

References

1. Departmental Manual (DM), Part 485, "Safety and Occupational Health," Chapter 6.
2. 29 CFR 1960, Subpart D, "Inspection and Abatement."
3. 29 CFR Part 1960, Subpart E and 41 CFR Parts 101-21.
4. 29 CFR 1910, "Occupational Safety and Health Standards."
5. 29 CFR 1926, "Occupational Safety and Health Regulations for Construction."

Requirements

Every National Park Service facility, operation and/or workplace will be formally inspected at least annually. More frequent inspections will be conducted when there is an increased risk of accident, injury or illness due to the nature of the workplace.

Workplace Technical Inspections

1. Formal technical inspections will be conducted by persons who are trained in hazard recognition and safety and health inspection procedures. The inspections may be conducted by NPS personnel, contractors or volunteers as long as they are appropriately qualified.
2. Risk assessment codes will be assigned to facility findings and deficiencies for management use in prioritizing corrective actions (Appendix A).
3. If an imminent danger condition is 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).
4. Preoccupancy building inspections for safety and health considerations will be conducted by safety and health professionals or other qualified person(s).
5. Written reports of workplace inspections shall be provided to the management official in charge of the operation within a reasonable time, but not later than 20 working days after the inspection. The report will cite hazards and safety management deficiencies and will recommend corrective actions. The inspection report shall contain, at a minimum, the date and time of the inspection, a description of the site inspected, a description of each deficiency, and whether corrective action is required. Inspection reports shall be maintained on file for a period of five years.

6. Deficiencies discovered during inspections will be tracked until corrected using a hazard tracking system or similar process. See Appendix B for a sample hazard-tracking log.
7. If abatement of a hazardous condition is not within the authority and resources of the organization, management will:
 - a. Request assistance from the next higher management level in the organization.
 - b. Coordinate, when necessary, with the federal lessor agency, if applicable (for example: General Services Administration), to secure abatement as specified in 29 CFR Part 1960, Subpart E and 41 CFR Parts 101-21.

Management Safety Walk-Arounds

1. Walk-arounds are a self-assessment tool used by managers to assess the overall condition of the safety program, engage employees in conversation about safety, identify programmatic issues and recognize safe practices. Normally management personnel above the first-line supervisor level should perform walk-arounds. Walk-arounds are not intended to be comprehensive, site-wide inspections. They should focus on performance of specific safety activities and are not directed toward compliance goals. They are cooperative, no-fault efforts between managers and workers.
2. A successful walk-around program will include the following elements:
 - a. Communication between line managers and workers during walk-arounds is essential. Managers should solicit worker observations, concerns and suggestions.
 - b. Unsafe work practices or conditions identified during walk-arounds with the potential to cause serious injury must be corrected immediately, or work must be stopped.
 - c. Walk-arounds should recognize and reinforce good performance.
 - d. The frequency of walk-arounds will be established (a graded approach – with higher risk operations being evaluated more frequently – is preferred). A rule of thumb is a minimum expectation of three walk-arounds per manager per quarter. (Preferably one per month for managers with low-risk operations such as office environments. A higher number is expected for managers with higher risk operations.)
 - e. Personnel responsible for conducting walk-arounds will be identified

- f. Documentation requirements for the results of the walk arounds will be established.
- g. Walk-arounds are followed up on to ensure tht program deficiencies have been prioritized and corrected and that safe practices are recognized as soon as possible.

