

Memorandum

Reply to Att. of: MP&E 00-05

U.S. Department of Transportation

Federal Railroad Administration

Date: June 22, 2000

subject: Slipping & Tripping Hazards in Locomotive Air Compressor Compartments

From: Edward R. English

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To: Regional Administrators, Deputy Regional Administrators, Motive Power & Equipment Specialists and Inspectors

The Railroad Locomotive Safety Standards, 49 CFR §229.119(c), requires that floors of cabs, passageways, and compartments be kept free from oil, water, waste or any obstruction that creates a slipping, tripping or fire hazard.

Locomotive air compressor compartments are routinely utilized for the storage of tools and materials for servicing the locomotive and train (i.e., air hoses, jumper cables, wrenches, etc.,) thereby requiring train crew members to enter the air compressor compartment to retrieve many of these items. If the floor in the air compressor compartment is cluttered with loose material or is covered with oil, a tripping or slipping hazard exists.

One railroad is currently installing toolboxes on their locomotives in the doorway leading into the air compressor compartment. The toolbox location is identified and all other doors leading into the air compressor compartment are marked for maintenance personnel only. The railroad believes that by removing the tools from the compartment and denying access to all except maintenance personnel, the slipping hazard has been removed. In addition, maintenance personnel entering the compartment are required to inspect the floor first and then remove any slipping or tripping hazard prior to entry.

In late-1999, an MP&E Technical Resolution Committee examined the application of §229.119(c) relevant to air compressor compartments, in light of the scenario noted above. Based on the discussions and recommendations developed by that Committee, FRA has determined that the presence of oil on the floor of the locomotive air compressor compartment does not constitute a slipping or tripping hazard under §229.119(c), if all of the following conditions are complied with:

- ! Train crews are prohibited from entering the air compressor compartment by general order, bulletin order, time table instructions, or other formal instructions;
- ! The air compressor compartment doors are stenciled to indicate that train crew members are not to enter the compartments;
- ! Tool storage compartments are readily and clearly identified by stencils;
- ! Tool storage compartments are self-contained units, arranged and designed so that any tools or materials falling from the storage hooks or rack do not fall onto the floor of air compressor compartment;
- ! When a train crew member identifies (without entering the compartment) a slipping hazard in the air compressor compartment, the condition is listed on the inspection report (current or next daily). Identification of such a condition should not be treated as a non-complying condition under part 229, if all other conditions contained in this bulletin are otherwise met;
- ! When any tools or materials intended for use by the train crew are found on the air compartment floor, the condition is treated as a tripping hazard, a non-complying condition under §229.119(c), and corrective action is taken;
- ! Railroads should continue to clean the air compressor compartment as necessary in a timely fashion.

FRA inspectors should take appropriate enforcement action, if there is oil on the air compressor compartment floor that creates a slippery condition <u>and</u> there is a tool, part, or material inside that may be needed by a train crew member, even though all other conditions noted above have been met (e.g. restricted access, separate tool storage compartment area).

Furthermore, if the locomotive is not properly stenciled, as noted above, or the train crew is unaware of the access restrictions to the air compressor compartment, then any loose material or oil on the air compressor compartment floor that creates a slipping or tripping hazard would constitute non-compliance with §229.119(c) and appropriate enforcement action should be taken.