



United States Department of the Interior



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May 4, 2010

Instruction Memorandum No. AK 2010-015
Expires: 09/30/2011

To: All BLM Alaska Employees

From: State Director

Subject: Comprehensive Field Safety Policies

Program Area: Safety

Purpose: The purpose of this Instruction Memorandum (IM) is to establish policies and guidance to better ensure the safety and well being of employees and volunteers who participate in field operations on lands managed by the Bureau of Land Management (BLM)-Alaska.

Policy/Action: Offices and personnel of the BLM-Alaska will comply with the policies set forth in the attached "Bureau of Land Management-Alaska Field Operations Safety Policies."

Timeframe: These policies are effective immediately.

Budget Impact: The overall budget impact is moderate. The majority of the component policies require no direct expenditures of funds. Offices may find it necessary to procure additional smoke or carbon monoxide detectors or field communications devices in order to comply with the requirements of this policy.

Background: In the course of accomplishing their field work¹ BLM-Alaska personnel encounter the same hazards as their BLM counterparts in the contiguous 48 states, such as severe and rapidly changing weather, poor communications, wild animals, mountainous terrain and primitive living conditions.

¹ The [BLM Manual Handbook 1112-2, Safety and Health for Field Operations](#), Chapter 3.2, defines field work as "travel or work in remote areas or under hazardous conditions."

However, the BLM-Alaska manages the largest and most remote areas of public lands in the United States, much of which is susceptible to sudden and extreme changes in weather. Great distances and unpredictable weather are two factors that routinely result in significant delays in getting seriously ill or injured people in Alaska's backcountry to adequate emergency medical treatment. Such lengthy delays in response time can mean that even a moderate injury or illness can have far more severe consequences than a comparable incident occurring in an area that has more immediate access to emergency medical services.

Such challenges compel us to take every reasonable measure to minimize the risk of an employee being severely injured or becoming seriously ill when working in the field, and to ensure that if emergency medical assistance is required it will be summoned and received as quickly as possible.

In order to more effectively address Alaskan field conditions, we have complimented the general field safety guidance provided by national Bureau policy with additional guidance appropriate to Alaskan field operations. These policies are intended to compliment, not replace, the personal responsibility that each of us has for our own individual safety and for the safety of our coworkers. Employees must always exercise their individual power to make thoughtful decisions and take sensible actions.

Manual/Handbook Sections Affected: This IM expands upon policy guidance provided in the [BLM Manual Handbook 1112-2, Safety and Health for Field Operations](#) Chapters 3, 9, 10, and 19.

Coordination: These policies were developed with the assistance and review of the BLM Alaska State Safety Committee and Alaska safety personnel.

Contact: For questions regarding this policy, contact Ken Higgins at 907-271-6370, or by email at Ken_Higgins@blm.gov.

Signed by:
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Attachment
- Safety Policies for Field Operations in Alaska (11 pp)

Bureau of Land Management – Alaska

SAFETY POLICIES FOR FIELD OPERATIONS IN ALASKA

I. Field Communications

All BLM employees working in the field must carry a reliable means of communication in order to meet Check-Out/Check-In (CO/CI) requirements [BLM Manual Handbook H1112-2, 3.2.B]. For most of our history the BLM Alaska was limited to radios for communications with, or between, field workers in remote areas, and had no choice but to accept the reality that there was simply no technology available that would permit full, continuous compliance with this requirement in Alaska.

Long distance communication systems with much broader operating ranges are now well established in Alaska. Available technologies include radio, cellular phones, Global Positioning System (GPS) based tracking, emergency locator transmitters, SPOT devices, and satellite telephones. This array of technologies has greatly expanded the menu of field communication options that are available to field going employees and their managers. In the vast majority of situations, an employee working in a remote area of the state can now immediately report an incident and request an emergency response regardless of location or the time of day. With the exception of relatively brief periods of time and occasional “dead spots” resulting from the few remaining technical limitations, there are no longer any technical reasons for an employee to be unable to make contact in a timely manner to request emergency assistance.

