

**UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
Oregon State Office
P.O. Box 2965
Portland, OR 97208**

In Reply Refer to:
1112 (OR-950) P

March 2, 2004

EMS TRANSMISSION 03/12/2004
Instruction Memorandum No. OR-2004-047
Expires: 9/30/2005

To: DMS, DSDs, Staff & Branch Chiefs
From: Associate State Director
Subject: Safety & Health Program Assessment and Facility Inspection Policy

Program Area: Safety & Occupational Health

Purpose: To establish the guidelines and procedures necessary to ensure compliance with the Assessment and Inspection element of the Bureau of Land Management (BLM) Manual 1112 – Safety & Health Management; and, to completely integrate the inspection process into the Oregon/Washington (OR/WA) Safety Program.

Policy/Action:

1. Comprehensive facility safety inspections shall be conducted annually at all sites in OR/WA as required by this policy and Department Manual 485 - Safety & Health Handbook, Chapter 5; the BLM Manual 1112 Safety; and, the BLM Manual Handbook 1112-1 Safety and Health Management.
2. District safety managers will perform a self inspection on their safety program at least annually to ensure that all elements of the program are compliant with Public Law, the Department of the Interior requirements, and BLM Directives. This self inspection will serve to assist management in providing a safe and healthful workplace for all BLM employees as well as ensure that all program elements are in place and functioning.

The attached policy provides various forms to be used in the assessment and inspection process and the safety program review. The Risk Assessment Code Matrix and instructions are also included.

Timeframe: This policy is effective immediately.

Budget Impact: This policy will not result in additional costs not normally associated with the program.

Background: The Bureau Safety and Health program outlines six essential program elements in a comprehensive Safety and Health program. Attention to each of these elements is necessary to ensure that Bureau offices provide safe and healthful working conditions for all employees. This policy provides information and guidance to assist OR/WA Safety Managers in complying with the inspection element of the program by requiring annual self inspections of their Safety Program.

Manual/Handbook Sections Affected: Supplemental to the BLM Manual Handbook 1112-1 Safety and Health Management

Coordination: Safety and Health

Contact: If you have questions concerning this policy, contact the State Safety Office at (503) 808-6202 or (503) 808-6249.

Districts with Unions are reminded to notify their unions of this Instruction Memorandum and satisfy any bargaining obligations before implementation. Your servicing Human Resources Office or Labor Relations Specialist can provide you assistance in this matter.

Signed by
A. Barron Bail
(Acting)

Authenticated by
Mary O'Leary
Management Assistant

1 Attachment(s)

1 - [Safety & Health Program Assessment and Facility Inspection Policy](#) (9pp)

Distribution
WO-740



UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
OREGON STATE OFFICE
MANUAL TRANSMITTAL SHEET

Release	1-318
Date	March 02, 2004

Subject

H-1112-1 – Safety and Health Management (Chapter 6)

1. Explanation of Material Transmitted:
This Manual Release Supplement transmits a new supplement to the BLM Safety and Health Management Handbook.
2. Reports Required: None.
3. Material Superseded: None.
4. Filing Instructions: File as directed below.

REMOVE:

None

Signed by
A. Barron Bail

INSERT:

Insert at end of Chapter 6 with Illustrations

Authenticated by
Mary O'Leary
Management Assistant

**United States Department of the Interior
BUREAU OF LAND MANAGEMENT
OREGON STATE OFFICE**

**Robert Duncan Plaza Building
333 SW 1st Avenue
Portland, Oregon 97204**



**SAFETY AND HEALTH PROGRAM
ASSESSMENT AND FACILITY INSPECTION POLICY**

OR/WA Supplement to BLM Manual Handbook 1112-1
Safety and Health Management

**FEBRUARY 2004
Oregon State Office**

Safety and Health Program Assessment and Facility Inspection Policy

6.1.1 Policy, Requirements, and Responsibilities

Oregon/Washington (OR/WA) Bureau of Land Management (BLM) is committed to providing a safe and healthful work environment for all employees. The BLM has various work procedures (such as administrative and engineering controls, work practice designs, and requirements for use of personal protective equipment [PPE]) in place which reduce employee exposure to hazards on the job. Comprehensive job training and the consistent use of all identified safe work procedures and PPE is critical to employee safety.

