Section 41
Safety Inspection and Abatement

41.1 Scope

This section specifies the minimum requirements for conducting safety and occupational health inspections of Reclamation facilities that are designated duty stations, construction sites, and other worksites. The following serves to standardize safety inspections, abatement tracking processes, and compliance with Department of the Interior (Department) and Occupational Safety and Health Administration (OSHA) requirements. This section applies to all Reclamation employees who conduct or participate in safety inspections and abatement of inspections findings.

41.2 General Requirements

Trained staff will conduct inspections with the relevant knowledge and experience to identify hazards within specific worksites and operations. After identification, staff must assess, prioritize, document and then abate worksite hazards. The Inspection and Abatement System (IAS) shall be the official inspection and abatement tracking system. Staff will prioritize deficiencies through Risk Assessment Codes (RAC), which consider the severity and probability of a hazardous condition resulting in an accident (see 41.6.2, *Risk Assessment Codes* for descriptions). The IAS is a safety inspection tool available through the Safety Management Information System (SMIS) which 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 to reflect any changes to safety requirements.

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 summary of Reclamation inspection findings and abatement.

41.3.2 Regional Safety Managers

41.3.2.1 Shall ensure an effective process is in place for identification, evaluation, and control of occupational safety and health hazards.

41.3.2.2 Shall verify inspection of Reclamation facilities, which are designated duty stations for Reclamation employees within the geographic area of responsibility, at least once annually and implementation of a corrective action plan for each finding.

41.3.2.3 Shall be aware of facilities inspected less than once annually, maintaining a record of written justification from area office safety professionals.

41.3.2.4 Shall support area offices and first-line supervisors at facilities by coordinating/providing safety awareness and hazard recognition training.

41.3.2.5 Shall assist in immediate abatement action for RAC-1 and RAC-2 findings.

41.3.2.6 Shall review patterns of frequently occurring injuries and illnesses.

41.3.3 Area Office Safety Professionals

41.3.3.1 Shall schedule and conduct, or ensure a qualified inspector conducts, the annual safety inspections at all facilities, which are designated duty stations for Reclamation employees, within the area of responsibility.

41.3.3.2 Shall provide alternative safety inspection schedules and justifications to their Regional Safety Manager for facilities not inspected on an annual basis.

41.3.3.3 Shall report and track findings in IAS until corrective action is taken either to eliminate the hazard or reduce the hazard to an acceptable level.

41.3.3.4 Shall support field offices in documenting field office facility inspections, findings, and abatement in IAS, as well as coordination with collateral duty safety representatives (CDSR), safety committees, supervisors, and managers.

41.3.3.5 Shall ensure IAS is updated quarterly until hazards are eliminated or reduced to an acceptable level.

41.3.3.6 Shall review all open inspection findings in IAS on a quarterly basis.

41.3.3.7 Shall support first-line supervisors and field staff in coordinating/providing training which incorporates the awareness of safety and health hazards.

41.3.3.8 Shall inform and request assistance from the Regional Safety Manager, and if necessary, the next higher management level, if abatement of a hazardous condition is not within the authority and resources of Reclamation (see 41.6.1.7.3, *Resources*).

41.3.4 First-Line Supervisors

41.3.4.1 Shall monitor conditions at worksites to prevent injuries, occupational illnesses, and property damage accidents. This includes performing periodic visits, at least annually, to employee worksites to ensure employee work practices are in alignment with governing safety and health standards.

41.3.4.2 Shall coordinate with the local area office safety professionals to train employees and designated CDSR personnel to recognize hazardous and unhealthful work practices, conditions, and how to report and correct them.

41.3.4.3 Shall ensure rapid abatement of unsafe or unhealthful work practices and conditions.

41.3.5 Collateral Duty Safety Representatives and Safety Committee Members

41.3.5.1 Shall coordinate with the area office safety professionals to facilitate/conduct facility inspections and attend training for hazard recognition and related 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 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 area office safety professionals to notify the regional safety manager when a RAC-1 or RAC-2 finding is identified.

