

GENERAL

Nearly every plant with rail operations has identified working around and on railroad tracks as high-risk and countermeasures need to be taken to prevent rail-related accidents. In most cases, the railroad is an internal plant department, but some companies have outsourced this function to contractors. In-plant railroads are typically under OSHA's general industry regulations. However, there are minimal references to rail activity in the regulations, and as such, most rail safety violations are addressed under the General Duty clause. The Federal Railroad Administration (FRA) has established extensive safety requirements under 49 CFR; however, in-plant railroads do not come under FRA jurisdiction. Appropriate training based on complexity of the job and potential hazards related to in plant rail shall be provided to all applicable employees. Assessments shall be used to determine whether the personnel have the knowledge and have demonstrated skills to safely perform their work assignments. Retraining and testing shall be required for unsatisfactory/ unsafe performance of job assignments.

Most rail-related injuries to construction workers fall into two categories: crushing injuries between and under cars and struck-by injuries. Contractors with the most success in preventing rail-related incidents have adopted a set of cardinal rules pertaining to railroad safety. Although the cardinal rules may vary slightly from company to company, the following list is representative of the important items that many companies want their employees to be aware of:

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~ Parking and Walking Around Tracks

No vehicle or equipment should be parked within 8 feet of the center of the tracks. This assures that moving rail equipment will not strike other equipment. In all cases pedestrians/employees shall cross at existing designated pedestrian rail crossings where provided. Additionally, vehicle crossings are not intended as pedestrian crossings unless they are so identified and/or located, and no other pedestrian crossings exist in the area. In addition, pedestrians should never walk inside the rails, but rather walk at least 6 feet from the outside of the rail. Approved hard hats, approved metatarsal boots and approved safety glasses with permanently attached side shields shall be worn in designated areas

~ Crossing Railroad Tracks

Pedestrians, vehicles and equipment should cross railroad tracks only at designated crossings. Furthermore, no crossing is permitted when lights and bells are activated and there is railcar movement in sight. If a designated crossing is not available, do not cross within 10 feet of the end of a parked rail car, do not cross between uncoupled cars, stop, look and listen prior to proceeding across the tracks, and never step on rails, as they may be slippery.

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~ **Head-End Protection**

Simply put, this refers to positioning a worker at the front end of the train in order to watch for pedestrians or other equipment that may be in the direction of travel. This can be the locomotive operator if he/she has a clear view of the rails ahead. It may also be a brakeman or switchman who is in radio contact with the locomotive operator. If the locomotive is operated by a radio-controlled remote, then the remote operator must be at the front of the train, watching in the direction of travel.

~ **Work On or Near Tracks**

Prior to performing work within six (6) feet of any railroad track, permission must be obtained from railroad Supervisor/Designated person to take the track out of service. When any type of maintenance or repair is being performed on or near railroad tracks, some form of positive track protection should be utilized. This could be in the form of a derailer placed in front of the work area or a switch that has been diverted and locked out. In addition, a warning device such as a blue flag or light should be placed in front of the work area. Never attempt to crawl under rail equipment or climb over moving rail equipment or attempt to cross in front of moving equipment. The positive protection and warning devices may need to be placed on both sides of the work area if rail equipment can travel both ways.

~ **Work Between the Rails**

Many of the injuries and fatalities that have occurred in plant railyards have occurred when employees positioned themselves between the rails. Never position any part of the body in a potential pinch point. Rail equipment can move in either direction at anytime. When coupling or uncoupling, it is safer to work with one foot outside the rails whenever possible. Also, workers should avoid kicking couplers when they stick, since this activity increases the likelihood of falling between the rails.

~ **Riding on Railcars**

Riding on railcars is a risky venture in the best case. Companies that permit this practice require that workers board or de-board the car only when the train is stopped. Furthermore, four points of contact should be maintained while riding, and one should never ride on the side or end sills or the couplers.

These cardinal rules by no means define the entire scope of a safe railroad operation in a plant. Safe railroad operations involve a significant number of rules, safe work procedures and comprehensive employee training. Railroad operations are inherently dangerous due to the sheer size of railroad equipment and the fact that there is often an abundance of equipment operating simultaneously. However, many companies can and do operate rail equipment safely. It all comes down to following the established rules and procedures to the letter.

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