

2022

Safety Plan

CSX INTERMODAL
TERMINALS



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Introduction

The **Power** of the Intermodal Safety **Program** is the **Plan**.

This Safety Plan aligns the efforts of an exceptionally well-qualified team of Intermodal Leaders to ensure tight integration and balance of operations & safety.

The Safety Plan identifies Roles & Responsibilities at every level. For leaders, our great team of craft employees and contractor partners who provide work and services on CSX Intermodal Terminals.

The Safety Plan identifies and directs leading indicators (positive actions) executed concurrent with intermodal operations. These actions build positive, achievement-based activity into a robust terminal tempo.

From annual training and Face-to-Face discussions to O-Tests and Operational Performance Evaluations, the intermodal Safety Plan leverages the power of predictive and preventive actions to deliver superb annual results.

For more information on Leading Indicators check out [Leading Indicators | Occupational Safety and Health Administration \(osha.gov\)](#)

The Guiding Principle Operate Safely

Maintain 100% compliance with safety and operating rules 100% of the time to protect our employees, our customers' freight, and the communities in which we operate.

How We Operate Safely

- Know the work and perform it responsibly
- Avoid unsafe acts and hazardous conditions
- Look out for others and hold them accountable to Operate Safely

We will achieve our goals by:

Focus on Critical Rules

Intermodal Critical Rules represent the most common rules and practices associated with fatalities or serious injuries. Every employee and contractor working on an intermodal terminal **MUST** know and understand **“when rule is not followed there is potential for a life to change forever.”**

Get Out on the Terminal

Leaders, get out on the terminal! **Be a capability, not a location.** Operate from the terminal vehicle, become a constant presence and positive influence on the terminal. Build relationships and commitment from everyone on the terminal to Operate Safely.

Operational Performance Evaluations & Training

Our craft employees are an incredible, productive resource. To ensure maximum productivity, we must increase the number of employees qualified to operate lift equipment. Currently, only 51% are fully qualified on their terminal lift equipment. Our goal for 2022 is to improve to over 75%. We will achieve this through assignment of online training and following up with OJT and the Operational Performance Evaluation.

The One-CSX Strategic Plan

Quarterly engagement between leaders and craft employees will ensure we are on the cutting edge of Strategic Plan implementation building blocks to:

1. **Build a One-CSX Workforce** - Employees at every level working together with mutual understanding to ensure success.
2. **Harness Transformative Technologies** – Leveraging systems that help us work safer and smarter and continually deliver better customer service.
3. **Growth through Innovation** – Identifying new service solutions that capitalize on service improvements, make it easier to do business with us, and make us more competitive with other modes of transportation.

The 2022 Safety Plan requires leaders to be out among the workforce guiding them in the right direction. Leaders own operations and safety at their locations.

The plan this year includes an updated Training Program that confirms meeting regulatory requirements and building competency in core subject issues.

Our team members will be trained the right way and not punished the wrong way. The Safety Plan builds accountability and alignment into scheduled activities from the bottom up through training, evaluation and coaching to make sure we spend less time dealing with discipline and remediation.

Leaders – you are directed to review this plan with your team and contractor partners to discuss Safety Plan components and develop your region/terminal approach to proactively execute the Safety Plan.

The Pillars of our Safety Plan

Leadership

The willingness and ability to direct actions that create a culture promoting safety, crew health and inclusion among employees, contractor partners and the dray community. Interactions between leaders and teams influence safety performance through words and actions.

Engagement

Commitment to being involved and actively participate in every aspect of the Safety Plan. Leaders and the team will constantly focus on identification and mitigation of workplace hazards to improve safety culture and set conditions for success.

Training

Providing resources to ensure operational readiness, develop employee knowledge and skills necessary to know the work and perform it responsibly and efficiently.

Accountability

Ownership of the Safety Plan by leaders and team. Accepting responsibility for driving the right results and desired end state. The desired end state is achieved when the team delivers positive outcomes and sustainable culture change. Deviations from the plan to Operate Safely are dealt with by leaders positively using coaching/counseling, remedial training, and if required, the disciplinary process.

Roles and Responsibilities

The complete list of responsibilities for each position is found in the Intermodal Safety SOP.

Senior Directors of Terminal Operations

- Set expectations and provide guidance for terminal safety action plan elements.
- Appoint Region Leader to ensure execution of the Safety Plan to include tracking and reporting of leading indicators. This appointed leader is the Region Safety Accountability Partner to the Safety Team.
- Develop Region Plan for review of safety performance dashboards to ensure terminals meet expectations for completion of Safety Plan elements. Review and corrective actions expected at least weekly.
- Allocate resources to terminals and hold them accountable for safety and training.
- Provide specific guidance to hubs and terminals to ensure top safety challenges and vulnerabilities are identified and the plan to improve is in place, monitored and sustained.
- Support Intermodal Equipment Reliability Program and ensure terminals are active participants in the process to improve equipment reliability and provide feedback to equipment operators on repairs and maintenance status.
- Conduct short notice Safety Blitz events to focus leaders on designated operational test issues and topics.

