



April 28, 2008

VICE PRESIDENTS, AREA OPERATIONS

SUBJECT: Safety and Health Inspections – Detached Mail Units (DMU)

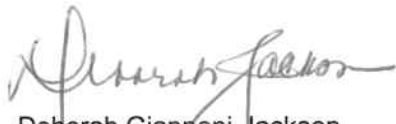
As a result of recent discussions between Labor Relations and the American Postal Workers Union, AFL-CIO (APWU) we are reissuing our subject guidance. This memorandum supersedes my previous memorandum dated January 9.

Pursuant to the Memorandum of Understanding (MOU) Re: Off-Site Safety and Health Program found on page 324 of the 2006 National Agreement requiring the National Joint Labor Management Safety and Health Committee to create an implementation process to ensure employees in off-site locations are fully protected by the Postal Service's Safety and Health Program, the parties agreed to the following implementation process:

- The Postal Service Safety and Health Program and OSHA standards and regulations cover postal employees who perform postal duties in private employers' establishments and while delivering mail and performing other activities off Postal Service Property.
- PS Form 1767 shall be made available in all off-site facilities. Reports of unsafe or unhealthful conditions will receive prompt attention in accordance with the Employee and Labor Relations Manual (ELM), Chapter 8.
- The parties at the local level shall be responsible for enforcing the terms of the MOU. Disputes arising from the implementation of the MOU shall be processed at the local level in accordance with the National Agreement.
- Districts must conduct a Safety and Health Inspection only of the work areas in which postal employees perform work in the off-site facilities.
- Safety Inspections of the postal employee off-site areas, e.g. office space and equipment, and APWU participation in such safety inspections will be conducted in accordance with Article 14, Section 8 of the National Agreement and Chapter 8 of the ELM. The appropriate safety inspection is determined by the size of the host postal facility. The parties agreed that annual inspections of an employee's work area in off-site facilities must be conducted by the Facility Safety Coordinator when the employee(s) report to a postal facility with less than 100 work years in the regular workforce in accordance with Article 14, Section 8 and ELM Chapter 8. Semiannual inspections of employee's work areas in off-site facilities must be conducted by the district safety staff or plant safety specialist when the employee(s) report to postal facilities with 100 or more work years in the regular workforce in accordance with Article 14, Section 8 and ELM Chapter 8.

The District Safety office is not required to input Safety and Health Inspection findings for the less than 100 workyear facilities into the Safety Toolkit. The District Safety office must only enter the inspection completion date in the Safety Toolkit.

Your supporting Safety office will provide technical assistance and mutual aid as necessary. I appreciate your cooperation with this effort.



Deborah Giannoni-Jackson

Attachments

Letter of Instruction - Safety and Health Inspections at Detached Mail Unit Facilities FY 2008

To: Postmaster/Installation Head

Subject: Annual Safety and Health Inspection – Detached Mail Unit Facilities

The Employee Labor Relations Manual (ELM), Section 824.331 requires your Facility Safety Coordinator (FSC) to conduct an annual Safety and Health Inspection of your facility. The FSC must lead the inspection team (ELM 824.332). The District Safety staff members will provide technical assistance, if needed. Please take the following actions:

1. Perform the inspection using the Level 21 and below (< 50 work years) Safety and Health Inspection Checklists from the Safety, Environmental and Ergonomics Resource Page on the Safety Programs/Safety Checklists page.
2. FSCs must complete the annual safety and health inspection and enter their findings into the Safety Toolkit (for those offices with computers) or for those facilities that do not have a Postal Service computer, submit the inspection certification, attachment 2, to their supporting Safety Office.
3. Installation/Facility heads that do not have access to the Safety Toolkit should go to the Safety Resources Web page and select Toolkit Information. Click on the e1357 link in the Request a Toolkit UserID and Password Section of the table. Follow the e1357 steps and request access. Contact 1-800-688-0321 for assistance.
4. When you have completed your inspection you must:
 - a. Post a copy of the inspection findings for employee review (ELM 824.426) and provide a copy to the employee representative(s).
 - b. Establish a Hazard Abatement Committee within 5 working days of receipt of the inspection and meet to assign priorities and specific abatement dates within the limits set by the inspection team (ELM 824.52).
 - c. Correct the serious deficiencies first, and all deficiencies as soon as possible.
 - If you cannot correct the deficiencies in 20 days, prepare a Hazard Abatement Plan (HAP) in the Safety Toolkit. When the plan is complete, you can run a report that prints out the plan from the reports module of the Safety Toolkit. Mail hard copies of the report or email the report to your district manager with copies furnished to the manager, Post Office Operations, or the lead plant manager; the supporting manager, Safety; and manager, Human Resources (ELM 824.532).

