



# National Transportation Safety Board

Washington, D.C. 20594

Office of Railroad, Pipeline and Hazardous Materials Investigations

March 24, 2014

Mr. Thomas Hebert  
BLET-STF Primary Investigator  
Brotherhood of Locomotive Engineers and Trainmen  
207 George Street #207  
Middletown, CT 06457

RE: NTSB DCA13MR002 Factual Report Technical Review

Dear Mr. Hebert,

Thank you for your valuable assistance in providing technical review comments in your letters of February 6 and 11, 2014 to NTSB group chairman factual reports relating to the Conrail freight train derailment with vinyl chloride release in Paulsboro, New Jersey on November 30, 2012. The respective NTSB group chairmen have responded to me with their assessments of the issues you identified. I have indicated below how these issues will be addressed in the draft accident report:

## Operations Group Factual Report

- Page 7: Second paragraph last sentence "The train dispatcher can observe whether the signal is clear or if the signal is not clear within the system" Consider changing to "The train dispatcher can observe whether the signal has been requested or has not been requested within the system." The original wording suggests that the train dispatcher can ascertain the signal indication from the model board.

NTSB response:

The final report will be worded to ensure there is no confusion whether the dispatcher could ascertain the signal indication. The draft accident report states: "*the dispatcher's console did not have an indication of the bridge position or signal aspect.*" The draft report also states: "*the train dispatcher did not have the ability to block the bridge or affect any of the other signals at the bridge...*"

- Page 13: Operational Testing, first paragraph, first sentence. Title 49 CFR 219.9 should read Title 49 CFR 217.9

NTSB response:

Any reference to this section will be corrected to read 49 CFR 217.9.

- General Question: Is the company named Consolidated Rail Corporation, or Consolidated Rail Corporation Shared Assets?

NTSB response:

The IIC contacted Conrail to verify the correct identity of the corporation as “Consolidated Rail Corporation.”

Hazardous Materials Group Factual Report

- Page 2 Second paragraph: Wasn't the Locomotive Engineer also tested for vinyl chloride?

NTSB response:

The NTSB does not have documentation of vinyl chloride exposures to specific individuals, so reference to the train crew’s exposure will be removed from the final report. The report will instead cite a summary of the numbers of individuals who sought medical treatment or have reported exposure symptoms based on surveys conducted by the National Institutes of Health and the New Jersey State Health Department. These surveys will also be included in the docket when available.

- Page 4 First paragraph first sentence: We are unable to locate any documentation that suggests/supports the conductor changed or updated the position of cars in their train containing hazardous materials (Exhibit attachments Group 2- J, and Group 3- BO)?

NTSB response:

See investigatory hearing exhibit Group 3-BO, page 51. The original consist of train FC4230 contains markings documenting placement revisions and changes. Investigators determined that rail car in-train placement was correctly reflected by the train consist.

- Page 14 Second paragraph: Is the correct term ICP or ICC (Incident Command Center)?

NTSB response:

The emergency responders referred to the “incident command post” or “ICP.” OSHA regulations at 29 CFR 1910.120 also refer to this location where the incident command is housed as the “command post.”

- Page 15 First paragraph, first sentence: Officer 217 is identified in the foot note (#18) as Sergeant 217. Is the correct rank Sergeant for 217 (consistency for document)?

NTSB response:

The footnote should refer to “Officer 217,” not “Sergeant 217.”

Sincerely,

Paul L. Stancil  
Investigator-in-charge