

September 11 – 12, 2013

## **Meeting Summary – Day 1**

Note: The DOI Occupational Safety & Health Council is referred to as SHC or the Council in the following notes.

### **SAI Discussion: Dave Schuller & Barry Noll**

-See PowerPoint presentation for full details; additionally, this presentation is expected to be presented at the next DASHO Council meeting September 19th. This SAI analysis is based off of materials the Forest Service provided to OSH directly (the CRP/FLA process slides and guidebook). Although the CRP process calls it a “review” instead of an “investigation” it is essentially the same as the SAI process with a few differences. The review point is mentioned because the Forest Service is trying to move away from calling everything an investigation due to the poor cultural image that has been created thanks to all of the investigations which include LE and have caused their people to not say anything during an investigation for fear of legal implications.

- The Forest Service is trying to get away from LE leading and SAIs being perceived as the bad guy sitting across the table. They will now have a different team makeup and include union representatives during the whole CRP process. The question of which representative is considered the chief investigator in this equation was asked and the response was that the Learning Review Team leader was considered the chief investigator. The question of whether the HR team will typically be locals from the area or be brought in was answered. They will be brought in to serve on the investigation team to make it easier on co-workers; although until we see the process work, it’s possible that they could be locals as well. A question of whether or not this was a long term program was asked and the response was that it is currently being discussed at a separate meeting.

- The SHC believes there are a lot of unknowns but it looks like the potential exists to incorporate CRP into SAI at some point in the future.

### **Process Comparison Choke Points:**

- Often problems tend to come up that cause an investigation process to slow rather than run smoothly. For example, all of the review documents are sent to the Solicitor General’s office to review and approve and that never goes quickly. There is also a lot of time spent writing up reports, more than the schedule usually allows.

-BIA brought one of their issues to the SHC’s attention; they only have two team leads and are having trouble getting folks to volunteer for training. The SHC also learned that the frequency of investigation is dependent on each bureau and varies significantly. A point was made that the

effects of each individual office/bureau SAI on the Department should be discussed at the next DASHO meeting.

-Nobody has access to ROSS yet; the proposed SAI Team “call-up” information hasn’t been uploaded into Emergency Management’s system. OSH placed the ROSS information in the draft DOI SAI Guide as we expected the system to be operational by the time the draft was ready but that hasn’t happened yet. The question was asked who would be using ROSS if they needed something, would it be DASHO, OSH, or somebody totally different and the response was that each individual office would be using ROSS on their own to request a SAI Team.

-Coroner reports take a while which may be another choke point. This delay is beyond our control since the backlog for the coroner’s office in certain states is insanely long. Bureaus that may be experiencing difficulties getting information from a Coroner can request the DOI’s medical officer to serve as a liaison with the Coroner’s office.

### **Serious Accident Investigation (SAI) Guide Discussion:**

-The SHC was previously given the task of creating a standardized departmental guide for Serious Accident Investigations. Now that the DOI draft is ready, concern was raised by council members about having two guides – the Interagency Serious Accident Investigation Guide (NWCG created) and now the DOI SAI Guide. The Chair asked for the SHC’s decision on what route should be taken on the dual guide issue. The current draft guide that Dave Schuller created originated from the interagency guide with only a few content modifications.

-The decision of the SHC is to take a month to review both guides and then have a conference call to figure out whether to stick with the interagency guide, use the one that DOI created, or create a new one with blended content from both guides. There will be a tentative conference call scheduled for the afternoon of October 22<sup>nd</sup> after 2pm unless a scheduling conflict arises.

### **DASHO Agenda Discussion:**

-The next DASHO meeting is scheduled for next Thursday, September 19<sup>th</sup> and the agenda will go as follows (please see the topic PowerPoint slides for more information):

- Barry Noll will give a short report on the Safety and Health Council Meeting
- The DASHO Council will be briefed on the pending OPM GS-0018 series changes and that it could potentially be something they may need to manage
- An explanation of the new OSHA record keeping system and how it will affect DOI
- The topics of the virtual conference, program evaluations, and the serious accident investigation power points will be presented for DASHO Council discussion

### **Council Thoughts/Discussion on Virtual Conference:**

-A point was made by Mike May that it would be better to do the conference on a topic such as building a world class safety program because it’s a universal key factor important to all bureaus and would likely gain the most interest. Bob Garbe mentioned that none of the conference costs were projected in the 2014 or 2015 budget requests; so we will need some other kind of process

to work this out without this in the planned budget, which may be where the DASHOs get involved.

-There was the suggestion that we could possibly use the virtual conference to also talk specifically about how we build the program everyone wants and meet the “world class” requirements as well.

