



Department of the Air Force
HQ AEDC (AFMC)
Arnold AFB, TN 37389

Safety, Health, and Environmental Standard

Title: COMPLIANCE AND INSPECTION

Standard No.: A3

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Releasability: There are no releasability restrictions on this publication.

The provisions and requirements of this standard are mandatory for use by all personnel engaged in work tasks necessary to fulfill the AEDC mission. Please contact your safety, industrial health and/or environmental representative for clarification or questions regarding this standard.

Approved:

Contractor/ATA Director
Safety, Health, and Environmental

Air Force Functional Chief

Record of Review/Revision

(Current revisions are highlighted in yellow and marked with a vertical line in the right margin.)

Date/POC	Description
03/06/2014	Updated for 3-year review. Major restructuring of content – review entire standard. Clarified roles/responsibilities in Section 4. Added IH non-annual survey retention period of 2 years in item 4.2.2.7. Reduced IH survey retention from 30 years to 10 years in item 4.2.3.15. Made necessary edits to reflect change in inspection responsibilities (reflect budget cuts) including all references to inspection of recreational facilities and beaches. Administrative changes throughout: ‘SHG’ to ‘SHE’; “Operating Contractor” to “Base Operating Contractor.” Deleted obsolete references.
03/01/2013	Added NFAC supplement; no other change.
08/08/2011 R. A. Eichel/ B. Bragg	Revised to align with SHE Standard A5; deleted requirements from this standard which had been incorporated into A5. Deleted requirement for OGM review SHCI before issuance. Changed requirement for HII from Semi-Annual to monthly. Deleted references to compliance inspections. Changed requirement to document HII and SI in Data Base and document any findings on an SOR. Added link for annual safety inspection schedule. Added requirement to update HAL with date AF1118 is posted. Added reference to AFI 91-202-AFMCSUP. Deleted references to AEDC SHE Std A7 and changed to A5.
08/20/2009 R. A. Eichel	Para 4.5.1.9 - Changed 30 day suspense to 21 day suspense from date of out-briefing.
06/04/2008 R.A. Eichel	Annual review. Added PRES as a definition for pre and post season inspections of recreational and beach areas, FIRE as a definition for fire hazards and EXPL as a definition for explosive hazards/inspections. Re-numbered paragraphs 4.1.2 thru 4.1.6. Minor word changes to paragraph 4.2.2.2 and 4.4.2.11. Added plural to hazard in paragraph 4.2.6.2. Minor typo correction in paragraph 4.4.1.2. Revised section 4.5.1. Changed 30 day suspense from date of OGM signature to 30 days from date of out-briefing.
03/19/07 R.A. Eichel	Annual review. Re-defined tracking number, added 1 digit to building number in tracking number.
07/15/06 R.A. Eichel	Annual review. Added definitions. Major rewording.
07/15/05 A.W. Jennings	Annual review; no change required
02/18/04 A.W. Jennings, R.A. Eichel M.B. Bragg	Developed standard on compliance and inspection of AEDC facilities and operations



Safety, Health, and Environmental Standard

COMPLIANCE AND INSPECTION

1.0 INTRODUCTION/SCOPE/APPLICABILITY

- 1.1 Introduction – The primary responsibility for identifying workplace hazards, to include equipment and environmental situations that place workers, equipment, or facilities at risk, rests with the individual. Managers, supervisors, and individuals identify hazards/deficiencies by evaluating the work environment and job tasks. Safety, health, environmental, and fire-protection personnel provide technical assistance.
- 1.2 Scope – This standard establishes local safety and industrial hygiene assessment and inspection requirements for the AEDC Base Operating Contractor. Through inspections the safety and health staff aids the **installation** Commander in determining the condition of work areas, the safety of work practices and the degree of compliance with applicable safety and health standards. Assessments measure the degree of compliance with safety program requirements.
- 1.3 Applicability – This standard applies to all Base Operating Contractor personnel conducting operations, maintenance, testing, and/or support to Arnold Engineering and Development **Complex** (AEDC).