If you cannot correct the deficiencies in 45 days, forward a copy of the HAP through management channels to the vice president of Area Operations, with copies to the area Human Resources manager and the area manager, Safety (ELM 824.533).

Certification Letter - Safety and Health Inspection at Detached Mail Unit Facilities

To: District Safety Office
ATTN: Manager, Safety

From:

Date:

Subject: **Safety and Health Inspection Certification Letter**

Detached Mail Unit Name: _____

Office Name	
Office Address	
City, State, Zip	
Office Phone	
Inspection Dates	

Deficiency Description:

Hazard Classification	Hazard Code	Number of Deficiencies
Imminent Danger*	I	
Serious Danger	S	
Non-Serious Danger	N	

* Imminent Danger (I) - a situation where there is a reasonable certainty that a danger exists that could cause death or serious physical harm immediately or before the danger can be eliminated through normal abatement procedures. Contact your supporting Manager, Safety before assigning a Hazard Classification of Imminent Danger

Serious Danger (S)-a situation in which there is substantial probability that death or serious physical harm could result.

Non-Serious Danger (N) - a situation that does have a direct relationship to job safety and health but probably would not cause death or serious physical harm.

We have completed our annual Safety and Health Inspection. I have

- reviewed the inspection results,
- attached a copy of the inspection report for your information,
- posted a copy for employee review,
- provided a copy of the inspection to the employee representative(s), and
- scheduled a meeting of our Hazard Abatement Committee.

The committee will (or has) assigned priorities for correction of the deficiencies found during the inspection.

I need your assistance in correcting the following deficiencies:

- 1.
- 2.

Postmaster or FSC Signature and Printed Name

**U.S. Postal Service
Small Facility Safety and Health Inspection Checklist**

Date Printed: 05/07/2007

Facility Name _____ Facility Head _____ Date Received _____
 Facility Address _____ Signature _____ Date Posted _____
 Inspection Dates _____ Date _____

Subject Level 21 & Below (<50 WY)					<50 WY	
Item	Inspection Criteria	References	Status (Y, N, NA)	Severity (I, N, S)	Comments or Actions Taken	Suggested Corrective Action Date Abated
1	Are exit routes kept clear? (spot check)	1910.37 NFPA 101, 4-5.3				Increase the emphasis on keeping exit routes clear.
2	Are exit doors unlocked on the inside when the facility is occupied?	1910.38, (d)				Ensure exit doors are unlocked from the inside when the facility is occupied.
3	Are exits and routes to exits clearly marked with readily visible, signs? (spot check)	MS-56, 229 EL-801, 8-5 NFPA 101, 4-5.3 1910.37, (b)				Mark exit routes clearly and provide readily visible exit signs at:
4	Are doors that may be mistaken as an exit marked "Not an Exit" or identified as to their function?	EL-801, 8-5 1910.37, (b)				Mark doors that are not an exit with a sign stating "Not an Exit".
5	Are walking and working surfaces free from slip, trip, or fall hazards?	1910.22, (a) EL-801, 8-7				Clean or repair walking working surface to remove slip, trip, or fall hazard.
6	Do employees wear footwear that is slip-resistant and in good condition?	EL-814, IV EL-801, 8-8				Increase the emphasis on employees wearing footwear that is slip-resistant and in good condition.
7	Do employees report slip, trip, and fall hazards using Form PS 1767?	EL-814, IX EL-801, 3-3				Reinforce the policy on reporting slip, trip, and fall hazards using Form PS 1767.
8	Are emergency lights provided where required?	EL-801, 8-5 NFPA 101, 4-5.3 1910.37, (b) MS-56, 228				Provide emergency lights at the following locations:
9	Are emergency evacuation plans current and posted?	EL-801, 8-5				Post the current emergency evacuation plan.
10	Are emergency phone numbers posted (fire, police, medical)?	EL-801, 8-5				Post emergency phone numbers where they are readily available.
11	Are storage racks, shelves, and cabinets securely anchored to the floor and wall to prevent tipping/falling?	1910.176, (b) EL-801, 8-9				Anchor unsecured storage equipment at the following locations:
12	Is storage height limited to control falling hazards (high storage >5ft)?	1910.176, (b) EL-801, 8-9				Relocate stored items at the following locations and limit the storage height to < 5 feet.

