

Defense Logistics Agency INSTRUCTION

DLAI 6055.01 Effective December 9, 2014

DS-O

SUBJECT: Occupational Safety and Health Program

References: Refer to Enclosure 1.

- 1. <u>PURPOSE</u>. This Instruction supersedes Reference (a) and establishes policy, assigns responsibilities, and provides procedures for development of a Defense Logistics Agency's (DLA's) Occupational Safety and Health (OSH) Program. The OSH Program includes, but is not limited to, the following specialty areas: Occupational Safety, Safety Engineering, Industrial Hygiene, Occupational Health, Radiation Safety, OSH Training, and Occupational Safety and Health Administration (OSHA) Injury and Illness Recordkeeping.
- 2. <u>APPLICABILITY</u>. This Instruction applies to all DLA activities and to all DLA bargaining and non-bargaining unit employees. If there is an applicable collective bargaining agreement and its provisions are in conflict with those of this Instruction, the provisions of the agreement prevail over the relevant provisions of this Instruction. In addition, these provisions consider limitations on the applicability of title 29 United States Code § 651 (Reference (b)), Executive Order 12196 (Reference (c)), and 29 Code of Federal Regulations Part 1960 (Reference (d)) to the Department of Defense (DOD). These limitations include certain exemptions or exceptions from Department of Labor oversight of military personnel, military-unique operations and workplaces, specific conditions governed by the statutory authorities, and, in certain overseas areas, conditions governed by international agreements.
- 3. <u>DEFINITIONS</u>. See Glossary
- 4. POLICY. It is DLA policy that:

- a. All activities follow OSH standards and strive to comply with applicable industry standards and best practices.
- b. A single, comprehensive OSH Program covering all co-located activities is implemented for each Continental United States (CONUS) geographic location (i.e., OSHA establishment) and for each Outside the Continental United States (OCONUS) region after coordinating with applicable Primary Level Field Activity (PLFA) Commanders or Directors.
- c. The Senior DLA Commander or Director at a CONUS geographic location and the Regional Commander of an OCONUS serve as the OSH lead.
- d. An OSH Management System is implemented to increase program effectiveness at each CONUS geographic location and each OCONUS region.
- 5. RESPONSIBILITIES. See Enclosure 2.
- 6. PROCEDURES. See Enclosure 3.

7. INFORMATION REQUIREMENTS.

- a. Annual self-assessment of the local DLA OSH Program and OCONUS Regional Program provided to DS-O by the last workday in March of each calendar year.
 - b. Monthly reports on alternate standard controls (if applicable) provided to DS-O.
- c. Annual inspection schedule submitted to DS-O on the last business day of January including quarterly updates to the annual inspection after that.
- d. DLA Form 1591, "Supervisory Mishap Report" is used to report mishaps only when Enterprise Safety Application Management System (ESAMS) is not available.
- e. All hazards or unsafe/unhealthful incidents reported verbally, in ESAMS, or on DLA Form 1404, "Near Miss/Hazard Report."
- f. OSHA Form 300A, "Summary of Work-Related Injuries and Illnesses" is required to be posted for each DLA geographic location (establishment) in each DLA workplace annually from February 1 through April 30. This form is generated from ESAMS.
 - g. DLA Form 7001, "Job Hazard Analysis" documents hazards associated with a task.

Note: Electronic versions of DLA Forms are available on the DLA Forms Management Program Web Site at http://www.dla.mil/officialforms/Pages/default.aspx.

- 8. <u>INTERNAL CONTROLS</u>. DS-O will monitor compliance with this Instruction through annual OSH Program Evaluations, annual review of OSH Program Self-Assessments, quarterly reviews of Annual OSH Inspection Schedules, and monthly reports of alternate standard controls.
- 9. <u>RELEASEABILITY</u>. UNLIMITED. This Instruction is approved for public release and is available on the Internet from the DLA Issuances Internet Website.
- 10. <u>EFFECTIVE DATE.</u> This Instruction:
 - a. Is effective on December 9, 2014.
- b. Must be reissued, cancelled, or certified current within 5 years of its publication in accordance with DLAI 5025.01, DLA Issuance Program. If not, it will expire effective December 9, 2024 and be removed from the DLA Issuances Website.

