BROTHERHOOD OF MAINTENANCE OF WAY EMPLOYES DIVITION
A DIVISION OF THE RAIL CONFERENCE
INTERNATIONAL BROTHERHOOD OF TEAMSTERS

BEFORE THE NATIONAL TRANSPORTATION SAFETY BOARD

NTSB Accident Number: RRD19FR002
Class: Regional

November 30, 2018

Proposed Findings, Proposed Probable Cause, and Proposed Safety Recommendations in the matter of CSXT Transportation train # F-794-30 Striking an Engineering Employee at Estill, South Carolina

Final Submission January 31, 2020

The Brotherhood of Maintenance of Way Employes Division of the International Brotherhood of Teamsters (BMWED) has been granted party status by the Board in the above-referenced investigation. BMWED respectfully submits these Proposed Findings, Proposed Probable Cause, and Proposed Safety Recommendations to the Board for consideration.

Accident Synopsis

On Friday, November 30, 2018, at approximately 10:20 a.m. Eastern Standard Time (EST) CSX Transportation (CSXT) freight train F-794-30 struck and fatally injured a Maintenance of Way employee at milepost (MP) S-449.7 on the CSXT Columbia Subdivision in Estill, South Carolina.

The train consisted of two (2) locomotive and seventy-four (74) cars. The train was 4,804 feet long and weighed 6,583 tons. CSXT freight train F-794-30 was operating northbound on the single main track at 50 mph (because of train make up). The time table speed at MP S-449.7 is 60 mph for freight and a maximum authorized speed of 79 mph for passenger trains. F-794-30 consisted of lead Locomotive No. 8065, trailing locomotive No.5358 and 44 loaded cars as well as 30 empties.

The weather at the time of the accident, the sky was clear, the wind was from the southeast about 4 mph, and the reported temperature was 60°F with a relative humidity of 55%.

Track Description

The CSXT Columbia Subdivision consists of 137.5 miles of single main track between MP S-359.7 and MP S-497.2. According to CSXT documentation, on average there are 22 trains that operate daily over the CSXT Columbia Subdivision. Train movements on the main track in this area are controlled by centralized traffic control and governed by operating rules, general orders, timetable instructions, and the signal indications of an absolute block system.

CSXT operates the main tracks in the vicinity of the accident as FRA Class 4 with a maximum authorized timetable operating speed of 60 mph for freight and 79 mph for passenger trains. There is limited passenger traffic on this subdivision.

The Point of Impact (POI) occurred at the North End Estill Siding switch, MP S-449.7. This switch provides entry into the Estill Siding which is inspected and maintained to FRA Class 1 standards, with a maximum authorized speed of 10 MPH for freight and passenger trains.

The tracks run roughly north and south, and CSXT designates this territory in the timetable as north - south. The train dispatcher controls traffic at control points, and automatic block signals are located between control points which provide block condition information to engineers.

Figure 1. Photo standing near the accident location, facing south. The track to the left in the photo is the main track, the track on the right-hand side is the Estill Siding.

The main track leading up to the accident location was constructed of wood crossties that measured 9-inches by 7-inches by 8-feet, 6-inches long, spaced 19.5 inches on center (nominal). On the main track, the rail sections were 132 lb. continuous welded rails and were fastened to the crossties using standard double shoulder tie plates fastened with spikes on each rail. These fasteners and anchors are used to maintain gage and alinement of the track as well as restrain longitudinal movement of the continuous welded rail (CWR).[1] The track was supported by granite rock ballast. Traveling on main track, the northbound train traversed a descending grade ranging from .24% to .39%, beginning at MP S-451.3 to the POI at MP S-449.7. The main track curvature leading up to the POI from MP S-451.3 was entirely tangent track.

Prior to the Accident

On the day of the accident, a job briefing was held at 7:00 a.m. in Yemassee, SC. During the job briefing, the Roadmaster reassigned the section trackman from working with the Yemassee section crew to working with the track welder to perform work as a welder helper, and to provide train

[1] Continuous welded rail (CWR) means rail that has been welded together into lengths exceeding 400 feet.

approach warning (TAW). The employee's normal assignment was as a trackman with the Yemassee section. The section is a local track maintenance work group and a trackman is a laborer position in that work group.

