

# NATIONAL TRANSPORTATION SAFETY BOARD - Public Hearing

GROUP 5

EXHIBIT

M

Conrail Derailment in Paulsboro, NJ with Vinyl Chloride Release

Agency / Organization

**CONRAIL** 

Title

# Conrail Guidelines for Conducting Efficiency Checks

Docket ID: DCA13MR002



# SUPERVISORS GUILDLINES FOR CONDUCTING EFFICIENCY CHECKS AND ACCESSING THE RULES PROGRAM

**Revised 12/2010** 



# CONRAIL

# THE PROGRAM

This booklet provides basic guidelines and establishes minimum requirements for the quality and type of efficiency checks to be conducted when monitoring compliance with:

- NORAC Operating Rules
- Conrail Safety and General Conduct Rules
- NS-1 Equipment Operation and Handling Rules
- HM-1 Hazardous Materials Rules
- Conrail Timetable and Special Instructions

Supervisors will be expected to conduct and record checks to ensure compliance with rules having application to their territory. Quality checks are of paramount importance. Prior to conducting efficiency checks, supervisors must receive appropriate field training and demonstrate proficiency in conducting each operational test the supervisor is authorized to conduct. Quality checks must be conducted:

- · at various times
- · on various dates
- · at various locations
- · on weekends and holidays
- on safety sensitive rules
- for procedural compliance with the rules



# CONRAIL

# SUPERVISORS GUIDELINES FOR CONDUCTING EFFICIENCY CHECKS AND ACCESSING THE RULES PROGRAM

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#### GENERAL NOTICE

Conrail's Efficiency Check Program is required by federal regulations at 49 CFR Part 217.9 and its intended purpose is to establish and maintain a safe and efficient work environment for all employees. Officers will conduct tests in accordance with Conrail's Efficiency Check Program, provide for operational testing and inspection under the various operating conditions on the railroad and paying particular emphasis on those operating rules that cause or are likely to cause the most accidents or incidents, such as those accidents or incidents identified in the quarterly reviews, six month reviews, and the annual summaries done by the Administrator of the Efficiency Check Program. Checks are to be conducted in a fair and impartial manner, and under no circumstances will the Efficiency Check Program be used as a tool for harassment. As a matter of practice, officers involved in efficiency testing should periodically commend employees when they consistently demonstrate proper knowledge and understanding of operating rules and instructions. On the other hand, an employee found in violation of an operating test or inspection must be advised of the noncompliance and corrective action must be taken as soon as possible without compromising efficiency check activity. The integrity of the program will rest with the principle and judgment of each officer, and they will be expected to maintain Conrail's policy for handling such matters in a fair but firm manner.

The following guidelines will become effective January 15, 2011. A copy will be provided to each officer whose duties include conducting efficiency checks.



# Quality testing is of paramount importance.

A large number of checks for compliance with a single rule is less effective than a smaller quantity for a number of rules. Checks are to be conducted at various locations and times. A substantial number of checks will be made on weekends and holidays.

# Types and methods of Efficiency Checks

The following outlines the types and methods of efficiency checks authorized on Conrail:

(a) <u>Saturation Rule Checks</u> will be conducted on specified territories at specified times in accordance with instructions issued by the appropriate senior management. Teams will consist of at least 2 officers, but no more than 3 officers, designated by the Superintendent, Assistant Superintendent, or Department Head.

Saturation Rule Checks will cover a 24-hour period but the team will not remain on duty an unreasonable length of time without rest. If a team is short of the required checks within the 24 hours, the team captain should forward an explanation to the Superintendent's office, with a copy to the Administrator of the Efficiency Check Program within 5 days of the complication of the Saturation Rule checks. Saturation Rule checks reports will be furnished by the team captain to the Administrator of the Efficiency Check Program and the appropriate Superintendent. Officers will enter all Saturation Rule checks into the system by keying the letter "S" into the "Type of Test" field on the Efficiency Check input screen. The program will automatically record and report saturation rule checks as "Tests."



