Part I

Onsite Assistance Review

Basic Program Review Criteria and Verification Statements

for Safety, Health, and Environmental Management Programs

(Revised January 1995)

Component A - Safety, Health, and Environmental Management

1. Does a written plan for safety, health, and environmental management exist?

To verify, look for:

(a) annual goals/objectives published by the Area/location;

(b) "State of Location" entry in ARMPS;

(c) safety/health/environment related performance standards for senior management officials; and

(d) DIRECTIVE and MANUAL 230.0, Safety, Health, and Environmental Management Manual.

2. Has an individual been delegated authority and assigned specific responsibility for the program?

To verify, look for:

(a) charge letter to the individual;

(b) critical elements in performance standards; and

(c) a response from the individual.

3. Has a Safety Committee been established (for locations with fifteen (15) or more employees?

To verify, look for:

(a) charge letters to the individuals, ARS Form 309;

(b) safety meetings held every two months; and

(c) safety inspection checklist.

4. Is funding requested and available for program operations and activities?

To verify, look for:

(a) memos requesting funds for program needs;

(b) amounts listed in ARMPS documents;

(c) official requests (i.e., A-106, HPRL, ARMPS, etc.) to Areas/Headquarters for additional funding; and

(d) HWC quarterly reports when Departmental hazardous waste funding is used.

5. Are safety, health, and environmental rules, codes, and regulations present or available?

To verify, look for:

(a) 29 CFR 1910, 1926, 1928, 1960 standards;

(b) applicable EPA and/or State regulations for:

the Resource Conservation and Recovery Act (RCRA), if hazardous wastes are generated;

the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), if quantities of petroleum products or hazardous substances, or circumstances of releases, would require reporting;

Clean Air Act; Clean Water Act; Federal Insecticide, Fungicide, and Rodenticide Act, others as appropriate;

(c) all ARS/Department Directives and Manuals; and

(d) accessibility of all documents to employees.

6. Is safety/health considered in procurement practices and repair, storage, and salvage operations?

To verify, look for:

(a) evidence that AD-700's for hazardous substance procurement has been reviewed with regard to possible product/process substitution, quantity verification;

(b) proper storage of chemicals/supplies;

(c) evidence that excess chemicals are offered to co-workers prior to disposal as waste; and

(d) asbestos/lead surveys performed prior to renovations principles.

7. Are safety, health, and environment related documentation, record-keeping, and reporting activities being performed?

To verify, look for:

inspection/abatement reports;

reports of unsafe/unhealthful working conditions;

records of occupational injuries and illnesses;

RCRA 3016 inventories;

hazardous waste disposal manifests;

spill notifications/waste site identification reports (CERCLA 103);

Pollution Abatement Project documents (i.e., OMB-A106); and

HWC accounting records.

8. Are safety, health, and environmental permits and approvals being obtained and maintained?

To verify, look for actual permits and compliance records for:

landfills;

hazardous waste disposal (EPA identification number);

underground storage tanks;

operating permits (Clean Air Act);

incinerators;

open burning;

wastewater treatment or disposal systems;

stormwater/wastewater discharge (NPDES);

water supply/monitoring wells; and

asbestos removal.

Component B - Safety, Health, and Environmental Education and Training

1. Does a safety, health, and environmental education/training program exist?

To verify, look for:

(a) education/training related funding amounts listed in ARMPS documents;

(b) documentation of CDSO training;

(c) training records for employees; and

(d) documentation that external agencies (i.e., EPA, OSHA, universities, the State) have been onsite or conducted courses for the location.

2. Are current safety, health, and environmental resource materials maintained?

To verify, look for:

(a) monthly trade magazines, periodicals, etc.

(b) safety, health, and environmental related materials posted on the bulletin boards; and

(c) BNA Environment Reporter or other source materials.

3. Do position descriptions/performance elements have safety, health, and environmental related elements?

To verify, look for:

(a) actual language in the position descriptions/performance elements; and

(b) delegation of authority/role/responsibility papers/letters for:

CDSOs

Safety Committee members

Others.

4. Are safety, health, and environmental orientation sessions conducted for new or transferred employees?

To verify, look for:

(a) a program outline;

(b) documents outlining hazardous areas within the facility, standard operating procedures, accident reporting procedures, and hazard reporting procedures;

(c) employees signatures acknowledging receipt of training;

(d) training records for part-time/summer employees; and

(e) new employees and discuss their orientation.