The welding crew arrived at the North End Estill Siding switch at approximately 8:00 a.m. Shortly after they arrived, the welder repeated to the trackman that the trackman was to be the watchman/lookout[2] because train approach warning was the form of on-track safety to be used for the duties to be performed, as instructed by the Roadmaster. Train Approach Warning is a form of on-track protection designated in the CSXT Operating Rules and Federal Railroad Administration (FRA) Railroad Workplace Safety regulation. Using Train Approach Warning, notification of an approaching train is provided by an employee assigned as a watchman/lookout. Railroad employees commonly refer to Train Approach Warning on-track safety protection as watchman/lookout protection.

After discussing the on-track safety, the welder started to perform repair on the frog portion of the switch.

The watchman recalled that prior to the accident, one southbound train had traversed the track through the work location. The watchman said, "I seen it coming. I went up; I said, John, you got a train coming. And he got out the track, put the grinder down, and then stepped over the track to the other side, and we split the train as it was coming through." Investigators asked for clarification regarding "splitting the train". The watchman described that he and the welder went to opposite sides of the track in order to visually inspect the passing train. After the southbound train passed, the welder stepped back in the track and continued to work on the frog.

CSXT Welding Truck

CSXT welding truck 240150 was registered for highway use, equipped with hi-rail guide wheels for traversing railroad tracks, and equipped with the tools and equipment necessary to perform

[2] From this point forward in the report, watchman/lookout will be used to characterize the trackman that was assigned to provide Train Approach Warning.

welding tasks. The truck was also equipped with internal and external radios programmed to monitor radio channels used for CSXT operations.

Figure 2. Photo showing the external radio mounted inside of a cabinet on the body of CSXT welding truck No. 240150.

The photo shows a radio with microphone manufactured by Kenwood. The radio is mounted inside of an external tool cabinet.

On December 2, 2018, investigators inspected the welding truck at the CSXT Engineering Department office in Yemassee, SC. Investigators identified required documents that were kept in the operating cab of the truck. The investigative team requested that CSXT employees start the trucks engine and the welding machine and place the throttles in the positions that they would be in when work was being performed. This was done to observe the level of ambient noise produced. During this effort, a train passed on an adjacent track and investigators noted that the train's horn could be heard over the noise produced by the welding truck in a working state.

Investigators determined that the radio located in the cab of the welding truck was functional, however, the external radio (mounted inside a cabinet on the body of the truck) was not able to be heard. The external radio was disconnected from a speaker mounted on the body of the truck, near the middle, on the passenger's side. Two other speakers were in the same cabinet as the radio, however, neither of those were properly connected to the radio.

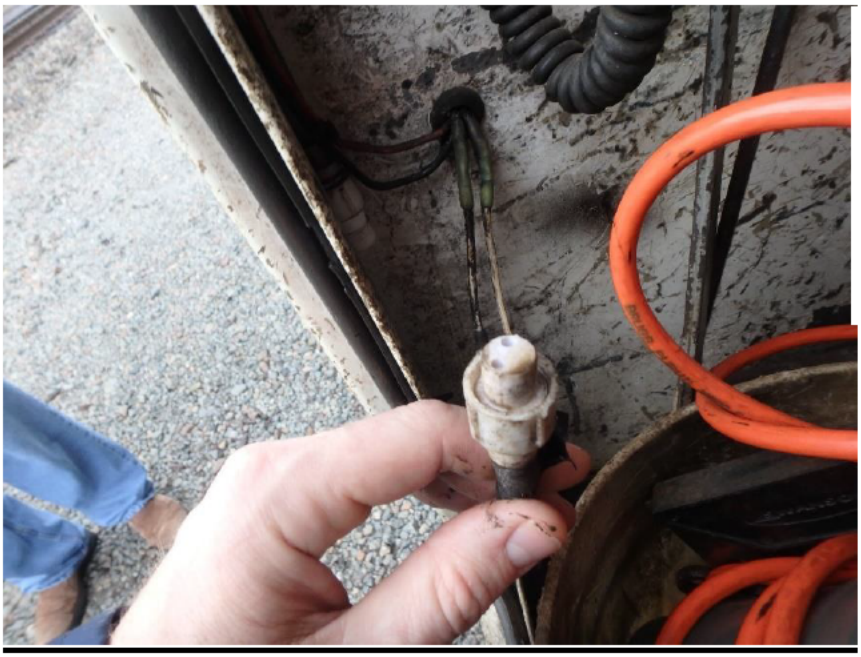


Figure 3. Photo showing disconnected white wire connector that was intended to connect the external mounted speaker to the external radio. The wire was disconnected from the radio and hanging inside the cabinet.

