

8 Safety, Health and Environment

810 Occupational Safety and Health Program

811 General

811.1 Authority

The Postal Service™ is subject to Public Law Number 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 Service-owned and -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 safe work practices into all of our services. The Postal Service is committed to participation in the OSHA Voluntary Protection Programs (VPP). (See 811.25.) The Postal Service also engages in innovative safety efforts such as the Ergonomic Risk Reduction Program and joint labor-management safety and health committees (see 816).

811.23 Guiding Principles

The guiding principles of the Postal Service are the following:

- a. *People* — Employees are our most valued resource. Our employees must be provided a safe and healthful workplace.
- b. *Customers* — When our employees work more safely, our performance improves.
- c. *Excellence* — We can demonstrate that management and employee attention to working safely is good business.
- d. *Integrity* — As a leader in occupational safety and health, we enhance our integrity with our customers, business partners, and the Congress.
- e. *Community Responsibilities* — When our employees work safely, our customers are safer, and we lead other employers by example.

811.24 Safety Philosophy

The safety philosophy of the Postal Service is the following:

- a. Any occupational injury and illness can be prevented. This goal is realistic, not theoretical. Supervisors and 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, injuries, and illnesses. It is preferable to eliminate the sources of danger. However, where this is not practical, management must use protective measures, including administrative controls, machine guards, safety devices, 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 doing so, they benefit not only their organization but also themselves.
- e. It is good business practice in terms of efficiency and economy to prevent personal injuries on and off the job. Injuries cost money, reduce efficiency, and cause human suffering.

811.25 Voluntary Protection Programs

The Postal Service is committed to participation in OSHA VPP. These programs recognize and establish partnerships with businesses and

worksites that show excellence in occupational safety and health. The Postal Service is committed to effective employee protection beyond the requirements of OSHA standards. The Postal Service is also committed to developing and implementing systems that effectively identify, evaluate, and control occupational hazards to prevent employee injuries and illnesses. Postal Service VPP implementation and maintenance procedures, based on the latest criteria from OSHA, are available on the Safety Resources Web site.

811.3 **Offsite Safety**

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

811.4 **Records Retention and Disposition**

811.41 **Records Control Schedule**

General retention and disposal instructions for the records and forms referenced in 810 through 850 can be found in the appendix, Records Control Schedules. Additional information can be found in the *Administrative Support Manual (ASM)*, 89, Records Retention, and in the Electronic Records and Information Management Systems, RIMSWEB (eRIMS) on the Intranet.

811.42 **PS Form 8214, Certificate of OSHA, Safety, and Environmental Records Transfer**

OSHA requires each establishment to maintain records and produce them when requested. The purpose of PS Form 8214 is to ensure that these required records are transferred when there is a change in establishment or installation head at a Post Office, station, or branch.

812 **Management Responsibilities**

812.1 **Headquarters**

812.11 **Postmaster General and Chief Executive Officer**

The postmaster general is responsible for establishing and maintaining an effective, comprehensive national occupational safety and health program that fully complies with the OSH Act.

812.12 **Chief Operating Officer and Executive Vice President**

The chief operating officer ensures that area management implements and maintains effective area safety and health programs by, among other

activities, monitoring Executive Safety and Health Committee activities during quarterly business 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 to ensure compliance with OSHA standards and regulations.

812.14 Vice President of Employee Resource Management

The vice president of Employee Resource Management is delegated the authority and responsibility to administer and evaluate the national 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 for ensuring compliance with OSHA standards and regulations.

812.22 Area Human Resources Managers

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

812.3 Performance Cluster and District Managers**812.31 District Managers**

District managers are responsible for implementing the occupational safety and health programs within their jurisdiction. Additionally, they must develop a performance cluster (PC) accident reduction plan (ARP) using the Safety Toolkit to achieve the corporate objectives of reducing injury, illness, and motor vehicle accidents. Refer to the Safety Resources Web site and the Safety Toolkit for additional information on developing, implementing, and monitoring ARPs.

