasional** -Likely to occur sometime in the life of an item (yearly 11 million miles)
- d. **Remote** – Unlikely but possible to occur in the life of an item (decade 110 million miles)
- e. **Improbable**-So unlikely, it can be assumed occurrence may not be experienced

### **MATRIX 2: LIKELIHOOD OF OCCURRENCE OF THE CONSEQUENCE**

QUALITATIVE DEFINITION	VALUE	MEANING
Frequent	A	Likely to occur with high frequency. Likely to Occur Frequently ( $>10^{-1}$ )
Probable	B	Will occur many times in the life of an item or at a specific location. Likely to Occur Several Times ( $<10^{-1}$ but $>10^{-3}$ )
Occasional	C	Likely to occur one or more times in the life of an item or at a specific location. Likely to Occur Sometime ( $<10^{-3}$ but $>10^{-6}$ )
Remote	D	Unlikely but possible to occur in the life of an item or at a specific location. Very Unlikely to Occur ( $<10^{-6}$ but $>10^{-8}$ )
Improbable	E	So unlikely, it can be assumed occurrence will not be experienced at a specific location. Almost inconceivable that the event will occur ( $<10^{-8}$ )

*A qualitative hazard probability will be derived from research, analysis, and evaluation of safety data from the operational and service experience of Omnitrans or other similar transit agencies.*

## 12.4 Assessing the Risk

The risk assessment determines the acceptability of assuming a risk associated with a hazard, the necessity of implementing corrective measures to eliminate or reduce the hazard, or a combination of both. The analysis results will be shared with Senior Leadership by the Director of Safety & Security on an ongoing basis to identify appropriate actions. All “unacceptable” hazards must be eliminated, and measures will be taken for the remaining risk acceptance categories to minimize risk.

Risk Assessment Matrix				
Likelihood	Severity			
	1 (Catastrophic)	2 (Critical)	3 (Marginal)	4 (Negligible)
A (Frequent)	1A	2A	3A	4A
B (Probable)	1B	2B	3B	4B
C (Occasional)	1C	2C	3C	4C
D (Remote)	1D	2D	3D	4D
E (Improbable)	1E	2E	3E	4E

Risk Assessment Matrix Color Code	
<i>"Tolerability" based on identified severity and likelihood.</i>	
	Unacceptable under the existing circumstances.
	Acceptable based upon mitigations.
	Acceptable with senior management approval.

## 12.5 Hazard Resolution and Mitigation

§ 673.25(d) – A transit agency must establish methods or processes to identify mitigations or strategies necessary for the agency's safety risk assessment to reduce the likelihood and severity of the consequences.

Once the hazards are identified and categorized in TrackIt database, subsequent analysis will be undertaken using the risk register described above to resolve the issue and minimize the risk associated with the identified hazard. A hazard resolution matrix will be developed combining hazard severity and hazard frequency, as shown in the matrix above, to determine the level of acceptance for a specific hazard/risk.

## 12.6 Corrective Actions

Omnitrans Trackit data tracking system is designed to notify the parties responsible for the corrective action and alert them of upcoming due dates and overdue corrective actions. The results of such analysis will be shared with agency staff and employees through Safety Communication and support.

Completed hazard identifications, and safety risk assessments and mitigation processes are documented and approved as appropriate, and any hazard needing correction is entered and tracked in the Trackit system. Corrective actions will have:

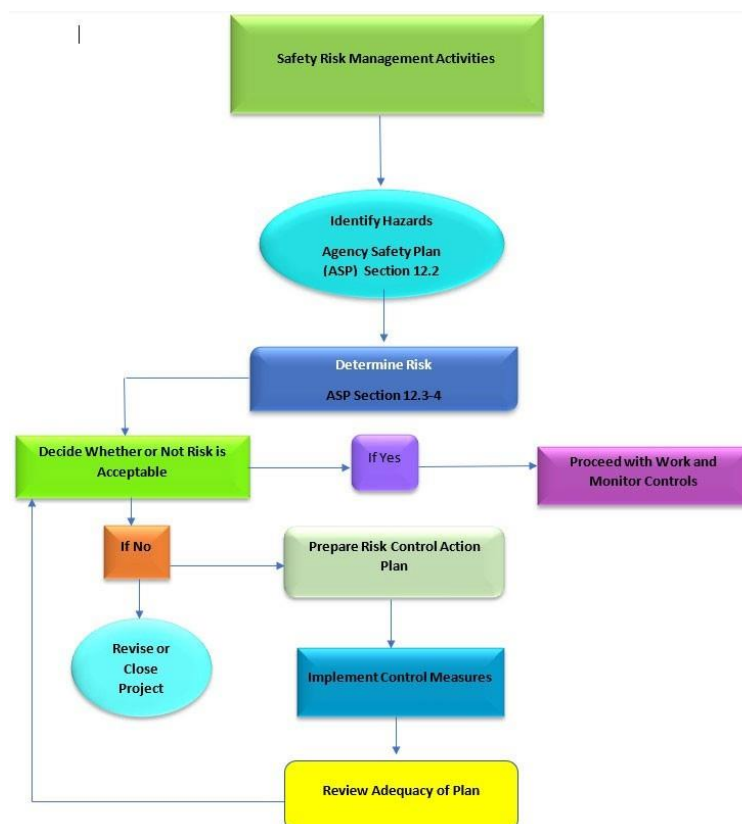
1. Original finding information
2. A suggested corrective action
3. The responsible parties assigned, and
4. The due date identified

Individuals assigning a corrective action and those responsible for the corrective actions are expected to effectively mitigate or eliminate the issue.

Specific Goals:

1. Implement a structured process for managing risk that includes assessing the risk associated with identified hazards, expressed in severity and probability.
2. Develop criteria for evaluating the level of risk the Agency is willing to accept.
3. Implement risk control strategies that include hazard elimination, risk control, risk avoidance, risk acceptance, risk mitigation, and, where applicable, an action plan.
4. Implement mitigating actions resulting from the risk assessment, including timelines and allocation of responsibilities, are documented.
5. Ensure that risk management is routinely applied in decision-making processes.
6. Ensure that adequate and robust mitigations and controls are implemented.
7. Appropriately justify risk assessments and risk ratings.

### **RISK MANAGEMENT FLOW CHART PROCESS**



## G. SAFETY ASSURANCE

§ 673.27(a) – Bus transit agencies must develop processes for (1) safety performance monitoring and measurement, (2) management of change, and (3) continuous improvement. Safety Assurance (SA) activities serve as a check on the agency’s Safety Risk Management (SRM) process.

### **13.0 Safety Data Acquisition and Analysis**

Safety Assurance means processes within the agency’s Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation and ensure that Omnitrans meets or exceeds its safety objectives through collecting, analyzing, and assessing information.

#### **13.1 Data Collection**

This section's activities complement and are supported by Section F, “Safety Risk Management (SRM).” Safety statistics and data are gathered through field inspections and evaluations, facility inspections, incidents, observations, compliance audits, and records reviews. Data is recorded in Trackit and used to track both safety and security-related data.