PHYLLISA S. GOLDENBERG Director, DLA Strategic Plans and Policy

Enclosure(s)

Enclosure 1 – References

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Glossary

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ENCLOSURE 1

REFERENCES

- (a) Safety One Book Chapter, June 25, 2007 (hereby cancelled)
- (b) Section 651 of Title 29 United States Code
- (c) Executive Order 12196, Occupational Safety and Health Programs for Federal Employees
- (d) 1960 of Title 29, Code of Federal Regulations
- (e) 1910 of Title 29, Code of Federal Regulations
- (f) 1904 of Title 29, Code of Federal Regulations
- (g) DOD Instruction 6055.01, "Safety and Occupational Health Program," October 14, 2014
- (h) DOD Instruction 6055.04, "DOD Traffic Safety Program," January 23, 2013
- (i) DLA Instruction 6055.08, "Enterprise Safety Applications Management System (ESAMS)," September 23, 2014
- (j) DLA Instruction 6055.07, "Mishap and Near Miss Reporting and Investigation," August 18, 2014
- (k) DLA Instruction 4113, "Radiation Safety," June 11, 2009
- (l) DLA Instruction 7207, "Injury Compensation," January 4, 2012
- (m) DTM 13-018, Process for Review of High Priority Hazards, November 22, 2013 (hereby cancelled)
- (n) DTM 20120416, Forklift Backrest Safety Policy, April 16, 2012 (hereby cancelled)
- (o) DTM 2011181, Alternate Standards for Occupational Safety and Health Administration Standards, June 30, 2011 (hereby cancelled)

ENCLOSURE 2

RESPONSIBILITIES

- 1. <u>DLA DIRECTOR (DLA D)</u>. Appoint the Vice Director or Chief of Staff to serve as the Designated Agency Safety and Health Official (DASHO) to provide oversight and guidance for the Agency's OSH Program.
- 2. <u>DESIGNATED AGENCY SAFETY AND HEALTH OFFICIAL (DASHO)</u> must:
 - a. Provide executive-level oversight and guidance for the OSH Program.
 - b. Report the status of the OSH Program annually through the DOD to OSHA.
 - c. Report status of the OSH Program in the annual OSH in progress review (IPR) to DOD.
 - d. Approve exceptions to policy policy described in paragraph 4.
 - e. Review alternate standard requests and forward the requests for approval to DOD.
- f. Approve Voluntary Protection Program (VPP) applications prior to the application being forwarded to OSHA.
- 3. <u>DIRECTOR, DLA INSTALLATION SUPPORT (DS-D)</u>. Under the authority, direction, and control of the Director, DLA, must:
 - a. Oversee the implementation of this Instruction.
 - b. Update DLA Senior Leaders on the OSH Program and reported hazards.
- c. Execute Sustainment, Restoration, and Modernization and Military Contruction requirements as necessary to abate identified hazards.
- 4. <u>STAFF DIRECTOR, OCCUPATIONAL SAFETY and HEALTH (DS-O)</u>. Under the authority, direction, and control of the Director, DS, must:
 - a. Develop Agency OSH policy and guidance.
- b. Serve as the Agency Substance Matter Expert on OSH activities and oversee DLA safety and health programs.
 - c. Develop guidance for the DLA OSH Management System.
 - d. Serve as the Agency VPP Manager.

- e. Conduct annual OSH Program evaluations at ten percent of DLA establishments and OCONUS regions.
 - f. Interface with DOD and OSHA on Agency-specific OSH issues.
 - g. Develop annual OSH report for DOD to submit to OSHA.
 - h. Develop annual OSH In Progress Review for DOD.
- i. Coordinate with Human Resources (J-1) to identify and address Agency OSH training requirements.
- j. Serve as program manager for ESAMS to ensure DLA satisfies the OSHA recordkeeping and reporting requirements of Reference (f).

