

Columbia Rail Group (Columbia-Walla Walla Railway, Yakima Central Railway, Rainier Rail, Washington Royal Line serving Port of Royal Slope, Kennewick Terminal Railway)

Internal Control Plan



Purpose

The Federal Railroad Administration (FRA) requires that railroads maintain an Internal Control Plan (ICP) to support the proper reporting of all railroad train accidents, incidents, injuries, and occupational illnesses arising from the operation of the railroad (49 CFR, Part 225.33). Columbia Rail Group has developed this ICP to help ensure compliance with the provisions of this regulation. This ICP is available for inspection by the FRA, employees and state inspectors at the office of the Columbia Rail Group Reporting Officer and will be posted at all reporting locations and at the Columbia Rail Group Headquarters building. The plan is maintained by Paul Didelius, Operations Officer, 509-492-3553. Columbia Rail Group will amend this plan, as necessary, to reflect changes to its internal reporting procedures.

Policy Prohibiting Harassment or Intimidation

Columbia Rail Group is committed to provide complete, timely and accurate reporting of all accidents, incidents, injuries, and occupational illnesses arising from the operation of the railroad. We strive to fully comply with both the letter and spirit of the FRA's accident reporting regulation. Columbia Rail Group does not tolerate harassment or intimidation that is intended to discourage or prevent employees from receiving proper medical treatment or reporting accidents, injuries or occupational illnesses. Any employee who violates this policy is subject to disciplinary action up to and including termination.

Medical Transportation and Treatment

If transportation to a hospital is requested by an employee who is injured during the course of employment, the railroad shall promptly arrange to have the injured employee transported to the nearest hospital where the employee can receive safe and appropriate medical care.

Complaint Procedures

Columbia Rail Group will investigate all complaints covered by this policy and take appropriate disciplinary action where warranted.

Employees may submit written or verbal complaints with the Operations Officer, Paul Didelius. It is requested that all verbal complaints also be submitted in writing to help facilitate the investigation process.

If the Superintendent is the subject of the complaint, the report will be made to the President;

If the President is the subject of the complaint, the report will be made to the Chairman of the Railroad; and

If a report is made to the Superintendent and then the President and the employee believes the response does not adequately address the concern the employee may report the concern to the Chairman of the Railroad.

- Any Employee, Supervisor, Manager or Officer who feels he/she has been harassed or intimidated so as not to report an accident, incident, injury or illness should contact the President or Superintendent. The complaint will be handled in as confidential manner as is possible.
- In addition, Columbia Rail Group has a Whistle Blower Policy in place (Appendix B).
- A prompt investigation will be undertaken of the alleged violation.
- The Railroad President/Superintendent undertaking the investigation will meet with the employee making the allegation to obtain further information pertaining to the nature of claim being made. Employees who make complaints or who participate in a company investigation of such report will be expected to fully cooperate with the Company by providing complete and accurate information as requested. An employee who makes a complaint under this policy should be prepared to provide the person investigating the complaint with as much detailed information as possible of the alleged behavior or conduct in question, including names of any witnesses in order to facilitate the investigation.
- If the investigation determines that a violation has occurred, appropriate disciplinary action, up to and including dismissal, will be taken and a record of this action will be entered into the employee's personnel file.
- The employee making the complaint will be advised of the results to the extent appropriate and reasonable.

The Policy Statement and Complaint Procedures will be disseminated to all employees, supervisory personnel, and management by posting this Internal Control Plan at all reporting locations and at the railroad headquarters. Columbia Rail Group shall provide "Whistleblower" protection to any person subject to this policy.

No Retaliation

Retaliation against an individual for making a complaint under this policy is strictly prohibited. If an employee believes he/she is being retaliated against he/she should immediately report the matter to any of the persons responsible for receiving harassment or intimidation concerns under this policy.



Dissemination Policy

The Columbia Rail Group Reporting Officer will update and post the "Monthly Report of Injury and Illness" at 709 N. 10th Ave, Walla Walla, WA 99362. A copy of the Company's Anti-Harassment and Anti-intimidation Policy and Complaint Procedures will also be maintained on this bulletin board. Paper or electronic copies of the policy are available by contacting the Columbia Rail Group Reporting Officer.

Internal Reporting System and Forms

Columbia Rail Group uses the FRA's Accident/Incident Report Generator (AIRG) software for the collection and internal recording of accident and incident information. AIRG is a Windows-based computer program which facilitates the processing and allows for the electronic submission of all FRA-required monthly reports and logs required under 49 CFR part 225.

The following internal forms are used to collect and record accident and incident information in the field by employees and supervisors and are located in Appendix A:

Incident Report: Incidents, Injuries, Derailments, Collisions, Trespassers *(Completed by Manager)*

- Highway - Rail Crossing Incident
- Railroad Employee Injury and/or Illness Record

Personal Injury Report *(Completed by Employee Reporting Injury and Witnesses)*

Accident/Incident Report *(Completed by Employee)*

Locomotive Inspection Record *(Completed by Locomotive Inspector)*

Procedures for Processing Internal Forms

The following is a summary of the procedures used for processing internal accidents, incident, injury and occupational illness forms.

