

# PART I — StaFull COMPLIANCE MATRIX

*Regulation → Requirement → How StaFull Satisfies It*

---

## U.S. DOT — Hazardous Materials & Vehicle Safety

Regulation	Requirement	StaFull Compliance Method
49 CFR §171.8	Defines bulk vs non-bulk packaging	All tanks are ≤ <b>119 gallons</b> (25–100 gal), legally classified as <b>non-bulk packaging</b>
49 CFR §172 Subpart F	HazMat placarding thresholds	No placards required; StaFull never exceeds bulk thresholds
49 CFR §173.150–155	Transport of flammable liquids	StaFull operates under flammable liquid exceptions with non-bulk containers
49 CFR §173.6	Materials of Trade limits	Aggregate quantities and per-container limits engineered to remain compliant
49 CFR §177.834(a)	Attendance during unloading	Driver attendance enforced by SOP + AI camera
49 CFR §177.823(a)	Fire extinguisher	Minimum 20-B:C extinguisher onboard every unit
49 CFR §393.65 / §393.67	Fuel system safety	Professionally mounted tanks, secured pumps, protected hoses
49 CFR §393.100–106	Cargo securement	Tank mounting & hardware meet federal securement standards
49 CFR §383.93(c)	CDL-HazMat endorsement	Not required due to non-bulk packaging design

---

## EPA — Environmental Protection

Regulation	Requirement	StaFull Compliance Method
40 CFR Part 112	SPCC plans above 1,320 gal	StaFull stays below threshold; SOP mirrors spill-response requirements

<b>40 CFR §110.3</b>	No discharge into waterways	SOP prohibits fueling over storm drains or standing water
<b>40 CFR Part 63 Subpart CCCCCC</b>	Gasoline vapor control	VR-capable hose/nozzle + carbon vapor filtration
<b>Clean Air Act §182(b)(3)</b>	Vapor recovery in non-attainment areas	Hardware compatible with Stage I/II where required

---

## NFPA — Fire & Fuel Safety

Code	Requirement	StaFull Compliance Method
<b>NFPA 30</b>	Flammable liquid handling	Bonding, grounding, ignition control built into SOP
<b>NFPA 30A §7.3–7.4</b>	Mobile fueling rules	Zero-Drip SOP fully aligned
<b>NFPA 30A §7.4.5.1</b>	No fueling near drains/water	Mandatory site verification + driver lockout
<b>NFPA 30A §7.4.8</b>	Spill containment	Spill trays + absorbent kits required
<b>NFPA 30A §7.4.9</b>	Attendance during fueling	AI-verified driver presence
<b>NFPA 407 §4.3.7</b>	Bonding	Bonding cable required before fueling
<b>NFPA 407 §5.12</b>	Hose/nozzle integrity	Certified hoses and nozzles only
<b>NFPA 10</b>	Fire extinguishers	Extinguisher onboard and inspected

---

## International Fire Code (IFC)

IFC Section	Requirement	StaFull Compliance Method
<b>§5706.5.4</b>	Mobile fueling unit operations	Unit design + SOP meet IFC criteria
<b>§5706.5.4.5</b>	Safe fueling locations	Address & slope verification in app
<b>§3405.2.4</b>	Dispensing restrictions	No fueling over drains or unstable surfaces
<b>Chapter 50</b>	Hazardous materials controls	SOP, spill kits, PPE, ignition control

---

# OSHA — Worker Safety

Regulation	Requirement	StaFull Compliance Method
29 CFR §1910.106	Flammable liquids handling	SOP enforces compliant handling
29 CFR §1910.132–138	PPE	Gloves, eye protection, hi-vis mandatory
29 CFR §1910.120	Hazardous waste	Not applicable due to zero-drip design

---

# State & Local Fire Marshal Rules

Authority	Requirement	StaFull Compliance Method
WA WAC 212-12	Fire Marshal authority	Permitting + inspection readiness
WAC 296-24-330	Flammable liquids	SOP aligns with state adoption
WAC 173-400	Air quality	Vapor control compliance
CA Title 17 CCR	Vapor recovery	Hardware already CARB-compatible