5. PLFA COMMANDERS AND DIRECTORS AND J/D CODE DIRECTORS must:

- a. Establish site-specific written OSH programs that implement the policies, requirements and procedures of this instruction covering all co-located DLA activities at a CONUS geographic location or an OCONUS region.
 - b. Develop additional procedures as appropriate for a site-specific program.
- c. Plan, program, and budget adequate resources to implement the OSH Program and correct hazards on a prioritized basis. Provide OSH staffing of sufficent quantities and technical competencies to satisfy requirements of this instruction and Reference (g).
 - d. Ensure supervisors and employees receive OSH training.
- e. Report and track to closure all mishaps, near misses, unsafe/unhealthful reports, and hazards in DLA's Enterprise Safety Application Management System (ESAMS) following the procedures identified in Reference (i) and (j).
- f. Establish a process for senior managers to conduct and document safety walk-throughs of their work areas covering the entire work area during a calendar year.
 - g. Publish annual OSH Program goals based on weak program areas.
- h. Conduct personal protective equipment (PPE) assessment and provide PPE at no cost to the employee.
 - i. Ensure safe work practices are followed at all times.
- j. Ensure OSH staff (e.g., 0018, 0019, 0690, 0803 or 1306 series) schedule and conduct annual inspections of all DLA workspaces.

- k. Assign additional OSH responsibilities as necessary.
- 6. OSH STAFF (0018, 0019, 0690, 0803, and 1306 series) must:
- a. Conduct a comprehensive, initial baseline OSH inspection (i.e., safety, ergonomic, and industrial hygiene) to identify potential workplace hazards.
- b. Identify site-specific hazard control procedures that must be included in the written OSH Program.
- c. Secure assistance of an industrial hygienist to complete the industrial hygiene portion of the site-specific hazard control procedures.
 - d. Update baselines as workplace conditions and processes change.
- e. Develop an annual OSH Inspection Schedule to cover all DLA work areas and update quarterly.
 - (1) Provide annual OSH inspection schedule by the last business day in January to DS-O
 - (2) Provide quarterly updates of inspection schedule to DS-O.
- f. Input OSH inspection findings from all inspections conducted by DLA or the Military Service host into ESAMS for tracking and resolution.
- g. Conduct annual OSH inspections of all DLA workspaces and operations using the OSH Inspection Checklist (located on DS-O eWorkplace page) and attach to the checklist in ESAMS.
- h. Follow guidance in DLA Master Labor Agreement to invite local union representative to participate in inspections.
- i. Refer issues beyond their capability or area of expertise through their assigned DLA activity chain of command to DS-O.
- j. Conduct PPE assessments and work with an Industrial Hygienist to determine specific PPE requirements based on hazards associated with tasks performed by all DLA employees on site.
- k. Guide and oversee subordinate activities on implementation of the local OSH Program and OSH Management System.
- 1. Establish a written schedule and track completion of supervisor and employee monthly self-inspections of their work area ensuring the entire work area is covered quarterly.
- m. Coordinate all OSH-related support contracts and OSH-related language in ISSAs or MOUs through their assigned chain of command to DS-O.

- n. Assist Occupational Health and Industrial Hygiene service providers in planning delivery of Occupational Health and Industrial Hygiene services to DLA employees.
- o. Coordinate through the assigned chain of command to request support from DS-O when the Military Service host is unable to support industrial hygiene requests or when industrial hygiene support is not available on site.
- p. Coordinate with DS-O prior to posting any OSH-related job announcement. DS-O will review the position description to ensure it is standardized, appropriate, and current.
- q. Coordinate with DS-O to ensure an OSH subject matter expert is include in the application review and interview process for OSH staff positions.
- r. Coordinate with the Military Service host to include smaller DLA locations (less than 50 DLA employees) in the host's OSH Council, in lieu of a DLA council.
- s. Maintain and review OSHA 300 Log of Injury and Illnesses in ESAMS and validate that information is accurate.
 - t. Assign a RAC in accordance with Reference (g) for all identified hazards.
 - u. Maintain a prioritized abatement log for all hazards open greater than 30 days.
- v. Assist supervisors and employees in developing job hazard analyses (JHAs) for operations.
- w. Conduct and document an annual review of written OSH Programs to ensure programs are adequate. Update programs as required.

