

## OCCUPATIONAL SAFETY & HEALTH AND INDUSTRIAL HYGIENE PROGRAM

### 1.0 Objective

The objective of this performance assessment is to evaluate the effectiveness of the laboratory's occupational safety and health and industrial hygiene program as implemented in the facility. The Facility Representative or Environmental, Safety, and Health Support Specialist will examine policies, procedures and programs that are implemented in the facility. In order to evaluate the effectiveness of implementation, the Facility Representative or Environmental, Safety, and Health Support Specialist will observe work activities, interview personnel, perform walkdowns, and review specific documents.

### 2.0 Definitions

Concern - A determination of a programmatic breakdown or widespread problem supported by one or more findings or observations.

Finding - An individual item which does not meet requirements.

Functional Area - A discrete group of related safety and support programs.

Lines of Inquiry - Questions that guide the assessor in planning and conducting the performance assessment.

Observation - A condition or practice that does not provide or promote effective protection of the health and safety of the public or DOE's workers or the environment.

Performance Assessment - An evaluation of a program or functional area to verify laboratory line management effectiveness in ensuring the health and safety of the public and of DOE's workers and in ensuring protection of the environment.

Performance Attributes - Key elements, functions, or activities to be assessed in a particular functional area.

### 3.0 References

- 3.1 DOE O 231.1, *Environment, Safety, and Health Reporting*
- 3.2 DOE O 440.1A, *Worker Protection Management for DOE Federal and Contractor Employees*
- 3.3 DOE 5480.4, *Environmental Protection, Safety, and Health Protection Standards*
- 3.4 DOE 5484.1, *Environmental Protection, Safety and Health Protection Information Reporting Requirements*

### 3.5 OSHA Title 29 CFR 1910, *Occupational Safety and Health Standards*

#### 4.0 Performance Assessment Activities

The assessor reviews selected program documentation before beginning the assessment. Suggested documents to be reviewed are listed in Appendix A. During the assessment, the assessor evaluates selected performance attributes through the developing and evaluating lines of inquiry for each performance attribute. The performance attributes to be evaluated and suggested lines of inquiry are listed in Appendix B. The assessor evaluates how effectively the facility has met the performance attributes through the review of facility records, interviews of facility personnel, observation of facility activities and walkdowns of the facility. Occupational Safety and Health and Industrial Hygiene Programs encompass a broad range of activities to protect workers. Typically, these broad programs are broken down into specific functional areas in order to more effectively manage and implement the overall occupational safety and health program. The intent of this assessment is not to provide a comprehensive evaluation for every functional area within the broad umbrella of occupational safety and health programs. However, it is equally impossible to evaluate the effectiveness of the overall occupational safety and health program without examining performance in some of the specific functional areas of occupational safety and health. The assessor may more closely examine the implementation and effectiveness of particular aspects of the occupational safety and health and industrial hygiene programs through the use of supplemental performance assessment guides and surveillance guides related to those particular programs.

The emphasis of this assessment is the effectiveness of the laboratory's occupational safety and health programs and industrial hygiene programs as implemented in a specific facility.

In performing the assessment, the assessor must balance review of site-wide programs, facility-specific policies and procedures, and "on-the-ground" implementation. The following questions provide the general framework that should be used in planning, conducting and documenting the assessment:

- Do the laboratory's site-wide occupational safety and health and industrial hygiene programs provide an effective basis for protecting the health and safety of workers at the laboratory?
- Has the laboratory effectively implemented the site-wide programs?
- Are routine activities at the laboratory consistent with the overall program and are they performed so that worker safety and health is protected?

## **APPENDIX A**

### **POSSIBLE DOCUMENTS TO BE REVIEWED**

Site-wide Occupational Safety and Health/Industrial Hygiene (OSH/IH) policies and program documents

- Facility mission/policy statements
- Facility organizational structure
- Facility budget for safety and health programs
- Staffing plans for safety and health programs
- Job descriptions
- Performance standards and performance appraisals
- OSH/IH program plan
- OSH/IH goals and objectives
- OSH/IH duties and responsibilities
- OSH/IH related procedures
- Facility issue management/corrective action process
- Facility injury/illness reporting data
- Occurrence reports
- Non-conformance reports
- Internal and external audit, inspection, and assessment reports

## **APPENDIX B**

### **PERFORMANCE ATTRIBUTES AND LINES OF INQUIRY**

**PERFORMANCE ATTRIBUTE: I.** The laboratory organization and administration ensures effective implementation and control of the occupational safety and health and industrial hygiene programs.

