

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Montana State Office
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Billings, Montana 59107-6800
<http://www.mt.blm.gov/>

In Reply To:

1112 (930.KV) P

June 14, 2004

EMAIL TRANSMISSION – 6/15/04
Information Bulletin No. MT-2004-074

To: Field Manager, Butte Field Office

From: Deputy State Director, Division of Support Services

Subject: CASHE Findings Status Update

DD: 07/16/2004

Washington Office Instruction Memorandum No. 2004-185 (Attachment 1) was issued to all field officials on May 26, 2004. It requests the field to provide an update on the implementation status of recommendations or other corrective actions related to findings from Compliance Assessment – Safety, Health, and the Environment (CASHE) audits.

Included as Attachment 2 are the findings that were identified during the last CASHE inspection at your facility. The list reflects findings that are not complete based on your last status report to the contractor.

This request is for an update of the following information, where applicable: 1) the status of corrective action for each finding; 2) the point(s) of contact (full names of individuals, not a program, committee, office, or building owner); and 3) facility name changes.

It is imperative that you use the following descriptives to ensure that you are credited for correcting the CASHE deficiencies. Findings are not considered complete unless completion is explicitly stated by the respondent. Listed below are examples of acceptable terms to be used when you describe the status of your incomplete findings:

- unscheduled
- completed in (date if available)
- implemented in (date if available)
- scheduled for completion by (date)
- funding requested; anticipate completion by (scheduled date of completion)
- preliminary planning; anticipate completion by (scheduled date of completion)
- under design; anticipate completion by (scheduled date of completion)
- under construction; anticipate completion by (scheduled date of completion)
- N/A (e.g., if no longer relevant because a facility no longer exists).

(Note: If a finding is no longer relevant, please explain why.)

For those who respond electronically, do not rename or convert the files to a different software as file integrity is critical to the contractor's ability to track the data. If you prefer not to respond electronically, you should print the documents and update them by hand.

You are asked to send the completed table to Karilynn Volk, MT-930, as soon as possible, but no later than **Friday, July 16, 2004**. A consolidated response will be sent to the contractor by July 30, 2004.

Offices with incomplete CASHE findings are to continue to submit quarterly status update reports in accordance with Instruction Memorandum No. MT-2004-018.

If you have any questions, please contact Karilynn Volk, at 406-896-5190, or Lisa Engelmann, at 406-896-5193.

Signed by: Sandra L. Guches

Authenticated by: Aleta Zahorodny (MT-930)

2 Attachments

- 1- WO IM 2004-185 (3 pp in its entirety)
- 2- Butte Field Office CASHE Findings (9 pp)

cc:

(MT-070), Bob Stewart, CDSO

(MT-070), Mike Browne, Hazardous Material Coordinator

(MT-073), Vicki Gillam, AO

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

May 26, 2004

In Reply Refer To:
1112, 1703 (360) P
Ref. IM No. 2003-167

EMS TRANSMISSION 06/04/2003
Instruction Memorandum No. 2004-185
Expires: 09/30/2005

To: All Field Officials

From: Assistant Director, Minerals, Realty, and Resource Protection

Subject: Facility Compliance Management and Tracking of CASHE Findings

DD: 07/31/2004

Program Areas: Facility Compliance and Safety.

Purpose: This Instruction Memorandum (IM) asks the Field to provide an update on the implementation status of recommendations or other corrective actions related to findings from Compliance Assessment - Safety, Health, and the Environment (CASHE) audits. This information will be used to identify projects for funding from infrastructure improvements money designated in Fiscal Year (FY) 2005 for CASHE corrective actions. In addition, the Bureau of Land Management (BLM) will make use of this data to:

- manage and minimize risk related to facility compliance, and
- identify future funding, policy, and training needs.

Accurate information about facility compliance is necessary for BLM to achieve its strategic planning goal to "Improve Public Safety and Security and Protect Public Resources from Damage."

Background: In FY 2003, 72 percent of BLM's organizational units were rated in good safety, health, and environmental condition. This performance was based on information received in response to Washington Office IM No. 2003-167, which asked the Field to update the status of unresolved CASHE findings. For the FY 2004 Annual Performance Report, organizational units will be considered in good condition if they have one or less incomplete corrective action related to a high priority CASHE finding. The good condition standard will be zero incomplete high priority findings in FY 2005 and subsequent Fiscal Years.