The objectives of the data acquisition and analysis are to:

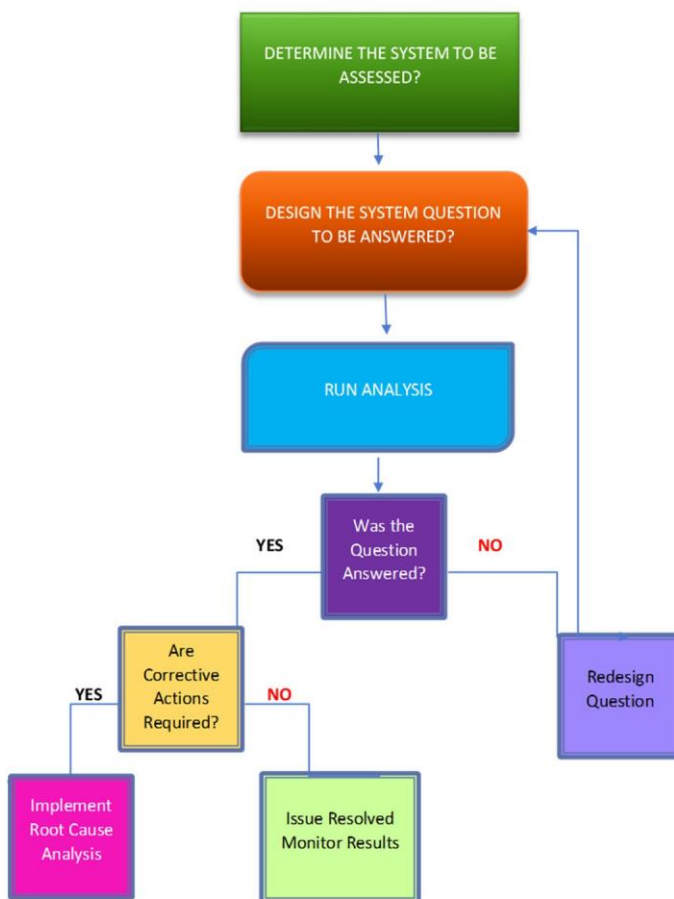
1. Monitor overall safety performance of all Omnitrans transportation service systems.
2. Identify potentially hazardous or unsafe trends and acts before they cause or contribute to the cause of injuries, accidents, or damage.
3. Establish performance measures and targets.
4. Document organizational efforts to improve safety and the results thereof

#### **13.2 Analysis**

The Trackit database offers reporting features to allow users to use trending data for reporting. Monthly, quarterly, annual, and ad-hoc reports must be reviewed by Senior Leadership and the CSO to examine data trends compared to previous periods. Senior Management and the Chief Safety Officer (CSO) examine reports in the following areas:

1. Broad contract compliance inspection activities that include internal, external, and regulatory inspections and audits.
2. External reporting from National Transit Database (NTD), American Bus Benchmarking Group (ABBG), and other industry standards.
3. Corrective action status for all modes.
4. Near miss and unusual occurrence activities for all modes.
5. Any factors that reveal unsafe trends are addressed through corrective action measures.

## DATA ANALYSIS PROCESS FLOW CHART



### 13.3 Reporting and Distribution

Senior Leadership and the CSO will use trending and data analysis to develop various reports. A report must be provided every quarter to the CEO/GM. A quarterly report is presented to Omnitrans Operations and Safety Committee (Board of Directors sub-committee) at quarterly meetings to highlight key safety and security performance indicators.

#### 5. Omnitrans CSO shall:

1. Directly investigate or assign an investigation of potential risks discovered through inspections and other reporting activities.
2. Submit monthly safety and security reports to Senior Leadership for presentation to Omnitrans Board of Directors.
3. Report abnormal trends and issues at each applicable Department.

#### 6. Other Omnitrans Departments shall:

1. Analyze safety issues resulting from data trends.
2. Cooperate with Safety & Security Department staff during regular audits or investigations.

### 14.0 Investigation and Reporting

§ 673.27(b)(3) – Conduct investigations of safety events to identify causal factors.

This section describes the Omnitrans process for conducting accident and incident investigations to identify factors.

### 14.1 Investigations

1. Accidents and emergencies must be subject to a formal and objective investigation. Incidents shall be investigated at the discretion of Omnitrans Directors of Operation and Safety & Security, with support from other Departments.
2. Omnitrans is prepared to conduct a thorough investigation to determine if an incident occurred and develop strategies to avoid similar incidents.
3. As with any investigation, time is of the essence. Therefore, investigations will proceed as soon as practical to avoid potentially losing valuable information.
4. Only trained investigators are to conduct investigations, and under no circumstance may an investigator examine his/her work area incident. The primary objective is fact-finding, not fault-finding.
5. If investigators from any regulatory agency observe an internal investigation or investigate an incident occurring on any Omnitrans services or property, all parties involved shall cooperate fully with these agencies' needs and requests.
6. The Chief Safety Officer (CSO) investigates accidents related to all contractors on-site or with Departmental Staff support.

### 14.2 Investigation Procedure

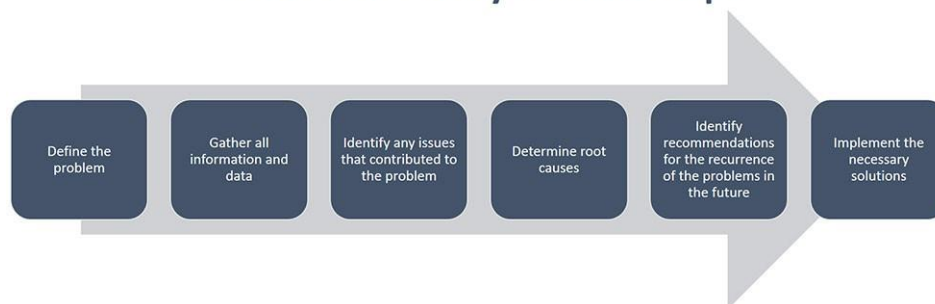
The procedures below are designed to conduct effective incident investigations and analyze incidents and develop corrective actions. The incident management system is a process. Management uses the process in each incident as a template from which to discover the multiple causes that may be involved.

A complete investigation is comprised of the following four stages being completed:

- Investigation and interview stage: All relevant information is found.
- Identify multiple causes, a Root Cause Stage will be implemented to identify: Contributing factors, and the root cause is determined, and information is recorded in Trackit.
- Preventative strategies are implemented through corrective actions. Recommendations are prepared and recorded in the Trackit database.
- For near-miss reports, a full investigation may not be required. In this case, the CSO will determine the appropriate investigation level to address the report effectively.

With support from Department Staff, the CSO reviews the facts that have been presented from the investigation and will implement a Root Cause Analysis (RCA) to determine a root cause/s for why the incident occurred.

