

THE BELT RAILWAY COMPANY OF CHICAGO
6900 South Central Avenue, Bedford Park, Illinois 60638



February 23, 2010
REVISED: August 10, 2010

CONTRACTOR/CONSULTANT
SAFETY ORIENTATION POLICY

The Belt Railway Company of Chicago (BRC) is the largest intermediate switching terminal railroad in the United States. We are governed by federal regulations administered by the Federal Railroad Administration (FRA). We are committed to being the safest switching and terminal railroad in the country.

This policy is designed to provide contractors and their employees with a clear understanding of our safety expectations and requirements.

This policy will be made part of the Contractor's Master Agreement for Services. Sub-contractors are under the responsibility of the primary contractor and must comply with all our rules and regulations.

Contractor employees will be provided with a copy of all applicable safety rules, operating rules, policies, and work practices prior to beginning work on and/or for the BRC.

Rules can not be written to cover every condition or situation encountered. However, by relying on common sense and good judgment, the safest course of action can be ascertained and followed.

No work/action should be taken until everyone involved is made fully aware of hazards, both seen and unseen, and have a plan to avoid incidents/injuries.

All contractor employees engaged in activities on BRC property must wear personal protective equipment (PPE) in situations where PPE is required. PPE includes, but is not limited to, wearing: Approved safety glasses with side shields, hard hat, hearing protection (when required by rule), reflective torso covering, safety-toe shoes at least six inches high with laces, oil resistant soles, and a distinct separation between the heel and sole.

CONTRACTOR/CONSULTANT SAFETY ORIENTATION POLICY

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Contractor employees will be observed/audited by BRC managers while engaged in activities on the BRC to insure adherence to this policy. While every effort will be made to utilize informal corrective instruction, frequent or flagrant violations of this policy may result in the contractor's employee being banned from BRC property and, in extreme or continued instances, the contractor being banned.

Contractor employees must have a photo identification badge visible on their person while on BRC property.

Job briefings are to be conducted before beginning a work activity, when work activity or conditions change or when another person enters the work area.

Job briefings must include, at the least, a discussion of the general work plan, existing or potential hazards, and ways to eliminate and/or protect against hazards.

Effective job briefings make the work group more aware of their surroundings and better prepared to recognize and avoid potential hazards.

BRC policy is that any contractor or employee of a contractor is required to receive on-track safety awareness training if their work activities will be within 25' of the outside rail on the track.

FRA regulation 49 C.F.R., Part 214 requires that a roadway worker must receive on-track safety training prior to fouling a track and annually thereafter. A Roadway worker is anyone whose duties include inspection, construction, maintenance or repair of: track, bridges, roadway, signal and communication systems, electrical traction systems, roadway facilities or roadway maintenance machinery on or near track or with the potential of fouling a track. To fulfill these requirements, contractor employees are required to participate in safety awareness and on-track safety training at www.ers-shortline.com or receive training deemed appropriate by the Chief Engineer and score 80% or higher on a recorded examination.



February 23, 2010

BRC CONTRACTOR SAFETY AWARENESS TRAINING

Statement of Safety:

The Belt Railway Company of Chicago (BRC) is committed to providing a safe working environment. We believe that every accident/incident or injury is preventable.

Safety Vision:

Our vision is that The Belt Railway Company of Chicago will operate free of accidents and injuries. The Belt Railway Company of Chicago will achieve this vision through:

A culture that makes safety our highest priority, and provides continuous self-examination as to the effectiveness of our safety process and performance. This culture is rooted in compliance with the rules and procedures that govern our operation...

A work environment, including the resources and tools, that is safe and accident-free where all known hazards will be eliminated or safe-guarded...

Work practices and training for all employees that make safety essential to the tasks we perform...

An empowered work force, including all employees, that take responsibility for personal safety, the safety of fellow employees, and the communities in which we serve.

Personal Protective Equipment:

- Wear high-top (6 inch or more), safety-toe shoes with laces, oil-resistant soles, and a distinct separation between the heel and the sole when working outside of an office environment.
- Wear approved safety glasses with side shields at all times while on duty.
- Do not wear tinted/dark eyewear:
 - During the period starting one hour before sunset and continuing until one hour after sunrise.

