

# 8 Safety and Health

## 810 Occupational Safety and Health Program ---

### 811 General

#### 811.1 Authority

The Postal Service is subject to Public Law No. 91–596, the Occupational Safety and Health (OSH) Act of 1970, pursuant to the Postal Employees Safety Enhancement Act (PESEA) of 1998. The OSH Act provides for citations, penalties, and criminal referrals for those employers who fail to comply. The Occupational Safety and Health Administration (OSHA) is responsible for promulgating and enforcing standards and regulations under the OSH Act.

#### 811.2 Principles

##### 811.21 Management Commitment, Involvement, and Accountability

Managers must demonstrate commitment to providing safe and healthful working conditions in all postal-owned and postal-leased installations, become involved in day-to-day safety performance, and be held accountable for safety performance and compliance with OSHA standards and regulations (see Handbook EL-802, *Executive's and Manager's Safety Compliance Guide*).

##### 811.22 Vision Statement

The Postal Service will become a leader in occupational safety and health for the federal government and private sector by demonstrating a commitment to integrating working safely into all our services.

##### 811.23 Guiding Principles

*People* — Employees are our most valued resource. Our employees must be provided a safe and healthful workplace.

*Customers* — When our employees work safer, our performance is improved.

*Excellence* — We can demonstrate that management and employee attention to working safely is good business.

*Integrity* — As a leader in occupational safety and health, we enhance our integrity with our customers, business partners, and the Congress.

*Community Responsibilities* — When our employees work safely, our customers are safer and we lead other employers by example.

#### 811.24 **Safety Philosophy**

It is the position of the Postal Service that:

- a. Any injury can be prevented. This goal is realistic, not just theoretical. Supervisors or managers have primary responsibility for the well-being of employees and must fully accept this principle.
- b. Management, which includes all levels including the first-line supervisor, is responsible and accountable for the prevention of accidents and control of resultant losses. Just as the line organization is responsible for attaining production levels, ensuring quality of performance, maintaining good employee relations, and operating within cost and budget guidelines, supervisors and managers must likewise accept their share of responsibility for the safety and health of employees.
- c. It is possible to safeguard against all operating exposures that can result in accidents and injuries and illnesses. It is preferable to eliminate the sources of danger. However, where this is not practical, management must use protective measures such as machine guards, safety devices, administrative actions, and personal protective equipment.
- d. All employees must be trained in proper work procedures and must be educated to work safely and to understand that they are responsible for doing so. Management is responsible for the adequate safety training and education of employees. However, all employees are responsible for working safely, and in being so, they benefit not only their organization but also themselves in a very real way.
- e. It is good business from the standpoint of both efficiency and economy to prevent personal injuries on and off the job. In addition to humanitarian considerations, injuries drain resources and reduce efficiency.

#### 811.3 **Offsite Safety**

The Postal Service Safety and Health Program and OSHA standards and regulations cover postal employees who perform postal duties in establishments of private employers and during delivery and other activities off postal property. Safe and healthful working conditions must be provided through engineering or administrative controls, personal protective equipment, enforcement of safe work practices, withdrawal of the employees from the private sector facility, or curtailment of mail, if necessary, to ensure that they are protected.

#### 811.4 **Records Retention and Disposition**

For retention and disposal instructions for the records and forms referenced in 810 through 850, see items 32 through 42 of the Appendix, *Records Control Schedules*, or the Records and Information Management Systems, RIMSWEB.

### 812 **Management Responsibilities**

#### 812.1 **Headquarters**

##### 812.11 **Postmaster General**

The postmaster general is responsible for the establishment and maintenance of an effective, comprehensive occupational safety and health program that fully complies with the OSH Act.

##### 812.12 **Chief Operating Officer**

The chief operating officer ensures that area management implements and maintains effective safety and health programs by, among other activities, monitoring Executive Safety and Health Committee activities during business quarterly reviews.

##### 812.13 **Officers**

Officers of the Postal Service are delegated the authority and responsibility to ensure safe and healthful working conditions and practices within their functional areas and compliance with OSHA standards and regulations.

##### 812.14 **Vice President of Employee Resource Management**

The vice president of Employee Resource Management (ERM) is delegated the authority and responsibility to administer and evaluate the safety and health program.