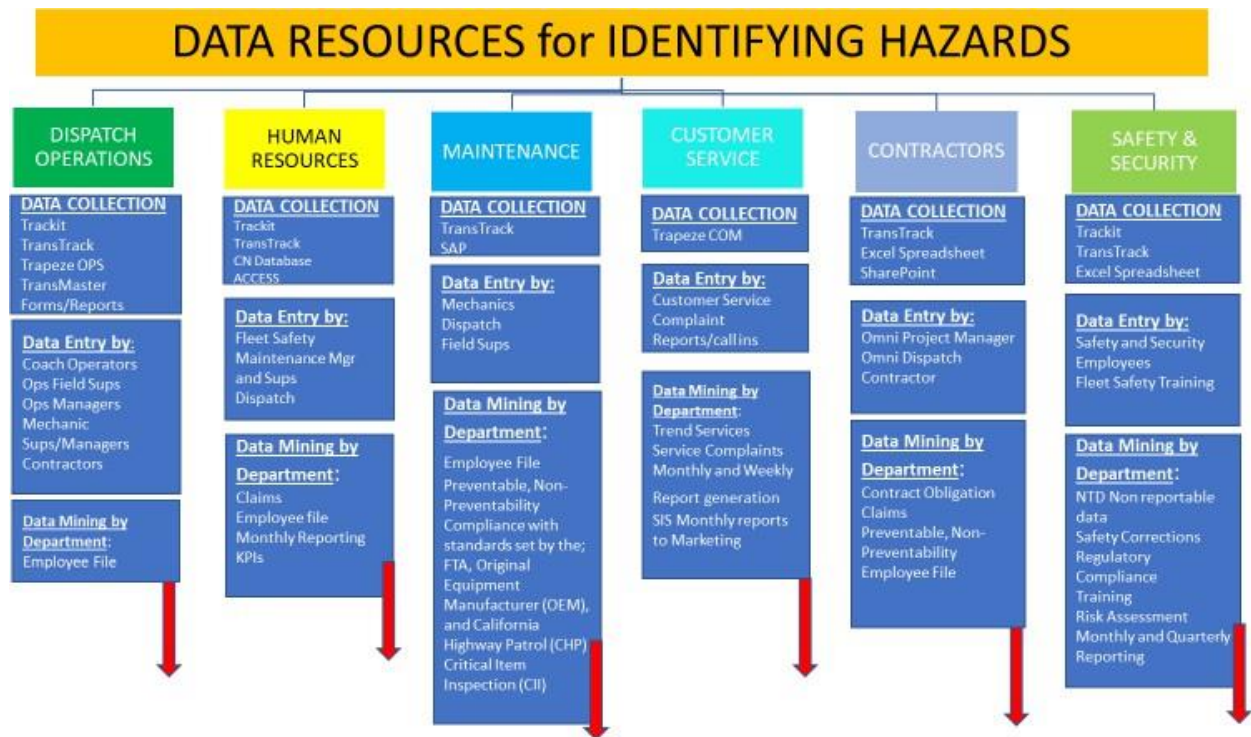
#### Root Cause Analysis Basic Steps





### 14.3 Reporting

Omnitrans utilizes the Accident/Incident Reporting Forms in Trackit to collect safety data from various departments. Each Department is responsible for reviewing and reporting any concerns they might have regarding the data entered by their departments. Additionally, the Chief Safety Officer (CSO) will review the data collected by Dispatch, Operations, Safety and Security, Customer Service, Contractors, and Maintenance for any hazard. Their consequences are appropriately identified, reported, and resolved. The CSO or designee will follow up to ensure that the hazards are mitigated.



### 14.4 Responsibilities of External Reporting

San Bernardino Sheriff's Department or Local Law Enforcement investigates (as applicable):

- Traffic collisions and incidents.
- Death of any person on board a bus when related to the movement of another vehicle.
- Grade crossing collisions involving buses.
- Death of any person on board a bus, related to the movement of the bus.
- Any impact between a moving bus and a pedestrian, trespasser, motor vehicle, occupied bicycle, or another object under another person's control.
- Unusual criminal activity.
- Law enforcement reports of the investigation and conclusions are usually reported within 30 days of the occurrence.

#### Service Contractor

All contracted vehicle service operators involved in an accident/incident will complete an Accident/Incident Report form while still at the scene. Documents, courtesy cards, photographic film, scene diagram, and other investigative material will be sent to the contractor's Purchased

Transportation Administrator. Copies will also be kept and held at the location division. The Purchased Transportation Administrator will notify and share all incidents reports and investigation materials with the Director of Safety and Security. The Purchased Transportation Administrator will archive and maintain all incidents reports/ investigation documents at its location. The National Transportation Safety Board (NTSB) will be notified via NTD Reporting criteria on any fatality incidents.

The service contractor performs and assists in the formal investigations of:

- Bus or paratransit vehicle collisions
- Passenger injuries
- Incidents that result in damage to Omnitrans equipment, structures, or property
- Employee injuries and occupational illnesses

A preliminary report is required within the next business day of an incident. A comprehensive written report with all supporting data shall be submitted within 24-72 hours of the occurrence. Should additional time be required to determine the root causes of an incident, a written communication stating such must be provided to Omnitrans Mobility Services, and Operations Directors, and the Safety, Security and Regulatory Compliance Department.

As soon as practicable following any event involving injury or death to any person or damage to equipment, all information must be obtained, secured, and retained for further investigation. The service contractor shall notify Omnitrans Operations, and the Safety and Security Directors of the following incidents:

- Collision
- Passenger/Third-Party Injury
- Assault
- Facility/Property Damage
- Any other significant incident

The Directors of Operations and Safety & Security shall, at their discretion, elect to perform an independent investigation of accidents involving transit vehicles or occurring on its property or involving its bus services, regardless of the parties involved.

The reviewing body will then issue written recommendations to address or mitigate any such conditions or practices. Recommendations will be tracked until completed or closed.



#### **14.5 Corrective Actions Resulting from Accident/Incident Investigation Team**

- Omnitrans develops corrective action plans based on the results of the investigation. Causal, root cause analysis, and contributing factors will be assessed, and any areas identified as needing improvement may be included in a corrective action plan. All corrective actions and solutions will be tracked and stored in Trackit.
- Corrective action is taken as soon as possible after the investigation and analysis process is complete. An immediately identified hazard or employee problem is addressed and corrected without delay to prevent another incident from happening again or a problem to become more severe.
- Lessons learned from the incident are communicated through training.

#### **15.0 Internal Safety & Security Inspection/Audit Process**

§ 673.27(b)(2) – A transit agency must establish activities to monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

System audits and inspections are a formal process of managing the Agency's Safety Plan and SMS requirements. Inspections and audits verify that all identified safety elements in an environment are in place and perform as designed. This section summarizes Omnitrans' internal safety and security inspection/audit processes. Internal inspections and audits are performed by the Safety & Security department and external contracted auditor.

#### **15.1 Departments and Functions Subject to Review by Internal Inspections/Audit**

The following groups are subject to audits and inspections:

1. Safety and Security
2. Bus Operations
3. Contracted Services Facilities (Office and buildings etc.)
4. Vehicle Maintenance Shop
5. Stops and Stations Maintenance
6. Outside third-party contractors or Sub-Contractors
7. Procurement (Parts)

#### **15.2 Scheduling External Audits**

The Director of Safety, Security and Regulatory Compliance will seek procurement of a contracted external audit services as required. The Safety, Security and Regulatory Compliance Staff will evaluate the auditor's results and findings for compliance with the Safety Management Systems (SMS) and its effectiveness.

Prior to an audit, schedules will be prepared and distributed to all agency departments at least 14 calendar days before the beginning of any scheduled audits.

Audits will be independent of the first line of supervision responsible for the performance of the activity being audited.

### **15.3 Scheduled Monthly Internal Safety Inspections**

The Director of Safety & Security and Department staff, with support from department Directors, Managers, or Supervisors performs monthly inspections of the following programs and facilities:

1. Maintenance Shop activities
2. Security Facilities
3. Building Maintenance Facilities activities (Office and Building etc.)
4. Stops and Stations facilities
5. Bus Service operations Contracted Services
6. Construction activities
7. Employee Environmental Health and Safety activities
8. Contracted Bus Services facilities and activities

### **15.4 Safety and Security Internal Audits**

The Director of Safety & Security and Department staff performs unannounced inspections of the following programs and facilities:

1. Maintenance Shop activities
2. Security Facilities
3. Building Maintenance Facilities activities (Office and Building etc.)
4. Stops and Stations facilities
5. Bus Service operations Contracted Services
6. Construction activities
7. Employee Environmental Health and Safety activities
8. Contracted Bus Services facilities and activities
9. Standard Operating Procedures and Processes
10. Documentation and Training Records

### **15.5 Scheduled Inspections By the Federal Transit Administration (FTA)**

In addition to Omnitrans internal inspections and audits, Omnitrans ASP is audited by the FTA once every three years (Triennial Audit). After these reviews, a formal report is submitted to Omnitrans by the FTA. Omnitrans is responsible for preparing a response to each recommendation and submitting a written reply to the audit findings with 45 working days, depending on the type of audit being performed and following receipt of the report. The time depends upon what kind of audit has been done.