- \* Note A test indicates the Saturation or Planned check results from one of the following:
- 1. An operating condition that the reporting officers cause to exist, e.g., setting a signal in Stop position, placement of a banner, etc.
- 2. Monitoring compliance with specific rules, e.g., Rule G, etc., by reporting officer(s) at a given location.
- 3. Speed checks conducted by one or more officers using radar.
- (b) Planned Checks are defined as any check other than a Saturation, Banner or Blitz rule check when conducted by one or more officers who are at a specific location for the purpose of monitoring compliance with one or more rules. Planned Checks will be conducted on specific territories on a regular basis in accordance with instructions issued by the Administrator of the Efficiency Check Program. Thirty percent of all planned Checks must be conducted between 10:00 p.m. and 6:00 a.m. except when the duty assignment of a particular officer makes compliance impractical. Officers will enter all Planned rule checks into the system by keying the letter "P" into the "Type of Test" field on the Efficiency Check input screen.

  The program will automatically record and report planned checks as "Tests"
- (c) <u>Blitz Checks</u> are defined as any checks that were ordered by the Department Head, Superintendent or Asst. Superintendent. Officers will enter all Blitz rule checks into the system by keying the letter "B" into the "Type of Test" field on the Efficiency Check Input Screen. The program will automatically record and report Blitz rule checks as "Tests."



# **Checks on Dispatchers and Operators**

Dispatchers and Operators are instrumental in providing for the following areas: The safe movement of trains, locomotives, on-track equipment and for protection of roadway workers. In addition to monitoring compliance with all rules and instructions having application to a given territory, officers must emphasize monitoring dispatcher and operator rules compliance in the following areas:

Authorities governing the movement of trains, locomotives and on-track equipment.

Radio and wireless communication procedures.

Protection of on-track equipment and the transmission of mandatory directives.

# **Reporting Categories**

Conrail's Efficiency Check Program is divided into fifteen reporting categories. The number of checks required by each officer may vary at the discretion of the Administrator of the Efficiency Check Program when their duty assignment makes compliance impractical or incidents have happened on his or her territory that calls for more or less checks in a specific category (derailments, run thru switches, injuries, etc.)

#### **Rules Table Abbreviation**

N: NORAC Operating Rules

A: NS-1 Equipment Operation and Handling Rules

H: Hazardous Materials Rules

S: Conrail Safety and General Conduct Rules

T: Conrail Timetable and Special Instructions



# REPORTING CATEGORIES

# **CATEGORY 1**

# Signals indicating Stop

# Rules Table:

N14 N2140 N241 N241A N241B

N241c N241d N241e N291 N292

# **PURPOSE:**

Evaluate crew members' ability to:

- Comply with Stop signal indications
- Stop train or engine short of a Controlled Signal or an Automatic Block Signal displaying a Stop indication

# **PREPARATION:**

- Advise Control Station unless included in the check
- Secure extra Event Recorder Data Pack Cartridges and/or PC Memory Cards
- · Calibrate radar gun
- Determine location of train(s) or engine(s)
- Review Track Chart
- Review Train Consist
- Review Crew Management Records

- Apply track shunts
- Verify signal aspects (Stop)
- Take a position which permits observation
- · Determine that movement stops short of signal or banner
- · Remove track shunts after test



# **Movements at Restricted Speed**

#### Rules Table:

N107 N402A N425 N501 N502 N502A N502B N550 N562 N562A N562B N562C N562E N562F N80 N96 N97 N98 NBanner

# PURPOSE:

Evaluate crew members' ability to comply with Restricted Speed. Stop train or engine short of an Obstruction Banner

#### PREPARATION:

- Advise Control Station unless included in the check
- Determine location of train(s) or engine(s)
- · Calibrate radar gun
- Review Track Chart
- Review Train Consist
- Review Crew Management Records
- Secure extra Event Recorder Data Pack Cartridges and/or PC Memory Cards

- Signaled territory
- Apply track shunts
- Verify signal aspects
- Erect Obstruction Banner, if applicable
- Take position which permits observation
- Remove track shunts after test
- Non-signaled territory and non-controlled track
  - Confirm conditions exist requiring Restricted Speed
  - Erect Obstruction Banner, if applicable
  - Take position which permits observation,



# **Speed Restrictions**

# Rules Table:

N124 N285 N286 N288 N290 N99

# PURPOSE:

Evaluate crew members' ability to operate trains or engines within the authorized speed.

# PREPARATION:

- Calibrate radar gun
- · Verify authorized speed, i.e., timetable, temporary, curve, equipment
- · Secure copy of the current Train Clearance
- Determine location of train(s) or engine(s)
- Secure extra Event Recorder Data Pack Cartridges and/or PC Memory Cards
- Review Track Chart
- Review Train Consist
- Review Crew Management Records

- Utilize radar gun
- Analyze Event Recorder printouts



# Movement on a main track within Yard Limits

# **Rules Table:**

N93

# **PURPOSE**:

Evaluate crew members' ability to operate trains or engines within yard limits.