OSHA Inspections

1. Officials from the Occupational Safety & Health Administration (OSHA) have the right to conduct inspections at any NPS site or operation. They also have the right to question any employee, supervisor, visitor or manager associated with the site (29 CFR 1960.31).
2. OSHA cannot issue monetary fines against federal agencies as they can against private industry. However, they can (and do) issue citations. All citations must be corrected.
3. If OSHA arrives to conduct an inspection at an NPS site:
 - a. Cooperate with the OSHA inspector in a cordial manner while on-site. This sets the tone for the rest of the process, both during and after the inspection.
 - b. The Superintendent, Assistant Superintendent or Manager should take an active interest in the inspection. This will send a message that you are serious about safety and correcting any identified deficiencies.
 - c. If your site receives OSHA citations:
 - Carefully review the citations for accuracy before you respond to OSHA.
 - Provide proper documentation of your corrective action (pictures, copies of work orders, copies of finalized written plans, etc).
 - Do a “quality control” check to make sure all corrective actions have in fact been implemented.
 - Notify the Regional Risk Manager.
 - Provide a copy of inspection findings, recommendations and abatement schedules to the Regional Risk Manager

Agency Technical Assistance Request (ATAR)

Any NPS site may ask OSHA for help through an Agency Technical Assistance Request (ATAR). The on-site visit may be triggered by a need for hazard abatement advice, training, a partial or comprehensive inspection, and/or program assistance. ATARs are scheduled at the discretion of OSHA's Area Office Directors.

Depending on the needs of each particular site, there are several types of ATARs. They may be phoned in; however, agencies normally request them in writing. On-site and off-site ATARs are conducted. An on-site ATAR may consist of a limited or comprehensive walk-through, complete with opening conference. An off-site ATAR may consist of a review of program documents. Whenever you request an ATAR, you have the right to limit the scope. Where other types of OSHA visits (i.e., inspections) may result in citations or notices of findings, the final product of an ATAR will be either a written or verbal report suggesting program or facility improvements.

1. Any serious or imminent danger condition identified by the OSHA Compliance Safety and Health Officer (CSHO) during an ATAR must be abated. All violations will be discussed with agency officials at the closing conference. For serious, unabated violations prior to the closing conference, abatement dates and an abatement plan will be discussed.
2. After the visit, the OSHA Area Director will send the site director a letter that summarizes results of the ATAR and, if appropriate, documents uncorrected violations and sets abatement dates as discussed with the agency. If an agency does not act in good faith to correct these deficiencies, OSHA will issue a Notice of Unsafe or Unhealthful Working Conditions.

Appendix A

Risk Assessment

Risk assessment is an essential element of effective risk management. The assignment of risk levels provides a relatively simple and consistent method of expressing the risk associated with worker exposures to identified hazards.

Methodology

The level of risk associated with a workplace hazard is expressed in terms of an assigned risk level of high, medium or low, based on the Risk Assessment Code (RAC) calculated for the hazard. The RAC is assessed through the determination of the severity of the injury or illness that could result from the hazard and probability that such an injury or illness could occur.

Severity Code

The severity code is a classification of the severity of the most serious type of injury or illness that could reasonably be expected as a result of exposure to a specified workplace hazard.

Severity Code Criteria

Determination of the severity code is the first step in assessing the risk associated with a workplace hazard. The code is assigned in accordance with the following criteria:

HAZARD SEVERITY	SEVERITY CODE
<i>Catastrophic</i> —Injuries/illnesses involving permanent total disability, chronic or irreversible illnesses, or death.	I
<i>Critical</i> —Injuries/illnesses resulting in permanent partial disability or temporary total disability in excess of 3 months.	II
<i>Marginal</i> —Injuries/illnesses resulting in hospitalization or temporary, reversible illnesses with a variable, but limited, period of disability of less than 3 months.	III
<i>Negligible</i> —Injuries/illnesses not resulting in hospitalization or temporary, reversible illnesses requiring only minor supportive treatment.	IV

Severity Codes for Health Hazards

The hazard severity code for health hazards is assigned based on the severity of the primary health effect that could result from an employee's exposure to a chemical or physical agent above a prescribed exposure limit. The primary health effect is the health effect providing the basis for the prescribed exposure limit (e.g., cancer, liver damage, sensory irritation). Sources of this information include the American Conference of Governmental Industrial Hygienists (ACGIH) Documentation of the Threshold Limit Values and Biological Exposure Indices, OSHA standards, and National Council on Radiation Protection and Measurement (NCRP) reports. For chemical and physical agents for which no prescribed exposure limit exists, the assigned probability code is based on the primary health effect (as documented in MSDSs), toxicology references and other appropriate sources.