### **15.6 FTA Triennial Report Findings**

FTA's triennial internal safety audit report will state the results of each internal audit in terms of the adequacy and effectiveness of this ASP and includes the status of any subsequent findings and corrective actions. If the findings cannot be resolved before submitting an Omnitrans response, Omnitrans will develop a corrective action plan for each outstanding item. The corrective action plan shall include the finding, noted by number and specific narrative, the proposed resolution of each finding, as well as interim methods to mitigate the issue, the individual responsible for resolving the finding, and the estimated date of closure.

### **15.7 Review Process of Findings**

All internal safety inspections are performed by safety walk throughs. Audits will be performed using checklist of specific items. Monthly walk-through inspection and quarterly audit reports are maintained and recorded in Excel and in Trackit. Findings from these audits and inspections are recorded and tracked by Departmental Directors and the Director of Safety & Security until closure.

### **15.8 Issuing of Findings**

Any finding during an audit or inspection containing a recommended corrective action will be assigned to select responsible parties with a due date. The Safety staff and all applicable Department Directors are responsible for following up and verifying closure and completing corrective actions. Findings that threaten employees' health and safety, property, or the environment will be dealt with immediately at the time and site of the finding.

### **15.9 Responsibilities**

1. The Director of Safety & Security and designated Department staff will perform announced monthly safety walks to ensure their oversight works in conjunction with the practices outlined in this ASP. Directors and Managers will receive all inspection reports.
2. The Safety staff will perform unannounced internal safety inspections to ensure their oversight works in conjunction with the practices outlined in this ASP. Directors and Managers will receive all inspection reports.
3. Omnitrans Directors are responsible for assigning and ensuring cooperation and coordination of Division staff with internal safety audits and announced and unannounced inspection activities.

### **16.0 Safety Performance Measures and Targets**

§673.11(a)(3) – The Public Transportation Agency Safety Plan must include performance targets based on the safety performance measures established under the National Public Transportation Safety Plan. Each transit agency must include SPTs in its ASP.

Omnitrans will include performance targets based on the safety performance measures established under the National Public Transportation Safety Plan in its ASP. These targets will be specific numerical targets set by the Agency and based on FTA's safety performance measures in the National Public Transportation Safety Plan. The CEO/GM and Senior Management are responsible for establishing and monitoring these detailed performance targets. The Agency Safety Committee will review Omnitrans Safety Performance Targets.

### **16.1 Performance Measure Objectives**

Omnitrans determines safety performance measures using several measures, including lagging indicators such as accidents, fatalities, injuries, property damage associated with transit agencies' provision of service, and leading indicators. Leading indicators will provide the agency the ability to monitor information or conditions that may affect safety performance. Lagging indicators provide information on events that have already taken place. The thresholds for "reportable" fatalities, injuries, and events are defined in the National Transit Database (NTD).

**Performance Measures included in the National Public Transportation Safety Plan are:**

1. **Fatalities** (total number of reportable fatalities and rate per total vehicle revenue miles by mode)
2. **Injuries** (total number of reportable injuries and rate per total vehicle revenue miles by mode)
3. **Safety Events** (total number of reportable events and rate per total vehicle revenue miles by mode)
4. **System Reliability** (mean distance between major mechanical failures by mode)

**Safety Performance Measures Specific Goals:**

1. Quantifiable (ease of analysis and examining trends)
2. Representative of what is being measured
3. Consistent when measuring the same conditions
4. Detectable even when there are changes in environmental or behavioral conditions
5. Efficiency of obtaining and using measures is consistent with the benefits
6. Easily understood by those who collect and analyze them
7. Capable of data quality control and verification
8. Manageable total set of measures, metrics, and indicators

## 16.2 Targets

Safety performance targets are reviewed annually and created for each safety measure when required. The Agency will ensure all relevant targets are being met. Omnitrans will use NTD reporting statistics to determine Agency targets as well as data stored in an internal Trackit database.

### Safety Performance Targets

Mode of Service	Fixed Route Bus 5-Year Average	Fixed Route Bus FY2023	Fixed Route Bus FY2024	Fixed Route Bus FY2025	ADA Paratransit 5-Year Average	ADA/Paratransit FY2023	ADA/Paratransit FY2024	ADA/Paratransit FY2025
Performance Measures		Safety Performance Targets (SPT)				Safety Performance Targets (SPT)		
Total Number of Fatalities	0.6	Aspirational ( zero)	Aspirational (zero)	Aspirational (zero)	0	Aspirational ( zero)	Aspirational (zero)	Aspirational ( zero)
Total Number of Injuries	23.2	Reduce by 3% (22.5) by the end of 2023	Reduce by 3% (21.8) by the end of 2024	Reduce by 3% (21.2) by the end of 2025	4	Reduce by 3% (4.1) by the end of 2023	Reduce by 3% (3.97) by the end of 2024	Reduce by 3% (3.8) by the end of 2025
Total Number of Safety Events	22	Reduce by 3% (21.3) by the end of 2023	Reduce by 3% (20.7) by the end of 2024	Reduce by 3% (20.1) by the end of 2025	4	Reduce by 3% (3.9) by the end of 2023	Reduce by 3% (3.8) by the end of 2024	Reduce by 3% (3.7) by the end of 2025
Total # of Maj. Mech. Failures	312.2	Decrease by 2% (306) by the end of 2023	Decrease by 2% (299) by the end of 2024	Decrease by 2% (294) by the end of 2025	105	Decrease by 2% (103.3) by the end of 2023	Decrease by 2% (101.1) by the end of 2024	Decrease by 2% (99.1) by the end of 2025
System Reliability (VRM/Failures)	20,904	Increase by 2% (21,322) by the end of 2023	Increase by 2% (21,784) by the end of 2024	Increase by 2% (22,219) by the end of 2025	27,674	Increase by 2% (28,200) by the end of 2023	Increase by 2% (28,764) by the end of 2024	Increase by 2% (29,340) by the end of 2025
* Rate is per 100K revenue miles								
** System Reliability is calculated as a mean distance between major mechanical failures								

## 16.3 Safety Performance Monitoring and Measurement

Omnitrans has established several activities to monitor operations and maintenance for compliance with procedures. These processes are also used to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended. Non-compliance with procedures is generally addressed through counseling, training, and other management oversight activities. Insufficient procedures are addressed through safety risk management activities.

1. Monitor system for compliance with and sufficiency of the agency's procedures for operations and maintenance.
2. Monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.
3. Conduct investigations of safety events to identify causal factors and root cause.
4. Monitor information reported through any internal safety reporting programs.

Omnitrans will be able to determine whether safety objectives and safety performance targets are being met.

#### **16.4 Target Coordination**

§ 673.15(a) – A State or transit agency must make its safety performance targets available to States and Metropolitan Planning Organizations to aid in the planning process.