---

# Franchise & Business Law

Regulation	Requirement	StaFull Compliance Method
FTC Franchise Rule (16 CFR 436)	FDD & disclosures	Holdings Portal document vault
State Franchise Laws	Registration where required	Regional board compliance tracking

---

# Data, Payments, Privacy

Law	Requirement	StaFull Compliance Method
PCI-DSS	Secure payments	Stripe-managed compliance
CCPA / CPRA	Consumer data rights	RBAC, encryption, audit logs
GLBA (as applicable)	Financial data protection	Secure banking integrations

---

# PART II — LEGAL OPERATIONS MANUAL

## CHAPTER

### *StaFull Fueling Operations, Safety, and Regulatory Compliance*

---

## Section 1 — Purpose & Authority

This chapter establishes the **mandatory operational, safety, and regulatory requirements** governing all StaFull fueling activities across residential, workplace, and fleet services.

Compliance with this chapter is **non-optional** and applies to:

- StaFull Holdings
- All franchisees
- All drivers
- All equipment
- All delivery locations

Failure to comply constitutes grounds for suspension or termination.

---

## Section 2 — Regulatory Framework

StaFull operations are governed by:

- U.S. DOT (49 CFR Parts 171–177, 383, 393)
- EPA (40 CFR Parts 110, 112, 63)
- NFPA 30, 30A, 407
- International Fire Code (IFC)
- OSHA (29 CFR 1910)
- State and local Fire Marshal rules
- Insurance underwriting requirements
- FTC Franchise Rule

StaFull SOPs are written to **meet or exceed** the strictest applicable standard.

---

## Section 3 — Equipment Compliance

All StaFull units must:

1. Use only **non-bulk tanks ≤119 gallons**
2. Remain under DOT hazardous thresholds
3. Use certified pumps, hoses, and nozzles
4. Include bonding cables, spill trays, absorbents
5. Carry approved fire extinguishers
6. Pass inspection and maintenance schedules

Unauthorized modifications are prohibited.

---

## Section 4 — Driver Operational Controls

Drivers may only operate within four system-locked modes:

1. **Resupply Mode**
2. **Driving Mode**
3. **Parked Mode**
4. **Delivery Mode**

Fuel flow is enabled **only** in Delivery Mode after SOP verification.

---

## Section 5 — Fueling Site Requirements

Fueling is prohibited if any of the following exist:

- Storm drains or water within fueling zone
- Standing water
- Excessive slope or instability
- Active ignition sources
- Unsafe pedestrian conditions
- Non-compliant employer zones

Drivers are required to abort delivery if conditions are unsafe.

---

## Section 6 — Zero-Drip SOP Enforcement

All fueling requires:

- PPE
- Bonding
- Spill tray deployment

- Correct nozzle selection
- AI camera verification
- Continuous driver attendance
- Zero-drip confirmation

These steps are enforced by the Driver App and AI systems.

---

## **Section 7 — Spill & Incident Response**

Any spill:

- Must be immediately contained
- Logged in the system
- Reported per volume thresholds
- Reviewed by Regional Safety Lead
- Escalated to Holdings if required

Spills  $\geq 1$  gallon trigger mandatory reporting review.

---

## **Section 8 — Oversight & Audit**

StaFull Holdings maintains:

- Continuous AI monitoring
- Audit logs for every delivery
- Compliance score tracking
- Equipment inspection records
- Franchise performance oversight

Records are retained for regulatory, insurance, and legal review.

---

## **Section 9 — Supremacy Clause**

In the event of conflict:

1. Federal law prevails
2. State/local law next
3. StaFull SOPs supersede franchise discretion

No franchisee or driver may override safety or compliance rules.

---

## **Section 10 — Enforcement**

Violations may result in:

- Immediate suspension
  - Retraining
  - Financial penalties
  - Franchise termination
  - Reporting to authorities if required
-