2.0 BASIC HAZARDS/HUMAN FACTORS

Personnel conducting inspections, audits, surveys, etc. of facilities, workplaces, and operations must be briefed and aware of the potential hazards of the area and ensure proper safety procedures are followed, to include wearing of appropriate personal protective clothing and equipment (PPE). The purpose of the compliance inspection is to identify hazards; this is the first step in the Operational Risk Management process (ORM). When a hazard poses immediate danger to personnel, immediate corrective actions shall be taken.

All personnel at AEDC have the responsibility to ensure a safe and healthful work environment exists, where recognized hazards are eliminated or controlled at acceptable levels. If unsafe and unhealthful working conditions exist, they shall be eliminated or controlled through engineering, substitution, isolation, administrative controls, revised procedures, special training, or PPE.

3.0 DEFINITIONS

Assessments – Analysis of the effectiveness and potential of the safety or health program.

Base Operating Contractor – A base contractor directly accountable to the Air Force for the AEDC mission.

Controls – Action(s) taken to eliminate or mitigate hazards or reduce their risk.

Compliance Audit/Inspection – A method of identifying and reporting workplace hazards and nonconformance with AEDC Safety Standard requirements. Lockout/tagout, confined space, fall protection, forklifts are some examples of compliance audits that are conducted.

Deficiency – A violation of a Safety, Health, or Environmental (SHE) standards, regulation, or other written guidance which requires a Risk Assessment Code (RAC) number be assigned.

Environmental, Safety, Occupational Health Council (ESOHC) – A quarterly meeting to brief the AEDC installation Commander on the status of the environmental, safety and occupational health programs. Council members include the Air Force Group Commanders and Senior Staff as well as the Contractor's General Manager and Department Directors. Other members are at the discretion of the Commander and General Manager.

EXPL – An inspection conducted by AEDC Explosives Safety personnel. Designation EXPL, in the type of inspection column on the Hazard Abatement Log (HAL), is used to track deficiencies found during these specific inspections.

Finding – A statement included on an inspection report to identify a safety or health issue, or situation, discovered during the inspection that could have positive or negative impact on the safety and health program. Deficiencies noted during inspections are reported as findings. Findings are based on the weight of evidence, professional knowledge, and good judgment.

Fire – An inspection conducted by AEDC Fire Department personnel, where fire hazards were identified that do not fall under the category of a Fire Safety Deficiency (FSD). Designation FIRE, in the type of inspection column on the HAL, is used to track the deficiencies found during these specific inspections.

Hazard – Any real or potential condition that can cause injury, illness, or death to personnel; or damage to, or loss of, equipment or property, mission degradation, or damage to the environment.

Hazard Abatement Log (HAL) – The database log kept by the Base Operating Contractor SHE branch which records and tracks hazards by identification/description, location, finding, RAC, interim control measures, and completion date.

High Interest Inspections (HII) – Inspections of facilities, workplaces, and/or operations which are conducted based on factors such as exposure to and potential severity of hazards, actual accident experience, special emphasis programs, changes in the organization's staffing or workplaces, or other events that increase risk of accidents and occupational illnesses.

Industrial Hygiene Survey – A method of identifying workplace environmental and occupational hazards and exposures.

Inspection – The process of determining compliance with safety and health standards through physical surveys of workplaces, operations, and facilities.

Interim Control Measures (ICM) – Those measures developed by the Contractor SHE professional in concert with the functional manager or supervisor to reduce the hazards of a RAC 1, 2, or 3 finding to an acceptable level, i.e. RAC 4 or 5.

Monitoring/Sampling – A method of determining risk of exposure to environmental and/or occupational hazards.

Outside Contractor/Subcontractor – An organization employed by a contractor or the Air Force to do construction, maintenance, repair or other work at AEDC. There is no employment relationship, control or supervision of the subcontractor's employees by AEDC contractors. Also referred to as the construction contractor.