#### 812.2 **Area Offices**

##### 812.21 **Vice President of Area Operations**

Vice presidents of Area Operations are responsible for providing effective safety and health programs in their areas and compliance with OSHA standards and regulations

##### 812.22 **Area Human Resources Managers**

Area Human Resources managers are responsible for monitoring safety and health programs and performance in conformance with national policy and direction.

#### 812.3 **Installation Heads**

Installation heads are responsible for employee safety and health and for compliance with OSHA standards and regulations, including maintenance of the OSHA Log and Summary of Injuries and Illnesses. Their responsibility includes the development and implementation of an effective safety and

health program. They must formulate and post a local safety and health policy statement consistent with national policy. Installation heads in facilities without full-time safety personnel also act as or designate the collateral duty facility safety coordinator (FSC) (see 813.32 and Handbook EL-802, *Executive's and Manager's Safety Compliance Guide*).

#### 812.4 **Middle-Level Managers**

Middle-level managers are responsible for the safety and health program within their operations. This responsibility includes OSHA-mandated written programs, employee training, accident prevention activities, and evaluation of supervisor safety performance. Middle-level managers coordinate activities, including the correction of identified safety deficiencies, with other operational managers.

#### 812.5 **Supervisors**

First-line supervisors are responsible for implementing written programs and plans, safety and health training, completion of Form 1783, *On the Job Safety Review/Analysis*, for their area, observing employees' safety performance, and preventing operational safety errors. Specific responsibilities are listed in applicable management instructions and in Handbook EL-801, *Supervisor's Safety Handbook*.

#### 812.6 **Objectives and Action Plans**

All managers, at every level in every function, must have specific fiscal year safety and health objectives, with accompanying action plans for their accomplishment. These plans should be based on accident, injury, and illness experience, and safety and health program evaluations. Action plans must list specific activities that will be taken to reduce accidents and injuries and ensure compliance with OSHA standards and regulations.

### 813 **Safety and Health Staff Responsibilities**

#### 813.1 **Headquarters**

Safety Performance Management (SPM), Employee Resource Management, assists the vice president of Employee Resource Management in the administration and evaluation of the safety and health program by monitoring and improving the program and related safety and health policies, procedures, and standards. Safety Performance Management, in conjunction with the General Counsel and other functional organizations, establishes policy and procedures to manage OSHA compliance activity, including citations, penalties, abatement, negotiated settlements, and OSHA-related judicial procedures. To ensure that safety is integrated into all postal operations to provide a safe work environment, Safety Performance Management provides safety and health expertise and staff support to other Headquarters functional areas and area offices, as necessary. Safety Performance Management provides comment on proposed OSHA regulations to Government Relations and coordinates and works with other

federal agencies, private sector employers, and professional groups on matters of safety and health.

### 813.2 **Area Offices**

The area Human Resources manager assists the area vice president in the implementation of national safety and health policies, programs, and directives. This responsibility includes long-term planning and monitoring activities. Area Human Resources managers, in conjunction with field legal counsels, provide oversight and advice on OSHA compliance activities.

The area Human Resources manager supports the performance clusters in the administration of their safety and health programs and monitors status of the OSHA Log and Summary of Injuries and Illnesses. Responsibilities include budgeting for and scheduling safety and health resources, including professional development of the safety and health staff. Additionally, the area Human Resource function provides technical support for performance cluster safety personnel and collateral duty facility safety coordinators (FSC).

### 813.3 **Performance Clusters**

#### 813.31 **Safety Personnel**

Safety personnel are responsible for developing and monitoring a comprehensive safety and health program for facilities within their geographical boundaries.

While the specific responsibilities of safety personnel may vary depending on the size of the organization, the number of locations, and the type of operations, the major function is that of a technical advisor and consultant to line management. To support line management, they contribute their experience, knowledge, and judgment to the formation of management's decisions that affect safety and health. Safety personnel functions include:

- a. Monitoring status of the OSHA Log and Summary of Injuries and Illnesses for all facilities in the cluster and advising management of deficiencies.
- b. Collaborate with management representatives on preparing and administering written OSHA-required programs.
- c. In coordination with the injury compensation and medical staff, assisting the line organization in solving safety and health problems, interpreting policies, standards, and regulations and providing management with detailed actions to be taken.
- d. Analyzing accident, injury, and illness statistics, hazardous condition reports, inspection results, and related data in order to advise management on corrective actions.
- e. Identifying and assessing accident and loss-producing conditions, practices, and trends.
- f. Conducting periodic safety and health inspections and program evaluations.

