

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
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In Reply To:

1112 (930.KV) P

February 27, 2003

EMAIL TRANSMISSION - 02/28/2003
Information Bulletin No. MT-2003-034

To: State Management Team

From: State Director

Subject: Compliance Assessment – Safety, Health, and the Environment (CASHE) Report for Montana

Washington Office Information Bulletin 2003-049 (Attachment 1), issued via email to all field offices on January 28, 2003, provided the field with a summary, by state, of organizational units that were in good safety, health, and environmental condition. Attachment 2 lists the number of incomplete findings by Montana organizational unit. Individual field managers with incomplete findings will receive Attachments 3 or 4 for their respective office.

Montana had 10 of 10 audited organizational units rated in good condition. Colorado and Montana were the only two states to have 100 percent of their offices rated in good safety, health, and environmental condition. This accomplishment is due to a lot of hard work by field and State Office staff and should be recognized. Safety, Hazardous Materials, and Engineering, as well as Montana's management team, have made it a priority to eliminate facility environmental regulatory compliance violations.

I want to express my personal appreciation to you and your staff who strive to ensure a safe and healthful working environment for us all. Thank you for a job well done.

Signed by: Thomas P. Lonnie, Acting

Authenticated by: Aleta Zahorodny (MT-930)

4 Attachments

- 1-WO IB 2003-049 (4 pp in its entirety)
- 2-Number of Incomplete Findings (4 pp)
- 3-List of Incomplete Findings (1 p) (910, 920, 930, and Malta only)
- 4-List of Incomplete Findings (1 p) (910, 920, 930, and Miles City only)

Distribution w/attms. 1 and 2

Assistant Field Manager, Glasgow Field Station
Assistant Field Manager, Havre Field Station
(MT-922), Don Judice
(MT-923), Peter Bierbach

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

December 31, 2002

In Reply Refer To:
1112, 1703 (360) P
Ref. IM No. 2002-029
IM No. 2002-211

EMS TRANSMISSION 01/28/2003
Information Bulletin No. 2003-049

To: All Field Officials
From: Group Manager, Protection and Response Group
Subject: Facility Compliance Status

The Protection and Response Group has compiled the responses received from the field on the status of recommendations made during each organizational unit's Compliance Assessment - Safety, Health, and the Environment (CASHE) audit. These CASHE status update responses were requested by Instruction Memorandum (IM) WO 2002-211.

The CASHE status updates have been summarized by state to show the number of incomplete findings broken out by their priority level or risk assessment code for each organizational unit. The Group also developed separate tables for each Field organizational unit that describe each incomplete finding along with its priority level/risk assessment code. These tables of incomplete findings note whether or not each finding is a repeat finding from a previous audit. Bureauwide approximately 25 percent of the findings in a follow-up CASHE audit are repeat findings from the previous audit. This is the second consecutive year for issuance of these facility compliance progress reports. Associate State Directors (ASD) and Deputy State Directors (DSD) will receive their statewide summary table and the tables of incomplete findings broken out for each organizational unit within their State. Center Directors and field managers will be sent the summary table and the table of incomplete findings specific for their organizational unit. The WO 360 will transmit these tables to the ASDs, DSDs, Center Directors, and field managers via email by the end of January 2003.

The CASHE status update has and will continue to be used to:

1. Identify CASHE recommendations that are eligible for deferred maintenance funding and program funding for their implementation. This will be done in close coordination with State and field office engineering, HAZMAT, and safety staffs.

In FY 2001-2003, the Protection & Response Group has programmed approximately \$2,500,000 of deferred maintenance funding to correct CASHE recommendations that had not already been identified for funding in the five-year plan.

2. Report on BLM Annual Performance Plan Long-term Goal 01.04.01.04. This goal calls for increasing the percentage of organizational units in “good safety, health, and environmental condition.” An Instruction Memorandum to update the status of CASHE findings will be sent to the field in June 2003 so that the progress on meeting the goal can be reported for FY 2003.

For FY 2002, an organizational unit is in good condition if it has three or less incomplete high priority CASHE findings. High priority CASHE findings are those findings with priority levels IA or IB, or risk assessment codes of 1 or 2. In FY 2003, the standard for good condition is reduced to two or less high priority CASHE findings. This standard will continue to be made more stringent each fiscal year until it reaches zero in FY 2005.