41.3.6 Inspectors

41.3.6.1 Shall have necessary training to understand the hazards associated with the worksites they are inspecting and ensure the involvement of subject matter experts when the inspection is outside or beyond their training.

41.3.6.2 Shall notify the facility safety representative and first-line supervisor immediately when a RAC-1 finding is identified.

41.3.6.3 Shall notify the facility ahead of time of intent to inspect and attend an opening meeting.

41.3.6.4 Shall verbally, or in writing, disclose anticipated findings of the inspection to the facility manager prior to leaving the facility.

41.3.6.5 Shall maintain access to IAS through SMIS and input annual inspections/findings, as well as any RAC-1 and RAC-2 findings throughout the year, in IAS.

41.4 Training Requirements

41.4.1 Initial

All persons conducting worksite inspections shall be trained to recognize the hazards associated with the area they are inspecting to identify and evaluate hazards of the working environment and suggest general abatement procedures.

41.4.2 Proficiency Qualification

Area safety professionals, or an inspector qualified by the facility manager and the area safety professional, will conduct annual safety inspections in compliance with OSHA 1960.25, *Qualifications of safety and health inspectors and agency inspections*.

41.4.3 Recordkeeping

The Department shall keep all Reclamation training records in the official Departmental repository.

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, but is not limited to hardhats, safety glasses, safety-toe shoes, and hearing protection. Refer to RSHS Section 8, *Personal Protective Equipment*, 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 OSHA 1960.26, *Conduct of Inspections*, DM 485 Chapter 6, and this section. Reclamation will conduct more frequent inspections when there are increased safety risks.

41.6.1.1 Frequent Worksite Inspections. Supervisors, or the designee, shall inspect conditions daily to prevent injuries, occupational illnesses, and property damage.

These inspections may be conducted informally and do not require input into IAS for tracking, unless a RAC-1 or RAC-2 is identified.

41.6.1.2 Annual Inspections. Persons meeting the requirements of paragraph 41.4.2 must inspect Reclamation facilities serving as designated duty stations for Reclamation employees, at least annually. Area office safety professionals and inspectors will document this activity as required in paragraph 41.6.1.6 of this section.

41.6.1.3 Inspector Right to Entry. OSHA, the Department, and Reclamation safety professionals will have the right to enter any facility, construction site, or other worksite to perform an inspection. They have the right to inspect any item or place within the establishment and to talk with any employee, manager, supervisor, visitor, volunteer, contractor, or concessionaire associated with the facility.

41.6.1.4 Annual Inspection 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. The inspector shall provide an opportunity for participation by a representative of the worksite/facility and an employee representative, including participation in 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. The inspector may deny the right of accompaniment to any person whose participation interferes with the inspection.

41.6.1.4.3 Hazard Assessment. A hazard assessment must be completed by the inspector and facility staff to identify all hazards specific to the work or tasks to be performed. Refer to RSHS Section 4, *Work Planning*. Analysis must include electrical shock and arc flash hazard considerations. See Facilities Instructions, Standards and Techniques Volume 5-14 for more information concerning arc flash hazards. A hazard assessment will determine if a job hazard analysis (JHA) must be developed and the identification of any hazardous energy control procedures necessary to ensure the safety of personnel and facilities. The inspector shall address all hazards identified by a hazard assessment and mitigation techniques identified on the JHA.

41.6.1.4.4 Imminent Danger Conditions. The inspector shall immediately inform management and employees of imminent danger conditions.

41.6.1.4.5 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 where appropriate.

41.6.1.4.6 ***Risk Assessment.*** The inspector shall assign a 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. Section 41.6.2 of this section details RAC criteria and definitions.

41.6.1.4.7 ***Debrief.*** The inspector shall disclose anticipated findings of the inspection to a facility representative prior to leaving the facility.

41.6.1.4.8 ***IAS.*** The inspector or designee shall document the inspection, safety deficiencies, and abatement recommendations in IAS within 30 days of finishing the facility inspection.

41.6.1.5 Findings

41.6.1.5.1 ***Imminent Danger Conditions.*** If an imminent danger condition (RAC-1 or RAC-2) is identified by anyone at any time, the management official in charge will initiate corrective/protective action immediately, stop the operation, and restrict access to the area.