Operational Risk Management (ORM) – The process used to assist management and supervision in identifying and controlling safety and health hazards and making informed decisions. The process involves six steps:

1. Identify the hazard
2. Assess hazard risks to personnel, equipment, and mission
3. Develop control measures
4. Make risk decisions to eliminate all unnecessary risks
5. Implement controls
6. Supervise and evaluate the appropriateness of established controls and making adjustments where necessary

Risk Assessment – A structured process to identify and assess hazards. An expression of potential harm, described in terms of hazard severity, accident probability, and exposure to hazard. See AEDC SHE Standards A4 System Safety and A5 Hazard Abatement Program for further details.

Risk Assessment Code (RAC) – An expression of the risk associated with a hazard that combines the hazard severity and accident probability into an Arabic numeral as described in AEDC SHE Standard A5.

Safety and Health Compliance Inspection (SHCI) – The formal process used for inspecting facilities, workplaces and operations at AEDC. SHCI also refers to an annual inspection with regards to Safety.

Safety Observation Report (SOR) (Form GC-1703) – The report form used for immediate safety observations and hazard reporting. See AEDC SHE Standard A5 Hazard Reporting Program.

Spot Inspections (SI) – A method of identifying and reporting workplace hazards. Spot inspections may utilize the SOR or other in-depth inspection criteria, depending on the nature of the inspection to be performed.

Tracking Number – A unique 21-character number assigned by SHE to any safety or health deficiency, used to track deficiencies until they are closed; this number includes: a 4-digit alpha and numeric organization code, separated by a dash; followed by a 5-digit alpha or numeric building number, separated by a dash; followed by a 6-digit date, starting with a 2-digit numeric year, preceded by a 2-digit numeric month, preceded by a 2-digit numeric day, separated by a dash; followed by a 3-digit numeric sequence number. The sequence number begins with 001 and increases by one digit for each identified deficiency but resets to 001 anytime one of the preceding data elements change, i.e., SH00-01478-110430-001.

4.0 REQUIREMENTS/RESPONSIBILITIES

4.1 Requirements

- 4.1.1 A formal Safety and Health Compliance Inspection (SHCI) Process shall be implemented and documented as outlined in AFI 91-202, Chapter 3.
- 4.1.2 As a minimum the SHCI Program shall include: Annual Safety Inspections (referred to as SHCIs), Spot Inspections (SIs), High Interest Inspections (HIIs), and Annual Industrial Hygiene Inspections.

4.2 Base Operating Contractor Responsibilities

4.2.1 Management Shall

- 4.2.1.1 Provide safe and healthful workplaces for all employees and require functional managers and supervisors to enforce the AEDC safety program requirements within their areas of responsibility.
- 4.2.1.2 Provide the safety and health compliance inspection team with the appropriate supervisor/manager of the area to be inspected for coordination of activities.
- 4.2.1.3 Use the ORM process to ensure that hazards are identified and corrected.
- 4.2.1.4 Establish a course of action for dealing with inspection deficiencies.
- 4.2.1.5 Review hazard abatement projects, coordinating with the appropriate Air Force counterpart, to establish priorities for corrective actions.
- 4.2.1.6 Attend the **semiannual** ESOHC and be prepared to brief RAC 1, 2, 3 deficiencies and provide the overall status of their safety and health programs, to include how it is entered into their budget.

