

Department of the Interior Departmental Manual

Effective Date: 12/22/09
Series: Safety Management
Part 485: Safety and Occupational Health Program
Chapter 6: Inspections and Abatement

Originating Office: Office of Occupational Health and Safety

485 DM 6

6.1 Purpose. To specify the minimum Safety and Occupational Health Program (Program) requirements for conducting occupational health and safety inspections of Department of the Interior (Department) establishments and timely abatement of hazards recognized during the inspection process.

6.2 Scope. The policy in this chapter applies to all bureaus and offices in the Department.

6.3 Authorities.

- A. Public Law 91-596, "Occupational Safety and Health Act of 1970," (The Act) Section 19.
- B. Executive Order 12196, "Occupational Safety and Health Programs for Federal Employees."
- C. Title 29, Code of Federal Regulations (CFR), 1960, Subpart D, Inspection and Abatement.

6.4 References.

- A. American Society of Safety Engineers *Safety and Health for Engineers*, Published by Wiley-Interscience.
- B. National Safety Council *Accident Prevention Manual for Business and Industry, Administration and Programs*, 11th Edition.
- C. ANSI/AIHA Z10-2005 American National Standard for Occupational Health and Safety Management Systems.
- D. 41 CFR Parts 101-21, *Federal Property Management Regulations*.

6.5 Responsibilities

A. Heads of Bureaus and Offices.

- (1) Requiring compliance with regulatory inspection requirements.
- (2) Assuring that all locations within their bureau or office are inspected by September 30th of each fiscal year, and follow-up inspections are conducted, as appropriate.
- (3) Ensuring safety and health staffs are knowledgeable of the inspection process and have the ability to recognize safety and health hazards.
- (4) Ensuring that identified hazards are classified according to the DOI Risk Assessment System (RAS).

B. Bureau or Office Occupational Health and Safety Manager.

- (1) Reviewing, annually, abatement plans and reports for unsafe/unhealthful conditions of national significance, and reporting issues to the Office of Occupational Health and Safety (OHS).
- (2) Developing and incorporating standardized inspection checklists and field tools for bureau/office use in meeting inspection requirements.
- (3) Providing bureau and office (headquarters and regions) safety and health inspection oversight of their organizations to ensure that an effective process is in place for the identification, evaluation, and control of occupational safety, health, and environmental hazards, where applicable, per bureau/office.
- (4) Assisting bureau/office managers in integrating occupational health and safety deficiencies into the bureau/office and/or regional deferred maintenance plans, as appropriate.
- (5) Analyzing inspection findings and integrating findings into annual reports, as appropriate.

C. Managers and Supervisors.

- (1) Conducting periodic walk-through inspections of worksites.
- (2) Establishing a schedule for formal occupational health and safety inspections. Inspection priorities should be based on high risk activities, accident occurrences, occupational hazards, and past history.
- (3) Ensuring occupational health and safety staffs are knowledgeable of the inspection process and have the ability to recognize safety and health hazards.

D. Site Safety Managers and Collateral Duty Safety Program Coordinators are Responsible for:

(1) Coordinating the establishment of a workplace inspection program with site managers and supervisors to effectively identify, document, classify according to the DOI RAS, and track safety and health deficiencies until corrective action is taken either to eliminate or reduce the hazard to an acceptable level.

(2) Providing guidance and assistance to line managers and supervisors in field locations for compliance with safety and health program inspection requirements.

(3) Coordinating the documentation of local field-level facility inspections and associated corrective actions, following up on local abatement logs to assure that corrective actions are documented and/or status reports updated every 90 days.

6.6 Requirements.

A. Each bureau/office 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 chapter. More frequent inspections will be conducted when there is increased risk of accidents or incidents. The Departmental Program includes the following inspection activities:

(1) Day-to-Day Inspections: Supervisors must daily monitor conditions in the workplace to prevent injuries, occupational illnesses, and property damage accidents.

(2) Annual Inspections: All Departmental workplaces must be inspected at least annually. If permitted by the bureau/office, low hazard establishments such as office occupancies may accomplish this requirement by completing a self inspection questionnaire.

(3) Unannounced Inspections: A reasonable number of unannounced follow-up inspections of selected bureau/office work sites will be conducted to determine overall program effectiveness and to ensure the proper identification and abatement of hazardous conditions.