Additionally, full-time district safety personnel assist collateral duty facility safety coordinators with technical advice and support, OSHA reporting, and related issues.

#### 813.32 **Collateral Duty Facility Safety Coordinator**

The installation head or designee is the collateral duty facility safety coordinator (FSC) in facilities in which there are no full-time safety positions and performs safety-related duties appropriate to the size and function of the facility. The FSC also conducts the annual safety and health inspection in his or her facility if there are less than 100 workyears of employment (see 824.33). He or she performs the inspection under the guidance of the servicing safety office. The FSC also maintains an Accident Log if required (see 821.34). FSCs must be trained commensurate with their duties, using postal approved courses.

### 814 **Employee Rights and Responsibilities**

#### 814.1 **Rights**

Employees have the right to:

- a. Become actively involved in the Postal Service's Safety and Health Program and to be provided a safe and healthful work environment.
- b. Report unsafe and unhealthful working conditions, using Form 1767, *Report of Hazard, Unsafe Condition, or Practice*.
- c. Consult with management through appropriate employee representatives on safety and health matters, i.e., program effectiveness and participation in inspection activities where permissible.
- d. Participate in the safety and health program without fear of restraint, interference, coercion, discrimination, or reprisal.

#### 814.2 **Responsibilities**

It is the responsibility of all employees to:

- a. Comply with all OSHA and postal safety and health regulations, procedures, and practices, including the use of approved personal protective equipment.
- b. Keep the work area in a safe and healthful condition through good housekeeping and proper maintenance of property and equipment.
- c. Immediately report safety hazards and unsafe working conditions.
- d. Perform all duties in a safe manner.
- e. Keep physically and mentally fit to meet the requirements of the job.
- f. Immediately report any accident or injury in which they are involved to their supervisors, regardless of the extent of injury or amount of damages.

- g. Drive defensively and professionally; extend courtesy in all situations; and obey all state, local, and postal regulations when driving a vehicle owned, leased, or contracted for by the Postal Service.

## 815 **Executive and Management Safety and Health Committees**

### 815.1 **Structure and Responsibilities**

#### 815.11 **National Executive Safety and Health Committee**

(Reserved)

#### 815.12 **Area Executive Safety and Health Committee**

The area executive safety and health committee — chaired by the area vice president and consisting of district managers, area office managers (as determined by the vice president), and chief postal inspectors — must meet at least quarterly. The area vice president establishes a system to track and monitor committee activities. The committee is responsible for following objectives established by the national Headquarters action plan and/or for establishing area action plans (using process management or other means) that achieve national and area goals. The area committee must monitor and review:

- a. Required safety and health inspections and abatement actions.
- b. Required program evaluation and implementation.
- c. Safety and health training and recordkeeping.
- d. Local joint labor-management safety and health committee activities.

The chief operating officer, during business quarterly reviews, monitors area executive committee activities.

#### 815.13 **Performance Cluster Executive Safety and Health Committees**

The performance cluster executive safety and health committee, chaired by the district manager, must meet quarterly. The committee must include plant managers, postmasters of large associate offices, critical enabling managers (e.g., Maintenance, In-Plant Support), and others as determined by the district manager and the committee. Their primary responsibilities are to review:

- a. Required safety and health inspections and abatement actions.
- b. Required program evaluation and implementation.
- c. Safety and health training and recordkeeping.
- d. Local joint labor-management safety and health committee activities.

The committee must report to the area on actions taken, and the area vice president must establish a system to track and monitor committee activities. The committee develops additional action plans to improve situations not addressed at a higher level. In addition, the committee must continually assess the adequacy of safety and health staffing at the plant level and must

monitor the quality and frequency of safety inspections and abatement activities within the performance cluster.

