

Surface Transportation Board
395 E Street Southwest
Washington D.C. 20423

RE: EP770 Rail Service Hearing

April 21, 2022

304427
ENTERED
Office of Proceedings
April 22, 2022
Part of
Public Record

Dear Chairman Oberman & Board Members:

I am a locomotive engineer in my 28th year of service on a class 1 railroad. For the past 15 years I've worked mostly in freight yards, switching cars & bringing cars to customer facilities. I operate all types of locomotives.

One problem I see at work is lack of locomotive maintenance. Locomotive problems that I routinely deal with include:

- excessive exhaust smoke from worn out or untuned diesel engines
- oil droplets blowing out of the exhaust stack & accumulating on exterior surfaces of the locomotive, including walkways, handrails, & windows.
- excessive vibration
- heaters that don't work
- air conditioners that don't work or have filthy unchanged filters
- refrigerators that don't work
- windows that are hard to see through for lack of cleaning
- moving parts such as doors, sliding windows, sliding seats, air brake & throttle assemblies that are damaged, worn out, or unlubricated
- filthy toilets

Some defects are addressed fairly quickly because they require, per FRA rules, that the locomotive be removed from service until repaired. The above defects don't always fall under that category so they often don't get addressed even when reported.

The other problem I'll discuss is the shortage of crew members; also called "train, yard, & engine (TY & E) employees". Different people have different reasons for quitting or passing up a TY & E job, but I'll list some reasons that I think would discourage almost anyone.

TY & E employees are exposed to numerous detrimental conditions. Train yards or areas close to main lines are often plagued with air pollution from particulate matter small enough to lodge in the throat, nasal passages & lungs. The smallest of these particles can pass through the lining of the nasal passages & lungs, & into the bloodstream where they spread throughout the body. Much of these fine particles comes from diesel exhaust, which is produced by freight & passenger trains, switch engines, road & hostler trucks, intermodal cranes & lift trucks, refrigerated containers, trailers, & boxcars, & motorized maintenance of way equipment. Also, yards with locomotive maintenance or storage areas often have a cluster of idling locomotives which produces a high concentration of exhaust.

The ground over which trains run often contains fine particles of creosote leached from railroad ties; rock & silica dust from ballast & locomotive sanders; asbestos & other material from train brake shoes; & possibly herbicidal chemicals from repeated spraying. Ground

particles can become airborne by the rush of air from fast-passing trains, the uncoupling of pressurized air hoses, the whirring of moving parts (traction motors?) under slow moving but high revving switch engines, the blast of air (pointed at the ground) from locomotive blow-down valves, & finally the wind. Dry weather compounds the problem of ground particles entering the air.

Locomotive cab floors quickly accumulate dirt & fine debris particles that can't be removed with just the provided broom. A dust pan would help but what's really needed, & to my knowledge is never done at any facility I've worked at, is for the floor to be vacuumed & then washed. The danger from these dirty floors is that when the cab door is opened on a windy day, or when the locomotive is moving, or anytime the cab blower heaters are turned on, or sometimes just when the windows are opened, the floor particles become airborne & are breathed by anyone in the cab. Also, locomotive heater & air conditioner filters are often unmaintained, unchanged, or missing; & even when new, may be incapable of trapping some of the finest & most harmful particles likely circulating in the air.

Dirty air has been linked to lung, bladder, kidney, colon, & stomach cancers, as well as diabetes, obesity, osteoporosis, decreased fertility, miscarriage, & sleep apnea. Diesel exhaust is especially rich in toxins & carcinogens, & is often included in the dirty air of railroad environments. Furthermore, a 2017 study by Harvard University scientists, published in the New England Journal of Medicine, demonstrated that air pollution increases the risk of premature death; even at or below the legal limits set by the U.S. E.P.A. People, like railroaders, who are exposed to dirty air consistently for several years are at high risk for health problems.