(4) Preoccupancy Inspections: All newly constructed or renovated space will be inspected by occupational health and safety professionals or other qualified person(s) for unsafe or unhealthful conditions and compliance with all applicable standards, codes, and requirements. Based on the inspection findings, the inspector will recommend occupancy of the space or identify corrective actions needed to bring the space into a safe and healthful condition before occupancy. Issues not resolved locally should be directed to the appropriate regional safety and health staff, regional office, or the General Services Administration (if applicable).

B. Annual inspections will be conducted by persons who are trained in hazard recognition and occupational health and safety inspection procedures. An opportunity will be provided for participation by representatives of the workplace/facility manager and employee representatives. If the establishment contains classified information, the inspector must obtain the

appropriate security clearance prior to admittance into the classified area. The inspector may deny the right of accompaniment to any person whose participation interferes with the inspection.

C. Departmental occupational health and safety professionals will have the right to enter any DOI (bureau/office) facility, construction site, or other workplace without delay and at reasonable times to perform inspections. They will also have the right to inspect any item or place within the establishment, and to question, privately, any employee, manager, supervisor, visitor, volunteer, contractor or concessioner associated with the establishment.

D. Each bureau will require persons conducting safety and health inspections to:

- (1) Have the necessary equipment to conduct the inspection.
- (2) Examine appropriate accident records and previous inspection reports.
- (3) Conduct opening conferences with establishment managers.
- (4) Consult with employees on matters of safety and occupational health.
- (5) Inform management and employees of imminent danger conditions.
- (6) Take environmental samples, where appropriate.
- (7) Comply with safety rules and practices.
- (8) Take or obtain photographs, where appropriate.
- (9) Avoid unreasonable disruption of the operation.

(10) Conduct closing conferences with the appropriate level(s) of management and the employee representative(s) to disclose the findings of the inspection, recommend abatement measures, and actions to prevent recurrence. The management and employee representative(s) will be afforded an opportunity to bring other information to the attention of the inspector regarding conditions in the workplace at this time.

E. Written "Notice of Unsafe or Unhealthful Working Conditions" (Notice) resulting from the inspections will be provided to the head of the activity or manager of the unit inspected. These reports will cite hazards and safety management deficiencies, and will recommend corrective actions.

F. If an imminent danger Risk Assessment Code (RAC) 1 or high threat to life, health, or property (RAC-2) conditions are found, the management official in charge will initiate corrective/protective action immediately and, if necessary, stop the operation and/or evacuate the area, except for those needed to abate the condition.

G. Where (RAC-1) or (RAC-2) conditions are identified, a written Notice will be conspicuously posted at or near each place a hazardous working condition exists. The Notice will be posted as soon as possible, and within 15 calendar days of completing a formal inspection (30 calendar days for items dealing with occupational health). It will remain posted until the condition is abated or for 3 working days, whichever is longer. If the Notice cannot be posted at or near the hazard, it will be posted where it is readily observable by all affected employees. The establishment manager will ensure all employees are briefed on the hazard and the steps underway to abate the condition.

H. The Notice will contain the following minimum information and be provided to the appropriate levels of management and employee representative(s) participating in the inspection:

- (1) Identification of the location of the hazard.
- (2) Description of the nature and extent of the hazard.
- (3) RAC.
- (4) Description of the mitigation control measures.
- (5) Interim RAC for interim control measures.
- (6) Reference to applicable safety or health standards.
- (7) Estimated date for final abatement of the hazard. The initial abatement timeframes should be set according to Table 1:

Table 1: Initial Abatement Timeframes

RAC Code	Initial Abatement Timeframe
1	As soon as possible within that work shift.
2	As soon as possible, but no later than 15 calendar days.
3	Within 12 months.
4	Within one budget cycle (no longer than 2 years).
5	Incorporate abatement into the five-year plan.

I. RACs are assigned by the inspectors (occupational health and safety, designated facilities management, or other personnel designated by the respective bureau or office) to each hazard or deficiency that violates an authority or reference to this chapter. RACs are used to assist management with prioritization of resources to abate the most critical hazards or deficiencies on a "worst-first" basis. The RAC assigned to each hazard is an expression of risk, combining the severity and the 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 should be considered when assessing the likelihood of a hazard resulting in an accident, injury, or illness. The RAC criteria and definitions are as found in Table 2:

