DRAFT RECLAMATION SAFETY AND HEALTH STANDARDS
RELEASE
Comments on this draft release must be submitted to acryns@usbr.gov by 6/8/2020.

Background and Purpose of the Following Draft Reclamation Safety and Health Standards (RSHS)
The RSHS are being updated by the Bureau of Reclamation Safety and Occupational Health Office to reflect new guidance from Reclamation, the Department of the Interior, and the Occupational Safety and Health Administration. This public release is intended to provide the public an opportunity to comment on each updated section in draft form. This process will enhance transparency and eliminate potential confusion about Reclamation’s safety standards.

The RSHS are incorporated into the Reclamation Manual through SAF 01-01, Occupational Safety and Health Directive – General. The Reclamation Manual is used to clarify program responsibility and authority and to document Reclamation-wide methods of doing business. All requirements in the Reclamation Manual are mandatory for Reclamation employees.

See the following pages for the draft RSHS.
Section 41

Safety Inspection and Abatement

41.1 Scope

This section specifies the minimum requirements for conducting safety and occupational health and inspections of Reclamation facilities. The following guidance serves to standardize safety inspections, abatement tracking processes and compliance with the Department of Interior (DOI) and Occupational Safety and Health Administration (OSHA) requirements for workplace safety inspections. This section applies to all Reclamation employees who conduct or participate in workplace safety inspections and abatement of inspections findings.

41.2 General Requirements

Inspections are conducted by trained staff with the relevant knowledge and experience to address the specific worksites and operations. After identification, worksite hazards must be assessed, prioritized, documented and then abated. The inspection and Abatement System (IAS) shall be used as the official inspection and abatement tracking system. Identified hazards shall be prioritized through Risk Assessment Codes (RAC), which considers the severity and probability of a hazardous condition resulting in an accident. IAS is a safety inspection tool available through the Safety Management Information System (SMIS) that provides Reclamation facilities a place to record safety inspection findings and track progress in abating them.

41.3 Responsibilities

41.3.1 Reclamation Safety and Occupational Health Office (SOHO)

41.3.1.1 Shall administer IAS, which includes reviewing and updating IAS to ensure any changes or updates to applicable safety requirements are reflected in IAS.

41.3.1.2 Shall support IAS users through training, set up, and technical assistance.

41.3.1.3 Shall review facility inspections and findings in IAS to provide the Reclamation Leadership Team with an annual summery of Reclamation inspection findings and abatement.

41.3.2 Regional Safety Managers

41.3.2.1 Shall Provide oversight of safety and health program inspections to ensure that an effective process is in place for identification, evaluation, and control of occupational safety and health hazards.
### 41.3.2.2
Shall monitor inspections in IAS to confirm that all Reclamation facilities within their geographic area of responsibility are inspected at least once annually and promote timely abatement of findings and/or updated status reports.

### 41.3.2.3
Shall be aware of facilities that are inspected less than once annually, maintaining a record of written justification from Area Office Safety and Health Professionals.

### 41.3.2.4
Shall support Area Offices and First-Line Supervisors at facilities by coordinating/providing safety inspection and hazard recognition training.

### 41.3.2.5
Shall provide immediate support to facilities with management of RAC 1 findings and abatement.

### 41.3.3 Area Office Safety and Health Professionals

#### 41.3.3.1
Shall ensure that annual safety inspections are conducted at all facilities within their area of responsibility.

#### 41.3.3.2
Shall provide alternative safety inspection schedule and justification to Regional Safety Manager for facilities not inspected on an annual basis.

#### 41.3.3.3
Shall coordinate a facility inspection schedule to document and track facility inspection findings in IAS.

#### 41.3.3.4
Shall ensure facility inspection findings are input and tracked in IAS until corrective action is taken either to eliminate the hazard or reduce it to an acceptable level.

#### 41.3.3.5
Shall support their field offices in documentation of field-level facility inspections, findings and abatement in IAS, as well as coordination with supervisors, managers, and other collateral duty staff.

#### 41.3.3.6
Shall communicate with their field offices to ensure abatement efforts are documented and/or status reports are updated with IAS every 90 days until hazard is eliminated or reduced to an acceptable level.

#### 41.3.3.7
Shall review all open inspection findings within IAS on a quarterly basis.

#### 41.3.3.8
Shall support First-Line Supervisors and field staff in coordinating/providing training that incorporates the inspection process and provides the ability to recognize safety and health hazards.

#### 41.3.3.9
Shall inform and request assistance from the next higher management level, if abatement of a hazardous condition is not within the authority and resources of Reclamation.
41.3.4  First-Line Supervisors

41.3.4.1  Shall observe their employees at least once annually, by going out to a worksite to observe worker job task and safety related practices.

41.3.4.2  Shall provide/coordinate with Area Office and Regional Safety Managers to provide training for staff.

41.3.4.3  Shall ensure conditions in the workplace are inspected daily, weekly, and monthly to prevent injuries, occupational illnesses, and property damage.

