

## NTSB Carrington RRD24LR012 Information Request March 7, 2025

**From** Lori Kennedy [REDACTED]  
**Date** Sat 3/22/2025 11:53 AM  
**To** David Casaceli [REDACTED]  
**Cc** Charlie Duffy [REDACTED]

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Mr. Casaceli;

As requested. This response is based on the information currently known to CPKC at this time and we reserve the right to supplement it if necessary. CPKC is providing this information under compulsion, by virtue of the authority granted to you as a National Transportation Safety Board (NTSB) Investigator as described under 49 CFR Part 831 Investigation Procedures. This information is being provided solely for the purposes of investigating the referenced accident, is considered confidential by CPKC, and is not to be used for any other purpose or in any prosecution.

*Note: Due to issues with uploading files into NTSB's new Box system and per exchange between Mr. Casaceli and Lori Kennedy, CP Share has been used to transfer files to avoid delays in providing information to the NTSB.*

**1. NTSB Request:** *What are CPKC's requirements, if any, to perform internal inspections of culverts? Please provide any relevant rules or documentation. By internal, I mean inspectors entering the culvert and inspecting it from the inside from one end through to the other, not just viewing it from the inlet/outlet.*

CPKC Reply:

- CPKC's requirements mandate inspection at the inlet and outlet end of each culvert and do not mandate that an inspector enter a culvert to perform internal inspections from one end through to the other. CPKC is not aware of regulatory requirements or industry practice that requires internal inspection of culverts.
- CPKC relevant requirements for inspecting culverts are included in the following documents that were previously provided to NTSB on Oct. 3/24. See:
  - For Structure inspectors: CPKC\_Red\_Book\_Structures\_2023\_Rev\_2023-05-29.pdf. Section(s): 2.3.0 Railroad Culvert Inspection and part of 2.4.0 Inspection of Drainage Hazards e.g. item b.i. and Figure 2-2.
  - For Track inspectors: CPKC\_Red\_Book\_Track\_Requirements\_2024-04-01.pdf. Section(s): 14.5.0 Track Inspection – Items, Methods, Actions; 14.13.0 Culverts and Drainage; and 14.14.0 High Water and Spring Run-Off Inspections

**2. NTSB Request:** The Red Book of Structures in section 2.3.3 (b) notes that culverts with 'poor hydraulic or structural conditions' should be inspected annually. How would one know if a given culvert had been designated as such and therefore required the increased frequency?

CPKC Reply:

If a specific culvert has been identified with 'poor hydraulic or structural conditions' and the inspection frequency should be annually:

- The condition(s) would be recorded for the culvert in the Structures Asset Management (SAM) system;
- If the inspection frequency needed to be modified (e.g. the culvert wasn't already scheduled for annual inspections), the responsible Railroad Bridge Engineer (RBE) would provide approval to a designated system administrator for the inspection frequency to be modified in SAM; and
- The designated system administrator would modify the frequency in SAM. (As a control, only individuals with specific access can make these modifications in SAM.)

Information on the conditions and annual inspection frequency would then be available in SAM for employees that had responsibility for inspecting the culvert.

**3. NTSB Request:** The accident location culverts were inspected in September 2023 and June 2024 but as far as I can tell were only required to be inspected every three years. Increased frequency is generally a good thing, but why was the culvert inspected at this increased frequency? Did either of the culverts at the accident location meet this criterion?

CPKC Reply: Following a general assessment of regional conditions that can impact culverts, in 2023, CP increased culvert inspection frequency to annual in identified regions where recent seasonal variations and soil moisture levels had changed. The Carrington Subdivision was one of the identified regions. The frequency was not based on specific conditions of individual culverts, including the culverts located at Miles 343.42 and 343.43 of the Carrington Subdivision.

**4. NTSB Request:** During his interview Manager Bonebrake stated one or more of the culverts at the accident location was put into the "scope of work for next year". Please provide any documentation of this planned maintenance or replacement of the culverts at the accident location. From the interview transcript, Page 9-10 BONEBRAKE: "I know he did the inspection and we talked about it, he said that the debris was still in the pipe, they didn't have a chance to go knock it down. But we're in the process of doing our scope of work for next year and we did put that pipe in for a replacement...For next year. Due to its age, location."