Hub Directors and Senior Managers

- Leaders of multiple terminals are directly responsible for the execution layer of the Safety Plan at their terminals.
- Responsible for ensuring training and other time-sensitive elements of the Safety Plan are accomplished within designated timelines for assigned terminals.
- Review Safety Dashboards and leading indicators at least weekly. Take actions to ensure goals are met and compliance with the Safety Plan is maintained.
- Conduct Safety and Training audits of your terminals using provided templates and directions to evaluate effectiveness of the Terminal Safety Action Plan, Manager's Safety Audit and leading indicator activities shown in the table below.

Roles and Responsibilities (cont'd)

Hub / Terminal Leaders and Team

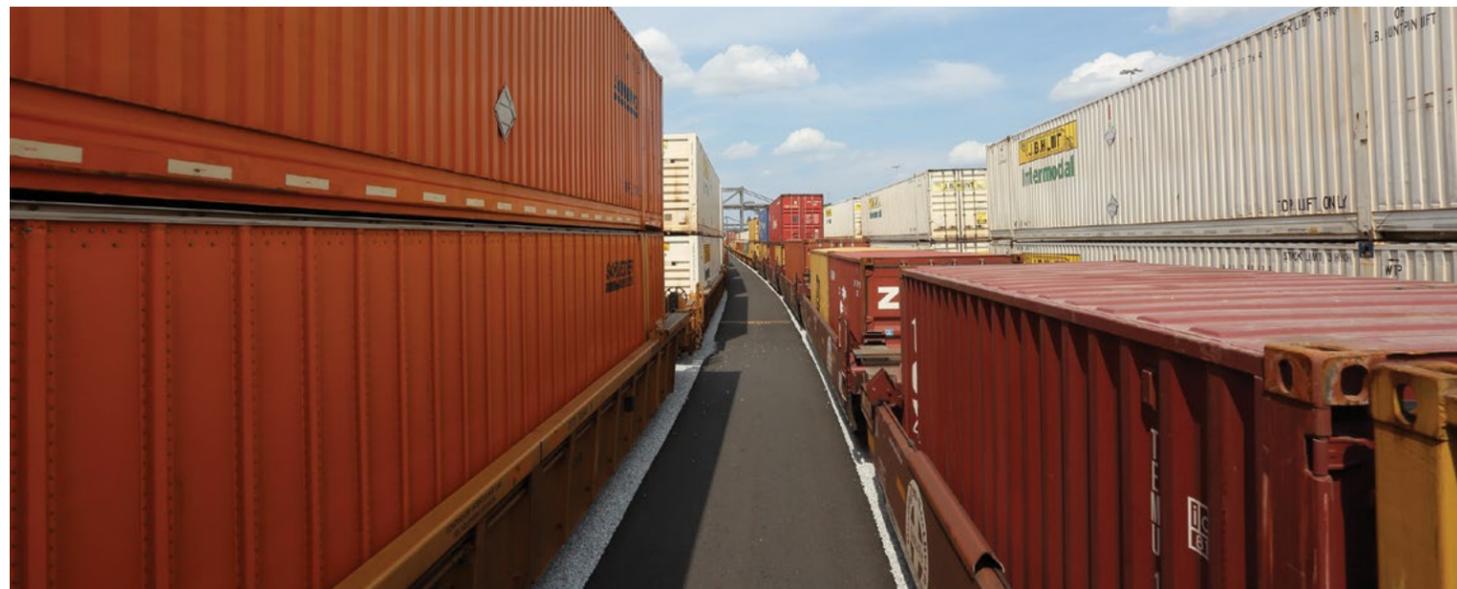
- Develop Terminal Safety Action Plan per guidance from the Region Director and this plan. Communicate it widely to your team, contractor partners and dray community.
- Build and foster intermodal operations safety culture that establishes an environment that:
 - o Promotes actions preventing mishaps through elimination of unsafe behaviors and hazardous conditions.
 - o Encourages employees to raise safety questions and concerns.
 - o Resolves safety concerns in a retaliation-free, retribution-free and timely manner.
- Conduct regular (at least weekly) review of leading indicator performance and Safety Dashboards. Aggressively lead to meet expectations and take corrective actions required to ensure compliance with the Safety Plan.
- Establish clear rules of accountability using pre-shift safety briefs, rules testing, regulatory training, operational performance evaluations (OPEs), terminal audits, and on-board camera systems as leadership tools to influence safety culture.
- Improve equipment reliability by establishing a positive and effective system that begins with employees/contractors performing pre-shift equipment inspections and follows discrepancies through the repair process and return to service.
- A Daily Vehicle Inspection Report (DVIR) will be completed and submitted by each operator using the equipment. See information on MyAssets within this plan.
- Provide feedback to equipment operators on the resolution of their DVIRs is a critical part of improving real and perceived equipment reliability. Any questions on the DVIR process can be answered by sending an email to DL IMOD Asset Management.
- Commitment to daily engagement and being where the work is.