The Bureau ensures consistency of the Safety and Health program by having all states follow the program structure outlined in BLM Manual 1112 – Safety & Health Management. The six essential program elements in the manual are identified below.

- Program management
- Training
- Inspections
- Safety and Health Promotion
- Accident Investigation and reporting
- Program Evaluation

This policy establishes the guidelines and procedures necessary to ensure compliance with the Inspection element of the manual, and, to completely integrate the inspection process into the OR/WA Safety Program.

There are two components to a comprehensive evaluation of a safety program. The first is a thorough inspection of the physical facilities [workplaces] to identify and abate any unsafe conditions. Such safety inspections identify hazards, determine risk, and make recommendations to eliminate identified hazards and assists in developing procedures to reduce risk to an acceptable level. The second is an evaluation of the safety program itself, including the level of management support for the program.

A. Safety Program Evaluations

A periodic review of the safety program ensures that the program is compliant with Public Law, the Department of the Interior requirements, and BLM Directives. The review serves to assist management in providing a safe and healthful workplace for all BLM workers. Public Law requires that all state safety programs be reviewed on an annual basis. The review will be accomplished using the OR/WA Self-Inspection Program Management Checklist (PMR) which can be found on the OR/WA Safety Intranet site.

This review should include an analysis of the accident data and trends for the preceding year, a

review of the effectiveness of the Safety Action Plan, and the abatement status of any outstanding deficiencies found during previous inspections.

B. Safety Inspections

Safety inspections shall be conducted in Oregon and Washington as required by the following regulations, manuals and handbooks.

- 29 CFR 1960 Subpart J – Evaluation of Federal Occupational Safety and Health Programs
- Department Manual 485 Safety and Health Handbook, Chapter 5 – Program Evaluations
- BLM Manual 1112 Safety
- BLM Manual Handbook 1112-1 Safety and Health Management

Supervisors are responsible to routinely inspect all operations, workplaces and facilities to ensure hazards are identified and abatement procedures are completed in a timely manner.

Prior to starting work each day, employees must ensure that equipment is inspected and safe work procedures are identified and reviewed.

Formal safety inspections of all physical facilities will be conducted by a qualified inspector at least once each fiscal year.¹ Existing conditions are reviewed and the adequacy of safety efforts applied to eliminate hazards and reduce accidents and illnesses are assessed. More frequent inspections are required for work areas/operations where there is an identified increased risk of accident, injury or illness.

A list of *High Interest Area Facilities or Operations* with an accompanying inspection schedule should be developed by the Safety manager each year. This list will be reviewed and approved by management.

On occasion, properly trained supervisors, safety committee members, and/or other employees may inspect low risk facilities² and operations as necessary.

Pre-occupancy inspections of all structures, such as office space, inclusive of leased facilities, must be completed prior to employee move-in.³ Deficiencies noted during the inspection are shared with the builder, lesser, or manager for abatement. All serious deficiencies must be abated before occupancy. Minor deficiencies may be corrected following occupancy if accompanied by a timely corrective action plan.

Completion of formal safety inspections always require well trained, competent inspectors. The BLM is responsible to provide adequate training for safety and health inspectors (safety managers) to ensure that all required inspections are conducted in a thorough and professional manner. Should an organization not have the required expertise on site, arrangements must be

¹ Safety Managers are qualified to inspect any BLM facility or operation.

² Low risk facilities are generally limited to administrative facilities.

³ This requirement includes interagency offices where BLM personnel may routinely work in Forest Service facilities.

made to obtain outside expertise to accomplish safety inspections.

6.1.2 Safety Program Review

Each safety manager will conduct a self inspection of the district safety program at least once each year. The program review may be conducted in conjunction with the facility inspection. A completed copy of the Program Management Review checklist will be sent to the State Safety Manager prior to the end of the fiscal year. A cover letter, signed by Management, will accompany the completed Checklist and outline any corrective actions or significant findings identified during the review.