5. Is an incentive program for improving safety, health, and environmental performance in place?

To verify, look for:

(a) an "awards" program (i.e., cash, certificates, etc.);

(b) letters of appreciation;

(c) safety or environmentally related performance elements; and

(d) an employee's response to the question.

Component C - Safety, Health, and Environmental Services

1. Does an Employee Assistance Program (EAP) exist?

To verify, look for:

(a) funding amounts in ARMPS;

(b) formalized documents outlining the program;

(c) the onsite EAP Coordinator (one is required to be in place);

(d) attendance records; and

(e) an employee's response to the question. (Most locations contract for these services.)

2. Do the Hazard Communication and the Community Right-to-Know Programs exist?

To verify, look for:

(a) plans for implementing the programs;

(b) recent chemical inventories;

(c) material safety data sheets (MSDS');

(d) the availability of MSDS's to employees; and

(e) an employee's response to the question.

3. Is a formalized written facility self-protection plan in place?

To verify, look for:

(a) a written plan outlining emergency procedures (e.g., fire, tornados, releases, etc.);

(b) posted fire/emergency escape routes (on every floor);

(c) fire protection/prevention systems (i.e., alarms, sprinklers);

(d) the program's relationship with local fire departments; and

(e) an employee's response to the question.

4. Does an emergency program exist?

To verify, look for:

(a) emergency care stations (i.e., first aid stations/boxes);

(b) location personnel qualified in first aid (all shifts);

(c) evidence of periodic "emergency disaster drills;" and

(d) an employee's response to the question.

5. Does an Occupational Health Maintenance Program (OHMP) exist?

To verify, look for:

(a) written procedures/policy statement;

(b) attendance records;

(c) the amounts listed in the ARMPS; and

(d) an employee's response to the question. (Most locations contract for these services.)

6. Is there a program for solid and hazardous waste management?

To verify, look for:

(a) policies and procedures;

(b) hazardous waste determination procedures and records;

(c) monthly hazardous waste generation and inspection records;

(d) evidence of proper hazardous waste storage, transportation, and disposal;

(e) waste disposal training program;

(f) solid waste disposal facilities or permits; and

(g) recycling programs for solid waste.

7. Is there a storage tank management program?

To verify, look for:

(a) above-ground and underground storage tank inventory;

(b) leak-detection and monitoring devices/equipment;

(c) corrosion protection, spill prevention, overfill protection;

(d) inventory control (for fuel dispensing facilities);

(e) written filling, operation, and maintenance procedures; and

(f) permits.

Component D - Safety, Health, and Environmental Oversight

1. Has a comprehensive Inspection/Abatement Program been implemented?

To verify, look for:

(a) the frequency of the inspections (one time per year is required);

(b) inspection reports and abatement activity results (by the location/Area/Headquarters);

(c) evidence that the "inspectors" are trained; and

(d) evidence that the identified deficiencies are given to appropriate authorities for corrective action.

2. Are safety, health, and environmental requirements taken into consideration during design/construction of facilities, equipment, and operations?

To verify, look for:

(a) NEPA procedures and documentation;

(b) review comments for design/construction drawings;

(c) review comments for contracts; and

(d) presence of personal protective equipment (PPE) onsite during construction activities.

3. Is applicable personal protective equipment and clothing (PPEC) available and its use mandated?

To verify, look for:

(a) a written program/policy statement;

(b) standard operating procedures regarding when and how to use PPE to perform tasks;

(c) proper orientation (training) on the use and maintenance of PPE;

(d) inclusion in ARMPS; and

(e) an employee's response to the question.

4. Does a sign, label, poster program exist?

To verify, look for:

(a) evidence that all hazardous areas or areas containing hazardous materials (e.g., biosafety, radiation) are clearly marked;

(b) exit/means of egress signs;

(c) areas requiring PPE for chemicals, noise, dusts, mists, gases, vapors;

(d) intact chemical labels on each container providing the chemical identity, hazard warnings, chemical manufacturer; and

(e) required posters in place (OSHA 200 statistics, USDA Occupational Safety and Health poster, FECA poster (CA-10)).

Component E - Safety, Health, and Environmental Evaluation

1. Is the ARS accident/incident investigation and reporting program in place?

To verify, look for:

(a) accident/incident records (CA-1, injury; CA-2, illness);

(b) ARS MANUAL 230.0 procedures for investigating and reporting accidents/incidents;

(c) supervisors trained in accident investigation techniques;

(d) required OSHA accident posting requirements (log of accidents/illnesses);

(e) evidence of corrective action; and

(f) accident/illness frequency and severity rates.