Probability Code

The probability code is an expression of the likelihood that a hazard will result in an injury or illness based on an assessment of applicable safety or health factors.

Relevant Factors

In the determination of probability codes, all relevant factors that may influence the likelihood that an injury or illness will occur should be identified, evaluated and considered. Potential considerations in the assignment of probability codes include:

Safety Factors

The following factors should be considered when evaluating the probability that a safety hazard will result in an injury or illness:

Number of employees potentially exposed, both concurrently and sequentially.

- Frequency of exposure, including the full range of possible frequencies, from one-time, short-duration exposures to continuous daily exposure.
- Employee proximity to the hazard (e.g., from a location at the fringe of the danger zone up to the point of danger).
- Working conditions that may distract the employee or cause employee stress (e.g., complexity of the operation, proximity to other ongoing activities or workplace hazards, extended work hours and fatigue, workplace lighting or noise levels, etc.) and thereby increase the likelihood of an accident.

Health Factors

The probability code for health hazards is a statement of the probability that an employee will be exposed to a chemical or physical agent above a prescribed exposure limit. The probability code is determined as follows:

- Where established through monitoring (e.g., breathing zone monitoring, dosimetry, biological monitoring, noise measurements, wet bulb globe temperature measurements, etc.) that an exposure above the prescribed exposure limit exists, the probability code is “A”.
- Where no overexposures have been documented, the probability code is assigned based on the likelihood that an overexposure will occur. Factors to consider include employee proximity (frequency and duration) to areas with potential hazardous agent exposure; documented exposures above established action levels; chemical and physical characteristics of the hazardous agent; nature of the operation (e.g., storage, materials transfer); reliability or redundancy of controls; and number of employees potentially exposed to the hazardous agent.

Hazard Probability

The probability code is assigned in accordance with the following criteria:

CRITERIA		PROBABILITY CODE
Frequent	Likely to occur immediately	A
Probable	Probably will occur in time	B
Occasional	Possible to occur in time	C
Remote	Unlikely to occur	D

Risk Assessment Code (RAC) and Risk Level

The RAC assigned to each hazard is an expression of risk, which combines the severity code and the probability code. Using the matrix below, the RAC for a given hazard is assigned by (1) determining the severity code of the hazard (I, II, III or IV) and entering the matrix along the corresponding row; (2) determining the probability code of the hazard (A, B, C or D); and (3) moving across the row until arriving at the corresponding column. The Arabic number at the intersection of the appropriate row and column is the RAC for that hazard. The RAC relates directly to a risk level that can be used as a tool to determine priorities among, and required oversight for, hazard abatement activities.

RISK MANAGEMENT CODE (RAC) MATRIX							
Probability Code					Risk Levels		
Severity Code		A	B	C	D	Hazard RAC	Risk Level
	I	1	1	2	3	1 & 2	High
	II	1	2	3	4	3	Medium
	III	2	3	4	5	4 & 5	Low
	IV	3	4	5	5		

Risk Assessment Codes and Risk Levels for Similar Hazards

When similar hazards exist (e.g., no guarding on similar types of power presses in the same workplace with comparable exposures), the RAC and risk level determined for one of the hazards may be assigned to the other similar hazards.

