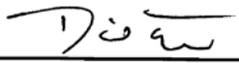


# NORTH COUNTRY NST DOCUMENTED OCCUPATIONAL SAFETY & HEALTH PLAN

*NPS-North Country  
National Scenic  
Trail*



Recommended: 

Daniel Watson, CDSO, NOCO

10/23/14

Date

Approved: 

Mark Weaver, Superintendent, NOCO

23 OCT 14

Date

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## Chapter 1

### Management Policy, Principles, and Responsibilities

#### MANAGEMENT COMMITMENT

#### POLICY:

At North Country National Scenic Trail the safety and health of our employees, contractors, volunteers and the public is a core value. It is equal to the value we place on protecting resources and serving visitors. It is our vision at North Country NST that we will excel in providing our employees and volunteers with a safe work environment so that they can do their jobs safely and effectively and go home healthy at the end of the day to fully enjoy their lives and families.

At North Country NST we expect that each manager, supervisor, employee and volunteer has the expertise to understand, recognize, practice and demonstrate their individual responsibilities for safety performance and safe behavior at the workplace, and all employees and volunteers have the tools and equipment to perform their work safely.

This policy has the following guiding principles. It is our desire that every manager, supervisor, employee and volunteer use these guiding principles as the overall guiding influence in performing their duties, and providing leadership and direction in the maintenance of a safe and healthful work environment.

#### GUIDING PRINCIPLES:

1. All injuries and occupational illnesses can be prevented or mitigated.
2. The combined energy of everyone at North Country NST is necessary to continuously improve safety performance.
3. Safety is a condition of employment at North Country NST.
4. Our Partners and Volunteers have an integral role in safety, including the same rights and responsibilities as our employees.
5. There is no such thing as a task that cannot wait when safety practices and/or mitigation efforts are not an integral part of the task.

## RESPONSIBILITIES:

### Superintendent

The Superintendent of North Country National Scenic Trail has the overall, ultimate responsibility for establishing, reviewing, implementing, and annually approving the documented NOCO Occupational Safety and Health Plan.

### Collateral Duty Safety Officer

North Country National Scenic Trail has a collateral duty safety officer (CDSO) who will be responsible for the coordination of the safety and health program at the trail. The CDSO will generally be responsible for:

- Arranging for and participating in a baseline hazard assessment at the trail
- Setting hazard correction priorities at the trail and tracking correction of those hazards
- Arranging or providing training for all park employees and volunteers as needed
- Conducting annual program evaluations for the trail's hazard specific programs
- Making adjustments to trail's hazard specific programs when needed to increase their effectiveness
- Conducting incident investigations as appropriate
- Assisting in providing hazard control planning
- Maintaining records required by the trail's hazard specific safety and health programs and SMIS and OSHA
- Coordinating safety efforts and initiatives with partner groups and volunteers
- Serve as an Operational Leadership facilitator for the trail, and other parks upon request

### Supervisors & Employees

Supervisors of North Country National Scenic Trail are responsible for promoting a culture of safety in the workplace, and for addressing employee concerns in conjunction with the CDSO.

Employees of North Country National Scenic Trail are responsible for following approved safety practices, and for reporting observed hazards through their supervisor to the CDSO.

All personnel assigned to North Country National Scenic Trail are members of the park safety committee.

## **Chapter 2**

### **Annual Goals and Action Plans**

During the formal October meeting each year, the safety committee will establish annual goals and action plans for that Fiscal Year. A mandatory component of the October meeting will be to review and update the overall NOCO Occupational Safety and Health Plan for approval and signature by the Superintendent.

Individual action items within Annual Goals may be assigned by the Superintendent to various individual safety committee members. Due dates for corrective actions will be assigned to each action item, with documentation to track the status of outstanding issues or the completion dates upon resolution.

Participation in the safety committee and fulfillment of assigned action items may be incorporated into Employee Performance Appraisal Plans (EPAPs) at the discretion of the Superintendent. The CDSO shall have this collateral duty as a critical element of his/her EPAP.