**U.S. Postal Service
Safety and Health Inspection Checklist**

Date Printed: 05/07/2007

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Subject Level 21 & Below (<50 WY)					<50 WY	
Item	Inspection Criteria	References	Status (Y, N, NA)	Severity (I, N, S)	Comments or Actions Taken	Date Abated
13	Have potential hazards to children been identified and eliminated (sharp edges, items that could be pulled down, swinging from, or climbed upon; safety caps on electrical outlets)?	EL-801, 8-9			Eliminate the following potential hazards to children:	
14	Are all live electrical circuits covered to prevent inadvertent contact?	1910.303, (g) NFPA 70			Protect live electrical circuits by installing appropriate covers at the following locations:	
15	Are electrical boxes (outlets/receptacles/function boxes) securely mounted?	NFPA 70			Securely mount all electrical boxes (outlets/receptacles/function boxes) at the following locations:	
16	Are extension cords used only for temporary wiring (not in use > 90 days)?	1910.305, (a)(2)			Install permanent wiring at:	
17	Is access to electrical panels blocked?	1910.303, (g)			Provide a Safety Talk and clear access to electrical panels at the following locations:	
18	Are all switches and circuit breaker functions identified? (spot check)	NFPA 70			Mark all switches and circuit breakers with their functions.	
19	Is each alarm system distinctive for its specific purpose?	1910.165, (b)			Adjust the alarm system so that it is distinctive for each specific purpose.	
20	Is the alarm system inspected and tested at least annually by trained Postal Service personnel or qualified contractors?	1910.165, (d)(5)			Train employees who inspect and test alarm systems, or hire a qualified contractor.	
21	Have employees received the required safety talks for the applicable required written programs?	ELM Ch8			Ensure supervisors deliver the required safety talks to their employees for the following written programs:	
22	Are fire alarm disconnecting means marked in red and labelled "Fire Alarm Circuit"?	NFPA 72, 4-4			Mark all disconnecting means for fire alarm circuits in red and ensure they are labelled "Fire Alarm Circuit".	
23	Are all alarm signals audible above background noise levels and visible above background light levels?	1910.165			Modify the alarm signals so they are audible and visible above background noise or light levels.	
24	Are fire alarm pull stations located along the normal exit paths?	1910.165, (e)			Locate the fire alarm pull station along the normal exit paths.	
25	Are manual fire alarm pull stations accessible (not blocked)?	1910.165, (e)			Maintain clear access to manual fire alarm pull stations.	

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Item	Inspection Criteria	References	Status (Y, N, NA)	Severity (I, N, S)	Comments or Actions Taken	Date Abated
26	Is access to the fire alarm circuit disconnects limited to authorized personnel only?	NFPA 72, 4-4			Restrict access to the fire alarm circuits disconnects to authorized personnel only.	
27	Are fire extinguishers readily accessible (unblocked)?	EL-801, 8-6 1910.157, (c) NFPA 10, 1-6			Install extinguishers in a readily accessible locations and ensure they are not blocked.	
28	Is an annual maintenance inspection of portable fire extinguishers performed?	1910.157, (e) MS-66, 4 NFPA 10, 6-2			Perform the annual maintenance inspection of portable fire extinguishers at the following locations:	
29	Are fire doors prevented from being blocked or held open by equipment or furniture?	NFPA 80, 15 1910.38 MS-66 NFPA 101 NFPA 80, 15-2.3 NFPA 101, 7.2.1			Clear access to fire doors and keep them closed at the following locations:	
30	Does the Postmaster inspect vehicles under his control periodically?	EL-814, X EL-801, 3-4			Ensure the Postmaster inspects the vehicles under his control periodically.	
31	Are all vehicles inspected daily prior to use by the driver?	EL-814, X EL-801, 3-5			Increase the emphasis on driver vehicle inspection prior to use.	
32	Are semi-annual driver observations performed using PS Form 4684 (spot check)?	EL-801, 3-5			Require supervisors to observe drivers at least twice a year using PS Form 4584.	
33	Do employees use Form 1767, Report of Hazard, Unsafe Condition or Practice, when necessary? (e.g. slip/trip/fall hazards, unanchored mail boxes, hazardous approaches, and bad road conditions)	EL-814, IX EL-801, 3-2			Increase the emphasis on reporting hazards and the use of Form 1767.	
34	Do employees use proper parking techniques to prevent roll-aways and run-aways?	EL-814, X PO-701, 245.27 EL-801, 3-5			Reinforce use of proper parking procedures to prevent roll-aways and run-aways (safety talk).	
35	Do supervisors verify carriers maintain a valid state drivers license?	EL-814, X EL-801, 3-5			Ensure supervisors verify carriers maintain a valid state drivers license.	