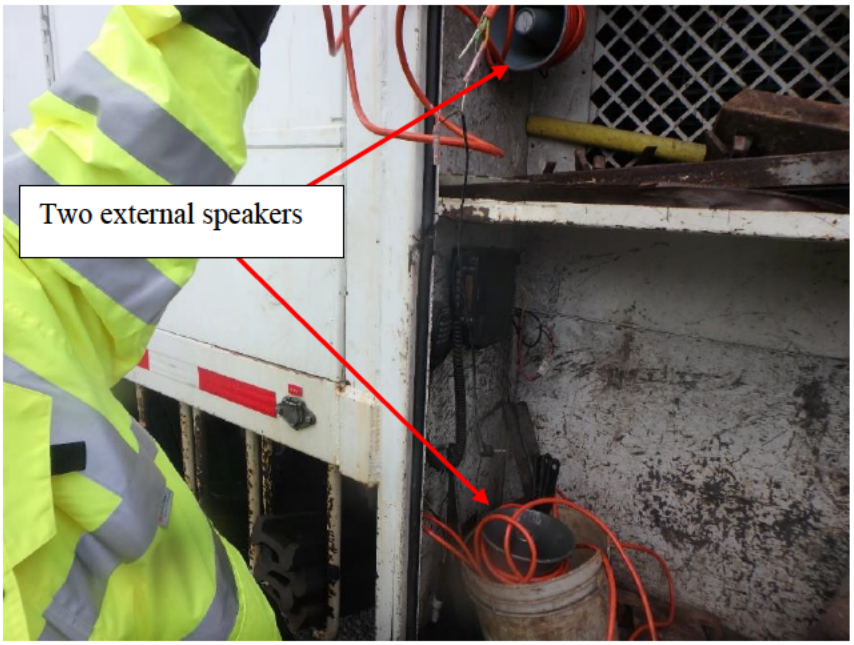


Figure 4. Photo showing two disconnected external speakers that were stored inside the truck cabinet that contained the external radio. Also shown are multiple wires, many of which are not connected.

During the interview with the watchman/lookout, investigators asked "Did you guys have a working radio with you?" The watchman responded "I know the inside radio worked. And thinking back on it now, I don't -- I never heard the outside radio. I don't know if it worked or not." Investigators asked, "Is that -- is there a procedure to test a radio, do a radio test prior to beginning work activity?" the watchman responded, "Yes, sir. You're supposed to make sure you got a working radio." Investigators: "Did you guys get a chance to do that?" The watchman responded, "No, sir".

Train F-794-30

On November 30, 2018, the engineer and conductor went on duty at 7:00 a.m. in Savannah, GA. The train consisted of 74 cars, 6,583 trailing tons and was about 4,804 feet long. The authorized train speed was limited to 50 mph because of train make up. Maximum authorized speed for this track was 79 mph for passenger and 60 mph for freight trains.

After preparing the locomotives, the crew waited on another train to clear tracks, then they completed the building of the train and departed the yard. They departed the yard traveling northbound and met one train at Garnett Siding.

The engineer recalled that there were about 8-9 highway-rail grade crossings just prior to the accident location. By FRA regulation and CSXT Operating Rule, the engineer is required to sound the locomotive's horn as it approaches and traverses highway-rail grade crossings.[3] The engineer said that he was operating the train at speeds between 45 and 48 mph, and the train's last signal indication was a clear signal. The engineer stated "*** once we got to the Estill signal, there are multiple crossings once you pass the south-end signal, there are multiple crossings, so we continued to blow. Once we got to the, I think by the second, maybe the third crossing, we were blowing, and we can tell there was some kind of debris on the north-end of the Estill signal. It looked like debris. Something was in the track. Maybe looked like, maybe a trash bag or something like that got hung up on the frog, or the track, or what have you, and the siding. So, we really couldn't make heads or tails of it, so we continue and as we got closer, I say about that, I know there's a Jenks store right on the -- there's a store, you know, on the road right next to the track, and somewhere in there we noticed a truck."

[3] CSXT Operating Rule 203.2 - Approaching public highway grade crossings. Sound the horn for at least 15 seconds, but no more than 20 seconds, before the lead locomotive enters the crossing. Trains or locomotives traveling at speeds greater than 45 MPH shall begin sounding the horn at or about, but not more than, one-quarter mile in advance of the nearest public crossing, even if the advance warning provided by the horn will be less than 15 seconds in duration. This signal is to be prolonged or repeated until the train or locomotive occupies the crossing or, where multiple crossings are involved, until the last crossing is occupied.