### **OSHA Record Keeping Update Discussion – Dr. Mikki Holmes OSHA:**

-Agencies will now be required to submit their OSHA 300, 300A data annually to the Bureau of Labor Statistics in addition to what OSHA already requests for the OSHA Report. The new rule change will also clarify and remind everyone that volunteers are considered employees and their injuries and hours worked need to be recorded as well. Mikki stated that the data submissions for the Department may be in one of the following formats/methods: a flat file option; directly through the BLS website through an OSHA link; or submit data through the E-COMP system. (Note: The Department has already decided that it will submit a single data package.)

The Department’s data will be requested by May 1<sup>st</sup> for the previous calendar year. In the new rule OSHA has changed the way they define an establishment, however the rest of the rule remains essentially the same. Volunteer hours can be entered into SMIS and saved automatically. SMIS keeps that information now by establishment. Armando volunteered to break the OSHA establishment list down by bureau and send it out to everyone for validation based on the new establishment definition. The documents that OSHA sent out are on the SharePoint site and you can feel free to contact Mikki Holmes to further discuss – Armando can provide her contact information.

### **Armando Galindo’s SMIS Report Discussion (See PowerPoint for more detailed information):**

-SMIS needs to be made scalable in order to meet each bureau’s needs. Currently there has been some trouble marrying the existing SMIS database with the Facilities database because there is no unique universal identifier for establishments, and there are 14 IAAS offices that have identical names to SMIS counterparts, once all the bugs get fixed everyone will have restricted views of SMIS. SMIS should eventually be able to communicate with MAXIMO to greatly reduce the hazard recording effort.

### **IAS System Discussion:**

Keith Wanless provided a briefing on the new Inspection Abatement System IAS system that will eventually be "bolted" onto SMIS. Following the briefing, there was a brief question and answer session.

-A question was asked that if an inspection is closed can you still go back in and correct the findings and the response was "no". One would have to go back and re-enter the findings but it appears to mainly only be done for incomplete inspections.

-A question was asked about reporting an unsafe condition when the person reporting the condition is different from the person who conducted the audit. Keith replied that unsafe conditions noted in an audit can also be reported as unsafe/unhealthful by a third party, the system will accept this. The unsafe condition reporting form will be largely copied to the broader SMIS form.

-Keith wanted everyone to know that the files open safely even if a pop up window shows that the page originates from the internet, and can still be downloaded. Work is planned to incorporate anonymous hazard notifications and will be available on the demo server in the very near future.

Question – when will the IAS database be up on the demo server and the response was it's expected to be up within the next 90 days.

### **Other Business: SMIS CCB Barry Noll**

-There will now be a form located on the SMIS website where users can request changes or modifications to the application that will automatically go to the Configuration Control Board (CCB). The CCB will decide if the users request is important/necessary and will then be prioritized to include figuring out what needs to be fixed, how, and when in relation to all other submissions. This change will help the workers comp people get a voice on system changes. The CCB is in process of getting up and running, they are anticipating it being fully functional sometime in October.

DOI Occupational Safety & Health Council

September 11-12, 2013

### **Meeting Summary - Day 2**

#### **Forest Service Crosscut & Chainsaw Directive Development – Jonathan Stephens and Robert Wetherall. *(Please see the PowerPoint presentation for more detailed information).***

-FS found that their trained employees were having a tough time navigating outside their program. Other land management agencies were not recognizing their training, so they met and established the broad goal of developing one common training/certification program for all the land management agencies. They would like to establish a safety and health working group to create interagency saw standards that will cover everyone in the land management agencies that use saws.

-The saw program would be accessible both inside and outside of DOI. With nationally approved training in place the expectation is that we will have the ability to recognize employee training received in another agency. This will also establish different skill level standards so that people can start at an entry level and work towards higher level goals and measure their progress.

- Bob Garbe asked the question: When we look at the jobs and training programs have there been any thought towards medically certifying these individuals prior to allowing them to do this

work? The answer was: the Forest Service has worked with all Interior Departments very closely and they all don't seem to think this is necessary. The program proposal originated as an attempt to rid the agencies of all slip, trip, and fall accidents related to chainsaws.

- Barry Noll asked whether or not the firefighting personnel were on board with this plan and the response was that they were completely on board which meant the agencies should be quick to follow.

-Barry Noll asked as to whether or not the SHC wanted to move ahead with this collaborated work project and the overwhelming majority agreed that they wanted to go ahead but also needed to talk to people back at their respective offices first. Barry allowed them to do so and asked that they get back to us within a few weeks after the SHC meeting.