Omnitrans will coordinate with the Southern California Association of Governments (SCAG) Metropolitan Planning Organization (MPO) for San Bernardino, and the California Department of Transportation (Caltrans) for the state requirements. Omnitrans will report to each agency, the maximum extent practicable.

#### **17.0 Facility Inspections**

§ 673.27(b)(2) – A transit agency must establish activities to monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

##### **17.1 Objective**

Omnitrans strives to enhance safety by performing facility inspections to identify potential hazards. All potential hazards are assessed for elimination or mitigating as outlined in Section F. Omnitrans Safety Risk Management. Omnitrans facilities inspections address the safety of passenger use areas, bus stops, shelters, and waiting areas. Criteria for locating and equipping customer areas are developed, including maintenance and security plans.

##### **17.2 Periodic Inspections: Omnitrans Transit Centers and Bus Stops**

Omnitrans Transit Centers and Bus Stops are subject to reviews and inspections by the Maintenance Department (Stops and Stations) with support from the Director of Safety & Security to verify that all facilities are well maintained and free of serious hazards. Activities performed by the Maintenance Department and the Safety and Security Department will consist of a combination of some or all the following:

1. Field inspections
2. Claims
3. Customer Service Safety and Security Complaints
4. Internal audits
5. Observations

## 6. Evaluations

Omnitrans Stops and Stations and Facility Maintenance has a Bus Stop Amenities Program that is responsible for maintaining and cleaning the bus service platforms and facilities. Omnitrans is accountable for security at these locations. Hazard identification and resolution at these facilities are coordinated as applicable.

### 17.3 Responsibilities

#### Omnitrans Maintenance Department (Stops and Stations) shall:

1. Perform Bus Stop maintenance. The Agency has different levels of amenities at bus stops based on ridership demand. Stops and Stations in partnership with various local cities will provide applicable maintenance and cleaning as stated:
  - a. Pressure washing, glass panel repair, graffiti removal, change out of customer information, etc.
  - b. Graffiti removal and pressure washing all benches.
  - c. The bus stops with trash cans need trash pickup, etc.
  - d. Perform inspections and provide Facilities Manager and Security Specialist of any deficiencies via email, phone, and Facilities Notifications.
2. Assign corrective actions for non-compliant items that need to be addressed.
3. Identify abnormal or unsafe trends.
4. Correct or address trends through investigation and solution activities.

#### Facilities shall:

1. Assign corrective actions in Trackit for non-compliant items that need to be addressed.
2. Perform repairs of all reported Facility Notifications.

#### The Safety, Security Department Staff shall:

1. Perform separate facility inspections/audits focused on facility safety, environment, and emergency preparedness items. These inspection/audits may overlap with facility maintenance oversight primarily performed by the Maintenance Department.
2. Perform internal “announced” monthly inspections, “un-announced” quarterly audits, and audits as contracted by an external auditor.
3. Perform quarterly inspections at all transit facilities and report findings to the Maintenance Department.
4. Communicate any findings to the Maintenance Department for review and proper assignment through a corrective action or Facilities Notifications (SAP work order).

#### Response to Unsafe Conditions

1. Discrepancies, potential hazards, or unsafe conditions discovered through inspections or other means should be resolved promptly through mitigation or maintenance action by the party responsible.
2. The Director of Safety & Security will notify the appropriate Directors, Managers, or Supervisors of any reported hazards for investigation and follow-up.
3. Omnitrans Facilities: A discrepancy or condition related to an Omnitrans facility, whether administrative, fleet maintenance, transit center, or maintenance and operations facility that does not present an immediate hazard or unsafe condition must be reported to the Omnitrans

Facilities Department who will forward to the appropriate contractor or Director for resolution.

#### **17.4 Inspections: Facilities Maintenance Activities**

Facilities Maintenance inspections ensure that effective maintenance activities are being performed for equipment and associated systems and structures. This practice applies to all parties performing inspections, maintenance, and repairs to Omnitrans transit, supporting vehicles, communication systems, and support structures. Inspections, audits, tests, maintenance, and repairs of items subject to this section are performed in compliance with standards set by the FTA, California Occupational Safety and Health Administration (Cal/OSHA), Occupational Safety and Health Administration (OSHA), National Fire Protection (NFPA), California Building Codes, etc., American Public Transportation Association (APTA) and with Omnitrans maintenance practices, procedures, and guidelines. For Omnitrans Bus Charging Stations, the maintenance and inspection services are provided through ABB a Connected Services Platform providing 24/7/365 network monitoring, remote updates, troubleshoot and onsite service within predefined response times.

#### **17.5 Tracking Corrective Actions to Conclusion**

Corrective actions are identified through Omnitrans inspections/audits and are entered into Trackit and tracked until completion. Hazards discovered through the contractor's inspection and maintenance process are corrected or removed through routine maintenance procedures.

If, for any reason, a hazard is determined unacceptable and cannot be resolved through the normal maintenance process, the equipment or structure is not returned to service, or service is restricted to the limits of a lower level of compliance until repairs are completed.

#### **18.0 Vehicle Maintenance Program**

Omnitrans Vehicle Maintenance inspections are used to verify that effective maintenance activities are being performed for equipment and associated systems and structures. This practice applies to all parties performing inspections, maintenance, and repairs to all Agency transit and supporting vehicles.

Inspections, tests, maintenance, and repairs of items subject to this section are performed in compliance with standards set by the FTA, Original Equipment Manufacturer (OEM), California Highway Patrol (CHP) Critical Item Inspection CII (Omnitrans maintenance policies, practices, and guidelines.), and Occupational Safety and Health Administration (Cal/OSHA) and with

Vehicle Inspections: Omnitrans Maintenance Department performs the following:

- 1. Operator's Daily Report (ODR) Review**

An authorized maintenance person reviews all pre-trip inspections, otherwise known as an Operator's Daily Report (ODR), to ensure all noted deficiencies are caught by transit Operations or maintenance staff and ensure all such defects are appropriately handled in accordance with corrective action procedures. Maintenance Supervisors generate work orders based on ODR entries.

- 2. Preventative Maintenance Vehicle Inspections (PMVI's)**

Maintenance conducts PMVI's every 10K miles.

- 3. A Critical Item Inspection (CII)** is conducted semimonthly and meets the California Highway Patrol inspection criteria.



## **18.1 Vehicle Preventative Maintenance**

Preventative maintenance and inspections are carried out at a minimum in accordance with the Original Equipment Manufacturer (OEM) recommendations. This process occurs every 10,000 miles and varies in complexity based on the mileage interval. Inspections include:

1. Brake inspection
2. Lube and oil filter
3. General inspection
4. Wheelchair ramp
5. Air conditioner
6. Electrical
7. Cooling
8. Compressed Natural Gas (CNG) and fire suppression
9. Farebox
10. Transmission
11. Differential and diaphragms

All inspections are documented and kept for three years. Specific details on the preventative maintenance programs are explained further in the Maintenance Manual that the Maintenance Department maintains. The California Highway Patrol (CHP) conducts an independent audit of the preventive maintenance program annually.

## **18.2 Battery Electric Bus (BEB) Repair**

BEBs possess simpler propulsion systems with fewer moving parts, generally requiring less regular mechanical maintenance than a traditional Compressed Natural Gas (CNG) bus. The recommended preventive maintenance inspections are on a 10K mile schedule with critical items inspected every two weeks. BEB buses require fewer brake replacements. A BEB does not require oil changes or filter changes; there is no air filter due to the lack of tailpipe emissions and no fuel/oil filter because neither fuel nor oil are used. However, BEBs do require antifreeze and power steering service.

