

U.S. Department of the Interior



National Business Center

Government Shared Service Provider

Tenant User Group Meeting
March 1, 2007
10:00 am, South Penthouse
Environmental, Safety and
Health Audit for the Main
and South Interior
Buildings

AGENDA

- **Introduction**
- **Purpose and Objectives**
- **Background**
- **Chronology of Events**
- **Overview of Audit Process**
- **Draft Findings, Corrective Actions,
and Proper Perspectives**
- **Communication and Follow-up**
- **Questions?**





Chronology of Events

- ▶ Funding received in FY06 to perform audits.
- ▶ NBC entered into an agreement with BLM in FY06.
- ▶ Audits scheduled in FY07 for Denver, CO.; Interior Complex, D.C.; and Anchorage, AK.
- ▶ Employees notified of audits at Administrative Contact Meeting (November 16, 2006), TUG Meeting (December 7, 2006), and via LAN Message (January 12, 2007).



Chronology of Events cont.

- ▶ Audit performed during the week of January 22-26, 2007.
- ▶ Out briefing completed on January 26, 2007.
- ▶ Facilities Management staff met on January 30, 2007 to discuss/develop strategy to address findings.
- ▶ Formed a Corrective Action Team and conducted first meeting on February 7, 2007.



Chronology of Events cont.

- ▶ Media and PEER reports on findings occurred on February 21, 2007.
- ▶ Second meeting of Corrective Action Team on February 27, 2007
- ▶ Response to Draft Report due April 2, 2007 following BLM standard schedule for Environmental Audits.
- ▶ BLM finalizes report 30 days after reviewing comments and corrective actions.
- ▶ Final Report will be made available.



CASHE DRAFT REPORT

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Safety Finding Classification

- Safety findings are each assigned a Risk Assessment Code (RAC) based on the BLM Manual Handbook 1112-1 - Safety and Health Management.

			Frequent	Likely	Occasional	Seldom	Unlikely
			A	B	C	D	E
SEVERITY	Catastrophic	I	RAC 1				RAC 3
	Critical	II				RAC 3	
	Marginal	III	RAC 3	RAC 3			
	Negligible	IV	RAC 3				

Severity	Effect
I. Catastrophic	Death or permanent disability, system loss, major property damage.
II. Critical	Permanent partial disability, temporary total disability in excess of 3 months, major system damage, significant property damage.
III. Marginal	Minor injury, lost workday accident, compensable injury/illness, minor system damage, minor property damage.
IV. Negligible	First aid or minor medical treatment, minor system damage.



CASHE DRAFT REPORT cont.

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Hazard Probability [Note: Experience and exposure affect probability of occurrence]	
A. Frequent Individual employee or item All employees or items	Occurs often in career/equipment service life Continuously experienced
B. Likely Individual employee or item All employees or items	Occurs several times in career/equipment service life Occurs frequently
C. Occasional Individual employee or item All employees or items	Occurs sometimes in career/equipment service life Occurs sporadically or expected several times in service life
D. Seldom Individual employee or item All employees or items	Possibility of occurrence in career/equipment service life Occurrence remote or expected sometime in service life
E. Unlikely Individual employee or item All employees or items	Assumed will not occur in career/equipment service life Occurrence possible, not probable; expected rarely
Positive – This classification is for proactive actions that exceed regulatory requirements. This classification may also be used to identify practices that are required, but are unusual among DOI facilities.	



CASHE DRAFT REPORT cont.

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Categories of Findings

Each of the findings in this document has been categorized according to the system described below. Safety and environmental findings are classified differently, as described below. These categories will be maintained throughout the CASHE reporting process. Tables summarizing the number of findings for the assessed facilities follow the definition of classifications.

Environmental Finding Classification

Environmental findings are each assigned a class, based on applicable regulations, as follows:

Class I: Out of Compliance - This classification is for direct violations of a Federal, State, or local regulation; a signed Federal Facility Compliance Agreement; an inspection report or Notice of Violation (NOV) issued by a regulatory authority; or Executive Orders.

Class IA: Significant: Requires immediate attention. Significant deficiencies pose, or have a high likelihood to pose, a direct and immediate threat to the environment.

Class IB: Major: Requires action, but not necessarily immediate action. Major deficiencies may pose a direct threat to human health, safety, the environment.

Class 1C: Minor: Administrative in nature, even though they may result in a notice of violation. Class 1C findings may also include temporary or occasional instances of non-compliance.

Class II: To be Out of Compliance - This classification is for actions needed for facilities to meet established or proposed standards with a compliance deadline in the immediate or near future.

Class III: Best Management Practice - This classification is for actions that are not in violation of any current or pending regulatory requirement, but pose a threat to the environment or the health and safety of personnel. These actions should be corrected to prevent future noncompliance, to reduce the threat of environmental contamination or health/safety problems, and to demonstrate DOI's leadership in protection of personnel and the environment.

Positive - This classification is for proactive actions that exceed regulatory requirements. This classification may also be used to identify practices that are required, but are unusual among DOI facilities.



NBC DFMS

Corrective Action Tracking Template

- ▶ Finding #
- ▶ Office Responsible
- ▶ RAC/Class
- ▶ Finding Description
- ▶ Individual Responsible
- ▶ Specific Finding
- ▶ Report Recommended Action
- ▶ Action Taken
- ▶ Status
- ▶ Target Completion Date
- ▶ Actual Completion Date
- ▶ Estimated Cost
- ▶ Actual Cost
- ▶ Future Budget Costs



Proper Perspectives

- ▶ Mercury
- ▶ PCB
- ▶ Friable asbestos
- ▶ Fluorescent lamps
- ▶ Electrical Grounding
- ▶ 25 one-gallon plastic containers filled with gasoline
- ▶ Paint Storage
- ▶ Sprinkler system maintenance



Additional Corrective Actions

- ▶ Assigned Building Manager to focus solely on Environmental, Safety, and Health issues in the Interior Complex.
- ▶ Awarded a contract through GSA for the identification (as necessary), recycling, and proper removal of waste materials.
- ▶ Conduct general and management HAZMAT training
- ▶ Develop policy and procedures, as needed.
- ▶ Implementing an Environmental Management System for NBC.
- ▶ Distribute memo to Bureau/Office Admin contacts to address general issues in office space.