To ensure effective field communications, employees of the BLM-Alaska will comply with the policies listed below.

- A. Utilizing appropriate off-the-shelf technology, ensure that project/incident base camps and all independent field crews (i.e., crews working directly out of their home office, rather than out of a base camp) maintain immediate and reliable access to the types of communication devices that best provide the ability to dependably establish emergency communication with emergency medical and rescue services.
- B. Spike crews or spike camps working out of a base camp may fulfill this requirement by maintaining reliable local communications with either their base camps or with servicing aircraft operating within transmission range.
- C. No individual or crew will travel to the field without taking adequate modes of communication to ensure reliable emergency communications throughout their entire travel or work area. If there isn't a single communications system that

provides coverage over an entire project or travel area, adequate additional methods will be carried to ensure that, collectively, the devices provide full communications coverage for the entire work area.

- D. If field work or field travel encompasses remote areas outside the range of both radio and cell phone coverage, a satellite telephone, Personal Locator Beacon (PLB), or other satellite based communications or tracking device will be carried.
- E. Workers in the field will carry a means of back-up emergency communication that also meets the requirements in I.B, above. Spike crews working out of a central base camp may select one of the following alternatives to this requirement:
 - 1. One proven, reliable voice communication device with a minimum of one extra charged battery for that device
 - 2. One voice communication device plus a functioning and appropriately registered personal locator beacon or other GPS based tracking device
- F. Employees are strongly encouraged to follow the requirements in I.A and I.B, above, for travel on roads and highways outside the road maintenance areas of Alaskan villages, towns or municipalities.
- G. Each office will continue to fund, develop and maintain adequate inventories of appropriate, reliably functioning communications devices, available in quantities and variety sufficient to ensure that their field employees are able to meet the above requirements in any project or travel area in which they will be working.

II. Check-Out/Check-In (CO/CI)

The BLM CO/CI requirements are found in BLM Manual [H1112-2](#), 3.2A. The policy requires the use of a CO/CI system to track all personnel working in “remote or hazardous areas” and specifies that a written record be maintained containing the itinerary, name/s of employee/s, work area, estimated time of return, and any pertinent additional miscellaneous information. The BLM Search and Rescue (SAR) policy [H1112-2, 19.5] requires “Districts, Resource Areas, and other detached facilities [to] write Search and Rescue Plans or Emergency Action Plans that include search procedures for lost, overdue, or missing employees. The purpose of the plan is to expedite emergency actions by various individuals to determine status, **effective** rescue, facilitate medical treatment, and handle security measures involved in a successful survival mission.”

To ensure full compliance with CO/CI procedures, employees of the BLM-Alaska will comply with the policies listed below.

- A. BLM-Alaska offices will fully comply with the Bureau wide policies stated above by ensuring that every employee working or traveling in the field is monitored by an effective and dependable CO/CI system.
- B. An effective CO/CI system means that:
 - 1. The supervisor recognizes in a timely manner that an employee is overdue in reporting at their stated return or check-in time
 - 2. A serious effort to contact a missing or overdue employee is initiated immediately after the estimated time of return or check-in call has been missed, in order to determine their location and condition
 - 3. Overnight “wait and see periods” are not acceptable
 - 4. The effort to locate the missing or overdue employee must continue and expand until their location and status are known, following the procedures and timelines specified in BLM Manual H1112-2, Section 19.3.A [A checklist derived from section 19.3.A is available on the [State Safety Office web page](#), titled “Search Procedures for Lost, Overdue, or Missing Employees,” under the “Field Operations Tools and Policies” menu]
- C. Responses to incidents involving missing or overdue aircraft will follow the guidance in the [Interagency Aviation Mishap Response Guide and Checklist](#).
- D. Each office will develop a SAR Plan that establishes procedures and timelines for responding to overdue or missing employees.
- E. Office managers may designate CO/CI systems that best fit their field conditions. For example, CO/CI systems may be centralized to service an entire field office; decentralized and performed by individual sections; or, in the case of spike crews or spike camps staging out of a base camp, locally performed by the base camp.
- F. GPS-based employee tracking technology, similar to the automated flight following system used for aircraft, is now available. It may fulfill both the CO/CI and the communications requirements (Section I, above) for many field situations.