2. Are records of employee exposure to chemical, biological, or hazardous physical agents maintained?

To verify, look for:

(a) chemical, biological, or hazardous physical agents inventories;

(b) written notification of potentially hazardous conditions to employees from management;

(c) availability of MSDS; inventory standards to the employee; and

(d) OHMP results of employee physical.

3. Is an annual program evaluation conducted?

To verify, look for:

(a) annual accident reduction goals prepared by locations/Areas (ARS 230 AVI, B); and

(b) annual inspection plan (ARS 230 AVI, D).

4. Does an Office of Workers Compensation Program (OWCP) exist?

To verify, look for:

(a) Location efforts to compile and analyze OWCP cost data;

(b) written procedures for submitting claims; and

(c) an individual assigned to perform duties.

Exhibit 2

SAMPLE

Part II - Onsite Assistance Review

Focus Program Review Criteria and Verification Statements

for Safety, Health, and Environmental Management Programs

(Revised January 1995)

A. Hazard Communication Program

1. Has an inventory list of chemical and biological agents been completed?

To verify, look for:

(a) Location-wide or Area-wide inventory list of chemical and biological agents;

(b) designation of chemical/biological agents in inventories as hazardous or nonhazardous;

(c) criteria/guidance for designation of chemical/biological agents as hazardous or nonhazardous; and

(d) a coordinator or point of contact for the inventory.

2. Are MSDS files in existence, complete, and accessible to employees?

To verify, look for:

(a) MSDS' available for all hazardous chemical and biological agents in inventory;

(b) request for MSDS' included in procurement of chemical and biological agents;

(c) procedures in place to determine whether MSDS needed for chemical/biological agents synthesized or acquired through non-commercial channels;

(d) MSDS' are organized and readily accessible to employees; and

(e) employees know of existence and location of MSDS'.

3. Are containers of hazardous chemical/biological agents properly labeled?

To verify, look for:

(a) hazardous chemical and biological agents have labels; and

(b) labeling is consistent with hazard criteria and Area or location procedures/guidance.

4. Have employees and supervisors been trained in hazard communication procedures/program?

To verify, look for:

(a) written training program exists;

(b) training includes

-provisions of hazard communication standard

-location/availability of the written program

-methods to detect presence or release of agent

-availability of environmental/medical monitoring

-physical and health hazards of agents used

-personal protective equipment

-emergency procedures

-labeling system and information sources; and

(c) records of employee training, including subjects, dates, and satisfactory completion.

B. Hazardous Chemicals Standard, or Chemical Hygiene Plan

1. Is adequate written chemical hygiene plan (CHP) in existence and available?

To verify, look for:

(a) plan contains sections on standard operating procedures, exposure determinations, fume hoods and other engineering controls, information and training, medical consultation and exams, designation of chemical hygiene officer, incident response, and additional employee protection for particularly hazardous chemicals;

(b) copies of plan are available to supervisors and employees;

(c) supervisors/employees aware of/familiar with CHP contents, their responsibilities; and

(d) a coordinator or point of contact for the CHP.

2. Are employees given information and training on the CHP?

To verify, look for:

(a) procedures/records of training when first assigned, or when duties/procedures changed;

(b) information includes CHP regulation, location and availability of the CHP, permissible exposure limits, signs/symptoms of exposure, location and availability of reference material;

(c) syllabus of training includes methods of detecting releases, physical/health hazards of chemicals, protective measures, personal protective equipment, emergency procedures, and the CHP; and

(d) employees familiar with plan/program.

3. Is workplace monitoring performed according to CHP?

To verify, look for:

(a) employee exposure determinations up-to-date;

(b) criteria to trigger and end incident-specific and periodic monitoring exist; and

(c) employees receive results of monitoring.

4. Are medical consultation/examinations available and performed per the CHP?

To verify, look for:

(a) medical attention available if employees develop signs or symptoms of exposure, if monitoring indicates potential for overexposure, or after spill;

(b) licensed occupational health or preventive health physician performs exams and gives opinions;

(c) physician gets information on chemicals employee may be exposed to, work description, descriptions of signs and symptoms of exposure; and

(d) employees know of services available, rights, and triggers for medical consultation/examinations.