Annual goals and action plans will be reviewed and updated at each formal meeting of the safety committee (January, May, and October). Documentation of all annual goals and action plans will be saved to the files by the CDSO. A written annual overview of accomplishments and outstanding issues shall be provided to the Superintendent each October by the CDSO summarizing the previous Fiscal Year.

Refer to Appendix A of his plan for current Fiscal Year Annual Goals and Action Plans.

## **Chapter 3**

### **Site Inspections and Abatement Plan**

Formal site inspections will be conducted by the CDSO annually each October, prior to the October formal meeting of the Safety Committee, with observations and photographs documented on the "Inspection Template" pptx form. Recommended abatement efforts will also be documented.

Inspection areas will include all offices and rooms of NOCO headquarters, government vehicle fleet as applicable, and any other structures or off-site facilities controlled by the NPS as future acquisitions are made.

The documented inspection results and abatement recommendations will be reviewed by the Safety Committee at the formal October meeting. The Superintendent shall assign mitigation/abatement tasks to Safety Committee members, with corresponding due dates for all actions.

Annually, the site inspection documents from the previous Fiscal Year will be updated to record final resolution of abatement needs, and filed electronically in the NOCO shared drive. Site inspection sheets for the current Fiscal Year shall be maintained in the NOCO shared drive as part of the documented Occupational Safety and Health Plan.

Site inspection sheets shall be used as the basis for the Annual Goals and Action Plan (Appendix A).

## Chapter 4

### **Hazard Control Planning & JHAs**

The NOCO Occupational Safety and Health Plan philosophy to hazard control planning follows this approach:

- Identify what the hazards are
- Identify who is exposed to these hazards (recognize when a hazard becomes an actual hazard “exposure”)
- Eliminate the hazard, or reduce it to an acceptable level, through various ways in order of descending preference:
  1. Engineering (eliminates the hazard through improved equipment or technology)
  2. Administrative Controls (substitutes for less hazardous material, process, or operation)
  3. PPE (final line of defense against a known hazard, where hazard exposure is at an acceptable level)

Hazard-specific safety and health plans and SOP’s (such as HAZCOM, Structural Fire, and Emergency Action Plans) will be used to address those respective issues, and included as chapters within the NOCO Occupational Safety and Health Plan.

JHA’s have been developed for all current trail operations. They are posted on the park website, [www.nps.gov/noco](http://www.nps.gov/noco), under the Volunteer Resources link. The safety committee may recommend and develop new JHA’s as circumstances dictate.

Additionally, the “Tailgate Safety Series” provides employees, partners and volunteers with additional safety information not conducive to JHA format (Hypothermia, Heat Disorders, Thunderstorm Safety, Violent Encounters, Wildlife, etc.). These references are also available on the park website under the Volunteer Resources link. A limited number of these references were formatted onto 3” X 5” laminated cards, attached by a carabiner, and clipped to a safety whistle for ready reference in the field. All employees and a limited number of partners and volunteers received these Tailgate Safety cards/whistles.

## Chapter 5

### Safety Committee Roles and Responsibilities

Due to its small workforce, the entire staff of the North Country National Scenic Trail comprises the safety committee.

The safety committee will formally meet three times per year in the months of January, May, and October to discuss new or outstanding issues and/or participate in some form of safety awareness or training event. Critical issues will be addressed as they arise, and shall not be made to wait for the safety committee to formally convene.

The CDSO will serve as the committee chair. Minutes of the meetings will be documented and saved to the NOCO shared drive.

The Superintendent may elect to have more frequent safety messages (Six-Minutes for Safety format) shared with the staff during the weekly staff meetings. If conducted, these safety messages should be briefly documented as to topic discussed and personnel participating, and saved to the NOCO shared drive.

Formal meetings of the Safety Committee may be conducted by conference call or other distance-learning technology. The October meeting shall require in-person attendance.