Intermodal Safety Team

- Support the Directors and terminal leaders in development and execution of safety plans and initiatives.
- Focus on Intermodal Operations safety challenges. Make certain there is an aggressive plan to improve and sustain desired safety performance.
- Provide safety performance data and trend analysis to support decision-making and planning.
- Assist leaders to track the execution and completion of the components of this plan.
- Conduct Safety and Training audits (scheduled and unannounced) to measure compliance with this plan.
- Provide feedback/recommended practices to provide consistent information on methods to correct and improve.
- Provide recommendations for change and improving the Safety Plan and Standard Operating Procedures.
- Support requirements for new employee training that includes Safe Start Orientation topics, standard operating procedures, and safety and equipment operations.

Employees and Contractor Partner Responsibilities

- Operate Safely
 - o Know the work and perform it responsibly.
 - o Avoid unsafe acts and hazardous conditions.
 - o Look out for others and hold them accountable to Operate Safely.
- Accept responsibility for knowing and following written and established safety rules and policies including the current CSX Intermodal Operations Rule Book and Standard Operating Procedures.
- Contractors complete ISNetworld registration for parent company and individual contractor employees providing work and services on CSX Intermodal Terminals property.
- Ensure all contractor employees complete required training designated through ISNetworld registration.
- Participate in the terminal safety committee initiatives.
- Report unsafe conditions to terminal leadership.
- Report all mishaps and near misses immediately to terminal leadership per the SOP.
- Safely operate equipment and perform functions for which they are qualified.



Training and Terminal Administration

- Managers are responsible to ensure new hire, recurring, regulatory and remedial training is assigned and completed as appropriate per Standard Operating Procedures requirements.
- Training completion for online resources is administered through the Learning Portal and supporting resources are available from learningadmin@csx.com.
- CSX Instructional Design provides regulatory-compliant training resources to support safe and efficient operations.

Leading Indicator Dashboards - Dashboard Guide for Roles and Responsibilities

(all dashboards available on the Intermodal Safety Team Site)

Dashboard	Required Action
Days since last tested	Identify employees not engaged with an O-test in over 16 days. Direct terminal leaders to remedy with an O-Test entered on team member's next shift.
Monthly Rules Test	Ensure timely completion of rules tests by each leader. All complete by 3rd Tuesday of each month.
OPE	Ensure number of qualified operators exceeds the terminal requirement for each equipment type.
OPTS Analytics Dashboard	Review leader test profiles to ensure compliance with Region or terminal guidance. Address issues of noncompliance with the leader and their Director.
OPTS Dashboard	4 tests per leader each week. Send reminder email on Friday and follow up Saturday to ensure all are complete.
Training + F2F	Complete annual training and F2F discussions per published guidance.
Supervisor O-Test Validations	Hub Directors – 8 per month All leaders with direct report leaders – 1 per week in addition to O-Test requirements