CPKC Reply:

- If a bridge inspector or supervisor intends to recommend replacement or extensive maintenance, the inspector or supervisor:
  - Determines what should be recommended and gathers supporting information, including photos, as needed.
  - Makes a recommendation to the territory Engineering Manager or designated Professional Engineer for further consideration as part of CPKC Engineering's system-level planning process.
- CPKC's system-level planning process is typically initiated in August or September each year.
- Based on a conversation (phone call) between Lori Kennedy and Manager Bonebrake on March 21, 2025:
  - Manager Bonebrake's reference to "we're in the process of doing our scope of work for next year" refers to the planning process that was expected to take place in August or September 2024 but had not started.
  - At the time of the occurrence, Manager Bonebrake had started to gather supporting information to make a recommendation to the territory Engineering Manager or designated Professional Engineer but had not made a recommendation.

**5. NTSB Request:** CPKC's Red Book of Structures references the "Structures Handbook of Best Practices". Please provide information on this handbook and its authority or relevance to CPKC culvert inspection and maintenance practices.

CPKC Reply: The handbook has no authority or relevance to CPKC culvert inspection and maintenance practices.

**6. NTSB Request:** CPKC's Red Book of Structures describes a condition rating table for components that is used by CPKC inspectors when rating culverts in the SAM program. Please provide any job aids, guides, or matrix that may exist to inform inspectors of how each rating applies to a given condition, if any exist.

CPKC Reply: A copy of the job aid has been uploaded to CP Share Subfolder 2025-03-07\_NTSB\_Request: See file: CPKC\_Component\_Condition\_Rating\_Job\_Aid\_Table.pdf.

**7. NTSB Request:** Please provide any track inspection records, include those for special inspections and automated inspection vehicles, that are in CPKC's possession that note an FRA or CPKC defect, or other concern, between MP 343.25 and 343.50 for the 10 years preceding the derailment.

CPKC Reply:

"CPKC defect" is not a term used by CPKC. Conditions found during an inspection would be assessed as either:

- an "FRA defect" if the condition meets the defect criteria and / or threshold as defined in the applicable regulatory requirements under 49 CFR Part 213 Track Safety Standards
- a "track condition" if the condition does not meet the defect criteria and / or threshold as defined in the applicable regulatory requirements under 49 CFR Part 213 Track Safety Standards

For track inspection records, see the following files that have been uploaded to CP Share subfolder 2025-03-07\_NTSB\_Request:

- Records from 2015 to 2022: CPKC\_Carrington\_M343.25-343.50\_DTN\_Defect\_Rpt\_2015-2022.pdf
- In the column "Reg Rule Description", if:
  - There is a code and description, the condition was assessed as an FRA defect
  - The field is blank, the condition was assessed as a track condition.
- Records from 2022 to 2024: CPKC\_Carrington\_M343-25-343.50\_TAM\_Defect\_Rpt\_2022-2024.pdf

**8. NTSB Request:** Please provide the two culvert inspection records prior to the September 2023 inspection for which we already have a record. If these two records show a rating of '3' for a blockage in the east culvert, MP 343.42, please provide all culvert inspection reports going back in time until a rating of '2' or less is noted for blockage. Please provide the version of the report that contains any text comments or photographs provided by inspectors.

CPKC Reply: Prior to September 2023, annual inspections were conducted on October 10, 2022 for the culverts at Miles 343.42 and 343.43. For both culverts, the rating for "blockage" was "1". A copy of the inspection reports have been uploaded to CP Share subfolder 2025-03-07\_NTSB\_Request: See file:  
[CPKC\\_Carrington\\_M343.42\\_343.42\\_Culvert\\_Insp\\_Rpts\\_2022-10-10.pdf](#)

**9. NTSB Request:** Please provide any records of track or culvert maintenance activity that are in CPKC's possession that note activities between MP 343.25 and 343.50 for the 10 years preceding the derailment. Please document the types of activities for which CPKC would have these records, and which activities it would not normally have these records. Please be sure to specifically provide records for, or otherwise address, culvert maintenance work and track surfacing.