- When working in tunnels or in places where there is a similarly low level of light.
- When the available light would generally be considered inadequate for the performance of the job task.
- Wear an approved hard hat at all times while on duty, except when working in an office, while riding in a highway motor vehicle, while operating work equipment with fully-enclosed cabs, or in a designated break area.
- Do not wear loose-fitting and/or torn clothing that could become entangled in tools or equipment or could be a tripping hazard.
- Wear trousers that cover your entire lower body; shorts are not appropriate attire while on duty.
- Wear a shirt that provides protection from sun, insects, abrasions, and/or scratches; has at least one-quarter length sleeves, and covers fully the back and abdomen.
- Do not wear jewelry that could become entangled in tools or equipment.
- Wear approved hearing protection:
 - When operating or working within 20 feet of machines/roadway maintenance equipment or car retarders when in use.
- Wear approved reflective torso covering while on duty.

Safety and Security:

- Contractors entering BRC property are required to notify/check in with the department that has contracted for the work.
- Contractors must have photo identification visible on their person while on BRC property.
- The BRC is a drug and alcohol free workplace.
- No one can carry or have in their possession any firearm or weapon while on BRC property, unless authorized to do so by the BRC's Chief of Police.

Rights and Responsibilities:

- Everyone has the right and responsibility to perform work safely. Training, skills, work experience, and good personal judgment provide the foundation for making safe decisions about work practices.
- Everyone engaged in a common task must participate in a job safety briefing before beginning work and when work or job conditions change. The briefing should include a discussion of the general work plan, existing or potential hazards, and ways to eliminate or protect against hazards.
- Everyone is empowered to take appropriate action when an unsafe action or condition is observed.
- Co-workers should be warned of unsafe acts or hazards.
- It is an individual's responsibility to follow the rules and polices of the BRC.

Personal Electronic Devices:

- Contractors may use personal electronic devices only for business purposes while performing work on the BRC.
- All applicable state and local laws regarding personal electronic device usage must be adhered to.

Environmental:

- Handle and/or dispose of any product, material, waste, or other refuse used or generated during BRC related work contracted for in accordance with all applicable governmental regulations and BRC policies.
- Store all drums, pails, and buckets properly labeled (whether containing material or empty) in the properly designated area which complies with all applicable governmental regulations and BRC policies.

Motor Vehicles:

- Speed limit on BRC property is not to exceed 20 MPH.
- Follow all applicable governmental regulations and BRC rules when operating or riding in a motor vehicle.
- Seat belts, if provided, must be worn while operating or riding in a motor vehicle.
- If two or more people are occupying the motor vehicle, designate one person to guide backing movements from the ground.

On or About Tracks:

- When within 25 feet of the near running rail, contractors must be accompanied by a BRC employee.
- When working on or about tracks:
 - Be alert for the movement of freight cars, locomotives, or equipment at anytime, in either direction; on any track.
 - Do not attempt to mount, dismount, or cross over moving locomotives or freight cars.
 - Look in both directions before fouling or crossing a track.
 - Do not cross within 25 feet of the end of standing freight cars, equipment, or locomotives, except when proper protection is provided.
 - Do not cross over coupled, moving freight cars.
 - Do not step or sit on rail, switch, or retarder.
 - Do not take refuge under any freight car or locomotive.
 - Do not go under any freight car, equipment, or locomotive.
 - Do not go under any freight car, equipment, or locomotive.



February 23, 2010

BRC CONTRACTOR ROADWAY WORKER ON-TRACK SAFETY TRAINING

STATEMENT OF SAFETY:

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SAFETY VISION:

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A culture that makes safety our highest priority, and provides continuous self-examination as to the effectiveness of our safety process and performance. This culture is rooted in compliance with the rules and procedures that govern our operation...

A work environment, including the resources and tools, that is safe and accident-free where all known hazards will be eliminated or safe-guarded...

Work practices and training for all employees that make safety essential to the tasks we perform...

An empowered work force, including all employees, that take responsibility for personal safety, the safety of fellow employees, and the communities in which we serve.

ON-TRACK SAFETY GLOSSARY:

The following are definitions that will be used throughout the On-Track Safety Rules in addition to those glossary terms within the General Code of Operating Rules.

Adjacent Tracks – Two or more tracks with track centers spaced less than 24 feet apart.

Controlled Track – Track upon which the railroad’s operating rules require that all movements of trains, engines and on-track equipment must be authorized by a train dispatcher.

Control Operator – A railroad employee in charge of a remotely-controlled switch or derail, interlocking, control point or segment of controlled track.

Effective Securing Device – When used in relation to a manually operated switch or derail: Vandal resistant, tamper resistant and designed to be applied, secured, uniquely tagged or stamped and removed only by the class, craft or group of employees for whom the protection is being provided.