Metrics

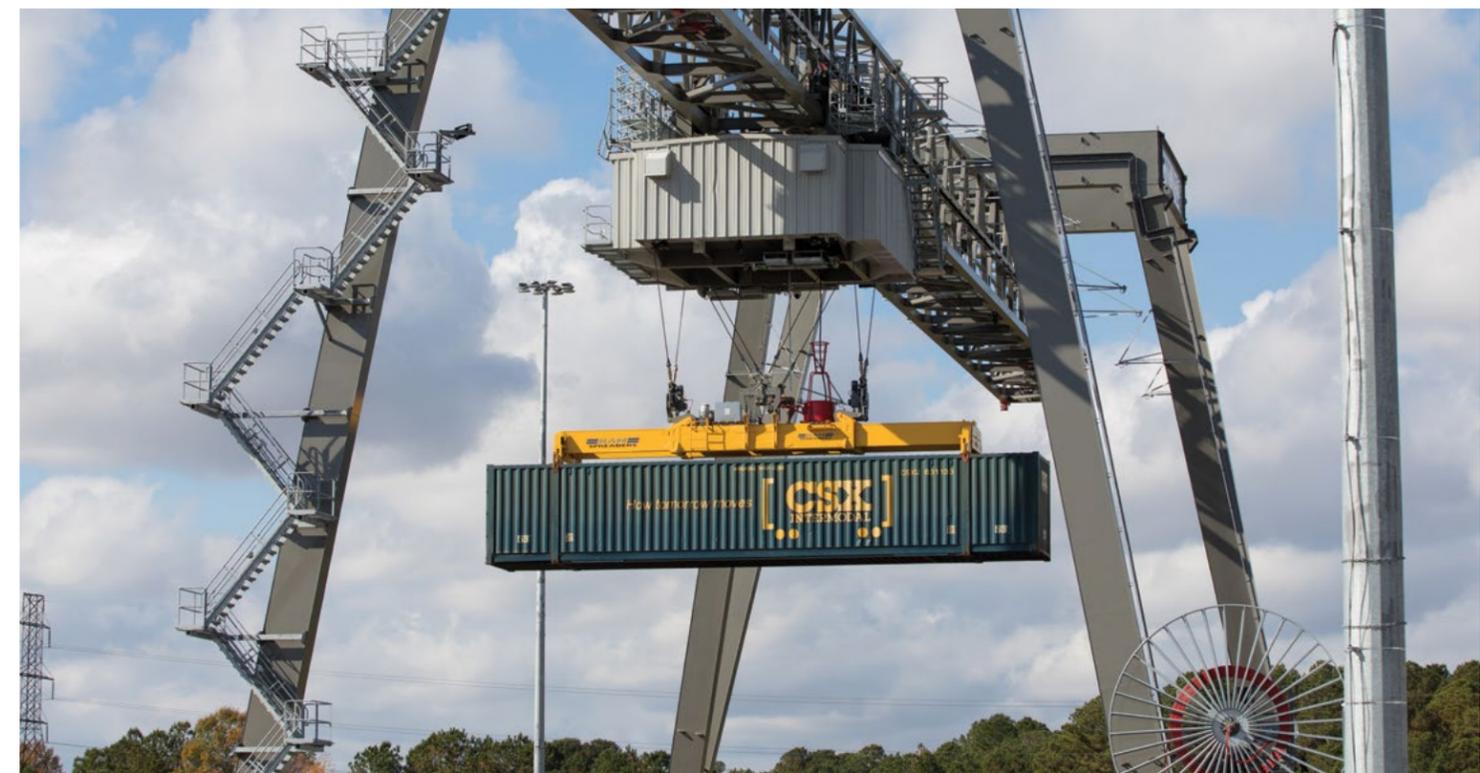
Metrics within this plan include the following:

- OSHA injury rating
- Mishap Severity Index (MSI)
- Contractor Incidents and OSHA injuries
- Regulatory compliance training
- Operational performance evaluations
- Rules testing through OPTS
- Drayman incidents and outreach program
- ISNetworld registration, badging and training compliance for contractors performing work and services on CSXIT property.
- Other metrics as presented during weekly safety calls and as directed by the Safety Council.

Safety metrics are updated regularly and published on Intermodal Safety Team Site.

Terminal leaders will review safety performance regularly and at monthly safety meetings to identify opportunities to improve (including contractors and the dray community who operate on the terminal). Factors to consider are:

- Identification of contributing factors and recommended practices to improve safety performance in challenging areas.
- Forward-looking statistics by month and quarter that can be emphasized early to correct or prevent a trend area in advance (seasonal transitions, severe weather preparations, etc.).
- Identification of safety trends that need attention or improvement (high mishap/injury areas).
- Identification of rules testing strategies for employees/contractors that drive improvement into areas not meeting expectations.
- Reports and video generated by onboard camera systems from lift equipment and hostler trucks.
- ISNetworld compliance of contractors operating on the terminal.



Appendix A | Safety Plan Elements

SAFETY PROGRAM ELEMENT	REFERENCE	EXPECTATION
Terminal Safety Action Plan (TSAP)	Terminal	Terminal level plan to improve and sustain desired safety performance through monthly audit/inspection of facilities, equipment, and training and contractor compliance through Leadership, Engagement, Training and Accountability.
Pre-Shift Safety Brief	Safety Plan	Premier engagement opportunity. Delivered to crew before work starts and if the work conditions change during a shift. Mandatory requirement for employees and contractors prior to starting work on a shift at an Intermodal Terminal.
Monthly Terminal Safety Meeting	Team Site	Monthly meeting of terminal leaders (employees, contractors) to discuss topics specified in the TSAP. Focus on performance (safety and productivity), communication and solutions. Terminal Leaders will submit written notes (uploaded) to the Safety Team site within the month of the meeting.
Manager Safety Audit	Team Site	Manager Safety Audit is conducted to ensure terminal leaders regularly review specific terminal facilities for serviceability, safety, and productivity. A monthly cross-functional terminal audit is conducted and submitted to the Safety team site along with the minutes from the Monthly Safety meeting. CSX Facilities Managers and contractors working on terminal will participate. Where issues are identified, solutions are the responsibility of the terminal leaders.
Contractor Badging, Training and Compliance	ISNetworld	Terminal leaders will validate (at the monthly Safety meeting), contractors who operate on CSX property by instructing the contractor to present a printed copy of their employee ISNetworld status. Contractors who are not compliant will not operate on CSX property.