#### **LINES OF INQUIRY:**

1. Are occupational safety and health and industrial hygiene roles and responsibilities well defined, clearly communicated, and understood by all personnel whose activities may impact occupational safety and health and industrial hygiene performance?
2. Are roles, responsibilities, and accountabilities supported by management systems and documentation such as job descriptions, performance standards, and performance appraisals?
3. Are personnel responsible for occupational safety and health and industrial hygiene held accountable for their performance and the performance of those they manage?
4. Do occupational safety and health and industrial hygiene managers have sufficient organizational stature, independence, and authority to effectively implement occupational safety and health programs and to make decisions related to occupational safety and health and industrial hygiene?
5. Do personnel responsible for the direction and operation of occupational safety and health and industrial hygiene programs at the facility have appropriate training and qualifications to implement the established programs?
6. Are interfaces and areas of joint responsibility clearly defined so that the respective organizations understand and fulfill their responsibilities?

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**PERFORMANCE ATTRIBUTE:** II. The laboratory has established an occupational safety and health and industrial hygiene program plan or provides support for the site plan. The facility has established adequate resources to implement occupational safety and health and industrial hygiene responsibilities.

#### **LINES OF INQUIRY:**

1. Does the laboratory budget address the resources needed to support occupational safety and health and industrial hygiene responsibilities?
2. Has the laboratory established long-term and short-term staffing plans to support occupational safety and health and industrial hygiene responsibilities?
3. Does the laboratory staffing level meet the plan and are the staff resources sufficient to meet occupational safety and health and industrial hygiene responsibilities?
4. Are laboratory fiscal resources (hardware and equipment, support funds) sufficient to meet occupational safety and health and industrial hygiene responsibilities?
5. Does the laboratory's budget include funds to correct recognized weaknesses in the safety and health program, and to mitigate or eliminate recognized hazards?

## **APPENDIX B PERFORMANCE ATTRIBUTES AND LINES OF INQUIRY**

**PERFORMANCE ATTRIBUTE:** III. Programs are in place that effectively implement occupational safety and health and industrial hygiene responsibilities and that meet applicable Federal, state, and local occupational safety and health and industrial hygiene laws and regulations and DOE Orders and policy.

### **LINES OF INQUIRY:**

1. Have program plans and procedures been developed and implemented for the following areas?
  - Lockout/Tagout
  - Injury/Illness Recording/Reporting
  - Accident Investigation
  - Employee Concerns
  - Respiratory Protection
  - Hazard Identification/Abatement/Control
  - Hazard Communications
  - Carcinogen Control
  - Confined Space
  - Means of Egress
  - Noise Abatement
  - Electrical Safety
  - Chemical Safety
  - Pressure Safety
  - Laboratory Safety (if applicable)
  - Posting of danger, warning, and safety information signs
  - Hazardous Waste Handling Operations Safety
  - Hazardous Material Emergency Response
  - Materials Handling Safety
  - Hoisting and Rigging
  - Machine Guarding
  - Walking/Working Surface Safety
  - Fall Protection
  - Construction Safety (if applicable)
  - Asbestos Removal and Control

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### **PERFORMANCE ATTRIBUTES AND LINES OF INQUIRY**

**PERFORMANCE ATTRIBUTE:** IV. The laboratory has established and implemented an effective program for identifying and correcting occupational safety and health and industrial hygiene deficiencies and for periodic evaluation of the effectiveness of the occupational safety and health and industrial hygiene programs.

#### **LINES OF INQUIRY:**

1. Do qualified OSH inspectors conduct formal inspections at least annually in all areas and operations of the workplace? Are more frequent inspections made where there is an increased risk of accident, injury, or illness due to the nature of the work performed?
2. Are periodic unannounced inspections and followup inspections conducted?
3. Do employee representatives accompany OSH inspectors during formal inspections?
4. Does the laboratory promptly abate all unsafe and unhealthful working conditions?
5. Is a written notice conspicuously posted at or near each place a hazardous working condition has been identified within 15 days of completion of the inspection?
6. Is an abatement plan developed for the correction of unsafe working conditions that cannot be corrected within 30 calendar days?
7. Does the laboratory have a system for controlling variance requests and do the requests address implementation of acceptable interim protective measures?
8. Is a system in place that permits employees who believe that unsafe working conditions exist to request an inspection by giving notice of the alleged conditions to a designated official?
9. Are management evaluations of the occupational safety and health and industrial hygiene programs conducted at least annually?
10. Has the laboratory established and implemented a formal, comprehensive self-assessment program that includes evaluation of the effectiveness of the occupational safety and health and industrial hygiene programs?