812.32 Installation Heads and Managers

Installation heads and managers are responsible for employee safety and health, implementation of the occupational safety and health program, and compliance with OSHA standards and regulations, including maintenance of the accident reports, OSHA Log, and Summary of Injuries and Illnesses. They are also responsible for developing, implementing, and monitoring facility ARPs using the Safety Toolkit to achieve the corporate objectives of reducing injury, illness, and motor vehicle accidents. Refer to the Safety Resources site and the Safety Toolkit for additional information on developing, implementing, and monitoring ARPs.

Installation heads are encouraged to attend annual safety and health training.

812.4 **Middle-Level Managers**

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

Middle-level managers are encouraged to attend annual safety and health training.

812.5 **Supervisors**

Supervisors are responsible for identifying and correcting physical hazards, investigating and reporting accidents, administering OSHA-mandated written programs, conducting accident prevention activities, training employees, developing job safety analyses, and enforcing safe work practices.

Supervisors are encouraged to attend annual safety and health training.

812.6 **Safety and Health Objectives**

For each fiscal year, managers at every level in every function must have in their performance plans safety and health objectives tied to corporate safety indicators and their facility-specific ARPs. Annually, Headquarters will issue management policy and procedures for ARPs tailored to address national safety indicators and priorities.

813 **Safety and Health Staff Responsibilities**

813.1 **Headquarters**

Safety and Environmental Performance Management (SEPM) assists the vice president of Employee Resource Management to administer and evaluate the safety and health program by monitoring and improving the program and related safety and health policies, procedures, and standards. In conjunction with the General Counsel and other functional organizations, SEPM establishes policies and procedures to manage OSHA compliance activity, including citations, penalties, abatement, negotiated settlements, and judicial procedures.

To ensure that safety is integrated into all Postal Service operations, SEPM provides safety and health expertise and staff support to other Headquarters functional areas and Area offices, as necessary. SEPM provides comments on proposed OSHA regulations to Government Relations and coordinates 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 includes responsibility for 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.

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 geographic boundaries.

While the responsibilities of safety personnel will vary depending on the size of the organization, the number of locations, and the type of operation, their major function is to serve as technical advisors and consultants to line management. To support line management, they contribute their experience, knowledge, and judgment to the formation of decisions that affect safety and health. Safety personnel functions include:

- a. Monitoring the status of the OSHA Log and Summary of Injuries and Illnesses for all facilities in the cluster and advising management of deficiencies.
- b. Collaborating with management to prepare and administer OSHA-mandated written programs.
- c. Assisting line managers, in conjunction with injury compensation and medical personnel, to resolve safety and health problems, interpret policies, standards, and regulations, and provide detailed action plans for management implementation.
- 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, and advising management on incorporating effective countermeasures into District/PC and facility-specific ARPs.
- f. Conducting safety and health inspections and program evaluations.

In addition, full-time safety personnel assist collateral duty facility safety coordinators with technical advice, OSHA reporting, training, and related issues.

813.32 **Collateral Duty Facility Safety Coordinator**

In facilities in which there are no full-time safety positions, the installation head or designee is the collateral duty facility safety coordinator (FSC) and performs safety-related duties appropriate to the size and function of the

facility. The FSC must be an EAS employee. If there are fewer than 100 workyears of employment (see 824.33) in the facility, the FSC conducts the annual safety and health inspection. He or she performs the inspection under the guidance of the servicing safety office. The FSC also maintains the hazard log (PS Form 1767, *Report of Hazard, Unsafe Condition, or Practice*) (see 824.634). FSCs must use the Safety Toolkit in the performance of their duties. At a minimum, they must record safety and health inspection deficiencies and abatements, program evaluation findings and corrective actions, employee reports of hazards and corrective actions. They must advise the installation head/manager with development, implementation, and monitoring of countermeasures in the facility ARP.

FSCs must be trained for their duties using Postal Service-approved courses. At a minimum, all FSCs must attend the FSC training course.

