



January 9, 2008

VICE PRESIDENTS, AREA OPERATIONS

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

This letter implements the provisions in the Memorandum of Understanding (MOU) between the United States Postal Service and the American Postal Workers Union, AFL-CIO; Subject: Offsite Safety and Health Program found at page 324 of the 2006 Collective Bargaining Agreement (CBA).

Pursuant to Employee and Labor Relations Manual (ELM), Section 811.3 the Postal Service Safety and Health Program and Occupational Safety and Health Administration (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.

For the purpose of application of this MOU the parties agree that the following shall apply:

- Districts must conduct a Safety and Health inspection only of the work areas in which the postal employee regularly works in the Off-Site Facilities.
- Safety inspections of postal employee off-site work areas, e.g. office space, and equipment will be conducted in accordance with the ELM, Section 824.1. The appropriate safety inspection is determined by the size of the host postal facility. That is, annual inspections of employees' work areas 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 ELM, Section 824.33. Semi-annual inspections of employees' work areas in off-site facilities must be conducted by the district safety staff or plant safety specialist when the employee(s) report to a postal facility with 100 or more work years in the regular workforce in accordance with ELM, Section 824.32.
- 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 ELM, Section 824.6.

The District Safety office is not required to input Safety and Health Inspection findings for these 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 Giannopoli-Jackson

Attachments

cc: Managers, Human Resources (Area)
Managers, Safety (Area)
Chip Kappler

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 can not 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
Safety and Health Inspection Checklist**

Date Printed: 06/29/2007

Facility Name _____

Facility Head _____

Date Received _____

Facility Address _____
Signature _____

Date Posted _____

Inspection Dates _____

Subject Level 21 & Below (<50 WY)
Item Inspection Criteria

Item	Inspection Criteria	References	Status (Y/N/NA)	Severity (I/NS)	Comments or Actions Taken	Suggested Corrective Action	Date Abated
1	Are exit routes kept clear? (spot check)	1910.37					<50 WY
2	Are exit doors unlocked on the inside when the facility is occupied?	NFPA 101, 4-5.3 1910.36, (c)				Increase the emphasis on keeping exit routes clear.	
3	Are exits and routes to exits clearly marked with readily visible, signs? (spot check)	MS-56, 229 EL-801, 8-5				Ensure exit doors are unlocked from the inside when the facility is occupied. 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?	NFPA 101, 4-5.3 1910.37, (b) EL-801, 8-5				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, N EL-801, 8-5				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				Provide emergency lights at the following locations:	
9	Are emergency evacuation plans current and posted?	NFPA 101, 4-5.3 1910.37, (b) MS-56, 228 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.	

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Signature _____

Date Posted _____

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Subject Item	Level 21 & Below (<50 WY)	Inspection Criteria	References	Status (Y, N, NA)	Severity (I, M, S)	Comments or Actions Taken	Suggested Corrective Action	Date Abated
13		Have potential hazards to children been identified and eliminated (sharp edges, items that could be pulled down, swinging iron, or clipped 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/junction boxes) securely mounted?	NFPA 70				Securely mount all electrical boxes (outlets/receptacles/junction boxes) at the following locations:	
16		Are extension cords used only during remodeling, maintenance, or repair, or for decorative purposes less than 90 days?	1910.305, (a)(2)				Remove extension cords, or install permanent wiring, at the following location(s):	
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, (c)(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 signal(s) 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.	

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25	Are manual fire alarm pull stations accessible (not blocked)?		1910.165, (e)				Maintain clear access to manual fire alarm pull stations.	
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, 8-5 1910.157, (c) NFPA 10, 1-5 1910.157, (e) MS-56.4				Install extinguishers in a readily accessible locations and ensure they are not blocked. Perform the annual maintenance inspection of portable fire extinguishers at the following locations: Clear access to fire doors and keep them closed at the following locations:	
28	Is an annual maintenance inspection of portable fire extinguishers performed?		NFPA 10, 6-2 NFPA 80, 15 1910.36 MS-56 NFPA 101					
29	Are fire doors prevented from being blocked or held open by equipment or furniture?		NFPA 80, 15-2.3 NFPA 101, 7.2.1					
30	Does the Postmaster inspect vehicles under his control periodically?		EL-814, X				Ensure the Postmaster inspects the vehicles under his control periodically.	
31	Are all vehicles inspected daily prior to use by the driver?		EL-801, 3-4 EL-814, X				Increase the emphasis on driver vehicle inspection prior to use.	
32	Are semi-annual driver observations performed using PS Form 4584 (spot check)?		EL-801, 3-5 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, X 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				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-801, 3-5 EL-814, X EL-801, 3-5				Ensure supervisors verify carriers maintain a valid state drivers license.	

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36	Are safety hazards identified during supervisor route inspections?	EL-801					<50 WY
37	Are dog bite prevention procedures followed (use of dog spray, the corner satchel, and dog warning card)?	EL-814, K EL-801, 3-1				Ensure supervisors perform route inspections and identify the existing hazards (e.g. backing, left-hand turns, parking points, etc). Reinforce the proper procedures for dog bite prevention.	
38	Is the parking area adequately lighted?	MMO-055-83 MS-49, Table 211.522 MS-1, 5 MS-1, 5				Provide better lighting to achieve at least (1.5 ft-candles in parking lots, 2 ft-candles at entrances).	
40	Is the parking area properly and clearly marked with directional arrows, lanes and route and parking space markings?	MS-1, 5				Provide the following signs for the parking area: Mark the parking area properly and clearly. Add the following:	
41	Has the FSC completed the FSC training course (NTD # 19201-45 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?	1904.7				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, HAZCOM, 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:	<50 WY Abated
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-810-96-2 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-810-96-2 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, 6-4 EL-801, 8-4				Ground the following equipment:	