These types of maintenance services require additional training for select mechanics, and all training was provided by New Flyer as stated:

- New Flyer BEB Maintenance Orientation – 8 hrs.
- New Flyer BEB Propulsion/ESS/HV Safety – 24hrs.
- New Flyer BEB/Vansco – 40hrs.
- New Flyer BEV Propulsion/ESS/Diagnostics – 40hrs.

In addition, all MTC personnel receive a general Battery Electric Bus (BEB) High Voltage (H.V) Awareness Orientation, and Emergency Response training for first responders to ensure streamlined response to BEB-specific emergencies. An Emergency Responder Guide is placed on all BEBs.

## **18.3 Vehicle Repair Personnel**

1. Omnitrans utilizes mechanics trained and explicitly evaluated regarding the maintenance of Agency vehicles. Only qualified mechanics perform maintenance on vehicles owned and operated



by Omnitrans. Omnitrans mechanics are encouraged to acquire Automotive Service Excellence (ASE) certifications to perform bus safety inspections.

2. The Operations and Maintenance Directors are responsible for ensuring that everyone performing inspections or maintenance is qualified as follows:
  - a. Understands the requirements outlined in Federal and State regulations and can identify defective components.
  - b. Is knowledgeable of and has mastered the methods, procedures, tools, and equipment used when performing maintenance and inspections.

#### **18.4 Quality Control Practice**

Supervisors conduct quality control inspections on vehicle repairs performed by mechanics.

#### **18.5 Non-Operation of Vehicles with Safety Problems**

All vehicles with identified safety problems are taken out of service until the safety-related issues are corrected.

#### **18.6 Data Tracking System**

The SAP database provides traceability and history on all vehicle repairs/inspections. In addition to a preventive maintenance scheduling and tracking capability, Omnitrans, under SAP, includes the following systems in vehicle maintenance management:

1. Cost Accounting - A system that tracks the labor and material costs attributable to each vehicle, class of a vehicle, and the total fleet.
2. Work Order Processing - A system that utilizes a sequentially numbered form to record a comprehensive description of the repairs chargeable against a specific vehicle, including the time required to complete the repairs and the parts utilized in the process. A Work Order is used in all cases, whether the work is contracted out or performed in-house. The types of work orders include repair, rework, and warranty.
3. Status Tracking - A system tracks each vehicle's history, including repairs, road calls, costs, mileage, configuration, component rebuilds, and inspections.

#### **18.7 Bus Safety Inspections**

Maintenance staff performs bi-monthly Critical Item Inspection (CII) on all buses operated by Omnitrans. Additionally, maintenance staff perform inspections and 10K mile preventative maintenance vehicle inspections (PMVI) on all buses operated by Omnitrans. Each bus receiving a safety inspection shall be checked for compliance with the requirements for safety devices and equipment as referenced or specified by all applicable guidelines. A CII inspection report will be prepared by the individual(s) performing the inspection and will include the following:

1. Identification of the individual(s) performing the inspection
2. The date of the inspection
3. Identification of the bus inspected
4. Identification of the equipment and devices inspected, including the identification of equipment and devices found deficient or defective
5. Identification of corrective action(s) for any deficient or defective items found and date(s) of completion of corrective action(s)
6. Records of safety inspections and documentation of any required corrective actions will be retained for a minimum of three years for compliance review

## **18.8 Pre-Trip Vehicle (Inspections)**

Omnitrans drivers conduct pre-trip inspections and ensure that all inspection areas are completed and documented. The daily pre-trip inspections apply to all agency vehicles.

## **18.9 Supporting Documentation**

### **1. Vehicle Maintenance Recordkeeping**

- a. Preventative Maintenance Vehicle Inspections (PMVI's) shall be maintained in the Maintenance Department office for a minimum of three (3) years.
- b. The Maintenance Department office will maintain all pre-trip inspection forms for a minimum of three (3) years.

### **2. Post Vehicle Accident/Incident Recordkeeping**

- a. When a transit vehicle is involved in an accident/incident in which the maintenance or inspection records could be used in the investigation or resolution of a claim, all maintenance and inspection records must be secured for future review. Omnitrans Human Resources Risk Management will direct this process.
- b. All records for the three (3) previous years before the incident date must be secured. The following methods will be used:
- c. Maintenance data is backed up to ensure the previous three (3) years of maintenance records are available for the vehicle in question.
- d. Paper documents (i.e., Pre-trip Inspections) for the vehicle in question are secured and labeled "Do Not Destroy or Transfer without the approval of the Maintenance Director and Human Resources Risk Management.
- e. If the vehicle in question is scheduled for disposal or sale, all records for three (3) years before the incident date must remain available to Omnitrans in anticipation of claim litigation.

### **3. Operator's Daily Report (ODR)**

All pre-trip inspection records (ODR's) shall be maintained in the Maintenance Department office for a minimum of three (3) years.

## **H. SAFETY PROMOTION**

### **19.0 Objective**

The Agency's goal is to achieve a high level of staff competency while meeting all regulatory requirements.

### **19.1 Training Program**

§ 673.29(a) – A transit agency must establish and implement a comprehensive safety training program for all agency employees and contractors directly responsible for safety in the agency's public transportation system. The training program must include refresher training, as necessary.

The agency's training plan outlines the requirements set forth by Omnitrans regulatory agencies. This plan sets the minimum training requirements for all agency employees, including mandatory and voluntary internal and external training. Detailed training programs are necessary to ensure policies, procedures, and programs are followed accordingly. Formal training programs entailing

in-class activities, curriculums, training manuals, lesson plans, field exercises, drills, computer-based training, written and video communications, and testing, have been established for Coach Operators, Operations Management, Dispatch, Safety & Security, Customer Service, Mechanics, and Facilities Maintenance personnel.

The training programs received by an employee are dependent on his/her job classification and the responsibilities of his/her position as determined by a Job Hazard Analysis (JHA). The training programs may also include on-the-job training that a supervisor monitors. Training efforts are first started at the initial stages of employment. They are continued periodically throughout an employee's employment to maintain certifications and ensure the employee can perform his/her duties safely and efficiently.

The agency's training plan outlines each Department's responsibility and lists the course requirements based on the employee's role at Omnitrans. Examples of training programs include, but are not limited to:

1. Environmental Health and Safety
2. Vehicle Operator
3. Maintenance training for various job classifications
4. Mechanics Technical
5. Equipment Operation
6. Americans with Disabilities Act (ADA) Laws and Regulations Compliance
7. Sexual Harassment Prevention
8. Injury and Illness Prevention
9. Customer Relations
10. Emergency Preparedness and Response Training including NIMS/ICS
11. Alcohol and Drug Abuse Policy
12. Bloodborne Pathogens
13. Hazard Communication
14. Hazard Identification and Risk Management Awareness
15. Causal and Root Cause Analysis
16. Accident and incident Investigations
17. Human Trafficking

Persons performing the following job functions are expected to have adequate training, qualifications, or certifications to complete their duties safely and effectively:

1. Operations Field Supervisors
2. Dispatch
3. Customer Service
4. Bus Vehicle Maintenance Employees
5. Facility Maintenance Employees
6. Safety and Security
7. Front Line Employees
8. Student Coach Operator Training Courses:
  - Student Coach Operator Manual
  - Fleet Safety and Training Instructors
  - National Safety Council Defensive Driving Course