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 be provided a safe and healthful work environment.
- b. Report unsafe and unhealthful working conditions using PS Form 1767.
- c. Consult with management through appropriate employee representatives on safety and health matters such as program effectiveness.
- d. Participate in inspection activities where permissible.
- e. Participate in the safety and health program without fear of restraint, interference, coercion, discrimination, or reprisal.

814.2 Responsibilities

All employees are responsible for:

- a. Complying with all OSHA and Postal Service safety and health regulations, procedures, and practices, including the use of approved personal protective equipment.
- b. Keeping the work area in a safe and healthful condition through good housekeeping and proper maintenance of property and equipment.
- c. Reporting recognized safety hazards and unsafe working conditions immediately.
- d. Performing all duties in a safe manner.
- e. Keeping physically and mentally fit to meet the requirements of the job.
- f. Reporting to their supervisors immediately any accident or injury in which they are involved, regardless of the extent of injury or damage.
- g. Driving defensively and professionally, extending courtesy in all situations, and obeying all state, local, and Postal Service 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 inspectors-in-charge — must meet at least quarterly. The area vice president establishes a system to track and monitor committee activities. The committee is responsible for monitoring area safety and health activities to ensure that Headquarters' goals and objectives for reducing injury and illnesses and motor vehicle accidents are met. The area committee must monitor and review:

- a. Safety and health inspections and facilitate prompt abatement of identified hazards.
- b. Program evaluation and implementation of safety and health program improvement plans at facilities that do not achieve a score of 3 on their program evaluation.
- c. District/PC ARPs to ensure that countermeasures are implemented to reduce motor vehicle accident (MVA) and motor vehicle injury (OSHA II) rates to achieve established targets.
- d. Safety and health training and recordkeeping.
- e. Joint labor-management safety and health committee activities.

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

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. Safety and health inspections and facilitate prompt abatement of identified hazards.
- b. Program evaluation and implementation of safety and health program improvement plans at facilities that do not achieve a score of 3 on their program evaluation.
- c. District/PC ARPs to ensure countermeasures are implemented to reduce OSHA II and MVA rates to achieve established targets.
- d. Safety and health training and recordkeeping.
- e. 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.

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 identify major safety and health problems by reviewing the following:

- a. Facility safety and health program evaluations.
- b. Accident reports and injury trends.
- c. OSHA compliance activity.
- d. Local safety inspection reports.

Based on the problems identified, the committee:

- a. Advises the plant manager with developing and implementing the plant's ARP.
- b. Assists the plant manager to monitor the effectiveness of the plan's countermeasures in reducing OSHA II and MVA rates.
- c. Recommends improvements if the countermeasures do not achieve the desired OSHA II and MVA rate-reduction targets.

815.15 **Other Levels**

Safety and health management committees need not be established below the plant level, 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 3 years.

**Plants that require executive safety and health committees are Bulk Mail Centers (BMCs), Processing and Distribution Centers (PDCs), Processing and Distribution Facilities (PDFs), International Service Centers (ISCs), Air Mail Centers/Air Mail Facilities (AMCs/AMFs), and Logistics Distribution Centers (LDCs).*

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

Reference Note:

For further information, 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 **Postmasters, Managers, and Supervisors**

All postmasters, managers, and supervisors must receive safety and health training in accordance with the curriculum established by Safety Performance Management and Employee Development. Local offices, districts, and Headquarters provide this training. Postmasters, managers, and supervisors are encouraged to attend annual safety and health 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.
- f. Accident reduction plans (ARPs).

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

817.21 **Safety Specialists**

All safety staff must obtain a level of expertise in safety training through participation and completion of the core curriculum safety course taught at the National Center for Educational Development (NCED) or as established by Safety Performance Management.

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. 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.

817.22 **Facility Safety Coordinators**

FSCs must obtain a level of safety expertise commensurate with their responsibilities through the FSC training course and the Safety for Postal Leadership course. Annual attendance of at least 8 hours of safety and health training is required. Management must give FSC training a high priority.

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 to include safety and health inspections.
- d. Identification and analysis of hazards and unsafe practices, including job safety analysis.
- e. Explanation of reports and statistics to be reviewed and analyzed by the committee.