- G. It is ultimately the supervisor's responsibility to ensure that the location and status of each of their supervised employees in the field is being effectively monitored and that efforts will be initiated to locate a missing or overdue employee. These duties may be delegated to a dispatch office or assigned to other designated employees, but the supervisor is always the default CO/CI monitor if no other person or group is clearly assigned that responsibility at the time of check-out.
- H. Employees traveling to the field and planning to return at a late hour or on weekends may have a family member assume the responsibility for reporting them overdue to supervisor or manager. This type of arrangement must be noted in the check-out record and the notification plan must be clearly understood by the employee, their family member, and the supervisor.
- I. The CO/CI procedures for Alaska State Office employees traveling to the field will be the responsibility of the employees' branch or division. For field projects that include participants from more than one branch or division, managers or supervisors of each section involved should confer and agree on a shared CO/CI system.
- J. Flight following for non-commercial aviation travel fulfills CO/CI requirements, provided it meets Bureau aviation requirements and is effectively accomplished. Field crews dropped off by non-commercial aircraft at remote sites for overnight stays or multi-day projects revert to standard CO/CI, and must check in with their home office or base camp within a reasonable prearranged time period each day.
- K. Official highway or road travel outside of urban or developed areas of Alaska can also be hazardous, particularly in the winter months. Employees will take personal responsibility for such travel and should keep a co-worker or family member apprised of their travel and Estimated Time of Arrival.

III. First Aid Training for Field Going Employees

The BLM Manual Handbook H1112-2, 10.2, states our national policy regarding first aid training: "Employees whose field work assignment makes it difficult to reach emergency medical care within 10 minutes, must be trained to render first aid and cardiopulmonary resuscitation." This policy is in turn based on 29 CFR 1910.151, which states: "In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for treatment of all injured employees, a person or persons shall be adequately trained to render first aid."

This first aid training requirement was long fulfilled by completing Basic First Aid (BFA) training, also known as Community First Aid. However, BFA is based on the relatively short emergency medical services (EMS) response time typical of urban areas. Consequently, it is primarily concerned with extremely short term stabilization of injured persons, and it simply doesn't prepare a responder to stabilize an injured coworker for even slightly extended periods of time. In backcountry areas, an EMS response to assist an injured person is frequently hours, even days away, not minutes.

To ensure effective emergency medical responses in the field, employees of the BLM-Alaska will comply with the first aid training policies listed below.

- A. In order to ensure an effective first aid response for seriously injured or seriously ill employees in the field, field-going employees will receive first aid training that appropriately addresses the types of injuries and extended response times that are likely to be encountered in remote areas of Alaska. Accepted courses are:
 1. Emergency Medical Technician (EMT)
 2. Wilderness First Responder (WFR),
 3. Wilderness First Aid (WFA), or other certified first aid course comparable to WFA² or with wilderness protocols
- B. WFA or a WFA-comparable certified first aid course will be the minimum level of first aid available to an injured field employee
- C. Managers and supervisors will ensure that adequate numbers of employees have received training to ensure that any employee injured in the field will receive timely emergency assistance from a WFA, WFA-comparable, WFR, or EMT certified person. In the case of a two person crew working beyond the range of receiving assistance from another crew, both crewmembers would require such certification.
- D. Certification or recertification in an EMT, WFR, WFA, or WFA comparable course replaces BFA and fulfills all first aid training requirements for field personnel. CPR and AED certification are still required. Newly hired personnel and employees transferring to BLM-Alaska may wait until their current BFA certification has expired to complete this training requirement.
- E. Offices will ensure that WFA or WFA-comparable training is funded and made available to their field employees; safety offices will assist in locating training providers, upon request.