CPKC Reply:

- CPKC maintains track inspection records as required under 49 CFR § 213.241 Inspection records. The retention period for these records vary depending on the inspection type and range from "at least one year after the inspection covered by the record"; "for at least two years after the inspection and for one year after initial remedial action is taken" and "for at least two years after the inspection and for at least one year after initial remedial action is taken, whichever is later."
- CPKC recordkeeping requirements for track and culverts are included in the following documents that were previously provided to NTSB on Oct. 3/24. See:
  - For Structure inspectors: [CPKC\\_Red\\_Book\\_Structures\\_2023\\_Rev\\_2023-05-29.pdf](#).
  - For Track inspectors: [CPKC\\_Red\\_Book\\_Track\\_Requirements\\_2024-04-01.pdf](#).
- Where records are required, track or culvert maintenance activity is primarily tracked in association with identified defects or conditions in centralized electronic systems (including Digital Track Network (DTN), Track Asset Management (TAM) or SAM). CPKC has searched these sources and has not found any additional records for the past 10 years beyond what has been previously provided to NTSB or is included in this response as part of answers to other questions.

**10. NTSB Request:** Please provide copies of any records that have not yet been provided (including communications, emails, text messages, and photographs) in CPKC's possession regarding the condition of the two culverts at the accident location. If none, please provide documentation of the nature of the search for such records and that no additional records were found.

- CPKC Reply: In addition to the response to question 9, CPKC employees with responsibilities related to the culverts located at Miles 343.42 and 343.43 of the Carrington Sub have searched information sources and data that are currently available to them e.g. emails, text messages and photographs. CPKC has found no additional records beyond what has been previously provided to NTSB or is included in this response as part of answers to other questions.

**11. NTSB Request:** CPKC provided two photographs taken in May 2023 during a previous incident near the accident culverts. Please share how these photos were obtained (i.e. who took the photographs). Also please provide, if possible, the original, unedited image files (.jpg, .heic, or similar) which would include metadata such as date/time stamps, device information, and potentially location information as well.

NTSB Clarification March 18, 2025 "There are actually three photos shared by CPKC that we were told were taken on May 17, 2023. They are located at the links below. (You'll need to login to the new service, Box, to view)

I'd like to be able to confirm what CPKC stated regarding the dates of the images, to the extent possible. Generally, if you have the actual image file from the phone or camera (jpg, heic, or similar) you can view metadata (file properties) that includes the date and sometimes the location where it was taken. We were only provided a PDF of the image so I am unable to view this information. It would also be helpful to know who took the picture for a bit of a chain of custody.

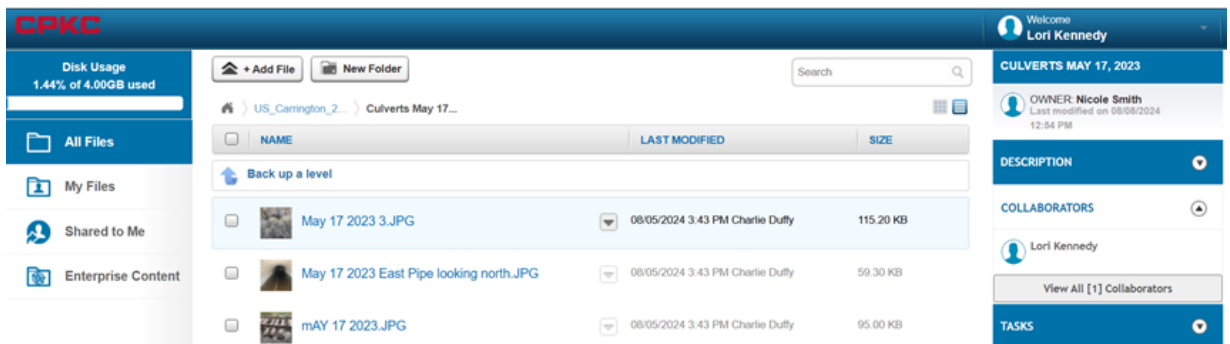
Thank you!