The BLM’s Annual Performance Report for FY 2002 shows 66 percent of BLM organizational units are in “good safety, health, and environmental condition.” The FY 2002 performance is significantly improved over FY 2001, which was 44 percent in good condition. WO 360 applauds the hard work done by state and field offices staffs to implement CASHE recommendations. Six states (Colorado, Idaho, Montana, New Mexico, Utah, and Wyoming) and the Washington Office had 70 percent or more of their organizational units in good condition. The BLM’s long-term goal is to increase the percentage of organizational units in good condition by two percent a year over the FY 2000 baseline, which was 59 percent. The primary reasons for the significant improvement in performance are: 1) Bureau's decision to identify a portion of the Deferred Maintenance Program specifically for funding CASHE recommendations; and 2) the first issuance of Facility Compliance Progress Reports to all organizational units that summarized their incomplete findings.

Attachment 1 is a table showing the number of organizational units in good safety, health, and environmental condition broken out by state, number of organizational units that have had CASHE audits completed, and number of organizational units that responded to IM WO 2002-211. The field is commended for the outstanding response rate, 99 percent of the spreadsheets sent out for updating the status of CASHE findings were returned.

Implementation of CASHE Recommendations: In accordance with IM WO 2002-211, organizational units are expected to complete or request funding for completion of all high priority CASHE recommendations within one-year of their receipt of the Final CASHE Report for their office.

Questions on the CASHE status update should be directed to myself at (202) 452-5058 or Ken Morin, CASHE Program Lead at (303) 236-6418.

Signed by:
Bernie Hyde
Group Manager
Protection and Response Group

Authenticated by:
Robert M. Williams
Policy and Records Group, WO-560

1 Attachment

1 - Number of Organizational Units in Good Safety, Health, and Environmental Condition (1 p)

Date: December 18, 2002

Number of Organizational Units in Good Safety, Health, and Environmental Condition

BLM Annual Performance Plan Long-term Goal 01.04.01.04

	Total Number of Organizational Units	Number of Organizational Units Audited	Number of Audited Organizational Units in Good Condition	Percent of Organizational Units in Good Condition (rounded)
Alaska	6	5	3	60
Arizona	8	8	5	63
California	17	17	6	35
Colorado	13	11	11	100
Eastern States	3	2	0	0
Idaho	11	9	8	89
Montana	10	10	10	100
New Mexico	10	10	8	80
Nevada	7	7	3	43
Oregon	11	10	3	30
Utah	11	10	7	70
Wyoming	11	10	7	70
Washington Office	5	5	4	75
Totals	123	114	75	66%

Note: The vast majority of organizational units that have not had a CASHE audit conducted yet are State Offices. The baseline CASHE audits for all State Offices are scheduled to be completed by the end of FY 2004.

MONTANA

Compliance Assessment - Safety, Health, and the Environment (CASHE)
Number of Incomplete Findings by State as of November 21, 2002

ORGANIZATIONAL UNIT/ Assessed Facility	Priority Level by Class				Risk Assessment Code			Good Condition?
	IB Major	IC Minor	II Future	III BMP	2 Serious	3 Moderate	4 Minor	
MONTANA								
MONTANA STATE OFFICE	-	-	-	-	-	-	-	Yes
State Office	-	-	-	-	-	-	-	-
Oil and Gas Field Station	-	-	-	-	-	-	-	-
Montana Eastern Zone Interagency Operations Center	-	-	-	-	-	-	-	-
BILLINGS FIELD OFFICE	-	-	-	-	-	-	-	Yes
Field Office	-	-	-	-	-	-	-	-
Pompey's Pillar	-	-	-	-	-	-	-	-
BUTTE FIELD OFFICE	-	-	-	-	-	-	-	Yes
Field Office	-	-	-	-	-	-	-	-
DILLON FIELD OFFICE	-	-	-	-	-	-	-	Yes
Field Office	-	-	-	-	-	-	-	-
LEWISTOWN FIELD OFFICE	-	-	-	-	-	-	-	Yes
Field Office	-	-	-	-	-	-	-	-
Lewistown Fire Facilities	-	-	-	-	-	-	-	-
MALTA FIELD OFFICE	1	-	-	-	-	-	-	Yes
Field Office	1	-	-	-	-	-	-	-
MILES CITY FIELD OFFICE	2	1	-	-	-	-	1	Yes
Field Office	-	-	-	-	-	-	-	-
Fort Howes Fire Station	2	1	-	-	-	-	1	-
MISSOULA FIELD OFFICE	-	-	-	-	-	-	-	Yes
Field Office	-	-	-	-	-	-	-	-

Good Condition is defined as an Organizational Unit that has 3 or fewer incomplete high-priority findings for the FY 2002 reporting period. For FY 2003 reporting, Good Condition will be 2 or fewer incomplete high-priority findings. The number of incomplete high-priority findings that an Organizational Unit may have and be in Good Condition will continue to be phased down each subsequent fiscal year until it reaches zero in FY 2005. High-priority findings are those assigned Priority Levels Class IA or IB; or Risk Assessment Code 1 or 2. As no Class IA or RAC 1 findings have been identified by the CASHE Team, columns for those categories are not provided on the table above.