To meet the requirements listed above, Safety and Health Committee members must attend the Safety and Health Committee training course (specified in Handbook EL-809T, *Area/Local Joint Labor-Management Safety and Health Committee Training*, and the Safety for Postal Leadership course, 1950102).

817.4 **General Safety Orientation for Employees**

All employees, including casual 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 site-specific safety rules, specific job safety analyses, required OSHA programs, emergency evacuation procedures, and OSHA rights and responsibilities (see 817.5).

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

For further information about training required by OSHA, refer to the following Handbook (HBK) and Management Instructions (MIs):

- HBK AS-556, *Asbestos Management Guide*
- MI EL-810-2001-1 *Personal Protective Equipment and Respiratory Protection Programs*
- MI EL-810-2000-2, *Bloodborne Disease Exposure Control Plans*
- MI EL-810-2000-1, *Hearing Conservation Programs*
- MI EL-810-99-1, *Lead Hazard Management*
- MI EL-810-98-1, *Asbestos Containing Building Materials Control Program*
- MI EL-810-2006-1, *Response to Hazardous Materials Releases*
- MI EL-810-96-2, *Hazard Communication Programs*
- MI EL-810-93-1, *Confined Space Safety*

Maintenance Management Orders (MMOs) on safety-related subjects such as lockout/tagout, hazard communication, and personal protective equipment are available on the Maintenance Technical Support Center's Web site:
www.mtsc.usps.gov.

Additional guidance is available in the Safety Training Matrix located on the Safety Resources Web site. Go to <http://blue.usps.gov>. In the left column, under "Essential Links," click on *Safety Resources*.

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 Service 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 Training Programs

Special emphasis training programs must be developed and initiated by Headquarters, areas, districts, plants, and other offices, as appropriate, to reduce the principal causes of accidents and injuries and occupational illnesses and to ensure compliance with OSHA requirements.

817.53 Training in Handling Hazardous Materials

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 information, pamphlets, or publication of articles in Postal Service publications, such as area bulletins, and use of distributed videos on *Hazwoper Awareness* and *Hazcomm Awareness*.

- b. Distributing current Publication 52, *Hazardous, Restricted, and Perishable Mail*, to employees whose duties may require acceptance or dispatch of hazardous, restricted, or perishable items. Distribution of current 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. Training in on-the-job awareness for employees whose duties may require the handling or transportation of hazardous, restricted, or perishable items. Training must include, but is not limited to, hazard identification, proper handling of hazardous materials, personal protective equipment availability and use, and cleanup and disposal requirements for hazardous materials. This includes Aviation Mail security hazardous materials training.

817.6 Refresher Training

Motor vehicle, powered industrial truck, asbestos, hazardous materials, and other refresher training programs must be provided and updated as needed per OSHA regulations and Postal Service policies. Such programs must also be used for correcting improper work practices before accidents result and for improving work practices after an accident.

Refresher training requirements are included in the Safety Training Matrix located on the Safety Resources Web site.

817.7 Training in New or Additional Equipment and Techniques

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, OSHA compliance, or both.

817.8 OSHA Job Safety and Health Protection Posters

Each facility must post OSHA Poster 3165, *Job Safety and Health Protection*, in a conspicuous place. This poster outlines management responsibilities and employee responsibilities and rights under the OSH Act. Poster 3165 and the Spanish-language version, 3167, are available from the Material Distribution Center. (OSHA Poster 2203, which is superseded by 3165/3167, may be posted until supplies are exhausted.)

817.9 Training Records

For each employee, records of safety and health training must be maintained to demonstrate compliance with Postal Service policies and OSHA requirements. The records must be retained and available to allow inspection by Postal Service and OSHA officials. All safety training must be recorded on

PS Form 2548, *Individual Training Record* (or equivalent), and recorded in 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 to support an effective and comprehensive safety and health program. Such budgeted items must include, but are not limited to:

- a. Personnel and support sufficient to properly implement and administer the program at all levels, including administrative costs 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. 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, provision must be made to include the achievement or failure of managers, supervisors, 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.