41.6.1.5.2 ***Notice of Unsafe or Unhealthful Condition.*** If the inspector identifies a RAC-1 or RAC-2 deficiency, they will transmit a written "Notice of Unsafe or Unhealthful Condition" to the site supervisor, then immediately and visibly posted where the hazardous condition exists. The written notice shall be posted for three working days or until the condition is abated, 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, they shall forward a copy shall to the site supervisor for review, action, and posting. The notice will contain the following minimum information:

- location of the hazard,
- description of the nature and extent of the hazard,
- RAC,
- description of the mitigation control measures,
- interim RAC for interim control measures,
- reference to applicable safety or health standards, and
- estimated date for final abatement of the hazard.

41.6.1.6 Documentation. All deficiencies identified in the annual safety inspection shall be documented in IAS. Deficiencies identified outside of annual inspection shall be entered in IAS if classified as RAC-1 and RAC-2, or abatement requires funding beyond normal maintenance budget allocations. All records generated as part of this

process shall conform with Reclamation Manual Directive and Standard, *Information Management* (RCD 05-01).

41.6.1.6.1 ***Required Information.*** Deficiencies or out-of-compliance discoveries are input in IAS and records are generated as findings. The minimum information required to generate a finding is:

- category or type of finding,
- description of finding or out of compliance issue,
- severity and probability (RAC), and
- reference to applicable safety or health standard.

41.6.1.6.2 ***Lack of Deficiencies.*** For inspections without recordable deficiencies or findings, 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 485 DM 6, see Table 41-1. for timeframes.

Table 41-1. Initial Abatement Timeframes

Risk Assessment Code	Timeframe
1	As soon as possible, within work shift
2	As soon as possible, no later than 15 days
3	Within 12 months
4	Within one budget cycle, but no longer than two years
5	Incorporate abatement into the five-year plan

41.6.1.7.1 ***Updates.*** Inspectors or area office safety professionals shall update the status in IAS, quarterly 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 findings in IAS.

41.6.1.7.3 ***Resources.*** If abatement of a hazardous condition is not within the authority or available resources of Reclamation, the area office safety professional shall inform potentially affected employees; inform and request assistance from the regional safety manager, and if necessary, the next higher management level; and coordinate with the appropriate federal agency (e.g., General Services Administration) to ensure 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 Risk Assessment Matrix. When assigning the RAC to an inspection finding, the inspector shall consult the Risk Assessment Matrix, see Table 41-2. 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 not changed to inflate or minimize the priority for abatement.

Table 41-2. Risk Assessment Codes

Probability Code / **Severity Code**	**Frequent (A)** Immediate danger to health and safety of the public, staff, or property and resources; occurs frequently or continuously.	**Likely (B)** Probably will occur in time if not corrected, or probably will occur one or more times during the life of the system.	**Occasional (C)** Possible to occur in time if not corrected.	**Rarely (D)** Unlikely to occur; may assume exposure will not occur.
Catastrophic (I) Imminent and immediate danger of death or permanent disability, chronic or irreversible illness, major property, or resource damage.	RAC 1	RAC 1	RAC 2	RAC 3
Critical (II) Permanent partial disability, temporary total disability greater than 3 months, significant property, or resource damage.	RAC 1	RAC 2	RAC 3	RAC 4
Significant (III) Hospitalized minor injury, reversible illness, period of disability of 3 months or less, loss or restricted workday accident, compensable injury or illness, minor property, or resource damage.	RAC 2	RAC 3	RAC 4	RAC 5
Minor (IV) First aid or minor medical treatment. Presents minimal threat to human safety and health, property, or resources, but is still in violation of a standard.	RAC 3	RAC 4	RAC 5	RAC 5

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

41.6.2.2.1 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.

41.6.2.2.2 ***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.

41.6.2.2.3 ***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.

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

41.6.2.2.5 ***RAC-5 (Negligible).*** Represents the lowest or most minor level risk. The correction of these risks can be planned as soon as is reasonable.

41.7 Definitions in Appendix K and References in Appendix L