ATTACHMENT 1

The performance measurement data specification that defines high priority CASHE findings and describes how the data will be used is located at: <http://web.wo.blm.gov/ms1/>. The performance goal for FY 2004 is 74 percent of BLM organizational units be in good safety, health, and environmental condition.

Policy/Action: Updating Status of CASHE Recommendations/Corrective Actions:

Organizational units (i.e., Washington Office, State and Field Offices, National Centers) that have had a CASHE audit between October 1993 and February 27, 2004 are asked to update the status of recommendations/corrective actions. This data is to be reported on the spreadsheet that was transmitted separately to every Field Office safety officer and HAZMAT coordinator by their State Office Safety Manager or HAZMAT Program Lead. The spreadsheets and instructions for updating them will be transmitted to each State Office Safety Manager and HAZMAT Program Lead by May 17, 2004 via email. In addition, comments on the status of CASHE findings from draft CASHE reports for audits completed through June 24, 2004, will be incorporated into the status update database.

Implementation of CASHE Recommendations/Corrective Actions: Consistent with available budget resources and other programmatic concerns, organizational units are to implement CASHE recommendations/corrective actions and/or request funding for implementation within one year of the audit. Please note: the instructions for completion of the FY 2004 CASHE Status Update clarify that CASHE corrective actions having Hazard Abatement Plans in place that are prepared and approved in accordance with BLM Manual Handbook 1112-1, Safety and Health Management are considered complete provided funding for their implementation has been formally programmed for completion within two years.

Timeframe: Please return the updated spreadsheets by July 31, 2004. The due date for the status update is earlier than last year's because the Department is requiring that BLM provide its FY 2004 Annual Performance Report data earlier (i.e., first week of October 2004).

Please note: Organizational units that do not respond by July 31, 2004, will:

- have their corrective actions shown as incomplete,
- negatively affect the FY 2004 performance for the CASHE Performance Measure, and
- be ineligible for deferred maintenance funding for CASHE corrective actions.

Budget Impact: None.

Manual/Handbook Sections Affected: None.

Coordination: National Safety Office (WO-740).

Contacts: Ken Morin, Protection and Response Group (WO-360), 303-236-6418; Phyllis McKoy, Occupational Safety and Health (WO-740), 202-501-2788.

Signed by:
Bob Anderson
Acting Assistant Director
Minerals, Realty, and Resource Protection

Authenticated by:
Barbara J. Brown
Policy & Records Group, WO-560

Montana

Organizational Unit: Butte Field Office
Assessed Facility: Butte Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
CAIR-03-001	Air compressors at the Field Office, Holter Lake, and Log Gulch are not drained periodically to prevent the accumulation of oil and water.	03/26/2004	No	N/A	4	A) Periodically drain the air compressors or leave the valves open when the compressors are not in use; and B) Maintain a log of all maintenance activities.	Robert Stewart, Brad Rixford, John Conlan	Scheduled for completion by December 31, 2003.	
ELEC-03-001	The electric cord on the metal chop saw and an extension cord in the warehouse are damaged.	03/26/2004	No	N/A	3	Repair or replace the cord on the chop saw.	John Conlan	Scheduled for completion by December 31, 2003.	
ELEC-03-004	Inadequate clearance is provided in front of the electrical panels at the Field Office and Holter Lake Campground.	03/26/2004	Yes	N/A	4	A) Move the items that are blocking the electrical panels; B) Mark the floor spaces in front the electrical panels with yellow and black striping to indicate the area is not to be used for storage; and C) Remind employees that the working space in front of electrical panels and equipment is not to be used for storage.	Robert Stewart, Brad Rixford	Scheduled for completion by December 31, 2003.	
EXIT-03-001	A fire prevention plan has not been prepared for the Field Office.	03/26/2004	No	N/A	4	A) Review the building lease to determine whether inspection and maintenance of the potential ignition sources (e.g., furnaces) and fire protection systems (e.g., fire extinguishers) are specified at the necessary frequencies, and if not, modify the contract to include an appropriate level of inspection and maintenance; and B) Train all employees on fire extinguisher use annually and maintain training records; or C) Prepare a fire prevention plan and educate employees on how to implement its contents.	John Thomson	Scheduled for completion by May 1, 2004.	
EXIT-03-002	Bins of electrical equipment block an exit route from the sprinkler system closet in the wildlife office area of the office.	03/26/2004	No	N/A	3	Organize materials in a stable and secure manner that allows for safe access and egress into and out of the sprinkler system closet.	Sarah Lamarr	Scheduled for completion by December 31, 2003.	