Appendix B

Safety Inspection Checklist

Inspected By: _____ Date: _____
(Mark N/A as appropriate)

1. WORK SITE INFORMATION:

- a. Posting OSHA and other work site warning posters _____
- b. Are Safety Meetings conducted periodically? _____
When was the last meeting? _____
- c. First aid equipment properly stocked _____
- d. Are work site injury records being kept? _____
- e. Are emergency telephone numbers conspicuously posted? _____
- f. Is the EMERGENCY INFORMATION form posted? _____

Describe Violation – Location – Remedy Taken

2. HOUSEKEEPING AND SANITATION :

- a. Are emergency lights fully operational? _____
- b. General neatness of working areas _____
- c. Regular disposal of waste and trash _____
- d. Passageways and walkways clear _____
- e. Waste containers provided and used _____
- f. Sanitary facilities adequate and clean _____
- g. Adequate supply of water _____
- h. Adequate lighting _____
- i. Trash receptacle for drinking cups _____
- j. Are handrails and stair treads in good repair? _____
- k. Is smoking restricted to certain locations? _____
- l. Are electrical cords and plugs in good condition? _____
- m. Is a clearance of 3' maintained around hot water heaters
electric breaker panels, heating units, and fire sprinkler riser? _____
- n. Are electric circuit breakers free of obstructions? _____

Describe Violation – Location – Remedy Taken

3. FIRE PREVENTION:

- a. Fire instruction to personnel _____
- b. Fire extinguishers identified, accessible, and fully charged _____
- c. "No Smoking" signs posted and enforced where needed _____
- d. Good housekeeping _____
- e. Storage, use and handling of flammable liquids properly done _____
- f. Fire hazards checked _____
- g. Is gasoline contained only in UL listed containers? _____

Describe Violation – Location – Remedy Taken

4. HANDLING AND STORAGE OF MATERIALS:

- a. Are materials properly stored and stacked? _____
- b. Are passageways clear? _____
- c. Shelves in stockrooms in good repair and properly anchored _____
- d. Stacks on firm footing, not too high _____
- e. Are employees lifting loads correctly? _____
- f. Are materials protected from weather conditions? _____
- g. Flammable liquids not stored in areas used for exits or stairways _____

Describe Violation – Location – Remedy Taken

5. HAND TOOLS:

- a. Proper tool being used for each job _____
- b. Neat storage, safe carrying _____
- c. Inspection and maintenance _____
- d. Electric tools are grounded _____

Describe Violation – Location – Remedy Taken

6. PERSONAL PROTECTIVE EQUIPMENT

- a. Eye protection _____
- b. Respirators and masks _____
- c. Helmets, hoods, head protection _____
- d. Gloves, aprons, sleeves _____
- e. Safety belts and lifelines _____
- f. Shirts are to be worn _____
- g. Back support belts _____

Describe Violation – Location – Remedy Taken

7. HAZARDOUS MATERIALS:

- a. Is a binder containing MSDS for supplies containing hazardous chemicals available to employees before using? _____
- b. Are "Material Safety Data Sheets are Available on Request" signs posted in conspicuous locations? _____
- c. Is the hazardous waste inventory log maintained? _____
- d. Are hazardous waste storage areas inspected weekly? _____
- e. Is the hazardous material disposition log maintained? _____
- f. All containers clearly identified _____
- g. Proper storage practices observed _____
- h. Proper storage temperatures and protection _____
- i. Proper type and number of extinguishers nearby _____

Describe Violation – Location – Remedy Taken

FROM PWR "SAFETY KIT FOR SUPERVISORS" (Sept., 2001)

APPENDIX C

HAZARD TRACKING LOG

ORGANIZATION: _____
 DATE SUBMITTED: _____

SITE: _____
 INSPECTOR: _____

Hazard Description:	
Date Identified:	
Corrective Action Planned:	
Follow-Up Date(s):	3.
1.	4.
2.	5.
Final Abatement Action:	
Supervisor Abatement Certification/Date:	Program Coordinator Review/Date:
Hazard Description:	
Date Identified:	
Corrective Action Planned:	
Follow-Up Date(s):	3.
1.	4.
2.	5.
Final Abatement Action:	
Supervisor Abatement Certification/Date:	Program Coordinator Review/Date:
Hazard Description:	
Date Identified:	
Corrective Action Planned:	
Follow-Up Date(s):	3.
1.	4.
2.	5.
Final Abatement Action:	
Supervisor Abatement Certification/Date:	Program Coordinator Review/Date: