

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Montana State Office
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Billings, Montana 59107-6800
<http://www.mt.blm.gov/>

In Reply To:

1112 (930.KV) P

June 14, 2004

EMAIL TRANSMISSION – 6/15/04
Information Bulletin No. MT-2004-069

To: Field Manager, Malta Field Office

From: Deputy State Director, Division of Support Services

Subject: CASHE Findings Status Update

DD: 07/16/2004

Washington Office Instruction Memorandum No. 2004-185 (Attachment 1) was issued to all field officials on May 26, 2004. It requests the field to provide an update on the implementation status of recommendations or other corrective actions related to findings from Compliance Assessment – Safety, Health, and the Environment (CASHE) audits.

Included as Attachment 2 are the findings that were identified during the last CASHE inspection at your facility. The list reflects findings that are not complete based on your last status report to the contractor.

This request is for an update of the following information, where applicable: 1) the status of corrective action for each finding; 2) the point(s) of contact (full names of individuals, not a program, committee, office, or building owner); and 3) facility name changes.

It is imperative that you use the following descriptives to ensure that you are credited for correcting the CASHE deficiencies. Findings are not considered complete unless completion is explicitly stated by the respondent. Listed below are examples of acceptable terms to be used when you describe the status of your incomplete findings:

- unscheduled
- completed in (date if available)
- implemented in (date if available)
- scheduled for completion by (date)
- funding requested; anticipate completion by (scheduled date of completion)
- preliminary planning; anticipate completion by (scheduled date of completion)
- under design; anticipate completion by (scheduled date of completion)
- under construction; anticipate completion by (scheduled date of completion)
- N/A (e.g., if no longer relevant because a facility no longer exists).

(Note: If a finding is no longer relevant, please explain why.)

For those who respond electronically, do not rename or convert the files to a different software as file integrity is critical to the contractor's ability to track the data. If you prefer not to respond electronically, you should print the documents and update them by hand.

You are asked to send the completed table to Karilynn Volk, MT-930, as soon as possible, but no later than **Friday, July 16, 2004**. A consolidated response will be sent to the contractor by July 30, 2004.

Offices with incomplete CASHE findings are to continue to submit quarterly status update reports in accordance with Instruction Memorandum No. MT-2004-018.

If you have questions, please contact Karilynn Volk, at 406-896-5190, or Lisa Engelmann, at 406-896-5193.

Signed by: Sandra L. Guches

Authenticated by: Aleta Zahorodny (MT-930)

2 Attachments

- 1-WO IM 2004-185 (3 pp in its entirety)
- 2-Malta Field Office CASHE Findings (4 pp)

cc:

(MT-090), Jody Miller, CDSO
(MT-092), John Fahlgren, Assistant FM, Glasgow Field Station
(MT-065), Kym Sigler, AO

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

May 26, 2004

In Reply Refer To:
1112, 1703 (360) P
Ref. IM No. 2003-167

EMS TRANSMISSION 06/04/2003
Instruction Memorandum No. 2004-185
Expires: 09/30/2005

To: All Field Officials

From: Assistant Director, Minerals, Realty, and Resource Protection

Subject: Facility Compliance Management and Tracking of CASHE Findings

DD: 07/31/2004

Program Areas: Facility Compliance and Safety.

Purpose: This Instruction Memorandum (IM) asks the Field to provide an update on the implementation status of recommendations or other corrective actions related to findings from Compliance Assessment - Safety, Health, and the Environment (CASHE) audits. This information will be used to identify projects for funding from infrastructure improvements money designated in Fiscal Year (FY) 2005 for CASHE corrective actions. In addition, the Bureau of Land Management (BLM) will make use of this data to:

- manage and minimize risk related to facility compliance, and
- identify future funding, policy, and training needs.

Accurate information about facility compliance is necessary for BLM to achieve its strategic planning goal to "Improve Public Safety and Security and Protect Public Resources from Damage."