SAFETY PROGRAM ELEMENT	REFERENCE	EXPECTATION
Safety Blitz	As directed	Leaders focus execution of the Safety Plan through audit of processes and testing during a specified time frame. The goal of the Safety Blitz is to increase the frequency and quality of engagement with employees on safety concerns.
Equipment Status	My Assets	Properly functioning equipment is essential to safe operations. Terminals have a robust process to inspect, identify and maintain equipment readiness per the guidance in the Equipment Reliability Program (ERP). Equipment inspections are documented using a Daily Vehicle Inspection Report (DVIR). Discrepancies are reported to the terminal maintenance contractor for correction. Visibility of equipment status will be maintained in the My Assets Application. Expectations are that DVIRs are completed daily, discrepancies reported to maintenance. Maintenance corrects and provides feedback to Operations on repairs.
Terminal Incident Reporting & Reviews	MRS and Incident Report Tool	<p>The first report of an incident is recorded by the terminal using the Initial Incident Report tool immediately. Follow up reporting is completed using the Mishap Reporting System (MRS).</p> <p>Incidents are reviewed weekly on the Intermodal Operations Safety Call and monthly during the terminal safety meeting. Employee incidents require a discussion of rule violation, remedial training assigned and how the disciplinary policy was applied.</p> <p>Incident review will include root cause analysis (what, why) and plans to prevent future occurrence and improve safety performance at the terminal.</p>

Appendix A | Safety Plan Elements (cont'd)

SAFETY PROGRAM ELEMENT	REFERENCE	EXPECTATION
Operational Testing	OPTS	Testing of employees and contractors is an opportunity to provide real time feedback on tasks being performed with the expectation of being 100% rules compliant. Meaningful feedback should be provided immediately following the test. Testing will be performed per guidance in Appendix D Guidance for Conducting Operational Tests on Intermodal Terminals.
O-Test Supervisor Validation	Tableau	<ul style="list-style-type: none"> • Testing focused on areas with the most risk of leading to behavior that could cause a mishap • Opportunity to provide guidance on testing for the region/terminal • Improved conversations on rules tests (what, who, when) • Improved compliance on day of week testing • Less follow up on 4 test per week compliance
Employee Testing Intervals (Days since last test)	Tableau	Leaders will monitor crew and contractor "last test" dashboard to ensure testing and engagement is occurring at least every 16 days. Status of employees not tested in over 16 days is discussed on the weekly safety call.
Operational Performance Evaluations (OPE)	LMS and Tableau	To meet OSHA requirements for equipment operators, CSXIT conducts an OPE every 3 years for each item of equipment the employee operates. OPE requirements and templates are located on the team site.
Regulatory Training and Face to Face	LMS and Tableau	Training required for the year is assigned in January 2022. Training is completed by July 30, 2022.
Face to Face Discussions	Team Site	Conducted biannually or on a call - Leader and team member discussion focused on safety performance of company/terminal/contractor. These conversational engagements will ensure alignment and commitment to Operate Safely for anyone who works on a CSX Intermodal terminal. Documented in the LMS using code IMODSAFF2F.

SAFETY PROGRAM ELEMENT	REFERENCE	EXPECTATION
Drive-cam coaching	Lytx.com	Regular review of events from Lytx website, coaching and discipline as required. Video evidence of rule non-compliance are addressed through the discipline system/recorded in OPTS as a rule failure.
Power Equipment Maintenance Shop	Intermodal Equipment Reliability Program	Regular leader visits to the shop to reconcile with maintenance on equipment status, inspect housekeeping, hazmat, electrical and safety expectations.
CCT Maintenance Shop	Intermodal Equipment Reliability Program	Regular leader visits to discuss terminal chassis requirements, repairs in progress, bad order reporting, housekeeping, hazmat, electrical and safety expectations.
Leader Safety & Training Audits with Safety Team	Team Site	Safety coaching and mentoring with a Safety Team member during terminal level audit. Opportunity to align expectations among leaders and recognize progressive productivity and safety performance.
Industrial Hygiene	Industrial Hygiene Team Site	Maximum compliance with annual Hearing Conservation Program across the terminals.