#### 815.14 **Plant\* Executive Safety and Health Committee**

The committee, chaired by the plant manager, is composed of plant safety, maintenance, and other enablers as appropriate. The committee meets as often as needed, but at least once every quarter. Primary responsibilities are to implement objectives established at a higher level and to develop additional objectives to improve the local safety and health program. To achieve these objectives, the committee must review and discuss safety and health program evaluations of the facility, accident injury trends, accident reports, OSHA compliance activity, and local safety inspection reports to identify the major safety and health problems. Based on these identified problems, the committee develops and implements action plans — with assigned responsibilities for improvement — and measures their effectiveness (using process management or other means). When objectives are not being met, action plans must be altered accordingly.

\*Plants by definition include BMCs.

#### 815.15 **Other Levels**

Safety and health management committees need not be established at levels below the plant, but safety and health must be a standard agenda item for regular staff meetings.

#### 815.2 **Written Minutes**

Written minutes of all management meetings at each organizational level must be prepared and retained for a period of 3 years. A copy of the area, performance cluster, and plant minutes must be submitted to the chairperson's immediate manager.

### 816 **Joint Labor-Management Safety and Health Committees**

**Reference Note:**

For additional material concerning the subject matter found in 816, refer to:

- Article 14 of the collective bargaining agreements.

Joint labor-management safety and health committees must be established and must function in accordance with applicable collective-bargaining agreements.

**817 Training and Education****817.1 Management Training and Education****817.11 Supervisors**

All supervisors must receive safety and health training in accordance with the curriculum established by Safety Performance Management and Employee Development. Local offices, districts, and/or Headquarters provide this training.

**817.12 Executives and Managers**

Executives and managers at the plant level and above must be provided an orientation that discusses their responsibility for:

- a. Safety and health program commitment, involvement, and accountability.
- b. OSHA compliance.
- c. Elements contained in a safety and health program evaluation.
- d. Accident investigation and reporting.
- e. Safety and health training requirements.

**817.2 Safety and Health Staff Training and Education**

Safety and health personnel must be provided, at least annually, professional training and education to enable them to carry out their basic duties and to fulfill their roles as advisors and consultants to management. Collateral duty FSCs must also be trained commensurate with their safety-related duties. Safety Performance Management mandates postal and/or external training or curriculums, as necessary, to ensure an effective safety staff and OSHA compliance. To maintain their technical proficiency, safety and health personnel are encouraged to pursue professional credentials and advanced education and to participate in professional safety and health-related organizations. Management must give a high priority to supporting these efforts to realize a professional safety staff. Specialized training not available within the Postal Service may be authorized in accordance with 740.

**817.3 Joint Labor-Management Safety and Health Committee Orientation**

Each member of a local committee must receive an orientation by the Postal Service that includes:

- a. Responsibilities of the committee and its members.
- b. OSHA compliance.
- c. Basic elements of the safety and health program.
- d. Identification and analysis of hazards and unsafe practices, including job safety analyses.
- e. Explanation of reports and statistics to be reviewed and analyzed by the committee.

**817.4 Employee General Safety Orientation**

All employees, including casuals and part-time employees, must receive a general safety and health orientation and sufficient on-the-job training to enable them to follow safe work practices, to recognize hazards, and to understand the benefits to be gained by following safe work practices. Such training must also include applicable safety rules and OSHA compliance, including any local job safety analysis for tasks assigned. All employees must be trained as required by OSHA standards if their jobs so require (see 817.5).

**817.5 OSHA Required Training****Reference Note:**

For additional material concerning the subject matter found in 817.5, refer to:

- Management Instruction EL-810-2000-2, *Bloodborne Disease Exposure Control Plans*.
- Management Instruction EL-810-96-1, *Response to Hazardous Materials Releases*.
- Management Instruction EL-810-96-2, *Hazard Communication Programs*.
- Management Instruction EL-810-98-1, *Asbestos Containing Materials Control Program*.
- Management Instruction EL-810-99-1, *Lead Hazard Management*.
- Management Instruction EL-810-2000-1, *Hearing Conservation Programs*.
- Handbook AS-556, *Asbestos Management Guide*.
- Management Instruction EL-810-93-1, *Confined Space Safety*.
- Current safety-related MMOs (e.g., Lockout/Tagout, Hazard Communication, Personal Protective Equipment), and memorandums of policy on the Safety and Health homepage.