# PREPARATION:

- Calibrate radar gun
- Verify authorized speed, i.e., timetable, temporary, curve, equipment
- Secure copy of the current Train Clearance
- Verify permission to occupy
- Determine location of train(s) or engine(s)
- Secure extra Event Recorder Data Pack Cartridges and/or PC Memory Cards
- Review Track Chart
- Review Train Consist
- Review Crew Management Records

- Utilize radar gun
- Analyze Event Recorder printouts if applicable



# **Switching Operations**

# Rules Table:

N100 N101 N102 N103 N104 N104A N104B N104C N104D N104E N104F N104G N104H N104 N104J N104K N105 N105A N105B N105C N105D N106 N106A N106B N109 N109A N109B N116

# PURPOSE:

Monitor crew members' compliance with rules governing shoving movements, switching, securing equipment, and handling switches and derails.

# PREPARATION:

- Secure operable railroad radio
- Secure copy of the current Train Clearance
- Determine location of train(s) or engine(s)
- · Secure signaling equipment
- · Secure copy of Work Order

# PROCEDURE:

Direct observation of switching operations



# **Blue Signals**

# Rules Table:

N16 N16A N16B N16C N16D N16E

# **PURPOSE**:

Monitor compliance with rules governing blue signal protection when required for personal safety.

# **PREPARATION:**

• Secure operable railroad radio

• Determine type of blue signal protection required for personal safety.

- Determine type of blue signal protection established
- Direct observation of employees
- Direct observation of blue signals, switches, derails, etc.
- Direct observation of Control Operators and records



# Rules for Equipment Operation and Handling Publication NS-1

# **Rules Table:**

AA-1 AA-12 AA-13 AA-14 AA-15 AA-16 AA-17 AA-18 AA-1b1 AA-1b2

AA-1b3 AA-1f AA-20.2 AA-21.1 AA-22 AA-24 AA-27 AA-29 AA-31.2

AA-31.4 AA-31.5.4 AA-31.6 AA-31.7 AA-35 AA-35.2 AA-35.3 AA-35.4

AA-4 AA-5 AA-6 AA-6.1 AA-6.2 AA-6.3 AA-7 AA-8 AC-100 AC-102

AC-104 AC-105 AL-201 AL-201.4 AL-204 AL-205.5 AL-217 AL-230

AL-236 AL-238 AI-240 AL-242 AL-251 AL-252 N108

#### **PURPOSE:**

Monitor compliance with rules governing air brake tests, freight car inspections, and train/equipment handling.

# **PREPERATION:**

- Secure operable railroad radio
- Secure air gauge
- Secure extra Event Recorder Data Pack Cartridges and/or PC Memory Cards
- Determine location of crews

- Direct observation of employees
- Direct observation of equipment
- Ride trains
- Review event recorder printouts
- Review voice recorder tapes



# **Hazardous Materials**

# Rules Table:

H2.1 H2.2 H2.3 H2.4 H2.5 H2.6

H5.1 H5.2 H5.3 H5.4 H6.1 H6.2

H6.3 H6.4 H7.1 H7.2 H7.3 H7.4 N119A

# **PURPOSE**:

Monitor compliance with rules governing the documentation and the handling, switching, and position in train of cars containing or last containing hazardous materials.

#### PREPARATION:

- Secure operable railroad radio
- Determine location of train(s) or engine(s)
- Secure copy of the train consist, switch list, work order, etc.

- Direct observation of
  - Employees
  - Train placement
  - Documentation
- Placards
- Hazardous Materials cars
- Switching



# Rule G

# Rules Table:

NG

S2.3

# **PURPOSE**:

Monitor employees to determine that they are fit for duty:

- No symptoms of impairment or unusual behavior due to alcohol and/or drugs
- No evidence of possession of any prohibited substance

# **PREPARATION:**

 Be knowledgeable of the signs and symptoms of alcohol and/or drug impairment

# PROCEDURE:

 Observe employees when reporting for duty and during the course of their duty



# Form D Control System

# Rules Table:

N160 N161 N162A N162B N163 N164 N165 N165A N165B N165C
N166 N167 N168 N169 N170 N171 N172 N173 N174 N175 N176
N177A N177B N400 N400A N400B N400C N400D N401 N401A N401B
N402C N403 N405 N406 N406A N406B N406C N406D

#### PURPOSE:

Monitor compliance with requesting, transmitting, copying, repeating, and complying with Form D Control System.