Table 2: Risk Assessment System

<u>Risk Assessment Codes</u>				
<p>RAC levels are identified by a numerical scale 1 - 5, with RAC-1 being the most critical requiring immediate response, RAC-5 being the least critical. RACs are annotated by the RAC Number, followed by the Frequency and Severity. Examples of RAC annotations are 1(A)1 for a RAC-1 that has catastrophic consequences and a immediate danger frequency. A 4(IV)(B) would be a low level risk, with a minor severity and a likely probability.</p> <p>RAC-1 (Critical) represents an immediate danger to life, health, property, or infrastructure and requires emergency correction or hazard controlled to a lower level of risk.</p> <p>RAC-2 (Serious) represents a high level of threat to life, health, property, or infrastructure and requires hazard correction or hazard controlled to a lower level of risk as soon as possible.</p> <p>RAC-3 (Moderate) represents a medium level risk to life, health, property, or infrastructure, with correction planned and completed, or hazard controlled to a lower level of risk.</p> <p>RAC-4 (Minor) represents a low level risk, with correction planned and completed, or hazard controlled to a lower level of risk.</p> <p>RAC-5 (Negligible) represents the lowest level risk and is considered minor. The correction of these risks can be planned in the out-years.</p>				
Probability 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.
Severity Code				
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

J. The establishment manager will ensure that abatement plans are prepared for those deficiencies which cannot be abated within 30 calendar days. A copy of the plan will be provided, upon request, to interested parties. The abatement plan will include:

- (1) Explanation for the delay in abatement.
- (2) Proposed abatement action and timetable for abatement.

(3) Summary of interim steps taken to protect personnel. If the abatement plan changes, the supervisor will be responsible for preparing a new plan and making notification to the inspector, site safety office, local safety committee, and to the employee's representative. Interim control measures do not decrease the RAC assigned to the original hazard. The inspector will reevaluate hazard with the interim controls in place and assign a new, interim RAC that will be annotated on the posted Notice of Hazard.

(4) Abatement Plans will be reviewed and updated at least every 90 days until all abatement actions are completed.

K. Establishments will incorporate correction of safety deficiencies in facilities maintenance management systems, such as MAXIMO. Abatement plans will note entry of the deficiency into these systems.

L. Coordinate, when necessary, with the Federal lessor agency, for example, General Services Administration (GSA), to secure abatement of hazards found in leased facilities occupied by Departmental offices.

M. If the Occupational Safety and Health Administration (OSHA) arrives to conduct an inspection of a bureau/office establishment:

(1) The bureau/office or local safety office will be notified immediately so an occupational health and safety or management representative may be assigned to accompany the OSHA inspector.

(2) The inspection findings, recommendations, and abatement schedules will be communicated to the office or bureau occupational health and safety office by the establishment manager.



United States Department of the Interior

INDIAN AFFAIRS

Office of Facilities, Property and Safety Management
Division of Safety and Risk Management
1011 Indian School Road, NW, Suite 331
Albuquerque, New Mexico 87104-2303



JAN 29 2016

Memorandum

To: Regional Safety Managers
Regional Collateral Duty Safety Officers (CDSOs)
Collateral Duty Safety Officer – Haskell Indian Nations University

From: Division Chief, Division of Safety and Risk Management (DSRM)

Subject: Notice of Hazard Form – Department Manual (DM) 485, Chapter 6

The purpose of this memorandum is to provide the Notice of Hazard Form for Indian Affairs use and to specify Department Manual (DM) 485, Chapter 6 requirements for the posting of the Notice of Hazard Form.

DM 485, Chapter 6 defines the following:

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

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

DM 485, Chapter 6 Requirements specify:

- F. If an imminent danger Risk Assessment Code (RAC) 1 or high threat to life, health, or property (RAC-2) conditions are found, the management official in charge will initiate corrective/protective action immediately and, if necessary, stop the operation and/or evacuate the area, except for those needed to abate the condition.
- G. Where (RAC-1) or (RAC-2) conditions are identified, a written Notice will be conspicuously posted at or near each place a hazardous working condition exists. The Notice will be posted as soon as possible, and within 15 calendar days of completing a formal inspection (30 calendar days for items dealing with occupational health). It will remain posted until the condition is abated or for 3 working days, whichever is longer. If the Notice cannot be posted at or near the hazard, it will be posted where it is readily observable by all affected employees. The establishment manager will ensure all employees are briefed on the hazard and the steps underway to abate the condition.
- H. The Notice will contain the following minimum information and be provided to the appropriate levels of management and employee representative(s) participating in the inspection:

- (1) Identification of the location of the hazard.
- (2) Description of the nature and extent of the hazard.
- (3) RAC.
- (4) Description of the mitigation control measures.
- (5) Interim RAC for interim control measures.
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- (7) Estimated date for final abatement of the hazard. The Initial abatement timeframes should be set according to Table 1:

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2	As soon as possible, but no later than 15 calendar days.
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4	Within one budget cycle (no longer than 2 years).
5	Incorporate abatement into the five-year plan.