**817.51 Standard Curriculum**

Employee Development, in coordination with Safety Performance Management and other Headquarters functional areas, is responsible for developing, implementing, and keeping current a safety and health training curriculum to comply with OSHA standards and postal policies. Managers and supervisors at all levels must refer to this curriculum and ensure that all affected employees are trained and that training is current and properly recorded.

**817.52 Special Emphasis Program Training**

Special emphasis training programs must be developed and initiated by Headquarters, areas, districts, plants, and other offices as appropriate, in

accordance with 721.22, to reduce the principal causes of accidents and injuries and occupational illnesses and ensure OSHA compliance.

#### 817.53 **Hazardous Materials Communication and Training**

In installations where employees handle or transport hazardous materials, the installation head must establish a program of promoting safety awareness through communications or training, as appropriate (see MI-EL-810-96-1). Such a program must include, but is not limited to, the following elements:

- a. Posting of information, pamphlets, or publication of articles in postal publications such as area bulletins and use of distributed videos on *Hazwoper Awareness* and *Hazcomm Awareness*.
- b. Distribution of Publication 52, *Acceptance of Hazardous, Restricted, or Perishable Matter*, to employees whose duties may require acceptance or dispatch of hazardous or perishable items. Distribution of Handbook EL-812, *Hazardous Materials and Spill Response*, to employees whose duties may include handling of hazardous materials and initial response to spills and leaks (First Responder Awareness Level). Acceptance and dispatch personnel must use Tag 44, *Sack Contents Warning*, to appropriately identify all mailbags containing hazardous materials as defined in Publication 52 so that an employee handling the mail is aware that the mailbag contains one or more hazardous materials.
- c. On-the-job awareness training of employees whose duties may require the handling or transportation of hazardous or perishable items. This training must include, but is not limited to, (1) hazard identification, (2) proper handling of hazardous materials, (3) personal protective equipment availability and its use, and (4) cleanup and disposal requirements for hazardous materials.

#### 817.6 **Refresher Training**

Motor vehicle, powered industrial truck, asbestos, hazardous materials, and other refresher training programs must be developed and provided per OSHA regulations and postal policies. Such programs must also be used for correction of improper work practices before accidents result and/or for improvement training following an accident.

#### 817.7 **New or Additional Equipment and Techniques Training**

Training must be provided when new or additional equipment or techniques are deployed that may, if not properly used, adversely affect safe and healthful working conditions and/or OSHA compliance.

#### 817.8 **OSHA Poster 2203, Job Safety and Health Protection**

Each facility must post OSHA Poster 2203, *Job Safety and Health Protection*, in a conspicuous place. This poster outlines management responsibilities and employee responsibilities and rights under the OSH Act. Both English and Spanish versions are available from the material distribution centers.

**817.9 Training Records**

Records of safety and health training must be maintained for each employee. These records must be retained to demonstrate compliance with Postal Service policies and OSHA requirements. The records must be available to allow inspection in a timely manner by Postal Service and/or OSHA officials. All safety training must be recorded on Form 2548, *Individual Training Record* (or equivalent), and/or recorded into the National Training Database.

**Note:** Documentation of safety talks and safety related on-the-job training must be maintained at the facility level. These records must be available to allow inspection in a timely manner.

**818 Safety and Health Program Budgeting**

All organizational levels must plan budgets and provide funds that support an effective and comprehensive safety and health program. Such budgeted items must include, but are not limited to:

- a. Sufficient personnel and support to properly implement and administer the program at all levels, including necessary administrative costs such as those for training, computers, travel, communication, and personal protective equipment.
- b. Hazard analysis, including industrial hygiene evaluations, sampling, testing, diagnostic and analytical tools and equipment, and laboratory analyses, as deemed appropriate.
- c. Any necessary contracts to identify, analyze, or evaluate unsafe or unhealthful working conditions and operations, as deemed appropriate.
- d. Development and delivery of safety awareness and promotional programs.
- e. Technical information documents, software, books, standards, codes, periodicals, and publications.

**819 Accountability for Safety and Health Performance, Compliance, and Evaluations**

In any evaluation of individual performance or potential, provisions must be made to include the achievement or failure of managers, supervisors, and/or employees in the performance of their safety and health responsibilities, including OSHA compliance. Evaluations must not be based solely on the number and seriousness of accidents, injuries, and illnesses experienced but also on how effectively the safety and health program has been implemented and supported.