## **PERFORMANCE ATTRIBUTES AND LINES OF INQUIRY**

11. Has the laboratory established and implemented a program to identify, prioritize, and correct occupational safety and health and industrial hygiene deficiencies?
12. Does the process for identifying occupational safety and health and industrial hygiene deficiencies include deficiencies identified through internal and external inspections, assessments, and audits; walkthroughs; management evaluations and program reviews; and employee concerns?
13. Is the prioritization of occupational safety and health and industrial hygiene issues and deficiencies consistent with the prioritized occupational safety and industrial hygiene register or a register which has been reprioritized with adequate justification?
14. Is there an effective process to develop occupational safety and industrial hygiene corrective action plans and to independently validate these corrective action plans?
15. Is there an effective process to track and monitor occupational safety and health and industrial hygiene corrective actions to ensure adequate and timely implementation?
16. Are occupational safety and health and industrial hygiene corrective action plans based on the root cause of the deficiency and are priorities based on the significance of risk associated with the deficiency?
17. Is there an effective process to verify that occupational safety and industrial hygiene corrective action plans were implemented and that the corrective actions resolved the issue?
18. Does the corrective action process have measures which ensure that corrective actions taken remain in force?
19. Does the corrective action process include long-term monitoring to ensure that the corrective actions are effective?

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**PERFORMANCE ATTRIBUTE:** V. The laboratory has established performance goals and objectives for the occupational safety and health and industrial hygiene programs. The facility tracks the status of the goals and objectives and is making progress in achieving the stated goals and objectives.

#### **LINES OF INQUIRY:**

1. Has the laboratory established formal goals and objectives for the occupational safety and health and industrial hygiene programs?
2. Is progress toward the goals tracked and periodically evaluated?
3. Are goals revised as a result of mission changes or other pertinent factors?
4. Has laboratory management communicated their support for the goals and objectives throughout the organization?
5. Do personnel at all levels understand the goals and objectives and the progress toward meeting the goals?

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**PERFORMANCE ATTRIBUTE:** VI. The laboratory has implemented a system for dissemination of occupational safety and health and industrial hygiene program information.

#### **LINES OF INQUIRY:**

1. Are copies of the Occupational Safety and Health Act, current copies of 29 CFR 1904, 1910, and 1926, and details of the site and facility occupational safety and health and industrial hygiene programs made available on request for employees or employee representatives to review?
2. Are copies of the site and laboratory occupational safety and health and industrial hygiene programs made available to each supervisor, each OSH committee member, and to employee representatives?
3. Has the laboratory conspicuously posted in work areas posters informing employees of the provisions of the Occupational Safety and Health Act of 1970, including their rights and responsibilities.
4. Does the laboratory promote employee awareness of occupational safety and health and industrial hygiene matters through employee information programs such as handbooks, newsletters, bulletins, and toolbox safety and information kits?
5. Has the laboratory implemented a system that disseminates occupational safety and health and industrial hygiene lessons learned to all affected employees?

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### **PERFORMANCE ATTRIBUTES AND LINES OF INQUIRY**

**PERFORMANCE ATTRIBUTES:** VII. Laboratory personnel at all levels promote and follow safe work practices.

**LINES OF INQUIRY:**

1. Has laboratory management communicated their support of safe work practices throughout the organization?
2. Have laboratory personnel been trained in and do they use required safety and personal protective equipment?
3. Have laboratory personnel been trained in and do they follow safe work practices?
4. Is employee compliance with safe work practices an integral factor in the employee performance appraisal system?
5. Has the laboratory established and implemented a system to recognize positive contributions to or superior performance in the occupational safety and health and industrial hygiene area?
6. Do employees have the right and are they encouraged to report unsafe working conditions?
7. Does the laboratory have a clearly stated stop work policy? Do the employees understand that policy?

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### **PERFORMANCE ATTRIBUTES AND LINES OF INQUIRY**

**PERFORMANCE ATTRIBUTES:** VIII. Has the laboratory established and implemented a program to train personnel, supervisors and managers on occupational safety and health?

**LINES OF INQUIRY:**

1. Do employees receive general training on workplace safety and on occupational safety and health responsibilities?
2. Do employees receive specialized training on hazards associated with their work and mitigation thereof?
3. Do supervisors receive training on OSH requirements and their responsibilities as supervisors in ensuring safety in the workplace?
4. Do managers receive training on overall programs to protect the health and safety of workers and management thereof?
5. Is a mechanism provided for continuing training of workers, supervisors, and managers?