# PREPARATION:

- · Secure operable railroad radio
- Determine location of train(s) or engine(s)

- Review of Track Authority Forms
- · Observations in the field
- Monitor radios
- Ride trains
- Review of voice recording tapes



# ROADWAY WORKER PROTECTION

# Rules Table:

N133 N135 N135A N140 N141 S10.2 S10.3.2 S10.5.2 S10.5.5 S10.6.1 S10.7.3 S10.7.4 S10.9 S4.9 S9.35 T143.1 T143.2

PURPOSE:

Monitor compliance with rules establishing minimum safety standards for the protection of Roadway Workers.

# PREPARATION:

- · Secure operable railroad radio
- Determine location of Roadway Workers
- Determine type of On-Track safety procedure required

- Direct observation of Roadway Workers
- Determine type of On-Track safety procedures in effect
- · Review working limit authority



# **On-Track Equipment**

# Rules Table:

N800 N801 N802 N803A N803B N804 N805 N806 N807A N807E

N807c N807d N808 N809 N810 N811 N812 N813 N814 N815

N816

PURPOSE:

Monitor compliance with rules governing the use and operation of On-Track equipment.

# PREPARATION:

- · Secure operable railroad radio
- · Determine location of On-Track equipment
- · Have Stop Obstruction Banner accessible
- · Have radar gun accessible and calibrated

- Direct observation of the operation of On-Track equipment
- Review movement authority
- · Erect Stop Obstruction Banner, if applicable



# Other Rules and Instructions

# Rules Table:

All rules imputed not showing on the above category graphs 1-14 will fall under the Other category.

# PURPOSE:

Monitor compliance with all Rules not contained in Categories one thru fourteen.

# PREPARATION:

- · Secure operable railroad radio
- Determine location of train(s) or engine(s)
- Review Track Chart
- Review Train Consist
- Review Crew Management Records

# PROCEDURE:

Direct observation of employees



# **Critical Rules**

 Rules Table:

 N711
 S2.2

 S9.2.1
 S9.3

 S9.4
 S9.4.

 NE

# **PURPOSE**:

Monitor employees for compliance with Safety Rules related to the proper discharge of their duties.

# **PREPARATION:**

- Secure operable railroad radio
- Determine location of employees
- Determine activities of employees

# PROCEDURE:

• Direct observation of employees



# THE CONRAIL EFFICIENCY CHECK PROGRAM

# DATA ENTRY AND RETRIEVAL

The following material explains the current on-line computerized Efficiency Check Program in effect on Conrail. The following instructions explain:

How to access the system. How to input data. How to retrieve reports.

# **Program Access**

The Conrail Efficiency Check Program is a MS Access application. An officer wishing to access the Conrail Computerized Efficiency Check Program will have to be authorized. If an officer needs authority to access the system, call the Operating Rules Department at 856-231-2165 or SMART at 8-320-2165.

Once authorized and at the primary screen, enter your User I.D. Click on the appropriate command;

Efficiency Check input Reports Exit Application

**Efficiency Check input** 

# **Division Code**:

A Division Code must be entered and must be one of the following:

80 - Conrail System (Office or Shop)

81 - Detroit

82 - North Jersey

83 – South Jersey

Note: This is the Division where the officer is making the check. It is not necessarily the Division where the employee being checked holds seniority.



# **Zone Code**

A zone code is used to identify a zone within the district. A zone code must be entered. Use the appendix to access valid zone codes. If a division has been entered on the screen, only the zone codes for that Division will be shown.

#### **Officers**

The initials of an officer or officers conducting the check are entered. There must be at least one entry.

Note: Valid officer initials are listed in the program authorization table. The rules program will require the initials listed in the table. Every officer authorized to conduct efficiency checks will be listed in the program authorization table. Administration of this table is handled by the Manager of Operating Rules and Regulatory Compliance.

# **Date**

The date of the rule check is to be entered as MM/DD/YYYY manually or through the date input box. The date cannot be in the future nor can it be in the past more than 10 days. This field is edited by the program.