MONTANA

Compliance Assessment - Safety, Health, and the Environment (CASHE)
Number of Incomplete Findings by State as of November 21, 2002

ORGANIZATIONAL UNIT/ Assessed Facility	Priority Level by Class				Risk Assessment Code			Good Condition?
	IB Major	IC Minor	II Future	III BMP	2 Serious	3 Moderate	4 Minor	
MONTANA (concluded)								
NORTH DAKOTA FIELD OFFICE	-	-	-	-	-	-	-	Yes
Field Office	-	-	-	-	-	-	-	-
SOUTH DAKOTA FIELD OFFICE	-	-	-	-	-	-	-	Yes
Field Office	-	-	-	-	-	-	-	-

Good Condition is defined as an Organizational Unit that has 3 or fewer incomplete high-priority findings for the FY 2002 reporting period. For FY 2003 reporting, Good Condition will be 2 or fewer incomplete high-priority findings. The number of incomplete high-priority findings that an Organizational Unit may have and be in Good Condition will continue to be phased down each subsequent fiscal year until it reaches zero in FY 2005. High-priority findings are those assigned Priority Levels Class IA or IB; or Risk Assessment Code 1 or 2. As no Class IA or RAC 1 findings have been identified by the CASHE Team, columns for those categories are not provided on the table above.

Priority Level and Risk Assessment Code Definitions

CASHE environmental and transportation findings are classified differently than safety findings. The definitions are described below.

Environmental and Transportation Finding Classification: **Environmental findings are each assigned a class, based on applicable regulations, as follows:**

Class I: Out of Compliance - This classification is for direct violations of a Federal, State, or local regulation; a signed Federal Facility Compliance Agreement; an inspection report or Notice of Violation (NOV) issued by a regulatory authority; Executive Orders; or BLM Instructional Memorandum.

Class IA: Significant - Requires immediate attention. Significant deficiencies pose, or have a high likelihood to pose, a direct and immediate threat to the environment. [Note: To date, the CASHE Team has never identified a Class IA finding at a BLM facility.]

Class IB: Major - Requires action, but not necessarily immediate action. Major deficiencies may pose a direct threat to human health, safety, the environment.

Class IC: Minor - Administrative in nature, even though they may result in a notice of violation. Class IC findings may also include temporary or occasional instances of non-compliance.

Class II: To be Out of Compliance - This classification is when actions are needed to meet established or proposed standards with a compliance deadline in the immediate or near future.

Class III: Best Management Practice - This classification is for actions that are not in violation of any current or pending regulatory requirement, but pose a threat to the environment or the health and safety of BLM personnel. These actions should be corrected to prevent future noncompliance, to reduce the threat of environmental contamination and to demonstrate BLM's leadership in protecting personnel and the environment.

MONTANA

Safety Finding Classification: Safety findings are each assigned a Risk Assessment Code (RAC) based on the BLM Manual Handbook 112-I – Safety and Health Management.

RISK ASSESSMENT CODE MATRIX			HAZARD PROBABILITY				
			Frequent	Likely	Occasional	Seldom	Unlikely
			A	B	C	D	E
SEVERITY	Catastrophic	I	RAC 1		RAC 2		RAC 3
	Critical	II				RAC 3	
	Marginal	III	RAC 2	RAC 3		RAC 4	
	Negligible	IV	RAC 3				

SEVERITY	EFFECT
I. Catastrophic	Death or permanent disability, system loss, major property damage.
II. Critical	Permanent partial disability, temporary total disability in excess of 3 months, major system damage, significant property damage.
III. Marginal	Minor injury, lost workday accident, compensable injury/illness, minor system damage, minor property damage.
IV. Negligible	First aid or minor medical treatment, minor system damage.

HAZARD PROBABILITY	
A. Frequent	Individual employee or item All employees or items
	Occurs often in career/equipment service life Continuously experienced
B. Likely	Individual employee or item All employees or items
	Occurs several times in career/equipment service life Occurs frequently
C. Occasional	Individual employee or item All employees or items
	Occurs sometime in career/equipment service life Occurs sporadically or expected several times in service life
D. Seldom	Individual employee or item All employees or items
	Possibility of occurrence in career/equipment service life Occurrence remote or expected sometime in service life
E. Unlikely	Individual employee or item All employees or items
	Assumed will not occur in career/equipment service life Occurrence possible, not probable; expected rarely