6.1.3 Formal Workplace Inspection Procedure

All formal inspections⁴ (e.g., required annual inspections) should be preceded by a written notice to management staff and employees detailing the intended dates(s) and time for the inspection. All inspections shall be conducted in a manner to preclude unreasonable disruption of workplace operations. The safety inspector will conduct a comprehensive walk-through inspection of all areas and document findings in a convenient format to ensure all areas are inspected. (Reference *Illustration 6.1-1 OR WA BLM Facility Safety Inspection Report*) Inspections shall be conducted according to the following protocol.

A. Initial Conference. Meet with the office or activity head to discuss current safety objectives, scope of inspection procedures, specific problem areas, and previous findings and recommendations. Extend an invitation to the office head and employee representative (or other employee) to accompany the inspection team.

B. Inspection Process. Perform on-site inspections of physical facilities, materials, equipment and work operations to determine the extent of compliance with OSHA standards and BLM safety requirements. Interview employees, supervisors, and office heads regarding matters of safety and health.

C. Findings. Identify all instances of non-compliance with safety and health standards and recommend corrective actions to management.

D. Close out Conference. Discuss findings and preliminary recommendations with office management. Identify areas of concern and discuss significant items. A preliminary report of findings; or, a copy of the safety inspector's notations, should be left with the manager.

E. Written Report.⁵ The written report shall be provided to the management official at the workplace within a reasonable time, but no later than fifteen (15) working days following the inspection. The report should contain the following:

- ▶ All identified deficiencies with location

⁴ This formal notification procedure does not apply to safety professionals and collateral duty safety personnel conducting *spot* inspections of District facilities.

⁵ Refer to *Illustration 6.1-1 ORWA BLM Facility Safety Inspection Report*

- ▶ Recommended abatement procedures
- ▶ A risk assessment code (RAC) defining the degree of hazard for each deficiency
- ▶ Applicable reference standard(s) for each deficiency

A formal cover letter should accompany the report. The letter should discuss any future safety monitoring and provide instructions for the preparation of the required written response to the safety inspection. The letter should also provide instructions for documenting action taken by the facility to abate identified hazards as well as for the preparation of a hazard abatement plan for any deficiency that cannot be corrected within thirty (30) days following the date of inspection. (Reference Illustration 6.1-2 Hazard Abatement Plan – Bureau Form 1112-8)

6.1.4 Imminent Danger

Imminent danger is defined as a situation posing the threat of immediate death or serious physical injury. Any situation of this type discovered during any safety and health inspection must immediately be brought to the attention of management. All work affected by the identified situation must be stopped by the safety inspector and/or management officials responsible for the site. Abatement procedures must be initiated immediately. All personnel not involved in these procedures will be evacuated from the area. Employees shall not be allowed to enter the site or begin normal work procedures until the abatement procedures have been completed and the hazard no longer exists.

6.1.5 Deficiency Abatement Requirements

Once a physical deficiency has been identified, it is the responsibility of management to ensure that corrective action is completed in a timely manner. Operating plans and budgets shall include programming of resources to correct safety and health deficiencies. Deficiencies will be prioritized based upon the degree of the hazard.

The BLM *Risk Management Process* is used to determine the degree of risk associated with each identified deficiency. The risk is determined by comparing the probability of a hazard occurring with the severity it would represent should it occur. The risk is then assigned a Risk Assessment Code (RAC) based on this comparison. (Reference Illustration 6.1-3A Risk Assessment Code Matrix and Illustration 6.1-3B Instructions)

All RAC 1, 2, or 3 hazards will normally be corrected within thirty (30) days of notification.⁶ If the hazard cannot be abated within this timeframe, the official responsible for the workplace, in concert with the Safety Manager, must develop a written Hazard Abatement Plan. The Hazard Abatement Plan must include any interim corrective actions applied to reduce the hazard until full abatement can be accomplished. Spot checks should be conducted to ensure that interim measures taken are effective. Management shall review abatement plans quarterly until all abatement actions have been accomplished.