Montana

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EXIT-03-003	Heat-producing equipment in the Field Office warehouse is not maintained to prevent fire.	03/26/2004	No	N/A	3	Relocate all items stored on the loft adjacent to the sharpener to provide an 8-foot clear area behind the sharpener.	Dave Dukart	Scheduled for completion by December 31, 2003.	
FIRE-03-002	Materials in the archeology office area are stored in a manner that does not provide adequate vertical clearance below sprinkler heads.	03/26/2004	No	N/A	3	A) Remove the materials stored on the top shelf; and B) Educate personnel on the importance of providing adequate clearance for a sprinkler system to function effectively.	Carrie Kiely	Scheduled for completion by December 31, 2003.	
GEC-03-001	Food and beverages are stored with non-food items in Field Office refrigerators.	03/26/2004	No	N/A	4	A) Determine if the refrigerators will be dedicated for employee food and drink or for nonconsumable items; B) Place a sign on the refrigerator indicating its intended use (e.g., "FOOD ONLY" or "NONCONSUMABLE ITEMS ONLY - NO FOOD"); and C) Provide additional refrigerators, if necessary.	Robert Stewart, John Thompson	Scheduled for completion by December 31, 2003.	
HAZMAT-03-002	The prefabricated concrete shed will need to be appropriately located, signed, and constructed to be used for flammable liquid storage.	03/26/2004	No	N/A	4	Ensure that the new fuels shed includes all required and necessary features before placing it into service.	Robert Stewart	Scheduled for completion by May 1, 2004.	
HAZMAT-03-003	Small propane cylinders are stored inside flammable storage cabinets throughout Field Office facilities.	03/26/2004	No	N/A	3	Remove all small propane cylinders from flammable storage cabinets and store them on shelves.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	
HMTRAN-03-001	The 100-gallon truck-mounted drip torch fuel tank at the Field Office is not properly labeled.	03/26/2004	Yes	Class IB	N/A	A) Mark the tank with its proper DOT shipping name; B) Apply the red triangular "FLAMMABLE LIQUID" label; and C) Ensure that DOT-compliant shipping papers are prepared.	Charles Tuss	Scheduled for completion by December 1, 2003.	

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HWGEN-03-001	There is no system in place for the proper disposal of paint thinner at the Field Office and Holter Lake.	03/26/2004	No	Class IB	N/A	A) Switch to latex-based paints or use disposable paint brushes, eliminating the use of paint thinner and the generation of used paint thinner; or B) If thinner use is unavoidable, instruct all personnel who use paint thinner to pour it back into the original container and continue to reuse it until it is no longer effective; and C) Turn the spent paint thinner in to the Field Office HAZMAT Coordinator for proper disposal as hazardous waste.	Mike Browne	Scheduled for completion by December 31, 2003.	
HWGEN-03-002	Field Office personnel have not been informed of the proper handling of spent lithium and NiCd batteries.	03/26/2004	No	Class III	N/A	A) Assign a person in the Field Office with the responsibility of accepting spent NiCd batteries from personnel and who will periodically give them to a local vendor; B) Educate all employees on the need to recycle spent Lithium and NiCd batteries, the opportunity to recycle other types of batteries listed in this finding, and to whom they should be given; and C) Post the accumulation start date on the box used to collect NiCd batteries or on each battery as it is added to the box and ensure that they are not accumulated for more than 1 year before they are turned in to a recycler.	Robert Stewart	Scheduled for completion by December 31, 2003.	
HWGEN-03-003	Uncharacterized waste has accumulated at the Field Office.	03/26/2004	No	Class IB	N/A	A) Hire a waste management contractor to characterize and properly dispose of the parts washer fluid; and B) Consider disposing of the parts washer.	John Conlan	Scheduled for completion by December 31, 2003.	