7. DLA SUPERVISORS must:

- a. Furnish employees with a place of employment, which is free from recognized hazards.
- b. Coordinate with designated OSH staff to determine required PPE. Provide required PPE to employees.
 - c. Work with employees to develop JHAs for all work areas and operations.
- d. Priorize development of JHAs, starting with those operations with the greatest operational risk or a history of mishaps.
- e. Report mishaps in ESAMS within one workday of being informed of the incident. The DLA Form 1591 will only be used when internet or computer access is unavailable.

- f. Maintain, use, and store safety equipment in accordance with federal, DOD, DLA, and Host Nation (where applicable) regulations and manufacturer's recommendations.
- g. Ensure equipment maintenance, modifications, and attachments are in accordance with OSH guidance and manufacturer's instructions.
 - h. Ensure assigned employees complete required OSH training.
- i. Post notices of unsafe or unhealthful working conditions for RAC 1-3 hazards for a minimum of three days or until the hazard is corrected, whichever is longer.
- j. Respond to deficiency notices and corrective action request in ESAMS. Enter weekly status updates for all open deficiencies in ESAMS.
- k. Brief employees on open hazards, interim controls, and actions being taken to correct the hazard. Continue to update employees on status until the deficiency is resolved.
 - 1. Brief employees on OSH inspection and Industrial Hygiene survey results.
 - m. Complete required OSH training.
- n. Include a safety-related topic at least monthly in employee meetings for administrative areas and weekly for industrial areas.
 - o. Comply with and enforce all OSH rules and regulations.
- p. Conduct monthly self-inspections covering all oftheir assigned assigned work areas quarterly.

8. DLA EMPLOYEES.

- a. Follow safety and health procedures, practices, and all JHAs.
- b. Report all work-related injuries, illnesses, or property damage to supervisor promptly.
- c. Follow guidance in Reference (1) for procedures on filing a work injury claim.
- d. Report all hazards or unsafe/unhealthful incidents promptly.
- e. Assist in developing JHAs for their specific work operations.
- f. Complete required safety and health training conducted by the local OSH office or through LMS.

ENCLOSURE 3

PROCEDURES

1. EXERCISE OF RIGHTS OF DLA EMPLOYEES AND THEIR REPRESENTATIVE(S).

- a. Participate in the OSH Program. Employees are authorized official duty time to participate in the OSH Program.
- b. Have access to copies of applicable OSHA, DOD, or DLA standards, DLA safety and health policies and procedures, and mishap, injury and illness statistics for their location and the Agency.
- c. Report unsafe and unhealthful working conditions to their supervisor or the OSH Staff using email, verbal communication, DLA Form 1404, or ESAMS unsafe/unhealthful report. Reports using the DLA Form 1404 and ESAMS may be made anonymously.
- d. If dissatisfied with the assessment of the alleged hazard or the actions taken to abate the confirmed hazard, discuss further with the designated OSH Staff.
- e. If at any point in the assessment or correction phase the employee remains dissatisfied with the decision regarding the condition, raise his/her concern through the chain of command to the activity Commander/Director, PLFA Commander/Director, or DASHO. If the issue is not resolved to the employee's satisfaction, the employee has the right to file a complaint with OSHA.
- f. Be free of fear of reprisal, interference, coercion, or discrimination for exercising any of their rights under the DLA OSH Program.
- g. Receive the necessary safety training to enable the employee to actively participate in the OSH Management System.
 - h. Comment on alternate standards proposed by DLA organizations.