Background: In FY 2003, 72 percent of BLM's organizational units were rated in good safety, health, and environmental condition. This performance was based on information received in response to Washington Office IM No. 2003-167, which asked the Field to update the status of unresolved CASHE findings. For the FY 2004 Annual Performance Report, organizational units will be considered in good condition if they have one or less incomplete corrective action related to a high priority CASHE finding. The good condition standard will be zero incomplete high priority findings in FY 2005 and subsequent Fiscal Years.

ATTACHMENT 1

The performance measurement data specification that defines high priority CASHE findings and describes how the data will be used is located at: <http://web.wo.blm.gov/ms1/>. The performance goal for FY 2004 is 74 percent of BLM organizational units be in good safety, health, and environmental condition.

Policy/Action: *Updating Status of CASHE Recommendations/Corrective Actions:*

Organizational units (i.e., Washington Office, State and Field Offices, National Centers) that have had a CASHE audit between October 1993 and February 27, 2004 are asked to update the status of recommendations/corrective actions. This data is to be reported on the spreadsheet that was transmitted separately to every Field Office safety officer and HAZMAT coordinator by their State Office Safety Manager or HAZMAT Program Lead. The spreadsheets and instructions for updating them will be transmitted to each State Office Safety Manager and HAZMAT Program Lead by May 17, 2004 via email. In addition, comments on the status of CASHE findings from draft CASHE reports for audits completed through June 24, 2004, will be incorporated into the status update database.

Implementation of CASHE Recommendations/Corrective Actions: Consistent with available budget resources and other programmatic concerns, organizational units are to implement CASHE recommendations/corrective actions and/or request funding for implementation within one year of the audit. Please note: the instructions for completion of the FY 2004 CASHE Status Update clarify that CASHE corrective actions having Hazard Abatement Plans in place that are prepared and approved in accordance with BLM Manual Handbook 1112-1, Safety and Health Management are considered complete provided funding for their implementation has been formally programmed for completion within two years.

Timeframe: Please return the updated spreadsheets by July 31, 2004. The due date for the status update is earlier than last year's because the Department is requiring that BLM provide its FY 2004 Annual Performance Report data earlier (i.e., first week of October 2004).

Please note: Organizational units that do not respond by July 31, 2004, will:

- have their corrective actions shown as incomplete,
- negatively affect the FY 2004 performance for the CASHE Performance Measure, and
- be ineligible for deferred maintenance funding for CASHE corrective actions.

Budget Impact: None.

Manual/Handbook Sections Affected: None.

Coordination: National Safety Office (WO-740).

Contacts: Ken Morin, Protection and Response Group (WO-360), 303-236-6418; Phyllis McKoy, Occupational Safety and Health (WO-740), 202-501-2788.

Signed by:
Bob Anderson
Acting Assistant Director
Minerals, Realty, and Resource Protection

Authenticated by:
Barbara J. Brown
Policy & Records Group, WO-560

Montana

Organizational Unit: Malta Field Office
Assessed Facility: Malta Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
FIRE-02-002	Not all fire extinguishers are properly mounted or signed throughout Malta and Glasgow.	07/18/2003	No	N/A	3	A) Post signs identifying the location of the fire extinguishers in the Glasgow warehouse; B) Remove the fire extinguisher sign in the YACC warehouse; C) Relocate the mops so they do not block the fire extinguisher in the furnace room; and D) Educate employees on the importance of not blocking fire extinguishers.	Jody Miller	No scheduled completion date for Glasgow. Completed for the Malta Field Office.	
HMTRAN-02-001	Propane cylinders requiring hydrostatic testing are stored at Glasgow Field Station.	07/18/2003	No	Class IB	N/A	A) When the cylinders require refilling, exchange them for new cylinders that are fitted with OPDs; B) Educate personnel on the need for periodic requalification of the cylinders; and C) Establish procedures to ensure that cylinders stay current with the hydrostatic testing requirements (e.g., arrange for retesting when required or exchange cylinders that are due).	Jody Miller	Scheduled for completion by September 30, 2003. Propane cylinders are being used until empty.	