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HWGEN-03-004	Fluorescent lamp tubes are accumulated and disposed improperly at the Field Office and Holter Lake Campground.	03/26/2004	No	Class III	N/A	A) Determine if there is a local recycling facility that will accept spent tubes (also inquire if they will accept low-mercury tubes); B) If not, contact the local landfill to determine if it accepts spent fluorescent tubes in a CESQG's trash and in what quantity (also inquire if they will accept low-mercury tubes), and document all discussions; C) Store both new and spent out tubes in their original boxes; D) Recycle or dispose of the entire box when it is full of spent tubes; and E) Begin the transition to low-mercury tubes; and F) Educate all personnel who perform maintenance activities on the proper storage and disposal of spent fluorescent lamp tubes.	Vicki Gillam, Brad Rixford	Scheduled for completion by December 31, 2003.	
MGUARD-03-001	The miter saw in the Field Office warehouse and a radial arm saw at Log Gulch are not equipped with blade guards and other required safety features.	03/26/2004	Yes	N/A	2	A) Clean and oil the guard on the miter saw; B) If cleaning and maintenance does not allow the guard to operate properly, replace the guard or disable and dispose of the miter saw; C) Install the blade guard on the radial arm saw at Log Gulch; D) Adjust the radial arm saw at Log Gulch so that the front end is slightly higher than the rear or install a retrofit pullback mechanism; or E) Discard and replace the equipment.	Robert Stewart, Brad Rixford	Scheduled for completion by December 31, 2003. The mitre saw was repaired on July 9, 2003.	
MGUARD-03-002	The belt on the auger in the Field Office fuels shed is not guarded.	03/26/2004	No	N/A	3	A) Replace the belt guard on the auger; or B) Fabricate an expanded metal guard that fully encloses the belt and pulley.	Robert Stewart, Brad Rixford	Scheduled for completion by April 1, 2004.	

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MGUARD-03-003	Tongue guards on grinders at Log Gulch and the Field Office are missing or not properly adjusted.	03/26/2004	No	N/A	3	A) Fabricate or purchase adjustable tongue guards for the grinder at Lag Gulch; B) Purchase a new grinding wheel for the grinder in the Field Office warehouse; and C) Adjust the tongue guards to the proper settings.	Robert Stewart, Brad Rixford	Scheduled for completion by December 31, 2003. The guard on the Field Office grinder was adjusted on July 10, 2003.	
MHS-03-001	Materials are stored in the warehouse in a manner that creates a hazard.	03/26/2004	No	N/A	4	A) Organize the materials in a stable and secure manner; and B) Maintain clear aisles in front of the shelves to allow unobstructed access to the materials stored on the shelves.	Richard Hotaling	Scheduled for completion by December 31, 2003.	
MHS-03-002	Bundles of pressure-treated fence posts stored in the wareyard are not secure.	03/26/2004	No	N/A	4	A) Install guard posts or barricades and store wood bundles and other yard materials with the potential to roll (e.g., culvert, fence posts) behind them; and B) If there is room available in the yard, do not stack bundles of wood.	Robert Stewart	Scheduled for completion by May 1, 2004.	
OHEC-03-001	A sound survey has not been conducted to determine if employees involved in fuels management are exposed to hazardous noise levels.	03/26/2004	No	N/A	3	A) Contract for a sound survey of equipment and operations conducted by fuels management employees to determine if a hearing conservation program is required; and B) Create and implement a hearing conservation program if necessary including baseline hearing tests.	Dave Dukart	Scheduled for completion by June 1, 2004.	
PEST-03-001	Not all equipment used to apply herbicides is properly labeled.	03/26/2004	Yes	Class III	N/A	Label all equipment used for the application or mixing of herbicides "CONTAMINATED WITH HERBICIDES" or "CONTAMINATED WITH PESTICIDES" to prevent its use for other purposes.	Pete Armstrong	Scheduled for completion by December 31, 2003.	

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PEST-03-002	Fire and police personnel have not been formally notified of the herbicide storage locations at the Field Office and an inventory is not available.	03/26/2004	No	Class III	N/A	A) Formally notify the fire and police departments of the herbicide storage location; B) Furnish the local fire department with a list of the stored herbicides' hazards and the herbicide point of contact's home telephone number; C) Maintain signs on the door of the herbicide storage building reading: "DANGER - POISON - PESTICIDE STORAGE;" D) Post emergency telephone numbers in the herbicide storage building; E) Post an inventory of the amount of stored herbicide and the range of container size in storage on the outside of the herbicide storage building; and F) Update the inventory whenever the amount or type of herbicide stored changes.	Pete Armstrong	Scheduled for completion by December 31, 2003.	
PW-03-001	Adequate measures to prevent contaminated water from being drawn into drinking water piping have not been taken at the Field Office, Holter Lake, and Log Gulch.	03/26/2004	Yes	Class IB	N/A	A) Contact the building owner and request that the irrigation line at the Field Office be re-routed to tie into the water supply at a	Vicki Gillam, Brad Rixford, Bob Stewart	Backflow preventors to be installed at fish cleaning stations by May 2004. Vacuum breakers installed on hose bibs and irrigation line rerouted in October 2003. A backflow preventor installed on the fire suppression system in February 2004.	