#### Safety Committee Functions by Month

October:

- Review Occupational Safety & Health Plan, revise as needed, Superintendent's approval signature
- Conduct annual walk through inspections of all areas, document action items needed
- Generate Annual Goals and Action Items for upcoming Fiscal Year
- CDSO provides Superintendent with annual report from previous Fiscal Year

January:

- Review and document status of assigned action items
- Participate in documented training of choice
- Address new issues as needed

May:

- Review and document status of assigned action items
- Participate in documented training of choice
- Address new issues as needed
- Annual Fire Protection System and Fire Extinguisher inspections and servicing (if deemed appropriate for NOCO)

Other Months:

- Take action on reported hazards as they are encountered, document per Hazard Reporting Procedures (refer to Chapter 9)
- Provide additional formal training for employees, partners and volunteers as opportunities arise, document all actions
- Incorporate Six-Minutes for Safety topics into weekly squad meetings as directed by the Superintendent; document topics covered and employees attending

## Chapter 6

### Incident Investigation and Reporting

At North Country NST, each employee and volunteer is responsible for immediately notifying their supervisor of all safety and health incidents, including near-miss incidents, of which they are aware.

A “near miss” or “near hit” is defined as an incident where there was a mishap that could have resulted in an injury or property damage, but did not. It is important to record near misses to identify trends for corrective action, and to educate others to avoid similar incidents that will inevitably result in injury if left unreported.

Upon such notification, supervisors shall immediately notify the CDSO of the incident.

The CDSO serves as Collateral Duty Worker’s Compensation Coordinator at NOCO, and maintains log on credentials in SMIS to fulfill that role, as well as SMIS Safety Manager log on credentials.

#### Employee (staff) Injuries, Filing a Claim

Employee (staff) injuries where a claim will be filed shall be reported in SMIS through the normal procedure of:

1. Employee initiates report of injury in SMIS
2. Supervisor completes their section in SMIS
3. Worker’s Comp Coordinator completes their section in SMIS

#### Employee (staff) Near Miss or Property Damage Report

Supervisors (not employees) input a near miss or property damage report in SMIS, using the following process:

1. Supervisor enters the SMIS website: <https://www.smis.doi.gov/>
2. Click on: Accident Reporting
3. Click on: Supervisors, radio button “Perform All Supervisor Safety Activities”
4. Log in: Supervisor’s last name as ID
5. DOI Validation: Last four of Supervisor’s SSN
6. Verify Supervisor’s email address
7. Click on radio button “Complete a NEW SMIS Accident Report, for property damage, minor injuries, or near misses
8. Complete the report and submit

#### Volunteer Injuries, Filing a Claim

Volunteers or their field supervisors report injuries where a claim will be filed to the CDSO. The CDSO interviews the injured volunteer and completes the report of injury in

SMIS as the “proxy” for the volunteer. The CDSO fulfills all roles in the process for a volunteer injury, including Employee (proxy), Supervisor, and Worker’s Compensation Coordinator.

#### Volunteer Near Miss or Property Damage Report

The CDSO shall enter a near miss or property damage report into SMIS on behalf of all volunteers.

#### Serious Incident Notification

Serious Incidents are categorized as High Priority (Level I) or Normal Priority (Level II) Incidents.

High Priority (Level I): Reported immediately to EICC (includes employee/volunteer death, hospitalization of three or more employees/volunteers from same incident, HAZMAT spills, property damage in excess of \$50,000, etc.)

Normal Priority (Level II): Reported within three days to EICC (includes visitor fatalities excluding heart attack or natural causes, significant natural or cultural resources depredation, structural fires, etc.)

A complete guideline for Serious Incident Notification is found in InsideNPS:

- <http://inside.nps.gov>
- WASO
- Protection
- Visitor and Resource Protection
- Law Enforcement, Security, and Emergency Services
- Serious Incident Notification

## Chapter 7

### Employee and Volunteer Training

#### Mandatory Training-Staff

All staff of North Country National Scenic Trail will be provided, at a minimum, with the following training and reference materials:

- Copy of the NOCO Occupational Safety and Health Plan
- Orientation to major plan components, such as HAZCOM, Employee Right-to-Know center, and Hazard Reporting Procedures
- Copy of the NOCO Volunteer Safety Handbook
- Initial 16 hours of Operational Leadership training
- Employees will sign & date a confirmation form stating that they have received and understand these materials, which will be maintained in the files by the Administrative Officer.