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Item	Inspection Criteria	References	Status (Y, N, NA)	Severity (I, N, S)	Comments or Actions Taken	Suggested Corrective Action	Date Abated
36	Are safety hazards identified during supervisor route inspections?	EL-801				Ensure supervisors perform route inspections and identify the existing hazards (e.g. backing, left-hand turns, parking points, etc.).	
37	Are dog bite prevention procedures followed (use of dog spray, the carrier satchel, and dog warning card)?	EL-814, IX EL-801, 3-1				Reinforce the proper procedures for dog bite prevention.	
38	Is the parking area adequately lighted?	MMO-055-83 MS-48, Table 211.522 MS-1, 5				Provide better lighting to achieve at least 1.5 ft-candles in parking lots, 2 ft-candles at entrances).	
39	Is the parking area equipped with needed signs?	MS-1, 5				Provide the following signs for the parking area:	
40	Is the parking area properly and clearly marked with directional arrows, lanes and route and parking space markings?	MS-1, 5				Mark the parking area properly and clearly. Add the following:	
41	Has the FSC completed the FSC training course (NTD # 18201-45 or an earlier version of this course)?	ELM Ch8, 817				Have the FSC complete the FSC training course.	
42	Are OSHA Forms 300 and 301 completed within 7 days of notification?	1804.7				Complete OSHA Forms 300 and 301 within 7 days of notification.	
43	Is OSHA Form 300A (log summary) signed by the facility head and posted annually (1 Feb to 30 Apr)?	1904.32				Sign and post OSHA Form 300A (log summary) annually (1 Feb to 30 Apr).	
44	Are records of weekly Safety Talks maintained locally?	EL-801, 1-7				Require supervisors to maintain records of weekly Safety Talks.	

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45	Are copies of the following written programs, or documentation to show a written program is not required, available on site: asbestos management, BBP, confined space, HAZOON, HAZMAT, and lead hazard management?	1910.147, (c) 1910.132, (d) 1910.1030, (c)(1) 1910.1001, (f)(2) 1910.146, (c)(4) 1910.1200, (e) 1910.120, (b)(1) 1910.95, (c) 1910.1025, (e)(3) 1910.134, (c) 1910.178			Develop the following required written programs or documentation to show why the written program is not required:	
46	Have employees received the awareness training for all required written programs?	ELM Ch8			Ensure employees receive the awareness training specified in the Safety Training Matrix for the following required written programs:	
47	Are hazardous chemicals listed on an inventory and maintained in a controlled storage location?	EL-810-98-2 1910.1200, (e)(1)			Complete a hazardous chemical inventory/store them in a controlled location.	
48	Are all secondary containers clearly marked with the chemical contents and dated?	EL-810-98-2 1910.1200, (f) EL-801, 8-22			Store all chemicals in their original container or appropriate secondary containers that are labelled with the name of the chemical and dated.	
49	Are closed-top trash cans provided for food wastes?	1910.141, (g)			Provide and use trash cans with tight-fitting lids.	
50	Are refrigerators, ovens, microwave, and drinking fountains kept clean?	1910.141			Keep refrigerators, ovens, microwave, and drinking fountains clean.	
51	Are portable space heaters equipped with an automatic shut-off device that activates if the heater falls over?	EL-801, 8-5			Remove the space heater from use.	
52	Are all electrical devices of the double insulated design or equipped with grounding plugs?	EL-801, 8-4 EL-801, 8-4			Ground the following equipment:	