- Coach Simulator
  - CO Performance Standards Handbook
  - Radio Procedures – Mobile Data Terminal (MDT)
  - Farebox
  - Video Query
  - Ride Check Evaluation
  - Human Trafficking
9. Battery Electric Bus (BEB) Coach Operators to Include training on: Proper charging, braking, and shut down, and for general understanding of the BEBs operation. Drivers are specifically trained on the differences between the CNG and Electric bus operation. Drivers are trained to know how Battery State of Charge (SOC) relates to range.
10. Employee Testing Program (ETP)
- DL 520 – Application for Employer Number
  - DL 814 – ETP Commercial Driving Performance Evaluation Route and Directions
  - DL 807 – ETP Commercial DPE Maneuver Checklist
  - ETP Primary Route Map # 2411-0003P
  - DL 260 – Transit Driver Training Record
  - ETP Primary Route Map # 2411-0003P
  - DL 260 – Transit Driver Training Record
  - DL 170 – Certificate of Driving Skill
  - SR 1 – Report of Traffic Accident Occurring in California
  - How to Burn and Wrap Video
  - DMV Brake Check, Pre-Trip Inspection & Skills Test
  - American with Disabilities Act of 1990
  - CNG Fuel Safety Awareness
  - De-escalation
  - Portable Fire Extinguishers
  - Bloodborne Pathogens
  - Hazardous Communications
  - Ergonomics
  - Heat Illness Training Program
  - Back Posture
  - Cyber Security
  - Active Shooter
  - ODR Completion Instruction Worksheet
11. Annual Training Certificate Renewal (ATCR) Classes:
- Annual Training Certificate Renewal (ATCR) Classes
  - DL260 - Transit Training Record
12. Battery Electric Buses Mechanics
- New Flyer BEB Maintenance Orientation – 8 hrs.
  - New Flyer BEB Propulsion/ESS/HV Safety – 24hrs.
  - New Flyer BEB/Vansco – 40hrs.
  - New Flyer BEV Propulsion/ESS/Diagnostics – 40hrs.

## 19.2 Voluntary Bus Safety Certification Training Program

As part of Omnitrans' comprehensive training program, the agency has chosen to incorporate Under the rule, 49 CFR Part 672, the Safety Promotion component of Safety Management Systems (SMS). Only select employees will complete and maintain training requirements as outlined in Public Transportation Safety Certification Training Program. These include but are not limited to all agency employees and contractors directly responsible for safety in the agency's public transportation system must complete both initial and annual refresher training.

FTA's voluntary Bus Safety Certification Training Program curriculum will include the following courses:

1. Effectively Managing Transit Emergencies
2. Transit Bus System Safety
3. Fundamentals of Bus Collision Investigation
4. SMS Awareness
5. SMS Safety Assurance
6. SMS Principles for Transit

## 19.3 Safety Communication

§ 673.29(b) – A transit agency must communicate safety and safety performance information throughout the agency's organization that, at a minimum, conveys information on hazards and safety risks relevant to employees' roles and responsibilities and informs employees of safety actions taken in response to reports submitted through an employee safety reporting program.

Effective communication is an essential requirement of the ASP to ensure and demonstrate closed-loop communication (lessons-learned) and as a part of the continuous improvement of the ASP throughout the Agency, to all its employees, directors, managers, and executives, as well as contractors, and the Board of Directors. Omnitrans communications methods vary but will comprise both internal and external communication/awareness.

**Internal Communication** Internal communication/awareness may be accomplished using:

1. Live Streaming TV
2. Management Meetings
3. Employee reporting systems
4. Departmental Meetings
5. Agency Safety & Security Committee Meetings
6. Safety & Security Newsletters
7. All Hands Meetings
8. Safety and Security Intranet
9. Employee Handbooks
10. Employee Mailboxes
11. Signature of Receipt
12. New Hire Training
13. Safety and Security Training
14. Safety & Security Communication Boards
15. Regular training sessions or email communications

Omnitrans Chief Safety Officer (CSO), with support from departmental staff, is responsible for worksite-specific internal Safety communication with assistance from the senior management. Worksite communication consisting of ad hoc and regularly established activities designed to communicate and reinforce the Agency Safety Plan (ASP) and SMS related elements to all affected employees, to include:

1. Conformance and the potential consequences of non-conformance with ASP, SMS processes, or procedures.
2. Information about hazards and safety risks and what actions are taken in response to reports submitted through the employee safety reporting program.
3. Explanations of changes to ASP requirements, policies, activities, or procedures.
4. Individual roles and responsibilities in achieving conformance with the ASP.
5. Risks associated with work activities revealed from ASP data.
6. Relevant output from management ASP reviews.
7. Local/site reported hazards/near-misses and incidents.
8. Agency hazards/near-misses and incidents of note and relevance.
9. ASP performance data.
10. Key results of internal/external assessments and audits.

In addition to the items mentioned above the CSO will be responsible for all internal ASP, SMS communication and maintain a respective intranet site. Additionally, the director will liaise with other departments to respond to ASP-related inquiries from regulatory authorities.

**External Communication:** Omnitrans shall determine that significant risks identified through the ASP operation, SMS will not be communicated to the general public unless required by federal, state, or local regulations. Information regarding general Agency operation and specific risks identified will be communicated to the appropriate governing body as required only.

The Director of Marketing and Communications is responsible for media communications regarding ASP, SMS issues and in consultation with the Directors of Safety & Security, and Human Resources, when relevant.

## I. OMNITRANS SYSTEM MODIFICATION PLAN

### **20.0 Managing System Modifications and Change**

§ 673.27(c)(1) – A transit agency must establish a process for identifying and assessing changes that may introduce new hazards or impact the transit agency’s safety performance.

§ 673.27(c)(2) – If a transit agency determines that a change may impact its safety performance, the transit agency must evaluate the proposed change through its safety Risk Management Process.

#### **20.1 Objective**

Omnitrans is implementing a structured Management of Change (MOC) process through monday.com application software. The Agency will follow this online process to review all proposed

changes to equipment, raw materials, processes, and procedures before the changes are implemented to evaluate the impact and risks associated with the change.

Project plans for system modifications to transit operations, maintenance, or infrastructure will include a safety element that addresses the projects' overall impact on employees and passenger's safety and a safety plan to be followed during the construction and implementation of the project. The online system modification review process will identify and analyze current or new technologies, systems, or processes to mitigate or eliminate hazards and resulting risks identified by a risk-based hazard analysis. These risks will be recorded and tracked in Omnitrans Trackit system.

For purposes of management of change, the changes that must be addressed include but are not limited to:

1. Activity changes (e.g., changes to processes, equipment, infrastructure, software)
2. Regulatory requirements
3. Audit results
4. City or regional planning
5. Service environment
6. New technology
7. Organizational changes (e.g., personnel or staffing changes)
8. Material changes (e.g., new chemicals, storage, packaging)
9. Changes to the EHS management system (e.g., procedures, training, audits)

## **20.2 Responsibilities for the Management of Change Process**

To ensure that proposed designs meet safety and security requirements and are consistent with the needs of the Agency, the Management of Change (MOC) process will be the responsibility of the Project Managers and the MOC Committee. The MOC Committee will perform internal reviews and be responsible for the approval/disapproval of all online submitted MOC requests before changes are made. Project Managers will be trained in the purpose and how to use the MOC process online.