#### Supplemental Training- Staff

Other training provided through the safety committee, such as Six-Minutes for Safety topics, on-line training of various topics, on-site training or refreshers in Operational Leadership core objectives, First Aid/CPR/AED, defensive driving, etc. will be documented through the safety committee minutes for all participants who attended.

The CDSO will arrange for at least two supplemental training events per calendar year to be presented to the NOCO safety committee members. Due to the remote duty station of the CDSO, these training sessions may be in the form of conference calls, webinars, or other formats whenever on-site travel is not possible or authorized. Partner staff and/or volunteers may be invited to participate in these training sessions as deemed valuable and pertinent by the NOCO safety committee.

#### Partner Staff and Volunteer Training

The North Country National Scenic Trail is a 4,600-mile footpath spanning seven states across the Great Lakes Region, from North Dakota to New York. The NPS partners with the North Country Trail Association (NCTA) and numerous local, state, and federal entities in managing all aspects of the trail. Volunteers build, maintain, and interpret the trail through a series of 30+ trail “chapters” of the NCTA, along with a number of “trail affiliate” groups.

Due to the linear, non-centralized makeup of the various partnerships and volunteer locations along the trail route, it is logistically difficult to establish any consistent or all-encompassing training program to reach volunteers in ways traditionally employed by other national parks.

However, safety remains a core value of the North Country National Scenic Trail, and park management is committed to providing partners and volunteers with as thorough a safety program as it does for its own staff—while remaining aware and mindful that the issues of property ownership and jurisdiction may limit its influence on certain aspects of the program.

At a minimum, park management will provide all trail volunteers with the following:

- Access to the NOCO Occupational Safety and Health Plan (through the park and partner websites)
- Access to the North Country NST Volunteer Safety Handbook (through the park and partner websites)
- Access to mandatory volunteer job descriptions and related JHAs (through the park and partner websites)
- Access to the “Tailgate Safety Series” cards developed for NOCO trail workers (either in hard copy format or through the park and partner websites)
- Funding to help pay for annual certification in chainsaw operations, first aid, and CPR for volunteers selected to perform chainsaw operations.
- No charge, on-site training in Operational Leadership for any requesting volunteer trail chapter or other volunteer group working on the trail
- Consultation with the NOCO CDSO for any safety-related reporting issue or question
- Funding for required PPE in support of approved trail projects
- Representation to the Department of Labor, Office of Worker’s Compensation Programs for any official NOCO Volunteer-In-Parks injury, through the NOCO collateral duty Worker’s Compensation Coordinator

#### Supplemental Training- Partner Staff and Volunteers

- The CDSO will provide partner staff and volunteers with periodic safety information (usually in electronic format) as pertinent bulletins, Lessons Learned, or other materials become available.
- The NOCO safety committee remains open to new ways of developing and delivering safety materials and training to volunteers through evolving technology, such as the creation of safety videos appropriate for trail volunteers.

## **Chapter 8**

### **Motor Vehicle Program**

The following shall apply to any park-owned or GSA Fleet vehicles operated by NOCO:

#### Vehicle Contents

- Mounted, 5-pound fire extinguisher
- First Aid Kit
- Reflective Traffic Vest (2 minimum)
- Reflective traffic control triangles (3 minimum)
- Flashlight (crank operated, or additional batteries replaced every six months)
- Space blanket (2 minimum)
- Energy Snacks (non-perishable)
- Windshield Washer Fluid (gallon container)
- Jumper Cables
- Accident Report Forms (store in glove box) & pens
- Tire Pressure Gauge
- Roll of Flagging Tape (bright red or orange)
- Spare Tire, Jack and Lug Wrench

#### Vehicle Walk-Arounds

Operators shall perform a cursory walk-around inspection of the vehicle before each use. Operators will visually check for:

- Proper Tire Inflation
- Damage or Vandalism to the Vehicle
- Windshield free of Chips or Cracks
- Adequate Gasoline Level
- Fluid Gauge Levels and/or Warning Lights
- Proper Seat and Mirror Adjustment