### **Program Management Plan: Steve D'Antoni**

-Steve provided an update that for Office of Facilities and Administrative Services (OFAS). Most of their risk is low risk because their work is mainly office work, but they have some increased risk exposure for their law enforcement/security workers. Steve also updated the SHC on the plan to improve the safety and health programs of the Office of the Secretary through a prepared "option plan" that was presented to the acting DAS, Mary Pletcher. Mary endorsed the proposed plan and will be providing an update on the proposal to the budget shop. Hopefully the budget shop will endorse the plan. If they don't, at least the proposal highlighted the fact that the level of risk has surpassed Steve's ability to manage with the resources currently at his disposal and it has made upper management aware of the program weaknesses that are continuing to occur.

### **Department of Interior Gun Care Decision Brief – Saundra Jackson OFAS**

-A study was done of the law enforcement weapon storage cleaning operation within the DOI Main Interior Building (MIB) and it was discovered that the newly constructed room where officer's weapons are now stored was seriously lacking some basic safety and health required systems, mainly ventilation. Saundra looked into what would it take to add ventilation versus what kind of green products they could be using that would not require new and costly ventilation systems be installed.

-Currently the best solution appears to be switching to a new green cleaner called M-Pro 7. The issues they had with the previous cleaner (Solvent 9) were a direct result of its chemical harshness, plus Solvent 9 took a longer time to clean properly, and it was flammable creating waste disposal issues.

-Overall cost statement for the new cleaning material (per bottle):

- By reducing personnel cleaning time and the weapon cyclic cleaning frequency there will be an approximate 80% cost savings of money
- M-Pro 7 is economical, in comparison to current products because it lasts 10 times as long

-Saundra provided a spreadsheet that showed flammability rating, ventilation requirements, odor, storage, shipping, disposal, etc for the M-Pro 7 cleaner. The material includes information on

the M-Pro-7 lubricant and gun oil which has been used in conjunction with the cleaner for this test. The security guards at MIB have found this product better to use due to the lack of odor and the fact that they can throw the cleaning patches in the trash. This product appears to have a great return on investment due to reduced cleaning costs, reduced replacement costs, savings on facility construction costs, long term employee health savings, as well as the fact that waste disposal and hazard material storage is cut out completely. Saundra also pointed out that the more we buy, the less it costs over time.

-Key points to keep in mind: this new greener product is a biodegradable, non-hazardous, and cost effective cleaner that maintains firearms in less than half the time as other products. The MIB security guards are already using this product and the next step was to share this with all Bureaus/Offices to consider.

### **CDSO & GS-0018 Competency Model Discussion – Dave Schuller**

-The decision to come back and take the two previous versions of the training guide and merge them to one was made at the last meeting and Dave has been working on this with a final product that's now ready for SHC review.

-The document itself was cleaned up to clearly identify duties; KSA's; and then suggest types of training to meet the KSAs. A question was asked that if we could not find the exact link to a suggested OSHA training, should we just take it out of the document all together. The majority of the council decided that the course title should stay but remove the OSHA ID Code so that way people can simply Google the title and find a representative training from an alternate source – there are many training sources available nationwide.

-Nothing in the new draft document KSAs are new; they have simply been merged from both previous editions. A question was asked – Is the document a “suggested” document or will it be mandatory? If it's suggested there is a chance that no one will read or use it. One Council member thought it should be suggested (non-mandatory); however any bureau could also make it mandatory if they desired. After much discussion the council decided to edit the verbiage to clarify what is mandatory and who is required to complete what. Additionally, a comment was made that it's not only important to have people but to have “*trained*” people and it has to become somebody's responsibility to manage and handle all of it.

-Further discussion: If someone is promoting from one level to another, the Guide shows that there are different KSAs and training requirements. This makes the Guide a good resource for people who were promoted from a technical job to an OSH manager position; they will know what their new duties are and how they will be expected to perform them. They can also use this information to establish a learning path that includes how to better communicate with others. With so many different hazardous environments a safety officer may work in, an individual may not always be prepared for something based off of previous experience – especially since one situation can be very different from another.

-The SHC decided to have Dave re-edit one last time to include adding the mandatory requirements.

### **Collateral Duty Safety Officer Task Book Discussion:**

-Based on field evaluations, there is an overall Departmental need to keep track of the training for people who are in CDSO positions and to follow how they are progressing. The CDSO Task Book tracks this progress and also lets us know who should be certified and who is not ready for certification.

-FWS thinks this is unrealistic to do all of these steps and that to add this to the workload of these volunteers is to put too much on them.