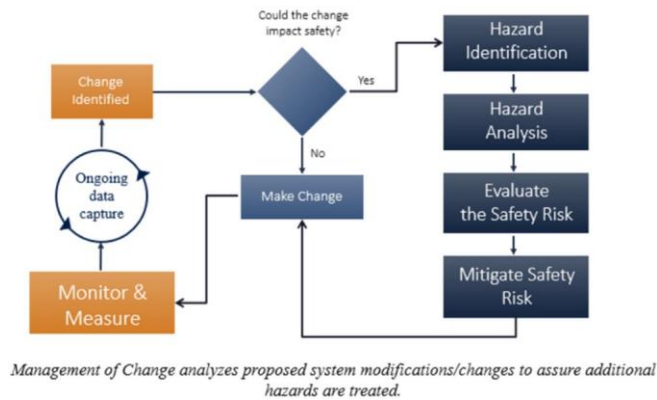
## **20.3 MOC Review Committee “Objectives.”**

Members will serve on the online review committee to determine those operations and activities associated with the identified hazard(s) where the implementation of controls is necessary to manage. Members will be notified online when a project is ready for review. MOC committee decisions will be directed back to the Project managers through the online reporting system. The MOC Review Committee supported by the CEO/GM will make the final approval or denial decisions. The MOC requirements will include the following important concepts:

1. System Analysis of a request for change.
2. Impact analysis to identify the hazards associated with “change.”
3. Assessment of the risks associated with “change.”
4. Consideration of all hazards and risks before the introduction of the “change.”
5. Implementation of the controls needed to address the hazards and risks associated with the “change.”
6. Monitor and Measure.



## Evaluating Change



## J. PROCUREMENT

### 21.0 **PROCUREMENT STANDARDS CRITERIA**

Omnitrans Procurement policies spell out all necessary steps to ensure that purchased vehicles are appropriate for the intended use. The manufacturer and vendor meet all federal, state, and local safety laws and regulations at the time of vehicle purchase.

1. The Safety and Security Department provides basic safety and security user requirements, and the Project Managers include them in procurement contract specifications and coordinate with appropriate offices. A new facility, system, hazardous materials, supplies, or equipment specifications are proposed, responding contractors are required to resolve any identified hazards.
2. Specifications include the requirement that contractors who provide systems, subsystems, or equipment that affect the safe movement of vehicles or passenger/employee safety, establish, and maintain a system safety program in accordance with an Omnitrans-approved system safety procedures, which defines objectives, tasks, processes, schedules, and data submittals for the safety activities that the contractor will perform. The contractor's system safety program plan and supporting documentation will be reviewed and approved by Omnitrans Project Manager and the Safety, Security Department.

#### 21.1 Responsibilities

1. Project Managers and Departmental Directors have primary responsibility for ensuring that the Procurements is in accordance with Omnitrans Safety & Security processes and procedures.
2. All departments are instructed to include a review of such proposals by the Safety & Security Department and to follow all Safety Procedures as well as Policies/Instruction issued by the Procurement staff regarding the storage, distribution, and issuance of hazardous materials, chemicals; and any changes made to such products being delivered.

#### 21.2 Procurement of Chemicals and Hazardous Materials

1. All chemicals and hazardous materials must be pre-approved by the Safety & Security Department and include the Safety Data Sheet (SDS) before purchase and use by employees, Contractors, and Sub-Contractors on agency property.

2. The use of Purchase Cards to procure chemicals and hazardous materials is not permitted by the Agency.
3. Any changes to contracts for the delivery of chemicals or hazardous material must be pre-approved by the Project Manager and Safety & Security Department before the change.

### **21.3 Inspection of Contractor Equipment**

1. Vehicles, Work, and Deliverables

All equipment and vehicles which a contractor intends to use in any facility or upon any Agency property must be evaluated and approved by the assigned Project Manager (PM), acknowledged by the Contract Administrator, and subject to review and approval by the PM and Safety & Security Department before use. The extent of an inspection varies with the contract and the product or service procured. At a minimum, the Project Managers and Omnitrans Parts Materials Manager are required to inspect contractor deliveries to determine whether:

- a. The proper type or kind of supplies was provided
- b. The correct quantity of supplies was provided
- c. Any changes or deviations from contract requirements exist
- d. The product operates as intended
- e. The item is identified correctly or marked

2. Inspection Methods of the contract deliverables by the Project and Parts Managers include:

- a. Sensory and dimensional checks
- b. Performance or physical tests
- c. Quality tests

3. Nonconformance with the contract specifications is unacceptable if it adversely affects:

- a. System safety, or the safety and health of the product user
- b. Reliability, durability, or performance
- c. Interchangeability of parts or assemblies
- d. Any other basic objective of the contract

### **21.4 Materials Management**

1. Materials Management System: maintains track of:

- a. Parts and component inventories
- b. Parts and component usage patterns
- c. Warranty programs
- d. Purchases and receipts
- e. Part costs

2. Quality Control System: The system incorporates or causes the incorporation of a quality control system that controls the quality of parts and component assemblies by:

- a. documenting the configuration of parts and component assemblies; including descriptions in purchase orders,
- b. by inspecting the parts and component assemblies for compliance, quality, and function before installation in the Agency's buses,
- c. providing traceability and history of the inspection, acceptance, or rejection process, and
- d. ensuring traceability and history of the inspection, acceptance, or rejection process.

3. Tracking System: In addition to a preventive maintenance scheduling and tracking capability, the transit system includes the following systems in the management of its repair operations:
  - a. Failure Monitoring: tracks the component failures for each vehicle, reports frequency by type of repair, and tracks road call types and frequencies.
  - b. Maintenance and Repair Quality Monitoring: compiles and tracks part and component assembly acceptance and rejection information, compiles and tracks inspections of maintenance and repair work.

#### LIST OF DEFINITIONS AND ACRONYMS USE

1. ACCESS: Omnitrans Access Service is an Americans with Disabilities Act (ADA) mandated public transportation service for people unable to use the fixed-route bus service independently
2. Americans with Disabilities Act (ADA)
3. California Environmental Protection Agency (CalEPA)
4. California Air Resources Board (ARB)
5. California State Water Resources Control Board (CSWRCB)
6. Certified Unified Program Agencies (CUPA)
7. Chief Safety Officer (CSO)
8. Clean Water Act (CWA)
9. Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
10. Department of Toxic Substances Control Act (DTSC)
11. Emergency Planning and Community Right-To-Know Act (EPCRA)
12. HAZMAT Hazardous Materials Management
13. Incident Command System (ICS)
14. Management of Change (MOC)
15. Medical Waste Management Act (MWMA)
16. National Incident Management Systems (NIMS)
17. Noise Control Act (NCA)
18. Pollution Prevention Act and Superfund Amendments and Reauthorization Acts (SARA)
19. Prevention, Control and Countermeasure (SPCC), Spill response, cleanup, and investigation
20. Public Health San Bernardino California (PHSBC)
21. Resource Conservation and Recovery Act (RCRA)
22. Request for Proposal (RFP)
23. Root Cause Analysis (RCA)
24. Safety Risk Management (SRM)
25. South Coast Air Quality Management District (SCAQMD)
26. Spill Prevention Control and Countermeasure (SPCC)
27. Storm Water Pollution Prevention Plan (SWPPP)
28. National Transportation Safety Board (NSTB)
29. United States Environmental Protection Agency (USEPA)
30. WeTIP: provides the most effective, anonymous citizens crime reporting hotline and text-based system in the nation. WeTip promises and ensures absolute anonymity, not just confidentiality. WeTip provides intelligence and information to local, state, federal, and international law enforcement agencies on criminal activity obtained from an online and telephone crime reporting hotline.