

# Reclamation Manual

## Directives and Standards

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- Subject:** Workplace Safety Inspection and Abatement
- Purpose:** To specify the minimum Occupational Safety and Health Program requirements for conducting safety and health inspections of workplaces and timely abatement of identified hazards for all Bureau of Reclamation workplaces. The benefits of this Directive and Standard (D&S) are to standardize Reclamation's workplace safety inspection and abatement tracking processes and assure compliance with the Department of the Interior's requirements for workplace safety inspections.
- Authority:** Occupational Safety and Health Act of 1970 (Pub. L. 91-596; 5 U.S.C. 7902; 29 U.S.C. 651 et. seq.) as amended; Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters, 29 CFR 1960; Executive Order 12196; OMB Circular A-123; Department of the Interior Safety and Health Manual, 485 DM Chapter 6; Reclamation Manual D&S, *Occupational Safety and Health - General* (SAF 01-01; and Reclamation Safety and Health Standards Section 2.1
- Approving Official:** Director, Security, Safety, and Law Enforcement
- Contact:** Safety and Occupational Health Office, 84-43000
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1. **Introduction.** This D&S standardizes the procedures and responsibilities for Reclamation's workplace safety inspection and abatement program. Reclamation's management is responsible for establishing and maintaining a safe and healthful work environment for employees, volunteers, and visitors. To achieve this goal, Reclamation must assess its Occupational Safety and Health Program and ensure that adequate and reliable policies, procedures, and systems are implemented to track and promptly correct identified safety and occupational health deficiencies.
2. **Applicability.** This D&S applies to all Reclamation employees who conduct or participate in workplace safety inspections and those responsible for abatement.
3. **Definitions.** See Appendix D for a list of acronyms and definitions.
4. **Responsibilities.**
  - A. **Designated Agency Safety and Health Official (DASHO).** The DASHO is responsible for:

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- (1) providing the Secretary of the Department reasonable assurance that Reclamation is in compliance with applicable safety laws and regulations, that Reclamation workplace inspections are conducted annually in accordance with the provisions of this D&S, and that workplaces are operating effectively with no weaknesses in the design or operation of internal controls; and
- (2) providing personnel and financial resources, as needed, to address abatement of findings and facilitate successful completion of the inspection process inclusive of continuous compliance improvement from year-to-year.

**B. Regional Directors.** Regional directors are responsible for:

- (1) providing the Commissioner with reasonable assurance that Reclamation workplaces in their region are in compliance with applicable safety regulations, that workplace inspections are conducted annually in accordance with the provisions of this D&S, and that workplaces are operating effectively with no material weaknesses in the design or operation of internal controls; and
- (2) providing personnel and financial resources, as needed, to address abatement of findings and facilitate successful completion of the inspection process inclusive of continuous compliance improvement from year-to-year within their region.

**C. Reclamation Safety and Occupational Health Manager.** The Reclamation Safety and Occupational Health Manager is responsible for:

- (1) providing Reclamation safety and health inspection oversight to ensure that an effective process is in place for the identification, evaluation, and control of occupational safety and health hazards, where applicable;
- (2) monitoring inspections to ensure all workplaces are inspected at least once each fiscal year;
- (3) developing and maintaining the Facility Safety Inspection module of the Dam Safety Information System (DSIS) to meet finding/deficiency tracking and abatement requirements for annual action plans, program evaluations, and compliance inspections as required by SAF 01-01;
- (4) developing and incorporating standardized inspection checklist templates for regional and field use in meeting inspection requirements (see Appendix B);

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- (5) developing DSIS reports for Reclamation, regional, and local tracking of unabated inspection deficiencies and management review for appropriateness and timeliness of corrective actions; and
- (6) providing the Reclamation Leadership Team with an annual summary of Reclamation inspection findings and deficiencies via integration into Reclamation's Annual Assurance Statement, as appropriate.

**D. Regional Safety Managers.** Regional safety managers are responsible for:

- (1) providing region-wide safety and health program inspection oversight of all organizations within their respective geographical boundaries to ensure that an effective process is in place for the identification, evaluation, and control of occupational safety and health hazards;
- (2) monitoring inspections in DSIS to ensure that all workplaces within their geographic area of responsibility are inspected at least once annually, and ensuring appropriate and timely closure of deficiencies and/or updated status reports;
- (3) identifying high-risk workplaces based on high-risk activities, high-rate accident statistics, occupational hazards, past inspection history, personnel turnover, amount of time since last formal review, etc.;
- (4) coordinating with area offices and providing support for high-risk workplaces in their region;
- (5) providing guidance and assistance to area office safety staff, managers, and supervisors to comply with workplace safety inspection requirements;
- (6) reviewing DSIS abatement logs and associated reports, and communicating information to respective regional management, as needed, to ensure appropriateness and timeliness of corrective actions;
- (7) supporting Reclamation regional and local safety and health staff (e.g., regional safety officers and collateral duty safety representatives) through training that incorporates the inspection process and provides subject personnel with the ability to recognize safety and health hazards through the conduct of workplace inspections; and
- (8) advising regional directors on the regional safety assurance statement, as appropriate.