5. Are chemical hazards in the workplace identified/evaluated?

To verify, look for:

(a) chemical containers are labelled with hazards;

(b) provisions for evaluating chemicals developed in laboratory or obtained from noncommercial sources exist and are followed; and

(c) supervisors and employees familiar with/aware of hazards and procedures for identifying or evaluating.

6. Does a respirator program exist?

To verify, look for:

(a) written plan;

(b) selection/maintenance criteria established;

(c) selection/maintenance training provided;

(d) equipment in plan in stock, good condition; and

(e) supervisors and employees familiar with respiratory program.

7. Are records kept in accordance with CHP?

To verify, look for:

(a) monitoring results records;

(b) medical records; and

(c) training records.

C. Community Right-To-Know (CTK) Program

1. Have notifications and MSDS' been provided to State/local emergency planning committees (EPCs), when applicable (40 CFR 355 and 40 CFR 370)?

To verify, look for:

(a) chemical inventory identifies extremely hazardous chemicals present at location in excess of threshold planning quantity and reportable quantity;

(b) up-to-date lists/MSDS' provided to EPCs, if applicable;

(c) coordinator or point of contact for CTK program; and

(d) notifications of releases from (entire) facility (40 CFR 355.40).

2. Have annual submissions (Tier I (March 1) or Tier II (30 days after requested)) been filed, when applicable or requested (40 CFR 370.20)?

To verify, look for:

(a) requests, correspondence, and transmittals; and

(b) coordinator or point of contact for CTK program.

3. Is public access and availability provided for required information?

To verify, look for:

(a) written list of information for public access/availability requests from State/local EPC or fire department; and

(b) procedures/records showing responsiveness to access/availability requests/public use.

D. Hazardous Waste (HW) Generator Standards

1. Do written plans/procedures for HW determination and waste analysis (40 CFR 262.11) exist, and is HW generator classification under both Federal and State regulations documented?

To verify, look for:

(a) written plans/procedures;

(b) records of HW determinations, waste analyses;

(c) documentation of monthly HW generation and generator classification; and

(d) employee familiarity with procedures.

Remainder of questions apply only if hazardous waste is/was generated.

2. Does location have EPA/State HW identification number (40 CFR 262.12)?

To verify, look for:

(a) up-to-date EPA Form 8700-12 and/or State equivalent; and

(b) EPA identification number.

3. Are HW shipments manifested, if required (40 CFR 262, Subpart B)?

To verify, look for:

(a) manifest records; and

(b) manifest records are complete and up-to-date.

4. Are hazardous wastes properly accumulated and stored (time and quantity limits) (40 CFR 262, Subpart C)?

To verify, look for:

(a) written procedures for accumulation of HW, use/management/marking/labeling of containers, handling, and removal/treatment/disposal;

(b) facility meets standards for accumulation, temporary storage;

(c) inspections are performed and records are kept;

(d) personnel involved in HW determination, accumulation, manifesting, inspection, shipment, and record-keeping are formally assigned responsibility and have at least basic training in RCRA requirements;

(e) hazardous waste labels with accumulation start dates, etc., on containers, and containers are properly selected and managed;

(f) no hazardous wastes present for more than 90, 180, or 270 days, as applicable;

(g) records of inspections, training, generation, and accumulation are up-to-date and accurate; and

(h) employees familiar with HW accumulation and temporary storage requirements and location/Area procedures for HW determination and management.

5. Are required records kept (40 CFR 262, Subpart D)?

To verify, look for:

(a) manifest records;

(b) biennial reports, if applicable; and

(c) exception or other reports.

6. Are hazardous waste requirements for exporters or importers of hazardous waste met, if applicable (40 CFR 262, Subparts E and F)?

To verify, look for:

manifests showing non-U.S. destination or origin of hazardous waste.

7. Are preparedness/prevention and emergency/contingency plans, procedures, and equipment in place, to the extent applicable?

To verify, look for:

(a) facility emergency plans;

(b) lists of equipment/supplies; and

(c) availability of equipment/supplies.

8. Is hazardous waste properly transported (off-site), treated, stored, or disposed (i.e. permitted)?

To verify, look for:

(a) transportation and treatment, storage, and disposal parts of location/Area's hazardous waste management plans/procedures; and

(b) consistency between generation and manifest records.;

9. Are there written plans/procedures for minimizing generation and/or recycling of hazardous waste?

To verify, look for:

(a) pollution prevention plans/procedures; and

(b) recycling/recovery/reclamation plans/procedure.