The engineer said that as he got closer, he recognized the truck as a CSXT truck, "As we get closer, we noticed a CSX truck, and we noticed there a high visible vest, that somebody was outside the truck. Their back was to us and they were, I guess, he was looking in the truck or towards the truck, but his back was toward us. And as got closer, we just laying on the -- I'm blowing and blowing, and I would say I can't give you a range of how close we were before we noticed that that was an employee that was in the track, but by the time we noticed it, it wasn't long before we -- I'm laying on the horn and I just -- from what I could see was like in a split second, it was like, oh, that's, you know. And so, immediately, I hit the brakes. Did what I can do to stop." The train came to a stop about 5,340 feet after applying the brakes. The engineer stated that he had no prior notice or warning of the welding team working in the area.

The conductor gave the following account of the accident: "We were approaching line speed, 60-mile an hour. We had a 50-mile an hour train, running at approximately 45-miles an hour. We knocked down the south end signal, blowing the horn, first crossing. Got to the second crossing. Know that something was in the track. Didn't know what it was at that time. And then once we crossed by the next crossing, which is across the street from Jenks Motor Sport, there's a tree on the east side of the rail that hangs over, a little bit close to the rail, blocking the view. Once we cleared that tree, we could see there was a CSX truck parked on the right-hand side, on the east side of the rail. And once we saw the look, lookout, that's when we realized it, more than likely, was a person in the middle of the track. And as we got closer, he was wearing dark clothing, black shirt, blue jeans, bent over. He was, it looked like, to me, he was on his knees facing, he was facing the same direction as travel, facing north. And he was just crouched down so low, I honestly didn't know it was a person until we saw that CSX truck. And after that, it was too late to, I mean, it was just confusion. Both looked up. And that's when we stuck (sic) him."

Frog Maintenance Work Description

The welder and trackman had been performing frog maintenance work for several hours prior to the accident. The work consisted of removing damaged material at the point of frog and then rebuilding it. This is a very time consuming, loud and cumbersome operation. The trackman noted "… various noises going on such as the Truck running, Welding machine running, traffic, and

grinder."[4] The trackman described what was happening at the work location at the time that the accident train arrived. The trackman told investigators the welder had told him that they had completed the work, and instructed the trackman to start rolling up the welding leads. The trackman then turned around, stepped to the side of the welding truck, and began rolling up the leads.