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- E. **Area Office Managers.** Area office managers are responsible for:
- (1) providing their regional director with reasonable assurance that Reclamation workplaces within their area are in compliance with applicable safety laws and regulations, that workplace inspections are conducted annually in accordance with the provisions of this D&S, and that workplaces are operating effectively with no material weaknesses in the design or operation of internal controls; and
  - (2) providing personnel and financial resources, as needed, to address abatement of findings and facilitate successful completion of the inspection process inclusive of continuous compliance improvement from year-to-year within their area.
- F. **Area Office Safety and Health Managers/Specialists.** Area office safety and health managers/specialists are responsible for:
- (1) establishing a workplace inspection program to effectively document and track safety and health deficiencies until corrective action is taken either to eliminate or reduce the hazard to an acceptable level;
  - (2) ensuring that high-hazard workplaces where there is an increased risk of accident or injury due to the nature of the operations are surveyed more frequently;
  - (3) conducting annual safety and health compliance inspections for workplaces, documenting deficiencies within DSIS, and coordinating with respective management to close all findings;
  - (4) coordinating and the conducting annual local field-level safety and health compliance self-inspections to include all subordinate field locations with supervisors, managers, and other collateral duty staff (e.g., local firearms and watercraft instructors and chemical hygiene officers);
  - (5) coordinating the documentation of local field-level workplace inspections findings and associated corrective actions in DSIS, as appropriate;
  - (6) ensuring that local abatement log corrective actions are documented and/or status reports updated within DSIS every 90 days until full abatement has been completed; and
  - (7) supporting local safety and health staff (e.g., collateral duty safety representatives and safety committees) through DSIS and Occupational Safety and Health Administration (OSHA) training that incorporates the

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inspection process and provides subject personnel with the ability to recognize safety and health hazards through the conduct of workplace inspections.

**G. Collateral Duty Safety Representatives and Safety Committee Members.**

Collateral duty safety representatives and safety committee members are responsible for:

- (1) assisting area office safety and health managers with workplace safety inspections as needed; and
- (2) attending training for hazard recognition and work place safety standards if assisting in or conducting safety inspections.

**5. Requirements.**

**A. Inspections.** Reclamation will conduct and document inspections of all occupied workplaces under its control for safety and health compliance as required by 29 CFR 1960 Subpart D and this D&S. More frequent inspections will be conducted when there is increased risk of accidents or incidents. Reclamation's Occupational Safety and Health Program includes the following types of inspection activities:

- (1) **Day-to-Day Inspections.** Supervisors must ensure that conditions in the workplace are monitored daily to prevent injuries, occupational illnesses, and property damage accidents.
- (2) **Annual Inspections.**
  - (a) All Reclamation workplaces must be inspected at least annually. Regions and area offices will document this activity as required in Paragraph 5.A.(3)(l) of this D&S.
  - (b) Annual inspections will be conducted by persons who are trained in hazard recognition and safety and health inspection procedures. Safety and health specialists, as defined in 29 CFR 1960.2(s), with experience and/or up-to-date training in occupational safety and health hazard recognition and evaluation, must meet the qualifications of safety and health inspectors. For those working environments where there are less complex hazards, employees who do not possess all of these safety and health specializations may be used. However, inspectors, such as collateral duty safety representatives, safety committees, or facility managers, will have sufficient documented training and/or experience in the safety and

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health hazards of the workplace involved to recognize and evaluate those particular hazards and to suggest effective abatement procedures.