41.3.4.4  Shall provide/coordinate training for employees to act as CDSR or conduct safety inspections in the workplace.

41.3.5  Collateral Duty Safety Representatives (CDSR)

41.3.5.1  Shall conduct facility inspections required and attend training for hazard recognition and workplace safety standards.

41.3.5.2  Shall assist with inspection follow up, including IAS tracking and coordination for abatement of findings.

41.3.5.3  Shall coordinate with their Area Office safety professionals to ensure local field staff receive necessary training to recognize and manage safety and health hazards and maintain compliance with applicable safety requirements.

41.3.5.4  Shall coordinate with their Area Office Safety Professionals to ensure the Regional Safety Manager is notified when a RAC-1 finding is identified.

41.3.6  People Doing the Work

41.3.6.1  Shall have necessary training to understand the hazards associated with the work they are inspecting.

41.3.6.2  Shall maintain up to date qualifications to work as a safety and health inspector.

41.3.6.3  Shall notify facility safety representative and First-Line Supervisor immediately when a RAC-1 finding is identified.

41.3.6.4  Shall notify the facility ahead of time of intent to inspect and attend an opening meeting, if requested by the facility.

41.3.6.5  Shall disclose findings of the inspection prior to leaving the facility.

41.3.6.6  Shall maintain access to IAS through SMIS.

41.4  Training Requirements
41.4.1 Initial
All persons conducting inspections shall be trained to recognize the hazards associated with the area they are inspecting, so that they are able to identify and evaluate hazards of the working environment and suggest general abatement procedures.

41.4.2 Proficiency Qualification
Annual safety inspections shall be conducted by Safety and Health Specialists as defined in 1960.2(s), with experience and/or up-to-date training in occupational safety and health hazard recognition and evaluation are considered to meet the qualifications of safety and health inspectors.

41.4.3 Recordkeeping
Safety training for inspectors shall be tracked in the DOI system for tracking training.

41.5 Personal Protective Equipment (PPE)
Inspectors are required to comply with safety rules and practices of the facility when conducting inspections, including using the required PPE. PPE may include hardhat, safety glasses, safety-toe shoes, and hearing protection. Refer to RSHS 8 for additional information.

41.6 Safe Practices
41.6.1 Inspections
Reclamation will conduct and document inspections of all establishments under its control for safety and health compliance as required by 29 CFR 1960 Subpart D and this section. More frequent inspections will be conducted when there are increased safety risks.

41.6.1.1 Frequent Worksite Inspections. Ensure conditions are inspected daily, weekly, and monthly to prevent injuries, occupational illnesses, and property damage. These inspections may be conducted informally and do not require input into IAS for tracking.

41.6.1.2 Annual Inspections. All Reclamation facilities must be inspected at least annually, conducted by persons meeting the requirements of paragraph 41.4.2. Regions and Area Offices will document this activity as required in paragraph 41.6.1.6 of this section.

41.6.1.3 Inspector Right to Entry. OSHA, DOI, and Reclamation safety and health professionals will have right of entry, at reasonable times, to any facility, construction site or other facility to perform an inspection. They have the right to inspect any item
or place within the facility and to talk with any employee, manager, supervisor, or concessionaire associated with the facility (29 CFR 1960.31).

41.6.1.4 Procedure

41.6.1.4.1 Notification. The inspector shall notify the facility ahead of time of intent to inspect and attend an opening meeting to discuss plans and obtain relevant records.

41.6.1.4.2 Participation. An employee bargaining unit representative must be invited to participate in all stages of an inspection, including the opening and closing meetings. All participants shall comply with facility safety rules and practices when conducting inspections. All participants shall avoid unreasonable disruption of the facility operations.

41.6.1.4.3 Imminent danger conditions. The inspector shall immediately inform management and employees of imminent danger conditions.

41.6.1.4.4 Other Resources. The inspector shall consult with employees on matters of safety and health, examine accident records, and previous inspection reports. The inspector, or designee, shall take photographs for documentation.

41.6.1.4.5 Risk Assessment. The inspector shall assign RAC to each hazard to assist management with prioritization of resources to abate the most critical deficiencies. The RAC assigned to each hazard is an expression of risk, combining the severity and the probability of occurrence. The RAC criteria and definition are detailed in 41.6.2.

41.6.1.4.6 Debrief. The inspector shall disclose findings of the inspection to a facility representative, prior to leaving the facility.

41.6.1.4.7 IAS. The inspector or designee shall document the inspection, safety deficiencies and abatement recommendations in IAS promptly after finishing the facility inspection.

41.6.1.5 Findings

41.6.1.5.1 Recording. All deficiencies identified in the annual safety inspection shall be recorded in IAS. Deficiencies identified outside of an annual inspection shall be entered in IAS if classified as RAC-1 or RAC-2 or requires additional funding beyond normal maintenance budget to abate. See Section 41.6.1.6 for detailed documentation instructions of findings.

41.6.1.5.2 Imminent Danger Conditions. If an imminent danger condition (RAC-1) is identified at any time, the management official in charge will initiate corrective/protective action immediately, stop the operation, and restrict access to the area.