Exclusive Track Occupancy – A method of establishing working limits on controlled track in which movement authority, of trains, engines or other railroad equipment is withheld by the dispatcher, control operator or restricted by flagmen.

Flagman – When used in relation to on-track safety means a qualified employee designated to direct or restrict the movement of trains, engines or on-track equipment past a point on a track to provide on-track safety for roadway workers. The flagman is engaged solely in performing that function.

Fouling a Track – The location of an individual or a piece of equipment in such proximity to a track that the individual or equipment could be struck by a train, engine or other railroad equipment, or in any case is within four feet of the field side of the near running rail.

Hi-Rail Vehicles – Defined as vehicles that are manufactured to meet federal motor vehicle safety standards and are equipped with retractable flanged wheels so that the vehicles may travel over the highway or on railroad tracks.

Inaccessible Track – A method of establishing working limits on non-controlled track.

Lookout – A qualified employee designated to provide warning to roadway worker of approaching trains, engines or other railroad equipment. Lookouts must be properly equipped to provide visual and audible warning such as whistle or air horn. A lookouts sole duty is to look out for approaching trains, engines or other equipment and provide at least fifteen seconds advance warning to employees before arrival of such equipment.

Non-Controlled Track – Track upon which trains and engines are permitted by railroad rule or special instructions to move without receiving authorization from a train dispatcher.

On-Track Roadway Maintenance Machines – Defined as self-propelled, rail-mounted, non-highway roadway maintenance machines whose light weight is in excess of 7,500 pounds and whose purpose is not for the inspection of railroad track.

On-Track Safety – A state of freedom from the danger of being struck by a moving train, engine or equipment, provided by operating and safety rules that govern track occupancy by personnel, trains and on-track equipment.

Qualified – A status attained by an employee who has successfully completed the application portions of BRC’s On-Track Safety training and has been authorized under these rules to perform the duties of a particular position or function.

Roadway Maintenance Machine – A device powered by any means of energy other than hand power that is being used on or near a railroad track for maintenance, repair, construction or inspection of track, bridges, roadway, signal or communications. Roadway machines may have highway or rail wheels, or may be stationary.

Roadway Work Group – Two or more roadway workers organized together on a common task.

Roadway Worker – Any employee of a railroad, or of a contractor to a railroad, engaged in: Inspection, construction, maintenance or repair of railroad tracks, bridges, roadway, signal and communication systems, roadway facilities or operation of roadway machinery, fouling a track or with the potential of fouling a track or when working as flagmen or lookouts. All Roadway Workers are required to wear highly visible apparel, as outlined in the BRC Engineering Rules.

Train Approach Warning – A method of establishing On-Track Safety by warning roadway workers of the approach of trains, engines or other railroad equipment, in ample time for them to move to or remain at prearranged place of safety.

Working Limits – A segment of track within defined limits upon which trains, engines or other railroad equipment may operate only as authorized by the roadway worker having control over that defined segment of track. Working limits may be established through “Exclusive Track Occupancy”, “Foul Time” or “Inaccessible Track”.

ROADWAY WORKER ON-TRACK SAFETY PROTECTION PROGRAM:

The BRC’s Roadway Worker On-Track Safety Program was developed in accordance with Federal regulations related to railroad Workplace safety (49 CFR 214). These rules are mandated by Federal regulation and prescribed safety standards for the protection of roadway worker.

The objectives of this program are to:

- Protect roadway workers from being struck by moving locomotives, railroad cars, and roadway maintenance machines; and
- Prevent accidents and casualties caused by collisions between roadway maintenance machines and moving locomotives, railroad cars and/or other roadway maintenance machines.

The program applies to all roadway workers whose duties require or may require them to enter fouling space around the tracks.

Responsibilities of Roadway Workers

Each roadway worker has immediate responsibility for:

- Complying with on-track safety rules and program requirements;
- Ensuring that on-track safety protection is being provided before fouling a track; and
- Not fouling a track except when necessary in the performance of their duty.
- Knowing who is responsible for the on-track safety protection.
- Exercising the right to challenge, in good faith, any instruction that would violate an on-track safety protection rule. If you are given such an instruction you must:
 - Inform the Roadway Worker In-Charge (RWIC) that the protection to be used does not comply with the rules for on-track safety protection;
 - Remain in the clear of the track until the challenge is resolved.