² Any course with an instructional program that specifically emphasizes long term monitoring and stabilization of injured persons to a degree comparable to WFA training.

- F. The Alaska Fire Service (AFS) effectively meets the intent of this policy for the majority of fire line personnel by providing emergency medical coverage that is equal to or better than WFR during fire fighting operations, including capabilities to air drop an EMT to an incident, provide helicopter or fixed-wing support for medical evacuation, or utilize Military Assistance, Safety, Traffic (MAST) units if needed. AFS fire personnel responding to fires in small initial attack teams without medical support and AFS support personnel traveling to the field to perform non-incident related work must still be WFA or WFA-comparable certified, as per the requirements above. Emergency Fire Fighters or BLM crews from other states are not required to fulfill this requirement.

- G. In order to increase the likelihood that a field employee with severe injuries will receive an advanced level of first aid response, funding will be provided by Alaska State Office to provide one to three scholarships annually to field going employees who wish to voluntarily complete a WFR course. The WFR is an in-depth emergency medical training program, roughly comparable to EMT training but with an emphasis on backcountry injuries and treatment. The WFR training is an expensive, lengthy and demanding course of study that requires a strong commitment and a basic aptitude on the part of the student. Consequently, it is offered on a purely voluntary basis to employees who routinely work in the field, and who in good faith intend to continue working for BLM for at least 2 more years. Requests for applicants will be issued annually by the State Safety Office.

- H. The cost of WFR recertification training is roughly comparable to that of WFA training, and will be funded by the employee's office.

IV. Consumption of Alcoholic Beverages in BLM-Alaska Camps/Facilities

Department of the Interior Manual 310 DM 13, "Use of Alcoholic Beverages in DOI Occupied or Controlled Facilities," states: "Policy. Except as provided in this chapter, the use or possession of alcoholic beverages is prohibited within space occupied or controlled by DOI." The phrase "Except as provided" refers specifically to the authority given to the Secretary of the Interior or their designee to grant an exemption to the ban for a specific facility or event.

To ensure compliance with this DOI policy, employees of the BLM-Alaska will comply with the alcohol consumption policies listed below.

- A. Offices of the BLM-Alaska will regard “space occupied or controlled by DOI” to include all work camps and other remote work facilities in Alaska located on BLM managed lands or directly managed and/or operated by BLM-Alaska for the purpose of housing or sheltering employees, volunteers, or contractors, including:
 - 1. All camps of any size using tents for temporary shelter or lodging
 - 2. All cabins or similar basic structures used to provide temporary shelter or lodging to employees in the field
 - 3. All buildings or trailers at field stations or at other sites used for administrative purpose
 - 4. All lodging where employees are provided crew housing and paid camp rate

- B. These restrictions do not apply to BLM-Alaska employees and volunteers being lodged in Alaska at Bureau facilities or at Bureau expense in the following situations, provided the location is within an area where the consumption of such beverages is allowed by local and state law:
 - 1. In travel status while domiciled in commercially provided state licensed lodging, such as hotels, motels, bed and breakfast establishments, and lodges
 - 2. In Bureau owned housing rented for a fee to a permanently assigned employee to serve as their private housing
 - 3. At the discretion of the supervisor, and if in agreement with facility-specific policies, in any other long term BLM housing equivalent to commercial lodging or rental properties that is being used as long term housing by a non-transient, permanently assigned employee

- C. DOI 310-DM-13 specifically prohibits all use or possession of alcoholic beverages without stipulating that it applies only to employees. Consequently, the policies above apply to employees, volunteers, directly supervised contract employees, personnel from other agencies, independent contractors, and

agreement partners of the BLM-Alaska who are lodging in a BLM managed camp or facility. All volunteers, contractors, and cooperating agencies should therefore be informed of these restrictions prior to signing service or cooperation agreements, Memoranda of Understanding, or contracts. It is suggested that the prohibition on alcohol be clearly stated in any such written agreement.