# Type of employee

TE: Train & Engine employee

OTE: Other than Train & Engine employee

Train I.D. (T & E employees)

This field accommodates the train entry identification of the employee(s) that are being checked.

#### Type of Test

B: Blitz

P: Planned

S: Saturation

#### **Employee Name**

There is a provision for six employees per screen. At least one must be entered.



Efficiency checks conducted on NS, CSX, AMTRAK etc.. will have "foreign" in the employee name menu. Example: NJT Foreign, NS Foreign & CSXT Foreign.

# Occupation

AS: Asst. Superintendent BB: Bridge & Building BO: Block Operator

CS: Communication & Signals

CT: Conductor Trainee

EN: Engineer

ET: Engineer Trainee

FO: Conductor

MC: Mechanical-Car

MG: Manager

ML: Mechanical-Locomotive MW: Maintenance of Way

RF: Road Forman SU: Superintendent SW: Trainman

TD: Train Dispatcher

TM: Trainmaster

YM: Yardmaster- All Others YO: Yardmaster Oak Island

# Employee I.D.

The employees' I.D. display's when the employees' name is entered.

#### Rule

At least one rule is required and up to nine may be entered on each screen. When a rule is entered, one record is created for each employee that was checked for that rule. Administration of this table is handled by the Manager Operating Rules & Regulatory Compliance.

N: NORAC Operating Rules

A: NS-1 Equipment Operation and Handling Rules

H: Hazardous Materials Rules

S: Conrail Safety and General Conduct Rules

T: Conrail Timetable and Special Instruction

Z: Special Training



# Reports

The Efficiency Check Reports screen lets you see a number of reports. Rule check activity, summary reports, rule checks in compliance, not in compliance and other supervisor activity. The reports screen also lets you see failures by employee and region. In reviewing the Reports screen, most information inputted into the Efficiency Check System is available to help you understand the process and recordkeeping of the Efficiency Check Program.

# Pitt, Kathy

"rom:

Maher, Richard

≠nt:

Tuesday, February 23, 2010 5:30 PM

To:

\*\* P T T \*\*

Cc:

Subject: Attachments: **Managers Safety Focus** 

Managers Safety Focus Schedule.xlsx; Job Briefing Guidelines.PDF

Beginning March 1<sup>st</sup> we will initiate the <u>Daily Managers Safety Focus</u> on the 7am engineering conference call. Each morning, the scheduled manager will present his job briefing or training as described below.

#### **Daily Managers Safety Focus**

The assigned Supervisor will present his job briefing as he intends to present it to his employees that morning. (Note: The Job Briefing Guidelines are on page 1 in your timetable)

The Mt. Laurel staff will:

- 1. Play the part of the employees receiving the job briefing, asking questions, etc.
- 2. Provide feedback
- 3. Make recommendations on how to improve your job briefing

ie emphasis will be on increasing the quality and thoroughness of the job briefings.

The assigned Terminal Engineer/Terminal Supervisor will describe the <u>TRAINING ON BASIC EQUIPMENT</u> that will be done at one of their subdivisions next monthly safety meetings. This is not too be one of the mandatory safety topics or be done by just showing a video. This should be <u>HANDS ON TRAINING</u>.

- 1. What is the topic for the month?
- 2. Why was this topic chosen?
- 3. How will it be presented?

The emphasis should be on learning the proper way to do tasks that are done on a regular basis, using tools and operating, inspecting and maintaining tools and equipment.

The safety committee will compile a list of topics to choose from if you should need some ideas.

Please refer to the attached schedule for your assigned days.

Call if you have any questions. Rick

# **Managers Safety Focus Schedule**

March		April		May	<u>, augusto de la companya de la comp</u>
1	Santos	11	Trela	1	
2	Tanner	2	Kneib	2	
3	Silvestry	3		3	Strauss
4	Lindenmuth	4		4	Engle
5	Maylie	5	Ganzel	5	Zimmerman
6		6 _	Ohr	6	Adams
7		7	Strauss	7	Falcao
8	Trela	8	Engle	8	
9	Kneib	9	Zimmerman	9	
10	Ganzel	10		10	Silva
11	Ohr	11		11	Botsford
12	Strauss	12	Adams	12	Voss
13		13	Falcao	13	Lappin
14		14	Silva	14	Santos
15	Engle	15	Botsford	15	
16	Zimmerman	16	Voss	16	
17	Adams	17		17	Tanner
18	Falcao	18		18	Silvestry
19	Silva	19	Lappin	19	Lindenmuth
20		20	Santos	20	Maylie
21		21	Tanner	21	Trela
22	Botsford	22	Silvestry	22	
23	Voss	23	Lindenmuth	23	
24	Lappin	24		24	Kneib
25	Santos	25		25	Ganzel
26	Tanner	26	Maylie	26	Ohr
27		27	Trela	27	Strauss
28		28	Kneib	28	Engle
29	Silvestry	29	Ganzel	29	
30	Lindenmuth	30	Ohr	30	
31	Maylie	31		31	Zimmerman