- (3) **Inspectors.** Persons conducting safety and health inspections must:
- (a) Have the necessary equipment to conduct the inspection.
  - (b) Examine accident records and previous inspection reports as appropriate.
  - (c) Hold an opening conference with the workplace manager. In cases where a single workplace is expected to undergo multiple inspections over a period of time, this meeting need only take place once. An employee representative must be invited to participate in all stages of an inspection, including the opening and closing conferences.
  - (d) Consult with employees on matters of safety and health as appropriate.
  - (e) inform management and employees of imminent danger conditions.
  - (f) Comply with safety rules and practices.
  - (g) Take or obtain photographs, where appropriate.
  - (h) Avoid unreasonable disruption of the operation.
  - (i) For deficiencies which can be abated in 30 days or less, record the deficiency in their inspection log and ensure it is abated within that time frame.
  - (j) Hold a closing conference with management to disclose the findings of the inspection and recommend abatement measures. The management and employee representative(s) will be afforded an opportunity to bring other information to the attention of the inspector regarding unsafe or unhealthful conditions in the workplace. In cases where a single workplace is expected to undergo multiple inspections over a period of time, this closing conference need only take place once.
  - (k) Assign risk assessment codes (RAC) to each hazard to assist management with prioritization of resources to abate the most critical hazardous deficiencies. The RAC assigned to each hazard is an

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expression of risk, combining the severity and the probability of occurrence. The RAC criteria and definitions are detailed in Appendix A.

- (l) Document the inspection and recordable safety deficiencies in DSIS.

### **B. Findings.**

- (1) If an imminent danger condition (RAC-1 or RAC-2) is identified at any time, the management official in charge will initiate corrective/protective action immediately and, if necessary, stop the operation and/or prevent access to the area, except for those needed to abate the condition.
- (2) If an imminent danger condition (RAC-1 or RAC-2) is identified during an inspection, a written "Notice of Unsafe or Unhealthful Condition" (Notice) will be transmitted by the inspector to the site supervisor and immediately posted conspicuously at or near each place a hazardous working condition exists, if practical, until the condition is abated or for 3 working days, whichever is longer. If not practical, the Notice will be posted where it is readily observable by all affected employees. A copy of the Notice, and instructions on filling it out, can be found in Appendix C.
- (3) Recordable safety deficiencies include:
  - (a) all RAC-1 and RAC-2 deficiencies regardless of timeframe necessary for abatement; and
  - (b) all deficiencies requiring 30 or more days to abate.
- (4) Deficiencies that will be corrected in less than 30 days will be entered in DSIS at the discretion of the inspector.
- (5) Deficiencies entered into DSIS will contain the following minimum information and be provided to management and employee representative(s) participating in the inspection:
  - (a) Identification of the location of the hazard that has or poses a safety deficiency. Where possible, include the Real Property Unique Identifier (i.e., RPUID).
  - (b) Description of the nature and extent of the hazard.
  - (c) Reference to applicable safety or health standards.

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- (d) Establishment of a reasonable time for abatement of the hazard (it is expected that most hazards can be abated within 90 days).
- (e) RAC. The RAC criteria and definitions are detailed in Appendix A.
- (6) For inspections without recordable deficiencies, a record of inspection will still be created within DSIS. This record will include at a minimum the name of the facility or workplace, the date of the inspection, and the name of the inspector.
- (7) In addition to entering recordable deficiencies in DSIS, safety inspections must also be documented at the area office level. A trackable document of record, listing all safety deficiencies found during an inspection, will be maintained and available for review. Documentation will include information identified in 5.B.(5) of this D&S.

### C. Abatement of Inspection Findings.

- (1) Inspectors will document the status of abatements within DSIS every 90 days until all inspection findings are abated.
- (2) Management will be responsible for quarterly review of all their open inspection findings within their DSIS abatement log.
- (3) If abatement of a hazardous condition is not within the authority and resources of the organization, local management will:
  - (a) inform and protect potentially affected employees;
  - (b) inform and request assistance from the next higher management level in the organization and their respective safety staff; and
  - (c) coordinate, when necessary, with the Federal lessor agency if applicable (e.g., General Services Administration), to secure abatement as specified in 29 CFR Part 1960, Subpart E, and 41 CFR Parts 101-21.

### D. Inspector Right of Entry.

- (1) OSHA, Department, and Reclamation safety and health professionals will have right of entry without delay, at reasonable times, to any facility, construction site, or other workplace to perform an inspection. They will also have the right to inspect any item or place within the workplace and



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to question, privately, any employee, manager, supervisor, visitor, contractor, or concessioner associated with the workplace (see 29 CFR 1960.31).

- (2) If an inspector from OSHA arrives to conduct an inspection of a Reclamation workplace, the manager of the workplace will be notified immediately and will ensure that a knowledgeable person accompanies the OSHA inspector. The manager or their representative will notify the respective regional safety manager. Workplace-related OSHA inspection findings, recommendations, and abatement actions will be documented within DSIS.

## Reclamation Manual Transmittal Sheet

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Effective Date: \_\_\_\_\_

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Filed by: \_\_\_\_\_

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