#### Vehicle Upkeep

- Immediately Fix or Report any Deficiencies
- Lock Vehicle When Not in Use
- Do Not Store Sensitive Items in Vehicle (laptops, etc.)
- Clean Vehicle of Trash, Food Wrappers, etc. After Each Use
- Ensure Minimum of Half-Tank of Fuel at End of Each Use

## Chapter 9

### **Hazard Reporting and Stop-Work Authority**

At North Country NST employees and volunteers are encouraged to bring safety and health concerns, including near miss occurrences, to the attention of management.

Employees and volunteers have the responsibility to “stop work” when there is a recognized immediate safety or health threat to themselves or others, immediately correct the problem, or involve a supervisor to assist in hazard elimination or mitigation.

Employees can, at any time, notify their immediate supervisors or the CDSO of any potential safety or health hazard, or suggestion for improvement in a park safety and health program or SOP. Employees are encouraged to use the NOCO Hazard Reporting Form (Appendix B) in bringing concerns or recommendations forward. Employees may remain anonymous.

Supervisors who take corrective action on employee concerns shall complete the Hazard Reporting Form and provide a copy to the CDSO for filing in the NOCO shared drive, as well as inform the employee of actions taken. If the supervisor and CDSO determine that no action is necessary, the employee will be so notified.

Whenever feasible, concerns or suggestions reported on the NOCO Hazard Reporting Form should be brought to the attention of the NOCO Safety Committee for discussion and recommended action. Serious safety and health issues shall be addressed immediately, with follow-up reporting provided to the safety committee on actions taken.

All NOCO Hazard Reporting Forms, and actions taken, shall be documented in the Safety Committee Minutes and made part of the annual report to the Superintendent.

NOCO Hazard Reporting Forms shall be available in hard copy format in the employee “Right to Know” Center, located in the NOCO headquarters. Electronic template copies of the NOCO Hazard Reporting Form may be printed from the shared drive at:

- Filing System- NOCO- Legacy Preservation
- Item 2 Protection and Safety
- Safety
- Occupational Safety and Health
- Hazard Reporting Form

Or, printed from the North Country NST website at [www.nps.gov/noco](http://www.nps.gov/noco) under the Volunteer Resources link.

## Chapter 10

### Hazard Communications Program; Procurement; MSDS

Exposure to hazardous chemicals in the workplace can cause serious injury and illness to park employees or volunteers. Knowledge of chemical hazards is fundamental in preventing such injury or illness. NOCO employees and volunteers have a right to know the identities and hazards associated with the chemicals that are exposed to at work. They also need to know what protective measures are available to prevent injury or illness.

#### Responsibilities

The Collateral Duty Safety Officer (CDSO) has the following responsibilities:

- Coordinate the Hazard Communication Program
- Provide technical advice, assistance, and training to employees
- Maintain the master chemical inventory and MSDS files

Employees and volunteers on NPS-NOCO property have the following responsibilities:

- Participate in training as provided
- Comply with requirements of this program
- Immediately report significant spills of chemicals
- Review MSDS's before using hazardous materials

Purchasing/Shipping and receiving Agents have the following responsibilities:

- Purchase "green" products whenever feasible
- Limit purchases of materials to approved, standardized items to restrict new products of interchangeable use from creating "inventory creep" (i.e.: avoid purchasing several brands of glass cleaner)
- Ensure that MSDS's received with shipments of chemicals are forwarded to work area MSDS binders where chemicals are stored, and copies provided to CDSO

#### Hazardous Chemical Inventory

An inventory of hazardous chemicals used at NOCO has been prepared by the CDSO. The complete inventory will be maintained in the NOCO shared drive and revised as needed by the CDSO.

All purchasers of chemicals must inform the CDSO of the existence of any new chemical brought into the park and obtain an MSDS. The CDSO will add the chemical to the master inventory.

Additionally, new chemical MSDS's will be incorporated into specific work location "Right to Know" stations, where that chemical will be stored and used.