4.2.2 Functional Manager/Supervisor Shall

- 4.2.2.1 Ensure all personnel have safe, healthful work environments where recognized hazards are eliminated or controlled at acceptable levels. If unsafe or unhealthful working conditions exist, eliminate or control them through engineering, substitution, isolation, administrative controls, revised procedures, special training, or use of PPE.
- 4.2.2.2 Ensure applicable AEDC SHE Standards and OSHA guidance for the workplace and operations are available to personnel.
- 4.2.2.3 Ensure all personnel under their direct control follow instructions and requirements contained in the AEDC SHE Standards applicable to the task(s) they are performing.
- 4.2.2.4 Ensure a functional manager, supervisor or qualified designated representative accompanies the SHCI team during an inspection.
- 4.2.2.5 Evaluate and process hazard reports per AEDC SHE Standard A5.
- 4.2.2.6 Ensure timely hazard abatement of items tracked in the HAL.
 - 4.2.2.6.1 Ensure accurate data is entered into the HAL (for example): Entry Dates, POCs, Estimated/Actual Completion Dates, Interim Control Measures (ICMs), Work Order/Work Request or Project Numbers, AF Form 1118 Posting Dates, Estimated Costs to Abate.
 - 4.2.2.6.2 Ensure RACs 1, 2 and 3 are reviewed by SHE, and ICMs are jointly developed by SHE and the Functional Manager or Supervisor.
 - 4.2.2.6.3 Ensure that RACs 1, 2 or 3 that have not been corrected within 30 days of notification are reported to SHE for review and inclusion in the HAL. Post completed AF Form 1118s for these RACs.
 - 4.2.2.7 Brief all area personnel on inspection results. The routine scheduled baseline industrial hygiene (IH) survey report shall be maintained on file in the workplace for a minimum of 10 years and **non-routine, special IH survey reports shall be maintained on file in the workplace for a minimum of 2 years.** A copy of the survey report shall also be posted on the workplace bulletin board for a period of 10 working days after receipt to allow all workers free access to the findings.

4.2.2.8 Apply the ORM process to the workplace, including investigating and correcting any hazardous condition observed or reported, enforcing all applicable safety and health practices, and reporting hazardous conditions promptly to a superior authority if immediate onsite correction is not possible.

4.2.2.9 Provide status of all open RACs 1, 2 or 3 to SHE every 30 days.

4.2.3 Safety, Health, and Environmental (SHE) Shall

4.2.3.1 Be allowed to enter a workplace to verify working conditions of contractor personnel. Accompaniment by the functional manager, supervisor, or designated representative is preferred.

4.2.3.2 Have the authority to direct contractor/subcontractor activities only when a condition exists, which presents imminent danger to personnel. In all other situations, discrepancies noted during inspections are reported as findings and forwarded to the functional manager, supervisor, contract monitor, and/or department director for resolution.

4.2.3.3 Conduct workplace safety inspections (SHCIs) annually for each functional area.

4.2.3.3.1 Report SHCI results in accordance with this standard. SHE shall publish, prior to October 1, a schedule of SHCIs for the following Fiscal Year. This schedule shall be made available to directors and Air Force counterparts.

4.2.3.3.2 Notify the director, functional manager, or supervisor of the area(s) to be inspected prior to the start of the inspection. Update the director and/or functional managers of area inspections on a monthly basis. Monitor any management findings along with the director and/or functional managers.

4.2.3.3.3 Verify past inspection deficiencies are closed as applicable.

4.2.3.3.4 Brief AEDC/SE weekly on inspection progress, including findings.

4.2.3.3.5 Prepare an SHCI report that consists of two major elements: (1) a safety program management element and (2) an execution compliance element.

4.2.3.3.5.1 The safety program management element of the inspection shall consist of an evaluation of those safety program elements applicable to the area, such as training, procedures, lockout/tagout, confined space, required inspections, and participation in job safety analyses or reviews (JSAs or JSRs), safety briefings, safety meetings, toolbox meetings, and applicable documentation for those elements.

4.2.3.3.5.2 The execution compliance element shall consist of inspection of the area for compliance with applicable safety standards, required program elements, conditions, safety behaviors and practices, and sampling as required. Each finding from the execution portion shall be clearly written to identify the hazard and corrective action required. ICMs shall be included for all RACs 1, 2, and 3. References to specific regulatory agency standards or regulations shall be provided for each identified hazard.

4.2.3.3.6 Focus SHCIs on Base Operating Contractor activities. If Base Operating Contractor projects involve Outside Contractors, the specific employer responsible for violations shall be noted for each hazard listed. Applicable project managers (AF or ATA) shall also be notified of any violations to determine the appropriate corrective action.

4.2.3.3.7 Submit a written report to the SHE Director that summarizes annual inspection activities. The report should contain any positive comments on the status of the safety program and its execution. The report should also identify any safety finding trends, or management related issues. A copy of the report shall be forwarded to AEDC/SE.