[US Carrington 2024-07-05 Culvert Photo 2023-05-17.pdf | Powered by Box](#)  
[US Carrington 2024-07-05 Culvert Photo East Pipe Looking North 2023-05-17.pdf | Powered by Box](#)  
[US Carrington 2024-07-05 Track Photo 2023-05-17.pdf | Powered by Box](#)

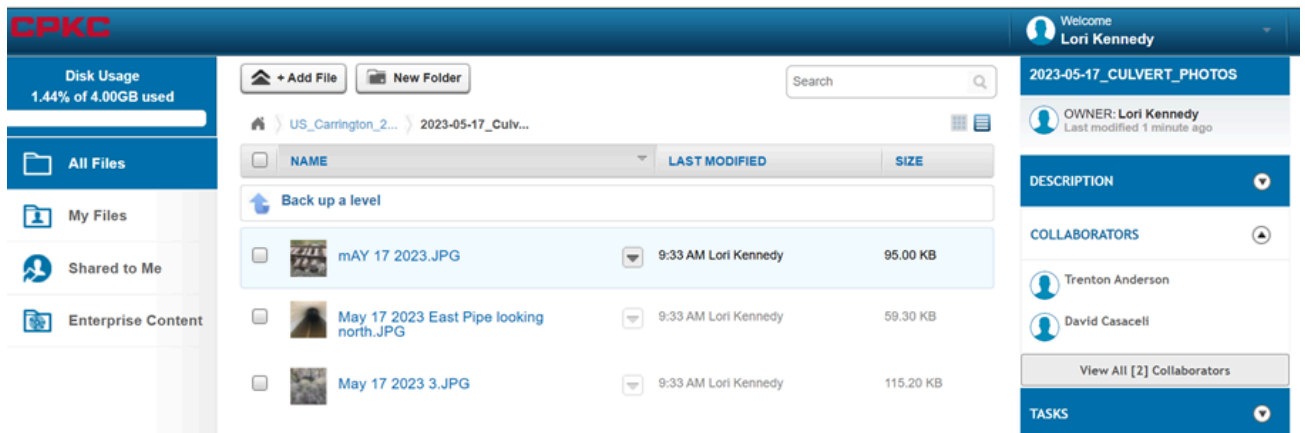
CPKC Reply:

- We have been unable to locate the original image files from the phone that was used to take the photos.

- The original photos were taken by Foreman Mike Hoffman on his phone in May 2023. Foreman Hoffman has reviewed the photos and texts on his current phone but he does not have the original photos.
- Foreman Hoffman sent copies of the photos via text to Charlie Duffy on July 15, 2024.
  - Mr. Duffy has provided snips of the photos and metadata from his phone which shows when he received them but not when they were taken.
    - Copies of these files have been added on Mar. 22/25 to CP Share Subfolder 2025-03-07\_NTSB\_Request > 2023-05-17\_Culvert\_Photos. See files: IMG\_0448.jpeg; IMG\_0450.jpeg; and IMG\_0452.jpeg.
  - Mr. Duffy has reviewed texts prior to July 15, 2024 but does not have the original photos.
- Per the screen shot below, on August 5, 2024, Mr. Duffy provided 3 photos in file format .jpg to CPKC Regulatory Affairs using a file transfer system CP Share. The filenames (May 17 2023 3.jpg, May 17 2023 East Pipe looking north.JPG, mAY 17 2023.JPG) were assigned by Mr. Duffy when he saved the files to an internal file system and after he received the text from Foreman Hoffman on July 15, 2024. It is Mr. Duffy's understanding that the photos had been taken on May 17, 2023. The "Last Modified" column reflects when the file was added to CP Share, is not the original file date and does not indicate that the file has been modified.



- Copies of these files have been added by Lori Kennedy on Mar. 22/25 to CP Share Subfolder 2025-03-07\_NTSB\_Request > 2023-05-17\_Culvert\_Photos. See files: May 17 2023 3.jpg, May 17 2023 East Pipe looking north.JPG, mAY 17 2023.JPG



- The table below shows how these files align with what was previously provided by CPKC.