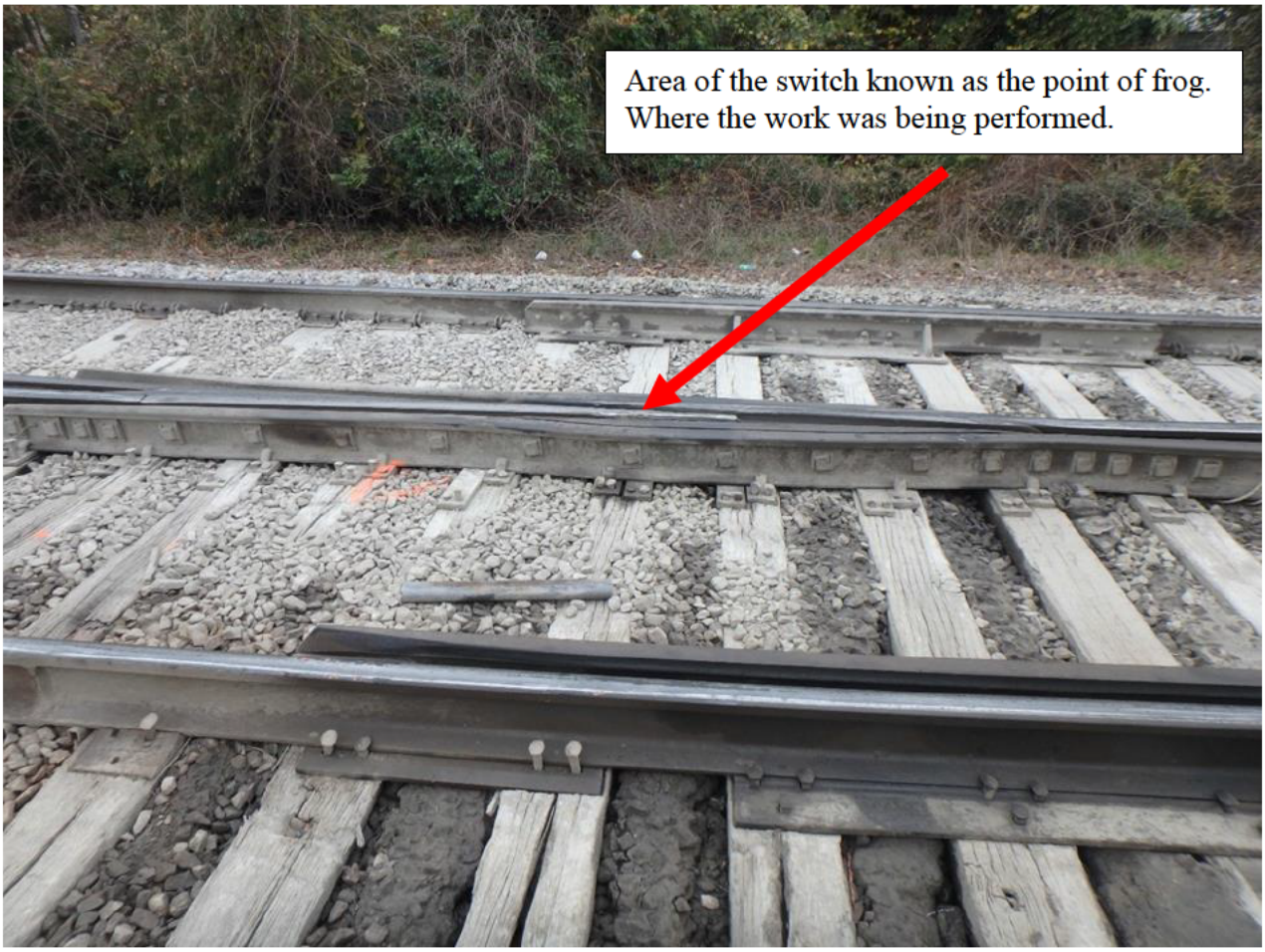
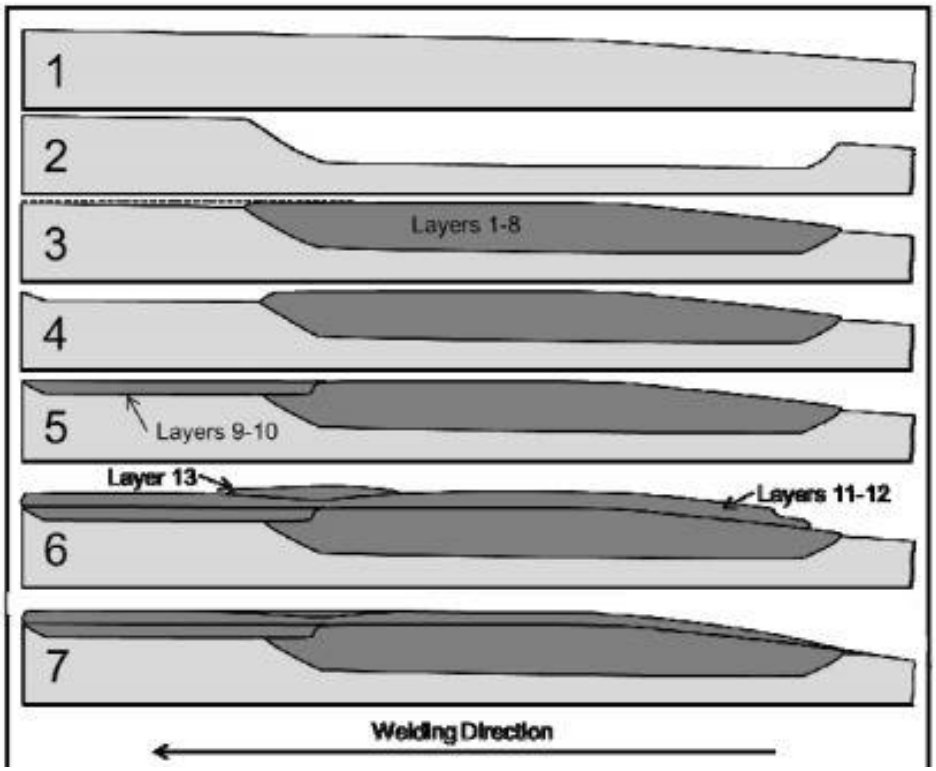


Figure 5. Photo of track frog at the accident location.