41.6.1.5.3 Notice of Unsafe or Unhealthful Condition. If a RAC-1 is identified during an inspection, a written “Notice of Unsafe or Unhealthful Condition” will be transmitted by the inspector to the site supervisor, then immediately and visibly posted where the hazardous condition exists. The written notice shall be posted until the condition is abated or three working days, whichever is longer. If not practical to
post where the condition exists, the written notice shall be posted where it is readily observable by anyone potentially affected by the hazard. Once the inspector has completed the “Notice of Unsafe or Unhealthful Condition” form, a copy shall be forwarded to the site supervisor for action, review, and posting.

41.6.1.6 Documentation. All deficiencies identified in the annual safety inspection shall be documented in IAS. High hazard deficiencies (RAC-1 and RAC-2) identified at any time shall be entered in IAS. If a deficiency is noted outside of an annual inspection, and abatement requires funding beyond normal maintenance budget, the finding shall be documented in IAS.

41.6.1.6.1 Required Information. Deficiencies entered in IAS will contain the following minimum information:

- Location of the hazard
- Description of the nature and extent of the hazard
- Reference to applicable safety or health standard
- Risk Assessment Code
- Interim control measures if RAC-1 or RAC-2
- Description of mitigation or recommendation action
- Reasonable time for abatement of the hazard

41.6.1.6.2 Lack of Deficiencies. For inspections without recordable deficiencies, a record of inspection must be created in IAS and the inspector must record the categories and questions looked at during the inspection.

41.6.1.7 Abatement. The initial abatement time frames shall be in line with the Department of Interior Department Manual Inspection and Abatement policy, see table 41-1 for timeframes.

<table>
<thead>
<tr>
<th>Risk Assessment Code</th>
<th>Timeframe</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>As soon as possible, within work shift</td>
</tr>
<tr>
<td>2</td>
<td>As soon as possible, no later than 15 days</td>
</tr>
<tr>
<td>3</td>
<td>Within 12 months</td>
</tr>
<tr>
<td>4</td>
<td>Within one budget cycle, but no longer than 2 years</td>
</tr>
<tr>
<td>5</td>
<td>Incorporate abatement into the 5-year plan</td>
</tr>
</tbody>
</table>

41.6.1.7.1 Updates. Inspectors will update the status of abatement in IAS every 90 days until all inspection findings are abated.
41.6.1.7.2 **Review.** Area Office Safety Professionals will be responsible for a quarterly review of all open inspection findings within IAS.

41.6.1.7.3 **Authority.** If abatement of a hazardous condition is not within the authority and resources of Reclamation, the local safety professional will inform and protect potentially affected employees; inform and request assistance from the next higher management level; coordinate, when necessary, with the appropriate federal agency (e.g. General Services Administration) to secure abatement.

41.6.2 **Risk Assessment Codes**

The RAC assigned to each hazard is an expression of risk, combining the severity and probability of a hazardous condition resulting in an accident. The exposure of personnel to a hazard is an integral part of the probability determination and shall be considered when assessing the likelihood of a hazard resulting in an accident, injury, or illness.

41.6.2.1 **Numerical Scale.** RAC levels are identified by a numerical scale, 1-5, with RAC-1 being the most critical requiring immediate response and RAC-5 being the least critical.

41.6.2.1.1 **RAC-1 (Critical).** Represents an immediate danger to life, health, or infrastructure and requires emergency correction or hazard controlled to a lower level of risk.

41.6.2.1.2 **RAC-2 (Serious).** Represents a high level of threat to life, health, or infrastructure and requires hazard correction or hazard controlled to a lower level of risk as soon as possible.

41.6.2.1.3 **RAC-3 (Moderate).** Represents a medium level risk to life, health, or infrastructure, with correction planned and completed, or hazard controlled to a lower level of risk.

41.6.2.1.4 **RAC-4 (Minor).** Represents a low-level risk, with correction planned and completed, or hazard controlled to a lower level of risk.

41.6.2.1.5 **RAC-5 (Negligible).** Represents the lowest level risk and is considered minor. The correction of these risks can be planned in the out-years.

41.6.2.2 **Risk Assessment Matrix**

When assigning the RAC to an inspection finding, the inspector shall consult the Risk Assessment Matrix, see Figure 41-1. The Risk Assessment Matrix shall serve as a tool to consistently assign the RAC to findings. Changing the RAC score shall reflect the existing conditions of the finding and shall not be changed to inflate the priority for abatement.
41.7 Definitions

Risk Assessment Code (RAC) A hazard number ranking system from 1 (the highest level of risk) to 5 (the lowest level of risk).

Inspection and Abatement System (IAS) The agency system of record, and is required to document all facility safety inspections, findings and abatement progress.

Safety Management Information System (SMIS) A collection of computer programs that assist Safety Managers and DOI employees in managing the safety risks associated with employment in the Department of the Interior. Additionally, SMIS serves as a conduit for employees who are injured on the job to file claims for compensation and enables Compensation Coordinators to track, review and monitor the Workers’ compensation program.

41.8 References