File Provided by CPKC to NTSB	Photo Taken By	Filename for Image from C. Duffy (.jpg format)
US_Carrington_2024-07-05_Culvert_Photo_2023-05-17.pdf	Foreman Mike Hoffman	May 17 2023 3.jpg,
US_Carrington_2024-07-05_Culvert_Photo_East_Pipe_Looking_North_2023-05-17.pdf	Foreman Mike Hoffman	May 17 2023 East Pipe looking north.JPG
US_Carrington_2024-07-05_Track_Photo_2023-05-17.pdf	Foreman Mike Hoffman	mAY 17 2023.JPG

- As additional background, Mr. Duffy has advised that it is his understanding that these three photos are related to the inspection record, including defect and action, entered into the TAM system on 5/17/23.

Any questions, please let me know.

Regards,  
Lori Kennedy  
Managing Director Regulatory Affairs  
**CPKC**

Building 1  
7550 Ogden Dale Rd. SE  
Calgary, Alta. T2C 4X9  
C [REDACTED]  
**CPKC Leadership Coach**

**From:** David Casaceli [REDACTED]  
**Sent:** Friday, March 7, 2025 1:31 PM  
**To:** Lori Kennedy [REDACTED]  
**Cc:** Charlie Duffy [REDACTED]  
**Subject:** Re: RRD24LR012 Information Request March 7, 2025

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Not specifically. Next week would be great, two weeks would also be reasonable. If one or more pieces looks like it'll take longer than that, let me know and we can talk about it.

Kind Regards,

David F Casaceli PE  
[REDACTED]

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**From:** Lori Kennedy [REDACTED]  
**Sent:** Friday, March 7, 2025 3:20:07 PM  
**To:** David Casaceli [REDACTED]  
**Cc:** Charlie Duffy [REDACTED]  
**Subject:** RE: RRD24LR012 Information Request March 7, 2025

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David;

Acknowledging receipt. If there a date that you need this by?

Thanks  
Lori  
Lori Kennedy  
Managing Director Regulatory Affairs  
**CPKC**

Building 1  
7550 Ogden Dale Rd. SE  
Calgary, Alta. T2C 4X9  
[REDACTED]

CPKC Leadership Coach

**From:** David Casaceli [REDACTED]  
**Sent:** Friday, March 7, 2025 1:14 PM  
**To:** Lori Kennedy <[REDACTED]> Charlie Duffy [REDACTED]  
**Subject:** RRD24LR012 Information Request March 7, 2025

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**This Message Is From an External Sender**

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Good afternoon, Lori/Charlie,

As I am working to finalize some internal reports on this accident and prepare for our report writing phase, I have a few lagging questions that I would like to ask. Lori, I spoke with Charlie, so he does know that some of these are coming. Note: some of the document requests are for extended periods of time given the nature of certain culvert failures to occur over long periods.

1. What are CPKC's requirements, if any, to perform internal inspections of culverts? Please provide any relevant rules or documentation. By internal, I mean inspectors entering the culvert and inspecting it from the inside from one end through to the other, not just viewing it from the inlet/outlet.
2. The Red Book of Structures in section 2.3.3 (b) notes that culverts with 'poor hydraulic or structural conditions' should be inspected annually. How would one know if a given culvert had been designated as such and therefore required the increased frequency?
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  - a. From the interview transcript, Page 9-10 BONEBRAKE: "I know he did the inspection and we talked about it, he said that the debris was still in the pipe, they didn't have a chance to go knock it down. But we're in the process of doing our scope of work for next year and we did put that pipe in for a replacement...For next year. Due to its age, location."
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7. Please provide any track inspection records, include those for special inspections and automated inspection vehicles, that are in CPKC's possession that note an FRA or CPKC defect, or other concern, between MP 343.25 and 343.50 for the 10 years preceding the derailment.
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- 11. CPKC provided two photographs taken in May 2023 during a previous incident near the accident culverts. Please share how these photos were obtained (i.e. who took the photographs). Also please provide, if possible, the original, unedited image files (.jpg, .heic, or similar) which would include metadata such as date/time stamps, device information, and potentially location information as well.

Thank you both!  
12.

*Kind Regards,*

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**David F Casaceli PE**

Railroad Accident Investigator

National Transportation Safety Board



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