The photo shows track components in the frog section of a railroad switch. In the foreground is the running rail and guard rail of the main track. Near the middle of the photo is the frog. The running rail and guard rail in the siding are located above the frog. Under the track components are crossties and subgrade material standard to railroad infrastructure.

[4] From Watchman Lookout Interview Summary, NTSB Operations, System Safety, Track and Field Notes



Frog Repair Sequence:

(1) The original frog geometry is documented.

(2) Damaged material is removed from the frog point using a grinder or carbon arc gouging and grinding.

(3) Multiple layers of metal are laid down by the welder to build up the removed material.

(4) Often times additional material towards the heel of the point must be removed according to the damage that is present.

(5) Additional layers of metal are deposited to build up the removed material.

(6) Additional layers are deposited that are nearly the full length of the repair to build up the height of the point to match the height of the wings.

(7) The frog is ground to final shape.[5]

The trackman said that he did not hear any warning from the approaching train; including the train's bell or horn.

[5] Diagram and Repair Sequence information based on AREMA 2014, Weld Repair of Manganese Frogs for Enhanced Safety in Shared Service.

CSXT Roadway Worker and On-Track Safety Operating Rules

CSXT Engineering Department employees are governed by the CSXT Roadway Worker and On-Track Safety Rules found in Chapter 7 of the CSXT Employee Operating Manual. The introduction to this section states the following: This section defines procedures to prevent cars, locomotives, on-track equipment or other equipment from striking roadway workers (including contractors) performing their duties. The rules in this section comply with relevant regulations contained in the Code of Federal Regulations (CFR) Title 49, Part 214. The following methods of on-track safety are available to roadway workers:

- EC-1/EC-1e Line 1 Authority
- Individual Train Detection, Train Approach Warning, and Train Coordination
- Working Limits on Non-Controlled Tracks
- Working Limits on Controlled Tracks (Conditional Stop)
- Removing Controlled Track from Service

The subject roadway work group, working on controlled tracks inside the interlocking, utilized Train Approach Warning as their method of on-track safety. Train Approach Warning-Rule 705.3 reads:

> Use of Train Approach Warning for on-track safety only if:
> 1. At least two qualified roadway workers are working together and one the employees is designated as the watchman,
> 2. All employees can reach an established place of safety at least 15 seconds before a train or on-track equipment reaches the location,
> 3. A method of communicating the approach of a train is established,
> 4. Employees hold a job briefing and all confirm their understanding and responsibilities,
> 5. Employees are performing routine maintenance o minor repairs that will not affect the safe passage of trains or on-track equipment,

6. Watchman/lookout knows and maintains required sight distance,

7. Watchman/lookout has unrestricted ability to see and hear approaching trains or on-track equipment, and

8. Watchman/lookout has access to a working radio.

FRA Railroad Workplace Safety Regulations

Train Approach Warning

49 CFR 214.7- Definitions

Watchman/lookout means an employee who has been annually trained and qualified to provide warning to roadway workers of approaching trains or on-track equipment. Watchmen/lookouts shall be properly equipped to provide visual and auditory warning such as whistle, air horn, white disk, red flag, lantern, fusee. A watchman/lookout's sole duty is to look out for approaching trains/on-track equipment and provide at least fifteen seconds advanced warning to employees before arrival of trains/on-track equipment.

49CFR 214.329-Train approach warning provided by watchmen/lookouts. Amended and published on June 10, 2016.

Roadway workers in a roadway work group who foul any track outside of working limits shall be given warning of approaching trains by one or more watchmen/lookouts in accordance with the following provisions:

(a) Train approach warning shall be given in sufficient time to enable each roadway worker to move to and occupy a previously arranged place of safety not less than 15 seconds before a train moving at the maximum authorized speed on that track can pass the location of the roadway worker. The place of safety to be occupied upon the approach of a train may not be on a track, unless working limits are established on that track.

(b) Watchmen/lookouts assigned to provide train approach warning shall devote full attention to detecting the approach of trains and communicating a warning thereof, and shall not be assigned any other duties while functioning as watchmen/lookouts.

(c) The means used by a watchman/lookout to communicate a train approach warning shall be distinctive and shall clearly signify to all recipients of the warning that a train or other on-track equipment is approaching.

(d) Every roadway worker who depends upon train approach warning for on-track safety shall maintain a position that will enable him or her to receive a train approach warning communicated by a watchman/lookout at any time while on-track safety is provided by train approach warning.