- I. RACs are assigned by the inspectors (occupational health and safety, designated facilities management, or other personnel designated by the respective bureau or office) to each hazard or deficiency that violates an authority or reference to this chapter. RACs are used to assist management with prioritization of resources to abate the most critical hazards or deficiencies on a "worst-first" basis. The RAC assigned to each hazard is an expression of risk, combining the severity and the 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 should be considered when assessing the likelihood of a hazard resulting in an accident, injury, or illness. The RAC criteria and definitions are as found in Table 2.

Control numbers shall be assigned to each Notice of Hazard posted within the respective region and monitored by the respective Regional Manager/CDSO. DSRM shall be notified upon issuance of the Notice of Hazard and via email by the 15th day after the end of the previous quarter using the attached template.

Recent Annual Inspection reports have revealed a large number of improperly assigned RACs. Please ensure the assigned RAC meets the definition as defined by DM 485, Chapter 6 prior to the posting of a Notice of Hazard.

If you have any questions, please contact this office at 505-563-5365.



Attachments: Attachment No. 1 – Notice of Hazard Form
 Attachment No. 2 – 485 DM Chapter 6
 Attachment No. 3 – DOI RAC
 Attachment No. 4 – Regional Notice of Hazard Quarterly Report Template

cc: Regional Facility Managers, w/attachments
 Wallace Keays, Deputy Director, Office of Facilities, Property, and Safety Management, w/attachments



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JAN 15 2016

Memorandum

To: Regional Safety Managers
Regional Collateral Duty Safety Officers
Haskell Indian Nations University – Collateral Duty Safety Officer

From: Division Chief, Division of Safety and Risk Management (DSRM)

Subject: Assigning Risk Assessment Codes

A recent internal audit of the Safety and Conditional Assessment Portal (S&CAP) revealed a systemic practice of mis-categorization of the Risk Assessment Code (RAC) and the Deficiency Category and Rank Code.

Although assignments of RACs can be a subjective process, the Division of Safety and Risk Management (DSRM) is presenting this document with the expectations that the process can be more clearly understood, and to answer some frequently ask questions.

What Policy mandates Indian Affairs to RAC? 485 Departmental Manual Chapter 6; mandates inspections, assignments of Risk Assessment Codes (RACs) to identified hazards, and abatement of the hazards within certain timeframes.

What is the purpose of assigning a RAC? To provide Indian Affairs with safety risk ranking information to assist them in making informed decisions concerning hazard control and to establish timely abatement/corrective measures of hazards recognized during inspection process.

What is a RAC? A RAC, Risk Assessment Code, is a numerical expression of risk determined by combining the severity and probability of a hazard. Ranking system from 1 (the highest level of risk) to 5 (the lowest level of risk).

Who assigns RACs? RACs are assigned by Inspectors (Occupational Health and Safety, designated Facilities Management) to each hazard or deficiency that violates an authority or reference. It is the responsibility of the Inspector to determine the category and rank of each deficiency.

How is a RAC evaluated? The inspector will evaluate each deficiency based on both the **likelihood (probability)** of an outcome occurring and the **consequence (severity)** of a potential outcome. The junction on the matrix indicates the RAC number for that deficiency (hazard, condition, activity). See Table 2. Risk Assessment System.

What is a Hazard? Anything that may cause illness, harm, injury or death.

What is Risk? Risk is a measure of both the likelihood (probability) and the consequence (severity) of all hazards related to an activity or condition.

What is determined first severity or probability? The severity of the hazard is determined first then probability of the hazard occurring.

What is a Severity? Describes the most serious type of injury or illness that can be reasonably expected from the exposure to the hazard. (Consequence)

What is Probability? Describes the likelihood that the condition related hazard will occur. (Likelihood)

What is exposure and is it considered into RAC? Exposure is part of the evaluation process of probability, it is the determination on number of people or the size of the area exposed to the hazard. Widespread exposure will increase the probability of injury or illness. An isolated exposure will decrease the probability that an injury or illness will occur.

What is a Risk Assessment Matrix? A tool used to assign RACs and can be found in 485 Departmental Manual Chapter 6, section 6.6. (I).

Where can RAC training be found? Visit: <https://gm2.geolearning.com/geonext/doi/login.geo>.