D. These policies are not applicable to:

1. Public visitors to BLM lands, camp-grounds, or public use cabins
2. Properly permitted enterprises legally utilizing or crossing lands administered by the BLM-Alaska
3. BLM-Alaska personnel who have traveled to DOI managed lands on their own time and at their own expense to recreate as members of the public

V. Camp Risk Management and Safety Plans.

The BLM-Alaska operates remote work camps around Alaska. Remote camps are logistically complex, present numerous hazards to personnel and often represent a substantial financial investment on the part of the government.

BLM-Alaska personnel must ensure that all such operations are planned with safety as a primary goal and that all such planning is fully documented.

To ensure that safety is addressed in the planning and management of remote camps, employees of the BLM-Alaska will comply with the camp planning and risk management policies below:

- A. Personnel planning a significant or non-routine field project will ensure that their servicing Safety Specialist is aware of the project sufficiently far in advance to have an opportunity to effectively consult with the planner about any special safety concerns, necessary training, or the content of the Camp Safety Plan.
- B. Personnel planning large, complex, or non-routine projects must begin planning well in advance of their project, and involve Division of Support Services support personnel - safety, IT, procurement, shop, warehouse, and fueling specialists - at the earliest planning stages. Making urgent requests for such services just a few days before they are required ensures haste, errors, and omissions that ultimately create unsafe conditions in the warehouse, shops and the field. It also puts undue stress on support personnel, and greatly increases shipping, transportation, and other costs.

Every field camp will develop and follow a written camp safety plan. Camp safety plans prescribe the camp's specific procedures and policies for preventing accidents, and the response procedures for specific types of emergencies if they should occur. All camp safety plans will address the following topics:

1. Backcountry travel (CO/CI procedures)
 2. Fire safety (Extinguisher number and locations, smoking restrictions, flammable storage, etc.)
 3. Wild animals (Secure food storage and garbage disposal)
 4. Medical or other emergencies - Emergency Communications and Emergency Evacuation Plans, including identification of adequate personnel with WFA, WFR, or EMT certifications
 5. Waterborne illnesses (Potable water source and storage method; Water Treatment and Testing Plan and Schedule, if using local non-treated sources)
 6. Food borne illnesses (Food storage and preparation, cleaning pots, dishes, and utensils)Sewage borne illnesses (Latrine facilities, hand sanitizing)
- C. The BLM has prescribed the use of the Risk Assessment (RA) process for managing risks on all projects or operations. This includes the management of field camps. The RA process is used to develop the camp safety plan. The [Risk Management Worksheet](#), BLM Form H1112-5, is used to facilitate and document this process. BLM-Alaska offices will complete a Risk Assessment (RA) prior to establishing any camp.
- D. An example of a typical RA for small camps is available on the [State Safety Office web page](#), as well as examples of RA's that address various topics and hazards typically associated with the operation of larger camps. Select the "Risk Management and Hazard Abatement" menu.

- E. RA will be completed to address all relevant hazards and identify control measures associated with each of the following topics for camps where they are applicable:
1. Fuel storage/handling
 2. Chemical storage/handling
 3. Aviation Watercraft operation
 4. All Terrain Vehicle operation
 5. Electrical generator use/power distribution
 6. Power tool operation
- F. An RA must determine the overall remaining hazard level associated with the camp after all hazard control measures have been accomplished. All camp safety plans will designate by name the individuals responsible for performing oversight or monitoring tasks, along with their alternates.
- G. The completion of RAs and Safety Plans is the responsibility of supervisors and project leads. Ideally, they should be performed as a team effort involving two or more project participants. Risk Management training is available online through [DOI Learn](#), Course Number 1112-07. Field safety specialists are available to provide guidance and to review completed risk assessments.
- H. Camp RAs and Safety Plans must:
1. Be specific to an individual camp, to geographic location, and to dates of operation
 2. Be updated annually for camps that are used repeatedly
 3. Include the camp name, location name, GPS coordinates, dates of operation of the camp, and the names of project leads and camp managers