Appendix B | Intermodal Critical Rules

CRITICAL RULE	EXPECTED BEHAVIOR	ACCIDENT RECAP
<p>Never walk on the side rail of railcars. (GRND.12)</p> <p>When placing or removing IBCs on well cars, the grated cat-walk will be utilized to traverse from side to side of car. At no time will personnel walk on surfaces not meant for foot traffic. (GRND.22)</p> <p>Look where you are planning to step: choose the safest route and use designated walkways, handholds, and handrails. (STF.2)</p>	<p>When traversing railcars, be very intentional where you place your feet (don't put your feet where your eyes have not been). Ensure to utilize designated walking surfaces and use the hand holds where provided. In addition, use containers, trailers or other parts of equipment to help maintain balance if applicable.</p>	<p>An employee, while placing IBCs from the outside cat-walk, lost their balance and fell to the ground. OSHA reportable injury.</p> <p>A contractor employee traversing on the side-rail of the railcar fell into the well. Multiple OSHA reportable injuries.</p>
<p>Do not position yourself on a platform or an adjacent platform of the well being loaded. (GRND.13)</p>	<p>Remain in a place of safety on the ground and do not climb onto these platforms until the lift machine is no longer engaged with those cars.</p>	<p>A contractor employee was standing on the adjacent well as the top container of a double-stack was loaded. The individual crossed over and attempted to lock an IBC while the lift operator was still making adjustments and placed their free hand on top of the bottom unit which ultimately got pinched/ crushed between the two containers. OSHA reportable injury.</p>
<p>No worker may engage in any activity on or about a railcar unless the track is properly locked out at the switch providing access and/or derailleurs properly locked and blue flagged at both ends. (BLU.1.a)</p> <p>Any personnel requiring access to an Automatic Wide-Span Crane (AWSC) must request access from CSXIT Terminal Management. The AWSC must be disabled in Traffic Control (TC) by CSXIT Terminal Management. The automation selection switch located at the base of the AWSC must be placed into "Maintenance" or "Manual" mode and visual confirmation of the status light must be confirmed. (WSC.5.a-b)</p>	<p>Understand and follow all applicable Blue Signal Protection rules for your terminal's situation. Avoid willful non-compliance.</p>	<p>Blue signal protection was dropped on one end of the track that was still being worked/grounded to allow the road crew to get head start by attaching locomotive. The contractor employee that was grounding was knocked off the railcar. OSHA reportable injury.</p> <p>Blue signal protection was removed and a track shoved without first disabling the Automatic Wide-Span Crane (AWSC) in Traffic Control. The crane spreader locked into a container prior to the shove, resulting in a Class A mishap.</p>

CRITICAL RULE	EXPECTED BEHAVIOR	ACCIDENT RECAP
<p>Maintain situational awareness and take appropriate measures to protect personnel, facilities and equipment from harm. (GEN.7)</p> <p>Get out and look when unsure of surroundings or conditions, especially when backing up. (Recommended Practices)</p>	<p>Avoid collisions by:</p> <ul style="list-style-type: none"> • Remaining alert • Obeying posted speeds • Avoid backing when possible • Maintain proper clearance when making turns • Get out and look 	<p>A contract employee fell asleep and rammed hostler into the rear of another contract hostler operator.</p> <p>An employee operator lifting a container out of the stacking area did not ensure proper clearance with containers to the right and behind the machine spreader. The container on the 2nd tier of the adjacent stack was knocked down to the ground.</p>
<p>When using onboard computers, positioning Glad Hands or IBCs, and anytime an operator takes their hands off the steering mechanism the following actions will be taken:</p> <ul style="list-style-type: none"> • Terminal Vehicles – must be stationary or in park. • Hostler – neutral with parking brake applied. • IBC Cart – stationary. • Lift Equipment – stationary with parking brake applied where applicable. If the operator is out of the seat, exits the vehicle/equipment or is not in direct control of the unit via a Remote Operating system, the operator must prevent inadvertent movement by appropriate means. This includes putting the unit in park, using chocks or turning the engine off. (EQP. 19. a-d.) 	<p>Avoid distractions. Do not drive/operate equipment and perform other tasks at the same time. Secure equipment prior to engaging in other activity, especially if it requires you to leave the cab.</p>	<p>An employee was updating the last physical move in the on-board computer while driving and veered the hostler truck onto the railroad tracks.</p> <p>While moving chassis, a contractor employee exited a hostler truck that remained in gear and subsequently struck the employee. OSHA reportable fatality.</p>
<p>Keep extremities and other body parts from under hitches. (GRND.6)</p>	<p>When raising hitches, ensure the locking mechanism is firmly in place prior to removing the pull up hook. When lowering pull-up hitches, safely position yourself on the ground alongside the hitch.</p>	<p>A contractor was attempting to remove the hook and strap from a hitch that had just been pulled, the hostler driver gave slack so that the hook could be removed, but the hitch was not properly locked in place and it fell on the contractor's foot.</p>