2. MANAGEMENT OF HAZARDS.

- a. DLA supervisors
- (1) Work to correct all RAC 1, RAC 2, RAC 3, RAC 4, and RAC 5 hazards within 10, 30, 90, 120, and 180 days, respectively.
- (2) Establish effective interim controls for all workplace/operational hazards that are not immediately and permanently corrected to lessen the severity and/or probability of injury. Keep the interim control in place until the hazard is corrected

(3) Brief employees on the hazard, the interim control, and the corrective actions that are being taken through completion or correction of hazards.

b. OSH Staff

- (1) Assign the RAC for identified hazards in accordance with Reference (g).
- (a) Assigned RACs will not be lowered due to the implementation of an interim control.
- (b) The RAC will remain the same unless initial evaluation is found to be incorrect or the situation worsens.
- (c) Permanent structural changes may reduce the risk of the hazard and allow for reassessing the RAC.
- (d) Rationale for any changes to the original RAC must be thoroughly explained and documented in ESAMS. The decision to reduce a RAC 1, RAC 2, and RAC 3 hazard will be discussed with and approved by the activity Commander/Director and DS-O prior to changing the RAC in ESAMS.
 - (2) Assist management in determining effective interim controls and permanent controls.
- (3) Periodically review interim controls to ensure they are still effective in decreasing the probability and/or severity of risk to personnel.
- (4) Conduct regular review of open hazards and assist management by recommending corrective actions.
- (5) List hazards not corrected within 30 days onto a prioritized abatement log. The abatement log is prioritized following the guidance in Reference (g).
- c. The Senior Commander or Director at the CONUS geographic location or OCONUS region will review and sign the abatement log at least quarterly.

d. DS-O.

- (1) Determine the appropriate RAC when differences in professional opinions exist.
- (2) Review RAC 1-3 hazards on a weekly basis.
- (3) Identify issues associated with correction of hazards to DS Director and DASHO.
- d. The alternate standard process is followed if a hazard cannot be corrected.

3. HIGH PRIORITY (RAC 1-3) HAZARDS.

a. PLFA Commanders and Directors, and J/D Code Directors:

- (1) RAC 1: Brief the DLA Director on open RAC 1 hazards during the weekly PLFA Roundtable.
- (2) RAC 2: Brief the DLA Director on the status of RAC 2 hazards open greater than 30 days during the 4th Wednesday of each month during the PLFA Roundtable.
- (3) RAC 3: Provide summary information on RAC 1-3 open hazards during their Annual Operating Plan Brief.
- b. DS Director: Provide information on open RAC 2 hazards to DLA senior leadership on the Friday preceding the 4th Wednesday of each month.

4. EQUIPMENT MAINTENANCE, ALTERATIONS, AND ATTACHMENTS.

- a. Only authorized personnel conduct equipment maintenance in accordance with manufacturer guidance.
- b. OSH Staff review alterations or attachments and authorized by the equipment manufacturer prior to purchase and installation. Document(letter, data plate, etc.) showing actions were taken in accordance with manufacturer and OSH guidance are maintained with or attached to the equipment.

5. USE OF FORKLIFT BACKRESTS.

- a. The load backrest on a forklift is that portion of the carriage and forks used to restrain a load when the load is tilted rearward or upward.
- b. Under limited conditions, some forklift operations cannot be performed with the backrests attached due to clearances with the transport vehicle. In such cases, forklifts may be used without the backrest if:
- (1) The activity verifies that the manufacturer sells that model of forklift with and without the backrest. Documentation shall be maintained on file to validate this verification.
- (2) The activity develops and implements specific procedures for loading and off-loading, using that forklift, so that the loads are maintained at a level below the operator cab ceiling in order to prevent falling materials from injuring the operator.
- (3) Once the task has been completed, the backrest is installed onto the carriage of the forklift truck.
- (4) The forklift procedures are evaluated periodically (minimum of every 6 months) or more often based on compliance issues or when there is a change in the job description and/or process.
- (5) The forklift is not being used for any other operations when the backrest is removed. It is highly recommended that only certain forklifts are dedicated to the specific function(s)

requiring removal of the backrest and these forklifts are identified to distinguish them from others in the workplace.