VI. Fire Safety

In the past fire safety was traditionally approached informally in camp situations, but it is one of the most critical elements of injury prevention in the field. Severe burns suffered in a remote area, with proper medical treatment hours, perhaps even days away, would be a terrible ordeal for the victim/s and for their field partners. To ensure that fire safety is thoroughly addressed in the field, employees of the BLM-Alaska will comply with the fire safety policies listed below.

- A. No smoking is allowed inside tents, cabins, rooms, or other lodging.
- B. No candles or other open flame devices may be used inside tents.
- C. No liquid fuel of any type may be kept or dispensed inside tents, and no kerosene, alcohol, white gas, or other liquid fuel lamps or lanterns may be used inside sleeping tents.
- D. Areas surrounding open campfires must be cleared of overhanging brush all the way around the fire pit to a distance adequate to prevent combustion of brush or ground cover. Ground areas immediately around open campfires should be cleared to bare ground for a distance appropriate to the general level of dryness and combustibility of the surrounding ground vegetation.
- E. Fires must be fully extinguished when they can't be directly monitored, e.g., at night or upon departing camp.
- F. Propane fueled catalytic type heaters that are specifically rated as indoor safe and acceptable for use in tents may be used in tents, but only under the following conditions:
 - 1. They may not be in operation in a tent when an occupant is sleeping. This restriction applies to all such heaters, including those models with built-in low oxygen shut off devices.
 - 2. The minimum distances to combustibles from the front, sides, and back of the heater (as listed on the heater, see item 9, below) must be maintained by the occupant. If the minimum distances can't be maintained, the tent is too small to use the heater and the heater may not be used. In nearly every instance, this precludes the operation of space heaters inside small tents.
 - 3. A fresh air supply opening must be maintained when the heater is in operation; the requirements will vary with the make and model of the heater. The required size of the opening will be listed on the heater (see item 5h, below) and is also available in the owner's manual for the heater.

4. Only small disposable propane cylinders that attach directly to a catalytic heater may be located inside a tent used as quarters. Refillable bulk cylinders may only be used with heaters that have a flexible rubber propane supply line that attaches to the propane tank, and the tank must be kept outside the tent. Exception: Tank mounted catalytic propane heaters may be used in large tents being used for incident administration, cooking, laundry, etc., but only when listed minimum distances to combustible materials and the minimum fresh air intake opening sizes are scrupulously observed.
5. In order to prevent the accumulation of flammable and poisonous gas in a closed space, connecting a heater to a propane tank may only be performed outside of the tent.
6. Functioning and properly placed carbon monoxide (CO) detectors (either battery powered electronic units or colorimetric tags) and smoke alarms must be located inside any tent in which there is any type of fuel fired heater. Warehouses should not issue such heaters without including these detectors. Internal oxygen deficiency shut-off devices do not detect CO, so they do not fulfill or negate this requirement. Exception: In areas directly subjected to ambient wild fire smoke in concentrations sufficient to trigger a smoke alarm, smoke alarms are not required.
7. Every heater must have either an intact original product/caution label or durable paint or permanent ink lettering applied that accurately reflects the pertinent safety information that was on the original manufacturer's label.
8. Product/caution labels or applied lettering will clearly state the requirements for minimum ventilation opening size and minimum allowable distances from the front, side and back of the heater to combustible materials such as tent walls, sleeping bags clothing, etc. If product or caution labels are missing, this information can be obtained from the manufacturer. Warehouses will not stock or issue heaters that don't have this labeling.

A list of these fire prevention rules is available on the [State Safety Office web page](#) to post in camps. Select the "Field Operations Tools and Policies" menu.