-USGS made the argument that the people doing this job are volunteering to do it and if you add this administrative burden there will not be anybody to raise their hands to volunteer.

-NPS made the suggestion that in this program the first 6 months be mandatory and then offer up suggestions for “non-mandatory” training that includes the latter 6 months to give incentive for people who have a desire to continue on that OSH career path. The compromise was made that CDSO’s were good for up to 180 days of appointment if they haven’t done a single training session on day 181, they are not allowed to continue.

-The SHC Chair requested the SHC establish a workgroup to work on the CDSO Task Book to address the new ideas. Workgroup members tasked to revise the task book are: Mike May, Ed Gerome, Paul Holley, and Rose Capers-Webb.

### **Employee Reports of Unsafe Conditions Discussion (DM discussions):**

-A question was asked – What does the lowest possible working level mean in relation to correcting a hazard? The answer was that any level an employee would be able to address an unsafe condition at.

-A follow up question was asked – How do people figure out who this specifically is addressed to since some may be confused by it? The answer was that it lets people know that they can correct a hazardous situation no matter who you are or where you work in an organization. The final SHC decision was to leave this discussion point alone.

Dave went through revision comments received from bureaus for DMs 8 and 9 and annotated the SHC’s preferred language decision on the draft documents. Dave will make the SHC’s requested revisions and then prepare both DMs for surnaming. Bureaus will then have an opportunity to comment again in the surnaming process.

-OLE’s draft *Firearms and Defensive Equipment Standards (Part 446, DM Chapter 10)* policy talks about firearms programs and it permits bureaus/offices to establish policy authorizing employees that are not law enforcement officers to carry firearms for purposes other than law enforcement. Continued OLES delay in surnaming the OSH draft DM Chapter 30 may need to be pursued at the DASHO level.

**Other Business:**

The SHC determined the FY 2014 meeting schedule as follows:

- December 4<sup>th</sup> & 5<sup>th</sup> 2013 – Ballston Va.
- February 5<sup>th</sup> & 6<sup>th</sup> 2014 – Ballston Va.
- May 7<sup>th</sup> & 8<sup>th</sup> 2014 – Out west with location to be determined
- September 10<sup>th</sup> & 11<sup>th</sup> 2014 – Ballston Va.

**Action Items:**

Action #	Action/Task	Resource Assigned to Task	Completion Date
1	The SHC is to take a month to review both SAI guides (Inter-agency & DOI's) and then have a conference call to figure out whether to stick with the inter agency guide, use the one that DOI created, or create a new one with blended content from both guides.	SHC	11/13/2013
2	Hold a conference call to discuss SHC SAI guide reviews. Preference is the afternoon of October 22 <sup>nd</sup> after 2pm unless a scheduling conflict arises.	OSH	Complete 10/23/2013
3	Break SMIS OSHA establishment lists into bureaus and send lists out to bureaus for validation based on the new establishment definition.	Armando Galindo	Complete 9/13/2013
4	Barry Noll asked as to whether or not the SHC wanted to move ahead with the chainsaw/crosscut saw joint policy collaboration with Forest Service. SHC agreed to move forward but wanted to go back to their bureaus and talk to program folks likely to be affected. Barry allowed them to do so and asked that they get back to us within a few weeks after the SHC meeting.	SHC	10/1/2013
5	Make the SHC's requested revisions for DMs 8 & 9 and prepare both DMs for surnaming.	Dave Schuller	11/1/12
6	Establish a workgroup to revise the draft CDSO Task Book to address the new ideas discussed at the meeting.	Mike May, Ed Gerome, Paul Holley, and Rose Capers-Webb	12/4/13

**Meeting Participants:**

<b>Name</b>	<b>Affiliation</b>
Rose Capers-Webb	BSEE & BOEM
Steve D'Antoni	OFAS
Mike May	NPS
Jim Meredith	BOR
Bill Miller	USGS
Cynthia Duffield	USGS
Mary Parkinson	FWS
Chip Murphy	FWS
Ed Jerome	BLM
Rudy Smith	PAM
Maurice Banks	OSM
Vince Mazzier	OWF
Bob Garbe	OSH
Barry Noll	OSH
Armando Galindo	OSH
Dave Schuller	OSH
Paul Holley	BIA
Katie Bernardi	OSH Intern & Facilitator
Emily Staib	OSH Intern & Note Taker
Scott Perdue – day 1 only	NPS
Mario Owens – day 1 only	NPS
Rhonda Poolaw – SMIS & CDSO topics only	OST

## SHC Meeting Agenda:



September 2013 SHC  
Agenda final (6).doc