- (6) The activity monitors the process to ensure that employees are adhering to the established procedures. This process must be documented (i.e., daily forklift inspection checklists).
- (7) The backrest is not part of the mechanical stop to prevent the forks from inadvertently moving and destabilizing loads.

6. ANNUAL OSHA 300 SUMMARY.

- a. DS-O maintains a current list of DLA geographic location (establishments).
- b. Designated OSH staff review the injury and illness data in ESAMS for accuracy. By January 17, the designated OSH staff notifies DS-O via SHARE@dla.mil that data is accurate.
 - c. The following persons have signature authority on the OSHA Form 300A:
 - (1) PLFA Commander or Director signs the form for the main PLFA location.
- (2) Designated VPP Site Leads sign the form at DLA locations that are working toward or have achieved VPP recognition.
 - (3) Director, DS-O signs all others.
- d. Designated OSH staff will email the signed OSHA Form 300A to DS-O via SHARE@dla.mil.
 - e. DS-O Posts signed forms on the DS-O eWorkplace page for downloading.
- f. Designated OSH staff will ensure the signed OSHA Form 300A is downloaded and posted in the workplace. The annual OSHA Form 300A for each DLA geographical location (establishment) in each DLA workplace annually from February 1 through April 30.

7. ALTERNATE STANDARDS.

- a. Under certain, and very limited conditions, complying with safety requirements may not be feasible during a job or mission. In such cases, the PLFA Commander or Director, J/D Code Director, or OCONUS Regional Commander:
- (1) Processes a request for approval of an alternate standard to an OSHA standard by identifying an alternate standard in accordance with DOD guidance in Reference (g).
- (2) Coordinates the request for an alternate standard with the affected employees and their representative(s).
 - (3) Submits the following information in each alternate standard request package:

- (a) An explanation, in detail, why the alternate standard is required, including why it is not feasible to comply with the specific standard.
- (b) Exact citation and quote of the standard. Each request can only address a single requirement.
 - (c) Detailed description of the alternate standard.
- (d) Detailed explanation of how the proposed alternate standard affords equal or greater protection than the standard(s) it replaces.
 - (e) Detailed JHA addressing the new procedure.
- (f) Indication that employee and employee representative comments were solicited, and a summary and analysis of such comments.
- (g) All information (e.g. maps, drawings, references, calculations, change analysis, or impact, etc.) used to make the decision.
 - (h) Interim controls in place to protect employees.
 - (i) Evaluation by the designated OSH Staff.

b. Designated OSH staff:

- (1) Provides management with guidance and technical assistance on the procedures and requirements for an alternate standard.
- (2) Ensures all interim controls for an alternate standard provide an equal or greater level of protection for employees.
 - c. All requests are for a limited period of time, not to exceed six (6) months.
- d. Following concurrence at the local level, management forwards the written request with a cover letter through the chain of command to DS-O for DASHO review.
- e. Each level in the chain of command evaluates the request and provides their written rationale for concurring or non-concurring with the request. The person responsible for making the determination at each level must sign to concur with the request.
 - f. DS-O reviews the request and provides a recommendation to the DASHO.
- (1) For CONUS requests, the DASHO submits the written request package through the Deputy Under Secretary of Defense for Installations and Environment (DUSD(I&E)) Safety and Health Office Representative. The DUSD(I&E) reviews the proposed standard and, barring non-concurrence, forwards the standard to the Secretary of Labor for approval or disapproval.

- (2) For OCONUS requests, the DASHO submits the request to the DUSD (I&E) Safety and Health Office Representative. The DUSD(I&E) provides a written approval or disapproval back to the Regional Commander and requesting activity.
- g. Upon final approval of an alternate standard, management may proceed with implementation of the alternate standard.
- h. Designated OSH staff maintain a record of all requests for alternate standards (both approved and denied).
- i. All operations related to the alternate standard request will be reviewed on a monthly basis.
- j. Management provides DS-O with a monthly written report describing on the effectiveness of the alternate controls.
 - k. DS-O reviews monthly reports for adequacy.