Responsibilities of Roadway Worker In-Charge (RWIC)

The RWIC has the responsibility to provide the on-track safety protection for a roadway work group. This responsibility includes but is not limited to:

- Informing all roadway workers affected of the on-track safety protection to be provided prior to fouling the track.
- Ensuring that all roadway workers affected understand the working limits, if being established.
- Ensuring that all roadway workers affected are informed of the place of safety they are to clear to, if working limits are not established.
- Verifying that all roadway workers affected understand the on-track safety protection to be used.
- Do not consider the job briefing complete until all roadway workers affected have acknowledge the understanding of the on-track safety protection being provided or have been afforded the opportunity to request explanation of any issues that are not understood.
- Keeping all roadway workers affected informed of any change in on-track safety protection prior to effecting the change.
- Releasing working limits after all roadway workers affected have cleared the track and the track is safe for the passage of trains or railroad equipment.

Job Briefings

When a roadway worker(s) is assigned duties that require fouling a track, a job briefing must be provided to that roadway worker(s) that must include all information on the means by which on-track safety is to be provided and instruction on the on-track safety procedures.

At a minimum, this job briefing should include:

- Name of the RWIC.
- Type of track that requires fouling (controlled or non-controlled).
- If establishing working limits on controlled track, track and time authority number, extent of the working limits, and the method of defining the working limits.
- If establishing working limits on non-controlled track, extent of the working limits and the method of defining the working limits.
- If not establishing working limits, the name of the lookout, the place of safety to clear to, and the method that the lookout will use to provide train approach warning.
- Adjacent track protection if required.

The job briefing will be considered complete only when each roadway worker has acknowledged their understanding of the on-track safety procedures and instructions or been afforded the opportunity to request explanation of any issues that are not understood.

Another job briefing must be conducted when:

- The working conditions or on-track safety procedures change.
- Other roadway workers enter the working limits.
- Working limits are changed, or about to be released.

Procedures to be Followed to Provide On-Track Safety Protection

Determine if track to be occupied or fouled is either controlled track or non-controlled track.

If establishing working limits on controlled track, exclusive track occupancy rules must be used to provide on-track safety protection. Prior to fouling the track, the RWIC must:

- Be qualified.
- Have a current copy of BRC's Daily Operating Bulletin (DOB).
- Obtain verbal permission from the train dispatcher and complete Track and Time Authority (BRC Form 1001-A).
- Conduct a job briefing.

If establishing working limits on non-controlled, inaccessible track rules must be used to provide on-track safety protection. Prior to fouling the track, the RWIC must:

- Be qualified.
- Obtain permission from the appropriate BRC employee having authority of the track to remove the track from service.
- Define the working limits with:

- A flagman with the instructions and capability to hold all trains, engines, and other railroad equipment clear of the working limits; or
- A hand-operated switch or derail aligned to prevent access to the working limits and secured with an effective securing device; or
- A remotely-controlled switch aligned to prevent access to the working limits that is blocked both electronically by the control operator and physically by wedging the open switch point and/or spiking the closed switch point; or
- A discontinuity in the track which precludes passage of trains, engines, or other railroad equipment into the working limits.

Conduct a Job Briefing

If not establishing working limits, train approach warning by a lookout must be used to provide on-track safety protection. Prior to fouling the track, the RWIC must:

- Be qualified.
- Insure that safe passage of trains, engines, or other railroad equipment will not be interfered with.
- Insure that required sight distance is available to provide for not less than 15 seconds of warning to allow roadway workers to move to and occupy place of safety prior to the movement of trains, engines, and other railroad equipment at authorized speed.
 - Trains, engines, and other railroad equipment will travel 220' at 10 M.P.H. and 550' and 25 M.P.H.
- Insure that lookout is properly trained and qualified.
- Conduct a job briefing.

Responsibilities of Lookouts

Each lookout is responsible for:

- Devoting full attention to detecting the approach of trains, engines, or other railroad equipment. Lookouts must be assigned or perform any other duties.
- Must have a means of communicating the warning of approaching trains, engines, or other railroad equipment that is distinctive and clearly signifies a train approach warning.
- Must be able to communicate train approach warning by means that does not require a warned worker to be looking in any particular direction.
- Warning affected workers in sufficient time to reach the place of safety at least 15 seconds prior to the passage of train, engine, or other railroad equipment.

Good Faith Challenge

Any roadway worker that has an honest concern that the on-track safety protection to be used does not comply with BRC's rules, has the right to challenge, in good faith, whether the on-track safety procedures to be used comply with BRC's rules and the right to remain clear of the track until the challenge is resolved.