⁶ All RAC 4 hazards will be completed as scheduling and resources permit.

Illustration 6.1-1 OR WA BLM Facility Safety Inspection Report

OR WA BLM Facility Safety Inspection Report						
Facility _____					Date _____	
Item #	Location	OSHA Reference	RAC* Code	Discrepancy	Recommendation	Safety Use Only Follow/Up

All hazards that cannot be abated within thirty (30) days must be transferred to an approved Hazard Abatement Plan. [Reference BLM Manual Handbook 1112-1 Chapter 6 and Illustration 6-2 for form and information]

*Risk Assessment Codes (RAC) were determined by the Risk Assessment Matrix and definitions contained in BLM Manual Handbook 1112-1 Chapter 2.

Illustration 6.1-2 Hazard Abatement Plan

Form 1112-8 (May 2001)	UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT HAZARD ABATEMENT PLAN		
1. Project No.	2. Date Prepared	3. Date Revised	
4. Organization	5. Location	6. Risk Assessment Code	
7. Specific OSHA or Other Standards Violated and Description of Hazard			
8. Description of Proposed Corrective Action(s)			
9. Estimated Cost of Corrective Action(s)			
\$			
10. Description of Interim Hazard Control Measures in Effect			
11. Other Relevant Information			
12. Estimated Final Abatement Date			
Prepared by		Approved by (Management Official)	

BLM Manual Handbook 1112-1 - Safety and Health Management

Illustration 6.1-3A Risk Assessment Code Matrix

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

Instructions for Use: Refer to the following page.

Illustration 6.1-3B Risk Assessment Code Matrix Instructions

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 worker/Item All employees exposed or item inventory	___ Occurs often in career/equipment service life ___ Continuously experienced
B	LIKELY Individual worker/Item	___ Occurs frequently
C	OCCASIONAL Individual worker/Item All employees exposed or item inventory	___ Occurs sometime in career/equipment service life ___ Occurs sporadically; expect to occur several times in inventory service life
D	SELDOM Individual worker/Item All employees exposed or item inventory	___ Possibility of occurrence in career/equipment service life ___ Remote chance of occurrence; expect to occur sometime in inventory service life
E	UNLIKELY Individual worker/Item All employees exposed or item inventory	___ Can assume will not occur in career/equipment service life ___ Possible, but not probable; expect to occur only very rarely
<i>NOTE: Experience and exposure affects probability of occurrence.</i>		
MANAGEMENT ACCEPTANCE OF RISK LEVELS		
EXTREMELY HIGH RISK		State Director/Associate State Director
HIGH RISK		Field Office Manager
MEDIUM RISK		Branch Chief
LOW RISK		Line Supervisor

United State Department Interior

BUREAU OF LAND MANAGEMENT

Oregon State Office

P.O. Box 2965

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1112 (OR-950) P

Manual 1112-1, Chapter 6

May 5, 2004

EMS TRANSMISSION 05/07/2005

Instruction Memorandum No. OR-2004-047-Change 1

Expires: 9/30/2005

To: DMs, DSDs, Staff and Branch Chiefs

From: State Director, Oregon/Washington

Subject: Safety & Health Program Assessment and Facility Inspection Policy

Program Area: Safety & Occupational Health.

Purpose: This Instruction Memorandum (IM) creates the Oregon/Washington (OR/WA) Safety & Health Program Assessment and Facility Inspection Policy in correct format as a supplement to the Bureau of Land Management (BLM) Manual Handbook H-1112-1. The intent of this program is to establish the guidelines and procedures necessary to ensure compliance with the Assessment and Inspection element of the BLM Manual 1112 – Safety & Health Management; and, to completely integrate the inspection process into the OR/WA Safety Program.

Policy/Action:

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Signed by
Kathy Eaton
Acting Associate State Director

Authenticated by
Mary O'Leary
Management Assistant

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