8. OSH COUNCIL.

- a. The Senior DLA Commander or Director at each CONUS geographic location or OCONUS Regional Commander:
 - (1) Charters an OSH Council that meets at least quarterly.
- (2) Establish membership per Reference (d) and appropriate collective bargaining agreements in the OSH Council committee.
- (3) Provide equal representation of management and non-management employees. A non-management employee is defined as bargaining unit employees represented by a labor organization and/or non-bargaining unit employees not represented by a labor organization. The local exclusive representative will determine bargaining unit employee(s) who will represent the Council, whereas management will determine the non-bargaining employee(s). The OSH Council will be used to improve the overall workplace safety for DLA.
- b. Geographic locations, with less than 50 DLA government employees, may participate on the Military Service host OSH Council instead of chartering a separate DLA OSH Council.
- (1) The Senior DLA Commander or Director is the primary DLA representative to the Military Service host OSH Council.
- (2) The DLA representative provides copies of minutes and other documents to all colocated DLA activities.
- c. For those locations pursuing VPP, the requirement for an OSH Council may be satisfied by a Steering Committee that includes management/union co-chairs and representatives from management and labor unions for each DLA activity located at geographic location.

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d. PLFAs are encouraged to establish a PFLA-level OSH Council to meet quarterly to discuss OSH issues or to include OSH topics at least quarterly at Executive or Corporate Board meetings.

9. JOB HAZARD ANALYSIS (JHA) (DLA FORM 7001).

- a. JHAs are used to identify potential hazards associated with conducting a task or process. JHAs are developed for all operations including administrative tasks or processes with hazards. The JHA provides a method of training and informing employees of the specific hazards and controls associated with task. The JHA will include as a minimum:
 - (1) Description of the operation broken down into easy-to-follow steps.
 - (2) Description of hazards associated with each step.
 - (3) Description of specific controls for each hazard identified.
- b. JHAs are developed by the workplace supervisor and employees familiar with the operation, along with personnel trained in developing JHAs.
 - c. JHAs are reviewed by the designated OSH staff and approved by the local management.
 - d. Designated OSH staff may complete the PPE assessments as part of the JHA process.
- e. First line supervisors and assigned employees review and update all JHAs at least annually, or sooner if the operation changes or a mishap occurs. Employees and supervisors initial or sign the JHA when changes occurand provide for OSH review and approval.
- f. Supervisors document the review all applicable JHAs with affected employees to ensure they understand the hazards and controls associated with a particular operation.
 - g. DS-O will establish a repository of JHAs for ease of sharing across DLA.
- 10. <u>OSH PROGRAM SELF-ASSESSMENTS</u>. DLA establishment Commanders and Directors and OCONUS Regional Commanders conduct a Self-Assessment of their OSH Program annually.
- a. DS-O develops and provides a self-assessment template to the OSH Managers at each geographic location and OCONUS regions for completion. OCONUS self-assessments should be provided for information to the appropriate PLFAs. The template may be modified annually by DS-O to include items of special interest.
- b. Designated OSH Staff conduct the OSH Program Self-Assessment annually following guidance provided by DS-O.
- c. Self-assessment results, along with identified goals for the coming year, are sent through command channels to DS-O. The self-assessment is due to DS-O by March 31.

d. DS-O uses the annual self-assessment results to identify overall DLA program weaknesses and gaps in existing policies. Information from self-assessments is also used to prepare the DLA OSH in process review for DOD.

11. DEPARTMENT OF LABOR OSHA INSPECTIONS OF DLA WORK AREAS

- a. Supervisors immediately notify the DLA Senior Commander or Director at the CONUS location, designated OSH staff, and DS-O when informed that OSHA is planning to be on-site or if OSHA arrives unannounced to conduct an inspection, to investigate an employee complaint, or a mishap.
- b. Designated OSH staff or management official accompanies the OSHA inspector at all times and take pictures of any areas that the inspector photographs.

c. Management:

- (1) Provides at least daily updates through chain of command to DS-O as the inspection or investigation progresses.
- (2) Coordinates with DS-O and DLA General Counsel to determine DLA's response to OSHA violations.
- (3) Makes the decision to appeal a violation in coordination with DS-O, DLA General Counsel, and the DASHO.