Many train crew ground employees spend hours walking adjacent to & between railroad tracks, where the surface is made of various sized rocks (the largest of which can be very uneven & unstable) & is often tapered rather than level. This surface is often littered with scrap iron, pieces of broken ties, discarded brake shoes, & in winter is rarely, if ever, cleared of snow. Other dangerous walking surfaces often found on railroad property include unpaved roads with ruts, holes, gravel & loose rocks. Walking on such surfaces can, over time, cause orthopedic problems in the feet, knees, ankles, & low back.

Actions, typically performed repeatedly by TY & E employees, which can, over time, cause carpal tunnel, & other orthopedic problems in hands, wrists, & elbows include: gripping & manipulating the brake levers, throttle, & reverser handles of a locomotive, gripping & jerking iron pin lifters, gripping & torquing iron hand brake handles, gripping grab-irons while riding the side of railcars & ascending/descending railcar ladders, gripping & pulling/pushing iron switch handles, & finally using the hands, arms & shoulders to apply force to all manner of rusted, corroded, unlubricated, frozen, & worn out moving parts such as switch locks, angle cocks, threaded air hose fittings, locomotive doors, sliding windows & sliding seats.

Many TY & E employees have no set work schedule. Instead they are on call 24 hours per day, often 7 days per week, with about 2 hours to report to work after getting the call, & just enough guaranteed time off between calls to drive home & sleep. Sometimes employees end up with a little or a lot more than just the minimum guaranteed rest time, but they never know when or how much extra time will arise; so they can't plan much or go anywhere too far from home, lest they find themselves called without enough time to get home, change into work clothes, grab whatever they need to bring to work, & drive to work (the location of which can change

from day to day). This hectic on-call work life makes it impossible to be consistently, if ever, present at meaningful events with friends & family. Also nearly impossible is the establishment of a regular sleep/wake cycle, which studies have shown is very important to overall health. Even the few TY & E employees who are fortunate enough, usually by decades of seniority, to have a set start time & place every day, still don't know what time their work day will end because only supervisors can decide when train crews go home. The only thing the crew member can count on is the federal 12 hour work limit for train crews. But that doesn't mean the train crew can just punch out and go home after 12 hours, because they may be on a parked train in a remote location when the 12 hours expires, leaving them stranded & waiting for a contracted van driver to find them & drive them back to the place where they punch out. Van drivers, like train crew members, are often in short supply. Not knowing what time your workday ends makes it very hard to keep medical appointments & important commitments after work, which over time translates into stress & deteriorating relationships, & possibly deteriorating physical & mental health. Furthermore, Dr. S.J. Heyman of the Harvard University School of Public Health conducted research that found kids whose mothers lack paid leave & flexible work hours are 2 to 3 times more likely to have academic & behavioral problems. Other studies show fathers' lack of flexible hours create similar problems. Donna Lenhoff, former V.P. of the National Partnership for Women & Families, said: "The lack of workplace flexibility & other out of date workplace policies are contributing in a major way to the problems occurring among children today." For those reasons, over the past several years in the white collar workforce, there has been more value placed on work/life balance; resulting in more flexible work schedules, working from home, healthier offices with standup or even treadmill computer stations, & lunch areas with fresh juice, smoothies, & salads. This beneficial trend is not trickling down to blue collar railroad workers; in fact work/life conflicts are increasing (Hi-Viz attendance policy is a good example).

Many TY & E employees spend several hours, sometimes more than 12, in the cab of a locomotive, where there is no room to walk & little room to perform beneficial stretching. The floor cannot be used because it's too dirty. It's common knowledge that a sedentary lifestyle is not healthy, but a 2020 study, published in the Journal of the American Medical Association in June 2020, by the University of Texas & other institutions nationwide, demonstrated a link between increased sedentary time & increased likelihood of death by cancer. Recent railroad rule changes in regard to train securement have made it harder to get off the locomotive & walk even a short distance.

Throughout my years of employment, I've seen substantial effort to reduce some injuries & accidents. However, the serious work/life issues, as well as the serious health problems which develop gradually & whose origins are hard to pinpoint, that I've described here are ignored or, in rare cases, only superficially addressed by management.

Paul Kamka