### Material Safety Data Sheet (MSDS) Information

MSDS's have been obtained by the CDSO for each chemical on the master inventory. MSDS's are kept in hard copy format in the yellow binders at employee "Right to Know" stations. They are also accessible on the NOCO shared drive under Filing System- NOCO-Legacy> Item 2> Safety> Occupational Safety and Health> MSDS.

### Employee "Right to Know" Stations

Employee "Right to Know" Stations will consist of the following:

- A list of all hazardous chemicals located in the work areas covered by the station
- A yellow binder containing an MSDS for each hazardous chemical at the work location
- A copy of this written program
- A supply of Hazard Reporting Forms

Employee "Right to Know" Stations are located in the following areas:

- NOCO headquarters, Lowell, MI

### Labeling

It is important that all containers of chemicals are properly labeled (including containers from a 5,000-gallon storage tank to a spray bottle of glass cleaner).

Labels affixed by the manufacturer must not be removed or defaced.

Supplemental labeling is not required when *consumer products* are used as intended and with a frequency and duration as expected for consumers.

Secondary, transfer, or temporary containers must be labeled. Minimum labeling information includes:

- Identity of the chemical (match the name on MSDS inventory)
- The hazard warning (including "target organ" information)
- Name and address of the chemical manufacturer

## Training

Employees and volunteers who work with, or are likely to be exposed to, hazardous chemicals on NOCO property will receive hazard communication training, to include the following:

- An overview of the NOCO Hazard Communication Program
- Operations in the work area where hazardous chemicals are present
- Physical location of the employee “Right to Know” Station
- Physical and health hazards of chemicals in the work area
- How to read and interpret a MSDS and product labels
- JHA's and required PPE for specific tasks

## **Chapter 11**

### **Structural Fire Protection SOP**

North Country National Scenic Trail does not currently have a Structural Fire Plan. The following Standard Operating Procedure is in effect until a more comprehensive Structural Fire Plan is approved and implemented:

#### **General Safety Procedures for All Fires in Any Building**

- DO NOT fight the fire. Evacuate yourself and others
- Use available fire extinguishers to help effect an escape if needed
- Place your hand on doors to check for heat before opening
- Close doors behind you as you exit any building
- Crawl close to the floor if there is smoke or other fumes present
- Call 911 from a cell or other phone in a safe location to report the fire

#### **Recommended Actions Toward a Comprehensive Structural Fire Plan**

- Superintendent designates in writing a Park Structural Fire Coordinator (PSFC) per RM-58
- Contract with Qualified Professionals to Provide Initial Assessment of Fire Extinguisher Needs (size, type, location), and Fire Protection System Requirements Analysis
- PSFC drafts a Structural Fire Plan for Superintendent Review and Approval, to include the following considerations:
  - A. Fire and Evacuation Plans by Building
  - B. Testing and Inspection of all Fire Extinguishers and Protection Systems
  - C. Contracting of Qualified Inspection Personnel for Annual Testing
  - D. Employee Training
  - E. Smoking Policy
  - F. Space Heater Policy
  - G. Chimneys
  - H. Hazardous Materials
  - I. Report Procedures
  - J. Investigations

## **Appendix A: FY15 Annual Goals and Action Plans**

### **FY15 Goals:**

- Strive to maintain zero reported injuries in FY15 (employee and volunteer)
- Provide orientation to any new NOCO employees on the Occupational Safety and Health Plan
- Review base line inspection forms, assign corrective actions and due dates
- Conduct formal meetings of the Safety Committee in October, January, and May 2015.

### **FY15 Action Plan:**

In addition to corrective actions noted on base line inspection reports for all offices and structures, the following actions are recommended:

- Lobby First Aid Kit mounted (Weaver)
- Write Emergency Action Plan (Watson)
- Write Structural Fire Plan (Watson)
- Sign JHAs as Approved (Weaver)
- Scan Signed JHAs into Website (McCusker)
- Copy of Plan to Eric Allen (Watson)
- Post Safety Plan to Website (McCusker)
- Review and report on these items at the January 2015 meeting