12. ANNUAL OSH INSPECTIONS.

a. OSH staff:

- (1) Schedule and conduct an annual OSH inspection of every DLA workplace.
- (2) Use the OSH Inspection checklist on the DS-O eWorkplace page for each annual inspection. A copy of the inspection checklist is located on the DS-O eWorkplace page.
 - (3) The checklist is tailored based on results of the pre-assessment questionnaire.
 - (4) Attach the completed checklist to the inspection in ESAMS.
 - (5) Issue Deficiency notices in ESAMS based on the inspection findings.
- b. OSH staff conducting the annual inspection on behalf of another DLA organization follow the below process:
 - (1) Coordinate with the appropriate PLFA.
- (2) Be responsible for entering the inspection, associated deficiencies, recommended interim controls, and recommended corrective actions into ESAMS.

- (3) Attach the inspection checklist into ESAMS and issue deficiencies based on inspection findings.
- (4) Add designated OSH staff as an administrator in the inspection to monitor and close deficiencies.

13. OSH PROGRAM EVALUATIONS.

- a. Designated OSH staff may conduct oversight program evaluations of their subordinate activities.
 - (1) Determine if OSH Programs are adequate for the hazards of the work area.
 - (2) Track deficiencies in ESAMS.
- b. DS-O conducts annual program evaluations of ten percent of DLA establishments and OCONUS Regions.
- (1) Provides notification to the Commander or Director along with a copy of the evaluation checklist 60 days prior to the evaluation.
- (2) Evaluations may include compliance walk-through of a sample of subordinate activities.
 - (3) Documents the evaluation results and tracks deficiencies in ESAMS.

14. SAFETY WHEN TRAVELING.

- a. Job duties may require DLA employees to travel. Supervisors should ensure employees are familiar with established guidance in order to reduce the potential for traffic mishaps caused by operator fatigue, distractions, and other unsafe driving practices, including the following:
 - (1) For directed travel, DLA travelers allow one day of travel time for each 350 miles.
 - (2) Travel should take place during daylight hours, as much as possible.

b. Drivers:

- (1) Take periodic rest breaks of at least 15 minutes every two to three hours, or every 100 to 150 miles whichever occurs first. Rest breaks are in addition to regular meal breaks.
 - (2) Follow local traffic laws.
 - (3) Use headlights at all times if the vehicle is not equipped with day-time running lights.
- (4) Minimize distractions while operating motor vehicles following guidance contained in Reference (h).

15. <u>FEDERAL SAFETY AND HEALTH COUNCIL</u>. OSH personnel are encouraged to participate and support their local Federal Safety and Health Council. Participation on the council or serving as an officer is a valuable professional development activity.

GLOSSARY

PART I: ABBREVIATIONS AND ACRONYMS

CONUS Continental United Safety

DAHSO Designated Agency Safety and Health Official

DLA Defense Logistics Agency

DLAI Defense Logistics Agency Instruction

DOD Department of Defense

ESAMS Enterprise Safety Application Management System

IPR In Process Review

ISSA Inter Services Support Agreement

JHA Job Hazard Analysis

LMS Learning Management System
MOU Memorandum of Understanding
OCONUS Outside Continental United States
OSH Occupational Safety and Health

OSHA Occupational Safety and Health Administration

PLFA Primary Level Field Activity
PPE Personal Protective Equipment

RAC Risk Assessment Code

VPP Voluntary Protection Program

PART II: DEFINITIONS

OSH Management System. A system of interrelated or interacting program elements and processes designed to direct and control how OSH policies are implemented and OSH objectives are achieved. The management system includes the major elements of: management leadership and employee involvement; work site analysis; hazard prevention and control; and OSH training.

21 GLOSSARY