(e) Watchmen/lookouts shall communicate train approach warnings by a means that does not require a warned employee to be looking in any particular direction at the time of the warning, and that can be detected by the warned employee regardless of noise or distraction of work.

(f) Every roadway worker who is assigned the duties of a watchman/lookout shall first be trained, qualified and designated in writing by the employer to do so in accordance with the provisions of §214.349.

(g) Every watchman/lookout shall be provided by the employer with the equipment necessary for compliance with the on-track safety duties which the watchman/lookout will perform.

Watchman/Lookout

The watchman/lookout started his railroad career in January 2015 in Charleston, South Carolina. Over the course of the next 3 years and 11 months, he held many different labor positions in the Track Department. He worked for several headquartered section crews as well as CSXT system production tie gangs. In his interview, the watchman/lookout said *"other than when I went to the extra gang doing ties and on a big gang, I've always been on the section".*[6] When asked by investigators, the watchman stated:

"Q. On the section. Okay. And on a -- working on the section, were you assigned as a watchman very often? Did you --

A. We very -- we don't really use watchman often.

[6] NTSB Interview of Watchman/Lookout Page 13, Lines 7-8

Q. Okay.

A. Because there's -- I mean, there's not a lot we can do under, you know, a watchman.

Q. Okay. So you're typically working with the track section out making repairs --

A. Right."

The watchman never met the employee-in-charge (EIC) territory qualification requirements set forth by CSXT. In the CSXT Operating rules effective January 1, 2014, the rule clearly states:

> *701.1 A Roadway Work Group is any group of workers, regardless of class or craft, working on a common task that involves fouling a track. One designated roadway worker in each group, referred to as the* ***employee-in-charge, provides on-track safety for all members of the group.*** *The employee-in-charge is responsible for ensuring the working group receives a job briefing on the type of on-track safety to be established.*

CSXT Response to the Accident

On December 14, 2018, in response to the accident, CSXT made rule modifications to operating rules dealing with welding frogs and switch points on controlled tracks. The directive was set forth in Sub System Bulleting No. 018, which states the following:

ITEM 1 NEW OPERATING RULE 702 - REQUIREMENTS WHEN WELDING FROGS AND SWITCH POINTS ON CONTROLLED TRACKS

702.1 WHEN WELDING WILL BE PERFORMED ON A FROG OR A SWITCH POINT ON CONTROLLED TRACK THE EMPLOYEE-IN-CHARGE MUST:

1. CONTACT THE TRAIN DISPATCHER AND HOLD A JOB BRIEFING THAT MUST INCLUDE:

A. THE MILE POST LOCATION OF WORK

B. AMOUNT OF TIME NEEDED TO COMPLETE THE WORK

C. LINE UP OF TRAINS THAT MAY APPROACH OR TRAVERSE THE WORK LOCATION

2. OBTAIN AN EC-1E LINE 1 AUTHORITY IF POSSIBLE,

3. PLACE A 10 MPH TEMPORARY SPEED RESTRICTION AT THE WORK LOCATION BEFORE THE WORK BEGINS UNTIL WORK IS COMPLETED

4. IF NECESSARY, TO UTILIZE WATCHMAN/LOOKOUT THE WATCHMAN MUST:

A. REMAIN IN POSITION SO THEY CAN PHYSICALLY TOUCH THE EMPLOYEE BEING PROTECTED

B. UTILIZE MAXIMUM AUTHORIZED TIMETABLE SPEED FOR THE PURPOSES OF SIGHT DISTANCE

ITEM 2 - MODIFY RULE 705.3 NUMBER 2

THE FOLLOWING RULE 705.3 NUMBER 2 HAS BEEN REPLACED BY THE FOLLOWING:

2. ALL EMPLOYEES CAN REACH AN ESTABLISHED PLACE OF SAFETY AT LEAST 15 SECONDS BEFORE A TRAIN OR ON-TRACK EQUIPMENT REACHES THE LOCATION, REFERENCING MAXIMUM TRACK SPEED, AND THE PLACE OF SAFETY MUST BE DOCUMENTED ON THE JOB BRIEFING FORM.

ISSUED BY OPERATING RULES DEPARTMENT

Proposed Findings

- The watchman/lookout was not qualified and lacked experience in the use of TAW on the Columbia Subdivision. This was a very time consuming, loud and cumbersome job that would challenge even a qualified, experienced, well-seasoned watchman/lookout.