4.2.3.4 Conduct spot inspections (SIs), when deemed appropriate based on professional judgment, or at the discretion of SHE Management, and with or without prior notice.

4.2.3.5 Conduct high interest inspections (HIIs) on a monthly basis and typically without prior notice.

4.2.3.6 Document inspections in the applicable SHE databases and document any deficiencies using SORs, in accordance with AEDC SHE Standard A5.

4.2.3.7 Ensure ICMs are put in place immediately in cases of imminent danger to people or property.

4.2.3.8 Review inspection deficiencies and assign RACs as described in AEDC SHE Standard A5, and assign tracking numbers in accordance with this standard. Note deficiencies closed during the inspection in the HAL as "COS" (corrected on the spot).

- 4.2.3.9 Ensure immediate corrective action is taken for any findings that represent a case of imminent danger.
- 4.2.3.10 Ensure inspection findings are briefed to the functional manager, supervisor, or designated representative.
- 4.2.3.11 Maintain the HAL in accordance with AEDC SHE Standard A5.
- 4.2.3.12 Ensure only qualified safety and industrial hygiene personnel evaluate hazards and deficiencies, assign RACs and tracking numbers as appropriate, and coordinate with the functional manager or supervisor the mitigating controls for all RACs 1, 2, and 3.
- 4.2.3.13 Provide status of all unabated hazards and deficiencies to AEDC/SE prior to the ESOHC meeting, as well as reporting all completed abatement actions
- 4.2.3.14 Develop base-wide communications for the AEDC work force to share pertinent safety and health information and/or mishap investigation results.
- 4.2.3.15 Maintain the industrial hygiene surveys and reports on file for a minimum of 10 years.

4.2.4 SHE Industrial Hygiene (IH) Shall

- 4.2.4.1 Conduct special IH surveys at the request of the functional manager, supervisor, employee, or SHE Director in order to evaluate potential health hazards and work processes identified during the course of day-to-day operations that are not identified during annual surveys or when processes change requiring evaluation.
 - 4.2.4.1.1 May also conduct special IH surveys in an area to identify compliance issues related to worker exposures.
 - 4.2.4.1.2 Communicate survey results to appropriate management and surveyed worker(s); verbally, in writing and/or through a written survey report, as required.
- 4.2.4.2 Conduct scheduled IH surveys on a frequency of every 12 months, 30 months or as needed, based on the health hazards, potential health hazards and control of the hazards found in the workplace.
 - 4.2.4.2.1 May also conduct follow-up IH surveys to ensure findings and recommendations are addressed and that actions taken to address findings and recommendations are effective.
 - 4.2.4.2.2 Communicate findings and recommendations to appropriate management and surveyed worker(s) through a written survey report.
- 4.2.4.3 Ensure SHE Safety reviews deficiencies.
 - 4.2.4.3.1 Enter deficiencies into the HAL and check status with area manager/supervisor on a regular basis.
 - 4.2.4.3.2 Ensure a completed AF 1118 for all RACs 1, 2 and 3 not corrected within 30 days is posted.

4.2.5 SHE Director Shall

- 4.2.5.1 Ensure all safety or health inspections are conducted in a professional manner, findings are documented accurately and objectively, and the findings and deficiencies are communicated to the affected area's functional manager or supervisor, and department director.
- 4.2.5.2 Provide final review of SHCI reports.
- 4.2.5.3 Determine the appropriate forum for base-wide communications related to safety and health findings and/or mishap investigations (for example): AEDC *High Mach*, base-wide bulletins, memoranda, updated training courses, safety alerts, and/or toolbox topics.
- 4.2.5.4 Designate safety-related emphasis areas for purposes of HII.
- 4.2.5.5 Ensure Department of Labor (DOL) OSHA inspectors are received and accompanied by appropriate staff representatives, i.e., safety, health, etc.
- 4.2.5.6 Attend all DOL OSHA inspector in-briefings and out-briefings, and accompany inspectors during occupational health inspections.

4.2.6 Employees Shall

- 4.2.6.1 Comply with the AEDC SHE Standards, OSHA regulations, and applicable DOD Standards.