What is a Deficiency Category and Rank Code? The alpha numeric format utilized to identify safety and health deficiencies in accordance with Occupational Safety and Health Administration definitions of "serious" and "other-than-serious" violations, to identify handicap accessibility deficiencies, and to identify other physical plant deficiencies.

What is an S-1? Is a Serious-Safety Deficiency that is life threatening. A violation which causes a substantial probability that death or serious physical harm could result from a condition which exists, or from one or more practices, means, methods, operations, or processes which have been adopted or are in use.

What is an S-2? Is a Moderate-Safety Deficiency affecting safety and health other than a serious violation. A violation, which would probably not cause death or serious physical harm, but would have a direct and immediate relationship to the safety and health of persons.

What is an H-1? Is a Serious Handicap Code Deficiency. A violation with high potential to discriminate against the physically challenged which can also be classified as a serious-safety deficiency.

What is and H-2? Is a Violation of Federal Handicap Codes and Standards that is a Non-Serious Handicap Deficiency. A violation of accessibility law, codes, and standards, which cannot be classified as a safety and health deficiency.



Table 2 Risk Assessment System

<u>Risk Assessment Codes</u>				
<p>RAC levels are identified by a numerical scale 1 - 5, with RAC-1 being the most critical requiring immediate response, RAC-5 being the least critical. RACs are annotated by the RAC Number, followed by the Frequency and Severity. Examples of RAC annotations are 1(A)(I) for a RAC-1 that has catastrophic consequences and a immediate danger frequency. A 4(IV)(B) would be a low level risk, with a minor severity and a likely probability.</p> <p>RAC-1 (Critical) represents an immediate danger to life, health, property, or infrastructure and requires emergency correction or hazard controlled to a lower level of risk.</p> <p>RAC-2 (Serious) represents a high level of threat to life, health, property, or infrastructure and requires hazard correction or hazard controlled to a lower level of risk as soon as possible.</p> <p>RAC-3 (Moderate) represents a medium level risk to life, health, property, or infrastructure, with correction planned and completed, or hazard controlled to a lower level of risk.</p> <p>RAC-4 (Minor) represents a low level risk, with correction planned and completed, or hazard controlled to a lower level of risk.</p> <p>RAC-5 (Negligible) represents the lowest level risk and is considered minor. The correction of these risks can be planned in the out-years.</p>				
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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

Common Mis-categorized Deficiencies (RACs)

	Violations, Conditions, and Potential Hazards	Severity	Probability	RAC	Cat/Rank
1	Required sprinkler system inoperable.	I	B	1	S-1
2	Sprinkler heads do not have 18" clearance from items /storage /shelves.	II	C	3	S-2
3	Fire alarm system inoperable.	I	B	1	S-1
4	Exits, means of egress, and /or exit discharge are not maintained free of obstruction or impediments.	II	C	3	S-1
5	Self-closing doors are not self-closing.	II	C	3	S-2
6	School building's corridor doors are not 20 minute fire rated.	II	C	3	S-2
7	Fire drills not conducted as required.	III	C	3	S-1
8	Fire extinguisher not inspected as required.	III	C	4	S-2
9	Fire extinguisher training is not provided as required.	II	C	3	S-2
10	Stairs are not equipped with stair handrails on both sides.	II	B	2	S-1
11	Emergency lighting not provided as required	II	C	3	S-1
12	There is no accessible parking space at this facility.	IV	C	5	H-2
13	Handicap accessible ramp slope exceeds the maximum 1:12	IV	C	5	H-2
14	Restrooms are not ADA Compliant	III	B	3	H-1
15	Electric receptacle does not have a cover plate.	III	C	4	S-2
16	Labeling of Circuit Breakers.	IV	C	5	S-2
17	Bathroom electric receptacle is not GFCI protected.	III	C	4	S-2
18	Floors & walking surfaces present potential for slips, trips, and falls.	III	C	4	S-2
19	Places of employment, e.g. passageways, storerooms are kept unclean a disorderly & in unsanitary conditions (poor housekeeping)	III	C	4	S-2
20	Riser height and Industrial stairs is not uniform.	III	C	4	S-2

Note: The examples provided are for general guidance on common mis-categorized deficiencies and are not absolute. In all cases, severity, probability and any other circumstances must be considered and will affect the RAC assignment and category and rank.

NOTICE OF HAZARD

CONTROL #

LOCATION

DATE POSTED

HAZARDOUS CONDITION

RISK ASSESSMENT CODE

INTERIM CONTROL MEASURES

PERMANENT CORRECTIVE ACTION

FOR FURTHER INFORMATION

EXPECTED COMPLETION DATE