# JOB BRIEFING GUIDELINES

Safety, Quality and Productivity are the result of well-planned and conducted job briefings.

STEP I. Plan the Job Briefing.

A. Develop your own work plan by:

1. Reviewing work or task to be accomplished.

2. Checking the job location and work area.

- 3. Breaking the work or task down into step-by-step procedures.
- Determining tool, equipment, and material requirements.
   Determining what safety rules or procedures are applicable.
- B. Consider existing and potential hazards that might be involved as

1. Job and weather conditions.

2. The nature of the work to be done.

3. The job location.

- 4. The tools, equipment and materials used.
- 5. Equipment to be worked on.
- 6. Traffic conditions and visibility.

7. Time of day.

- 8. Safety or personal protective equipment required.
- C. Consider how work assignments will be made.

1. Group assignments.

- 2. The nature of the work to be done.
- 3. Abilities and experience of individuals.

STEP II. Conduct the Job Briefing.

- A. Explain work or task to employees.
  - 1. What is to be done.
  - 2. Why it is to be done.
  - 3. When it is to be done.
  - 4. Where it is to be done.
  - 5. How it is to be done.
  - Who is to do it.

7. What safety precautions are necessary.

B. Discuss existing or potential hazards and ways to eliminate or protect against them.

C. Make definite work assignments.

1. Make sure employees understand assignments.

2. Ask questions of the "how" and "why" type.

D. If special tools, materials, equipment, or methods are to be used, make sure employees know how to proceed safely.

E. Issue all instructions clearly and concisely; check to see that they are understood.

STEP III. Job Briefing for Special Conditions.

A. Complex jobs.

1. Brief only a portion of the job.

2. Give additional briefing as the job progresses.

- B. Change in job conditions when it becomes necessary to change plans and procedures as the job progresses, brief employees on these changes. (As an example: the weather condition changes.)
- STEP IV. Follow-up by Supervisor.

It is important that frequent checks be made as the job progresses to be sure that:

- A. Your plans are being followed and correct work methods used.
- B. Each person is carrying out the assigned responsibilities.
   C. Any hidden hazards have been identified and action initiated to eliminate or what precautions are required.
- STEP V. Individual Responsibility.

All employees are responsible to see that the work plan is carried out according to the Job Briefing or modified when conditions change.

# Pitt, Kathy

From:

Maher, Richard

nt:

Monday, July 26, 2010 5:34 PM Pitt, Kathy

lo: Cc:

Subject:

Bilson, Thomas Safety Blitz

Kathy,

The rule checks for the next engineering department safety blitz will be:

**S10.2 Responsibilities of Employees** 

S11.2 Hand Tools

N140 Foul time

Rick

# Pitt, Kathy

From:

Maher, Richard

nt:

Wednesday, August 18, 2010 9:07 AM

To:

\*\* P T T \*\*

Cc:

Subject: Attachments: Managers Safety Focus Schedule.xlsx Managers Safety Focus Schedule.xlsx

Attached is the September thru November schedule for the Managers Safety Focus Discussion. Be prepared to start at 7:00am on your scheduled day. If you will be off on your scheduled day, make arrangements to switch with someone and let me know of the change.

Please include the following in your Managers Safety focus discussion.

Focus on the monthly FRA required efficiency checks that you perform. In particular discuss the counseling that you do when you find a rule violation. Include details of the violation and what is being done to correct the situation.

Our compliance to failure ratio in slightly below industry standard, so you should be looking for what is wrong. It's easy to find compliances.

Another area to focus on is the new hire training inputs. If you have new hires, <u>especially the new hires under 60 days</u>, that have unsatisfactory inputs please discuss the details during your managers safety focus.

Observations or discussions are to be with specific employee(s). Give details.

Call if you have any questions.

Rick