- 4.2.6.2 Promptly report safety, fire, and health hazards.
- 4.2.6.3 Have the opportunity to request inspections of unsafe or unhealthful working conditions or report those conditions to the functional manager or supervisor, SHE Director, Fire Protection, or OSHA officials without fear of reprisal.
- 4.2.6.4 Have access to applicable AEDC, OSHA, and AFOSH standards, installation injury and illness statistics, safety, fire protection, and health program procedures, and their own exposure and medical records.
- 4.2.6.5 Decline to perform an assigned task because of a reasonable belief that the task poses an imminent risk of death or serious bodily harm without fear of reprisal. The person and local management should request an assessment by SHE before proceeding.
- 4.2.6.6 Be advised that OSHA officials, as representatives of the Secretary of Labor, may conduct announced or unannounced inspections of nonmilitary-unique workplaces and operations where Air Force civilian personnel work. OSHA inspections may be in response to a mishap or a complaint from a Base Operating Contractor or Air Force employee; may be part of OSHA's annual evaluation of Air Force programs; or may be solely at the Secretary of Labor's discretion.

4.3 AEDC/TSD-SG Responsibilities

AEDC/TSD-SG shall conduct Public Health Surveys/Inspections in accordance with AF requirements.

5.0 TRAINING

- 5.1 SHE personnel shall be trained and qualified to perform Safety and Health Compliance Inspections, Audits, and Industrial Hygiene Assessments.
- 5.2 The SHE Director shall determine the required qualifications for SHE personnel to conduct Safety and Health Compliance Inspections, Audits, and Industrial Hygiene Assessments.

6.0 INSPECTIONS/AUDITS

Other safety and/or health inspections, audits or surveys may be conducted as required.

7.0 REFERENCES

- AEDC Safety, Health, and Environmental Standards
- AFI 91-202, The US Air Force Mishap Prevention Program
- AFI 91-203, Air Force Consolidated Occupational Safety Instruction
- DODI 6055.1, DoD Safety and Occupational Health (SCH) Program, Aug. 19, 1998

8.0 SUPPLEMENT

- NFAC A321-0801-XSP- A3 Compliance and Inspection

A321-0801-XSP- A3 Compliance and Inspection

This supplement has been approved for the NFAC Site.

Review: This supplement will be reviewed and updated using the same cycle as AEDC Safety, Health, and Environmental (SHE) A3 Compliance and Inspections.

References: AEDC SHE Standard A3 Compliance and Inspection

Scope:

This supplement provides a means to measure the overall compliance with applicable safety, health, and environmental requirements, to minimize loss of resources, and to protect NFAC personnel from occupational deaths, injuries, or illnesses by managing risks.

NFAC will comply with AMES Health and Safety Manual 1700.1 when applicable. For issues not addressed in the Ames Health and Safety manual, refer to AEDC SHE Standard A3. For Environmental issues, refer to AMES Environmental Handbook (APR) 8800.3.

This supplement applies to all personnel conducting operations, maintenance, testing and support at NFAC, NASA AMES.

NFAC Worksite Application:

- I. NFAC Site Management shall ensure all employees comply with this supplement.
- II. NFAC Safety Engineer/Management Designee shall
 1. Conduct management walk-through/area safety inspections on a monthly basis with all areas being inspected four times annually. All quarterly safety inspections will be documented in the appropriate monthly report and findings shall be entered into the NFAC Hazard Abatement Log (HAL).
 2. Review and evaluate submitted NFAC Safety Observation Reports A321-0801-XSF-03 for ATOM personnel. Hazards shall be assigned a Risk Assessment Code (RAC) and entered into the NFAC HAL in accordance with NFAC Hazard Abatement Supplement A321-0801-XSP A5.
- III. NFAC Staff shall
 1. Follow this supplement.
 2. Report hazards to supervision and NFAC Safety Engineer verbally, anonymously, or with the NFAC Safety Observation Reports A321-0801-XSF-03 for ATOM personnel. When assigned, they will participate in the monthly area inspections.