Montana

Organizational Unit: Malta Field Office
Assessed Facility: Malta Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
HWGEN-02-001	Waste determinations have not been performed on sediment collected from grit traps prior to disposal.	07/18/2003	Yes	Class IB	N/A	A) Research whether the Glasgow Field Station building lease requires the owner to maintain the warehouse grit trap and properly dispose of the sediment; B) If the building lease requires the owner to maintain the warehouse grit trap, request the owner to create a maintenance schedule for the grit trap and ensure that maintenance is performed according to the schedule; or C) If the building lease does not require the owner to maintain the washrack, revise the lease to include this requirement; or D) Contract for cleaning, testing, and proper disposal of the grit; E) Test the sediment at Malta for total metals to determine if the sediment is a hazardous waste or if it will fail Montana TPH standards; and F) Dispose of sediment as either solid waste, hazardous waste, or as appropriate, based on the results of the required waste determination.	Jody Miller	Complete at Glasgow. Malta waiting for results of discussions with City Sanitarian, John Demaris.	
PCB-02-001	The light ballast in an out of service fluorescent lamp fixture in the Malta land-use warehouse contains PCBs.	07/18/2003	No	Class IB	N/A	A) Contract with an engineering firm to survey all Field Office buildings to conduct a lighting survey as follows: 1) determine how many PCB ballasts must be removed and disposed properly, 2) measure the existing illumination levels, and 3) specify the types of electronic ballast lighting fixtures using T-8 lamps that should be installed to obtain the optimal brightness levels; and B) Replace the PCB ballasts with new energy-efficient ballasts that use T-8 lamps. [Note: Contact the Miles City Field Office for information, costs, and benefits from their relamping effort.]	Rich Adams	In preliminary planning. Scheduled for completion by October 31, 2003.	

Montana

Organizational Unit: Malta Field Office
Assessed Facility: Malta Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
PW-02-001	The potable water well is located 60 feet from the Glasgow Field Station's septic system leach field.	07/18/2003	No	Class IB	N/A	Instruct the building owner to connect the Field Station to the City water supply.	Jody Miller	Scheduled for completion when connected to City water in January 2004.	
PW-02-002	The drinking water system at the Glasgow Field Station is not monitored for contaminants.	07/18/2003	No	Class IB	N/A	A) Instruct the building owner to connect the Field Station to the City water supply; and B) Request that the water system be monitored at least quarterly for bacteriological contaminants until the connection to the City water system is completed.	Jody Miller	Scheduled for completion by January 2004. The building owner is working with the City to connect to City water; however, sampling subsequent to connecting to City was not addressed.	
THS-02-001	The Hazard Communication (HAZCOM) Plan developed for Malta and Glasgow does not contain all required information.	07/18/2003	No	N/A	4	A) Modify the plan to include all required information; and B) Review the plan annually to ensure it stays current with operations.	Jody Miller	Scheduled for completion by January 31, 2004.	

Montana

Organizational Unit: Malta Field Office
Assessed Facility: Malta Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
THS-02-003	Material Safety Data Sheets (MSDSs) are not available for all hazardous materials used or stored at Malta or Glasgow.	07/18/2003	Yes	N/A	4	A) Inventory all hazardous materials (be sure to include often-forgotten hazardous materials such as concrete mix and welding rods); B) Obtain MSDSs for all hazardous materials used and stored at each facility; C) Organize MSDSs applicable for each work area and place them in the binder to ensure that they are available to employees in their workplace [Note: Place MSDSs for products that are no longer used in a separate binder that can be maintained for 30 years.]; D) Instruct credit card holders that they should request MSDSs from retailers when purchasing a hazardous material; and E) Assign supervisors the responsibility for maintaining the hazardous material inventories and MSDSs at each facility.	Jody Miller	Scheduled for completion by September 30, 2003.	
WW-02-001	The washrack at the Malta Field Office may constitute an unpermitted discharge to the City sanitary sewer.	07/18/2003	No	Class IB	N/A	A) Contact the City Sanitarian, Mr. John Demarais (406-654-1676) and arrange for an inspection and permitting of the washrack; B) Implement any additional pretreatment requirements as recommended by the City Sanitarian; and C) Document all conversations with the City sanitarian.	Not provided. This finding was added to the final report after POCs were provided for draft report findings.	Not provided. This finding was added to the final report after status was provided on draft report findings.	