Appendix B | Intermodal Critical Rules (cont'd)

CRITICAL RULE	EXPECTED BEHAVIOR	ACCIDENT RECAP
Keep spreaders and equipment booms at least 20 feet from electrical lines. (EQP. 25.)	Follow Terminal Specific Instructions regarding low power lines at your terminal.	Multiple incidents in 2021 where lift operators were operating in prohibited areas where power lines are too low. After power lines were struck some operators dismantled equipment without regard to electrical danger.
<p>Stop, Look & Listen for oncoming rail traffic before driving over rail tracks. (GEN. 30.)</p> <p>Approach unregulated intersections with caution and prepared to stop as necessary. (GEN. 29.)</p> <p>Be alert for and keep clear of the movement of railcars, locomotives, or equipment at any time, in either direction, on any track. (TRC.1)</p>	Expect movement of other equipment at crossings and intersections. Stop look and listen where required. Approach with caution and be prepared to stop everywhere else.	<p>An employee approached a rail crossing, looked in both directions, and did not see either the railcars being shoved towards the crossing or the flagger protecting the crossing. The employee proceeded to cross without stopping and the chassis/ container was struck causing a derailment.</p> <p>An employee operating an IBC cart while crossing multiple tracks did not see a train crew shoving cars into one of those tracks. The IBC cart was struck and the employee ejected, landing safely to the side, without injury.</p>
<p>Do not approach a running lift machine unless the operator has been notified by a hand signal or radio or until the operator has acknowledged the personnel's presence. (GRND.10)</p> <p>Do not lift suspended loads overhead of personnel or other lift equipment with personnel inside. (EQP.23)</p>	Exercise extreme caution around lift machines engaged in loading and unloading containers/ trailers. Communicate with operators, stay in their line of sight and remain clear of the crane's movement.	A contractor lift operator was observed dangling a container above a chassis they intended to load. The operator dismantled the crane to unlock the twist-locks, positioning themselves directly under the suspended container.

Appendix C | Drayman Critical Rules

CRITICAL RULE	EXPECTED BEHAVIOR	ACCIDENT RECAP
Unattended vehicles must be shut off with parking brakes properly applied. (G-6)	Secure equipment from moving before exiting the cab	A drayman was fatally injured when he failed to secure his truck while picking up a chassis. The tractor moved while he was in between the equipment.
<p>During live lift operations, stand in designated safe zone as instructed by the terminal personnel. (H-4)</p> <p>Do not drive under suspended loads. (G-5)</p>	<p>Do not approach lift machines.</p> <p>Maintain situational awareness at all times.</p>	A drayman was fatally injured when outside of his vehicle cab and struck by a moving crane.
Drivers will remain in their vehicles while in the roadability area. Airlines must be removed and engines shut off. (K-2)	Follow established safety and securement procedures when receiving maintenance at CCT/Roadability.	A maintenance contractor was fatally injured when safety protocols at the CCT maintenance area were not followed. (This was in the industry, not CSXIT.)
<p>Park in authorized areas only, such as Driver Assistance. (G-8)</p> <p>Do not change lanes within the gate area. (E-6)</p>	<p>Ensure the way is clear when walking across the flow of traffic. Use crosswalks where provided.</p> <p>Lane changes are prohibited.</p>	<p>A drayman was walking in an undesignated area, crossing multiple lanes at the out-gate and was subsequently run over by the left chassis wheels of a fellow driver from the same drayage company.</p> <p>Multiple reports of lane change accidents in gate area.</p>
DO NOT attempt to adjust a container/ chassis positioning issue by yourself (using personal tools or otherwise) if a container is not loaded properly on top of a chassis twist-lock or pin. While adjusting a twist lock do not place hands or any body parts near a pinch point. (H-7)	Avoid placing any part of your body in a pinch point.	Multiple reports in 2021 - Draymen attempted to use a hammer to adjust a container that was sitting on top of a chassis twist-lock while placing their free hand on the chassis. When the twist-locks turned, the containers dropped on their hand.