1. The FRA Reporting Officer is responsible for updating as needed and making available copies of the internal forms to employees throughout the Company.

2. Employees must notify a supervisor/manager of an accident, incident, injury or occupational illness as soon possible, but not later than the end of the tour of duty. The employee is required to complete and submit applicable forms and statements as set forth in the applicable GCOR or other applicable operating rules.
3. Employees who are incapacitated need to complete the applicable forms as soon as they are able.
4. Supervisors/managers are required to complete applicable Columbia Rail Group accident/incident internal forms.
5. Supervisors/managers are required to submit all accident and injury reports to the Columbia Rail Group Reporting Officer after an accident or incident.
6. Supervisors/managers are required to hand-deliver original forms or electronically submit documents to Paul Didelius.
7. The Columbia Rail Group Reporting Officer reviews the forms for completeness and accuracy.
8. The Columbia Rail Group Reporting Officer files copies of all forms. The Columbia Rail Group Reporting Office, 709 N. 10th Ave, Walla Walla, WA 99362 is the master file location for all incidents.

Internal Review Procedures

Paul Didelius will review the Columbia Rail Group accident, incident, injury and occupational illness records in the first quarter of each calendar year. This review will include the overall performance of the railroad in adhering to the provisions of this plan and analysis of individual records for accuracy and completeness. The reviewer will perform additional investigation as deemed necessary to evaluate any files that seem inconsistent with expected reporting practice. Adjustments to the reporting process and corrective action will be taken if the review identifies exceptions. A copy of the audit results will be maintained at Columbia Rail.

Internal Procedures for Collecting Cost Data and Compiling Costs

1. In the event of a train accident, supervisors/managers are required to complete the applicable Columbia Rail Group Accident/Incident Reports. This includes sections requiring estimated equipment, lading, track and signal damages and environmental clean-up costs.
2. The Columbia Rail Group Reporting Officer reviews the forms for completeness and accuracy and records the final cost estimates in the Incident Report.



Internal Procedures Ensuring Adequate Communication

To ensure adequate communication between the Columbia Rail Group Reporting Office and other departments responsible for collecting, receiving, processing and reporting accidents and incidents, Columbia Rail Group's internal procedures include the following:

1. An open communication policy.
2. A written Accident and Incident Reporting Guide for use by Columbia Rail Group Managers and Supervisors.
3. Ready access by all employees to the Columbia Rail Group Reporting Officer.
4. A Corporate policy that requires prompt verbal notification of incidents to both the Railroad and Anacostia senior leadership.
5. A periodic (every 5-6 weeks) conference call where FRA reportable and in some cases non-reportable incidents are discussed and evaluated.
6. Recording of data on the Corporate File server for tracking of accident and incident performance.
7. Publishing of Safety Alerts on selected incidents are issued to communicate incident and lessons-learned to supervisors and the workforce.

Internal Procedures for Updating and Amending Accident and Incident Information

At the end of the month, the Columbia Rail Group Reporting Officer will perform a closeout to update accident and incident information prior to reporting to the FRA. This closeout includes the following:

1. The Columbia Rail Group Reporting Officer solicits final cost estimates related to rail equipment, highway rail crossing accidents and incidents from all applicable departments.
2. The Columbia Rail Group Reporting Officer reviews all occupational injury and illness data in the "Occupational Injury or Illness Report" log required in 49 CFR part 225.25 and rail equipment and highway rail grade crossing incident data in the CSS Derailment Reporting Database.
3. The Columbia Rail Group Reporting Officer will then complete and submit the final report to the FRA electronically.
4. In the event an accident or incident was omitted in the final report the railroad will submit an amended report along with a letter that explains the reason for the changes and late filing. Amended reports and explanations will also be submitted if final cost estimates are received from the mechanical, track and/or car departments with a 10% variance from the initial cost estimate and the variance exceeds the current FRA dollar threshold by 10%.
5. When the medical status of an employee with an occupational injury or illness changes from non-reportable to reportable within 180 days of the event or a reporting error is discovered, the same process is followed to amend the report.

Organization Components:

The following are Columbia Rail Group components that regularly come into possession of information pertinent to the preparation of reports under 49 CFR 225.33, the managers of the components, and the officers to whom they are responsible:

1. Chuck Osborn
2. Paul Didelius
3. Dan Robirds

Custodian and Location of F6180.107 Forms and Supporting Documentation:

The F6180.107 forms and supporting documentation are held by the Columbia Rail Group, Paul Didelius - at 709 N. 10th Ave, Walla Walla, WA 99362.