- The lack of an outside working radio removed the employee's ability to monitor train movement in the area.

- Although the watchman/lookout was current in his CSXT provided roadway worker training, qualifying him to perform the duties of a watchman/lookout, he was not qualified to be a roadway worker in charge and should have never been put in this situation.
- There was no temporary speed restriction[7] in place at the time of the accident. CSXT train F-794-30 did not reduce speed as would have been provided by published track bulletins.

- There is an absence of effective training and the post-training mentoring that would challenge the consciousness of an immature workforce in a way to reduce accidents.

- There is an absence of a just and mature safety culture at CSXT and a resultant lack of communication, collaboration, cooperation, and trust between labor and management.

[7] A temporary speed restriction is a localized speed restriction on a rail line which is set below the track's normal speed limit. Temporary speed restrictions are usually imposed by railway dispatchers for sections of track that are in some way deficient, or when there is a requirement to perform maintenance on a section of railway.

- Drugs or alcohol or the use and distraction of an electronic device played no role in the severity or cause of the accident.

Proposed Probable Cause

BMWED proposes that the probable cause of the accident on November 30, 2018 was CSXT's failures to utilize and enforce the use of exclusive track occupancy when performing track welding operations.

There were numerous contributing factors implicated in the accident including:

(1) The inexperience of the watchman/lookout in overseeing such a complex and unfamiliar operation;

(2) The failure of CSXT to improve the engineering employee qualification process, training, and mentoring concerning roadway worker protection (watchman protection).

(3) The failure of CSXT to implement a temporary speed restriction.

(4) The common use by CSXT of watchman/lookout as the exclusive form of roadway worker protection when performing frog welding, grinding, maintenance procedures.

While any of the 4 items listed above could be seen as the "single point of failure" causing the accident, the total lack of exclusive track occupancy along with the combination of the watchman/lookout's inexperience and CSXT's lack of training, qualifying, and mentoring led to CSXT train F-794-30 tragically fatally striking the maintenance of way worker. The absence of a strong and mature safety culture at CSXT relates directly to the absence of a comprehensive safety training program. Human error clearly played a significant role in the fatal accident at Estill, SC. However, the use of appropriate exclusive track occupancy for roadway worker protection would have prevented human error from manifesting into this horrific train strike. Thus, BMWED

concludes that the failure to use the proper roadway worker protection is the probable cause of this tragic accident.

Proposed Safety Recommendations to CSXT

1. Immediately stop the use of TAW as the only form of roadway worker protection in all grinding welding operations. Require the establishment of exclusive track occupancy any time grinding welding operations are to be performed.

2. Immediately implement a safety stand down to inspect radio systems on all maintenance of way equipment to insure proper functionality, with a focus on outside audible speakers.

3. Develop effective procedures and meaningful training on watchman/lookout requirements and eliminate work risk for engineering employees. The curriculum should require locational awareness, and emphasize TAW is not to be used in grinding welding operations.

4. Review and improve Engineering employee training in the delivery and conduct of job briefings and On-Track Safety Briefings concerning the use of watchman/lookout protections.

5. Assure that inexperienced employees, especially new Foremen/EIC, are properly trained, field-mentored, and supported with sufficient oversight during the process of gaining requisite experience and knowledge.

6. Review and improve Engineering Department employee training programs and delivery (i.e., content, duration, knowledge transfer, and applicability). Assure that trainers have practicable and relevant field experience in the areas and subject matter they are teaching. Assure that all trainers understand adult learners and employ adult teaching techniques.

These comments constitute BMWED's proposed findings, proposed probable cause, and proposed recommendations pursuant to 49 CFR §831.14(a)(b). BMWED appreciates the opportunity to participate as a party to this investigation.

Throughout the document, gender-specific terms may be used in order to ease the text flow. Whenever a gender-specific term is used, it should be understood as referring to both genders, unless explicitly stated. This is done solely for the purpose of making the text easier to read, and no offense or sexism is intended.

CERTIFICATE OF SERVICE

I hereby certify, on this date (1/31/20), I have electronically served Mr. Tomas Torres, NTSB Investigator-in-Charge (tomas.torres@ntsb.gov), and the Party Spokespersons listed below, a copy of the BMWED's "Proposed Findings, Proposed Probable Cause, and Proposed Safety Recommendations" in the matter of CSXT Freight train No. F79430 Employee Strike on November 30, 2018; NTSB Docket No. RRD19FR002.

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