Appendix C | Drayman Critical Rules

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During live lift operations, stand in designated safe zone as instructed by the terminal personnel. (H-4) Do not drive under suspended loads. (G-5)	Do not approach lift machines. Maintain situational awareness at all times.	A drayman was fatally injured when outside of his vehicle cab and struck by a moving crane.
Drivers will remain in their vehicles while in the roadability area. Airlines must be removed and engines shut off. (K-2)	Follow established safety and securement procedures when receiving maintenance at CCT/Roadability.	A maintenance contractor was fatally injured when safety protocols at the CCT maintenance area were not followed. (This was in the industry, not CSXIT.)
Park in authorized areas only, such as Driver Assistance. (G-8) Do not change lanes within the gate area. (E-6)	Ensure the way is clear when walking across the flow of traffic. Use crosswalks where provided. Lane changes are prohibited.	A drayman was walking in an undesignated area, crossing multiple lanes at the out-gate and was subsequently run over by the left chassis wheels of a fellow driver from the same drayage company. Multiple reports of lane change accidents in gate area.
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CRITICAL RULE	EXPECTED BEHAVIOR	ACCIDENT RECAP
Stop, Look, and Listen for oncoming rail traffic prior to commencing movement through any rail crossing. (G-1)	Exercise extra caution around rail tracks. Stop at rail crossings to ensure all tracks are clear of moving rolling equipment.	Drayman focused on parking unit in slot and backed container into the moving train.
NEVER back up in gate lanes. (E-5) Never pass behind a vehicle that is attempting to backup. (G-13)	Take precautions to avoid collisions. Get out and look when unsure of surroundings or conditions.	A drayman was parking in a lot and failed to ensure the path was clear while turning, colliding with railcars being shoved into a track. A drayman was backing up and hit the chassis of another driver who was swinging around to exit the terminal.
No use of wireless headsets or hands-free device is permitted while in motion/ moving on the terminal, including while outside the cab of the truck in any operating areas (parking or lift areas). (C-1) Mobile devices may be used only while a vehicle is parked (parking brake applied) in a designated parking area or parking spot (per the terminal guide). (C-2)	Avoid distractions; maintain focus on driving safely on the terminal.	Multiple reports of draymen entering the XGate portal or gate area and striking a concrete post, causing severe damages to their tractors.
Do not park or block rail tracks, roadways, crane paths, transfer lanes or aisles. (G-9)	Avoid parking in the foul of a track or Crane Path.	A drayman moved into the foul of the crane path on the east side of the stacks and the operator in the crane could not see the driver, striking the cab on the passenger side.
Obey all posted signage, speed limits and route guidance. (A-1)	Comply with posted speed limits avoiding sharp turns.	A drayman exiting the terminal took the turn towards the out-gate too fast and flipped the container onto its side.

Appendix D | Operational Testing Guidance

What does a good test look like?

What is your test plan?

- **When** – day or night, weekday or weekend, time on duty duration?
- **Where** – physical location of the team member and leader conducting test.
- **What** – processes to observe, rules to measure compliance against?
- PPE and Drug & Alcohol rules will not be tested unless a failure is noted while conducting an O-test on another rule.
- **How** - personal observation, camera, onboard recording device, drone.
- **Who** – when was the employee last tested? How were they rated? Employee strengths and weaknesses, what is the coaching opportunity? Demeanor during pre-shift brief calls attention for follow up testing.
- Announced or unannounced testing?

Observation of a series or sequence of processes – Does the method comply with our SOP?

- Equipment operations – sequence of four to six iterations of operating the equipment (lift machine, hostler shuttling chassis, ROS load/unload).
- What rules apply? How does the employee perform when measured against the rule as written?
- Provide examples of rules for:
 - o Lift machine operator
 - o Hostler operator
 - o Securement and grounds man
 - o ROS
 - o DVIR and equipment condition reporting

What is the debrief plan?

- Make sure the employee knows they were tested and why. This is the most important phase of the test and an opportunity to give feedback to the observed individual.
- Positively engage the employee or contractor being tested.
- Ask the person to assess their own performance or to describe to you what they were doing.
- Inform them of any corrective action such as training, remediation and/or discipline.

Tell the person what you observed them doing and how they performed against your expectation. Ask the person to summarize the conversation and testing event and clear up any misunderstandings.

(See link to OSHA article at https://www.osha.gov/safeandsound/docs/SHP_Better-Safety-Conversations.pdf.)

Provide feedback, positive or “opportunity to improve”.

Enter the test into OPTS within 48 hours.

Important Points on Operational Testing

- Review the entire process with new leaders who are becoming qualified to conduct an O-Test.
- Show new leaders the OPTS Analytics Dashboard and how to track their testing history.
- O-Tests must be submitted by COB on Saturday.
- PPE and Drug & Alcohol rules will not be tested unless a failure is noted while conducting an O-test on another rule.



Required reading for all leaders conducting Operational Tests is located at the OSHA link below.

www.osha.gov/safeandsound/docs/SHP_Better-Safety-Conversations.pdf

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