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PW-03-002	The backflow preventor on the tank fill hose at the Field Office is not tested annually.	03/26/2004	No	Class IB	N/A	A) Review the building lease to determine if the building owner is responsible for maintenance and annual testing of the backflow preventors; B) If the building owner is responsible for these functions, contact the owner to ensure the required testing is performed and documented annually; C) If the building owner is not responsible for the testing of the backflow preventor, contract for a certified contractor to perform annual testing of the backflow preventor and maintain records of testing.	Vicki Gillam, Brad Rixford	Scheduled for completion by December 31, 2003.	
PW-03-003	Wastewater from the vehicle washing area in the Field Office parking lot and the floor drain in the warehouse discharge to a Class V injection well.	03/26/2004	No	Class IB	N/A	A) Submit the required Class V inventory form (use of the drains may resume 90 days after submitting the inventory if no other guidance has been received from EPA); B) If the discharge from the warehouse to the french drain is not permitted, remove all grit from the floor drain grit trap and test for TPH and TCLP-metals to determine if it must be managed as contaminated soil, and seal the floor drain; C) If the discharges and storm water runoff from the parking area to the french drain is not permitted, contact the City of Butte to coordinate re-routing storm water to the municipal sewer system; and D) Require that all vehicles be washed at a commercial facility or in grassed or gravel areas where the wash water can infiltrate through the ground.	Richard Hotaling	Scheduled for completion by May 1, 2004.	

Montana

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PW-03-005	The drinking water systems at Clark's Bay and Devil's Elbow were not monitored in 2001 to determine compliance with the maximum contaminant level (MCL) for nitrate.	03/26/2004	No	Class IB	N/A	Perform annual nitrate testing for all drinking water supply systems.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	
PW-03-006	Coliform sampling was not performed at Clark's Bay in the third quarter of 2001.	03/26/2004	No	Class IB	N/A	A) Ensure the water systems are monitored for coliforms at least quarterly; and B) Maintain bacteriological records for 5 years.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	
PW-03-007	A coliform sample siting plan has not been prepared for the Departure Point drinking water system.	03/26/2004	No	Class IC	N/A	A) Prepare a coliform sample siting plan for the Departure Point drinking water system that includes all of the elements in the finding discussion (see Final Report); B) Submit the plan to the State for review and approval; C) Perform all coliform sampling according to the approved plan; and D) Always record the specific sample location or number, as identified in the coliform sample siting plan, on the bacteriological analysis form that is submitted with the coliform sample.	Not provided. This finding was added to the final report after POCs were provided for draft findings.	Not provided. This finding was added to the final report after status was provided on draft findings.	
THS-03-001	The hazard communication (HAZCOM) plan developed for the Field Office does not contain all required information.	03/26/2004	Yes	N/A	4	A) Modify the plan to include all required information; B) Review the plan annually to ensure it remains current with Field Office operations; and C) Implement the plan at all facilities.	Mike Browne	Scheduled for completion by May 1, 2004.	
THS-03-002	Unlabeled and improperly labeled containers are stored at the Field Office and Log Gulch Campground.	03/26/2004	Yes	N/A	4	A) Label all containers as to content, appropriate hazard warnings (e.g., flammable), and target organ effects; and B) Label the water tanks "NONPOTABLE WATER."	John Thompson, Brad Rixford	Scheduled for completion by December 31, 2003.	

Montana

Organizational Unit: Butte Field Office
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Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
WCB-03-001	Welding gas cylinders are not stored properly in the Field Office warehouse.	03/26/2004	No	N/A	3	A) If cylinders are intended for periodic use, place them on a welding cart to keep the leads on them and store the cart so that it is ready for use; and B) If the cylinders are being stored, separate them by at least 20 feet and chain them below the shoulder to a wall with the valve caps on.	John Conlan	Scheduled for completion by December 31, 2003.	
WWS-03-001	The storage of various materials exceeds posted load limits in a loft in the warehouse.	03/26/2004	No	N/A	4	A) Obtain a professional re-evaluation of the load limits for the loft areas in the warehouse, and post any changes in total capacity and weight per square foot capacity; and B) Determine whether the materials currently stored in the loft are in compliance with the load limit, remove materials if necessary, or reconfigure the materials so as not to exceed the load limits.	Robert Stewart	Load limits will be evaluated by December 31, 2003. The paint was removed on September 25, 2003.	