

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Montana State Office
5001 Southgate Drive, P.O. Box 36800
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-2004-071

To: Field Manager, Miles City 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-Miles City Field Office CASHE Findings (1 p)

cc:

(MT-020), Donna Bradley, CDSO
(MT-020), Bea Knudson, CDSO
(MT-020), Dex Hight, Hazardous Material Coordinator
(MT-024), Linda Reder, 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: Miles City Field Office
Assessed Facility: Fort Howes Fire Station

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
SPCC-01-001	A Spill Prevention, Control, and Countermeasures (SPCC) Plan has not been prepared and implemented for Fort Howes.	11/12/2001	N/A	Class IC	N/A	Request the Forest Service to do the following: A) Prepare and implement an SPCC Plan; and B) Provide required spill response equipment; and C) Provide training on the plan.	Robert LaPlant, Dex Hight	BLM installed tanks for their use and will not be using USFS tanks. An SPCC plan is scheduled for completion by September 30, 2003. No status of corrective action regarding Forest Service plan or spill response.	
SPCC-01-002	The aboveground storage tanks (AST) located at Fort Howes are not equipped with all of the required spill prevention and safety features.	11/12/2001	N/A	Class IB	N/A	Request the Forest Service to do the following: A) Install a whistling vent alarm; B) Contact the Fire Marshall to provide written approval of the tanks as they are currently equipped (i.e., without the high-level alarm or positive shutoff valve); and C) If the Fire Marshall will not provide a written permit for the tanks as they are currently equipped, install the required devices.	Robert LaPlant	BLM installed tanks for their use and the tanks are in compliance. No status of corrective action regarding Forest Service plan or spill response.	