



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

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February 5, 2015

EMS TRANSMISSION: 02/06/2015
Instruction Memorandum No. ID-2015-018
Expires: 09/30/2018

To: District Managers
Telecommunications Team Supervisors
Telecommunications Team Members
District Safety

From: State Director

Subject: Establishment of Risk Management Worksheets (RMW) for Radio Communications
Sites and Facilities DDs: 3/13/2015; 9/30/2015; 9/30/2016; 9/30/2017

Program Area: Safety, Engineering, and Radio

Purpose: To ensure compliance with national policy, this Instruction Memorandum (IM) establishes a timeline and guidance for Radio Infrastructure Site Points of Contact (RI Site POCs) to publish Risk Management Worksheets (RMWs) for each RI site and each climbable RI communications tower where they are designated as the RI Site POC. This IM also establishes minimum involvement of District Safety and the State Telecommunications Lead in the development, approval, and subsequent dissemination and availability of RMWs.

Policy/Action: This IM reiterates and clarifies national policy stating that qualified radio support personnel are the subject matter experts regarding all occupational risks at those RI Sites where they are designated the POC. As such, they are responsible to ensure appropriate, accurate, and comprehensive RMWs are developed and administered for each site they are assigned.

The RI Site POC is the primary stakeholder. District and state safety personnel, telecommunications supervisors, state telecommunications lead, and the site POC will work together to prepare RMWs for no less than 1/3rd of their assigned RI sites each fiscal year (FY). Prepared RMWs will be submitted to the District Safety personnel and the State Telecommunications Lead for final review before requesting approval and signature by the Risk Decision Authority. District and State Safety personnel as well as the State Telecommunications

Lead have the authority to require changes to active RMWs any time a new risk is identified or a risk is deemed to require change to its initial or residual risk assessment.

All RMWs will be created using the newest BLM form 1112-005 located at: <https://blmspace.blm.doi.net/oc/intra/dbs/eForms%20Library/Forms/1000-1199.aspx>. If the RI site has a climbable tower, that site will have an RMW for the site itself and another RMW specific to the tower. Due to the extreme inherent risk that comes with tower climbing, the RMW developed for that task will have at least one entry speaking to the identified hazard of the fall risk associated with climbing towers from 20 to 100+ feet in height. This hazard must have a minimum initial risk assessment of Extremely High, and a residual hazard risk of High. Risk Decision Authority at this level will be at the District Manager or higher.

Timeframe: RI Site POCs are to provide an action plan using Attachment 1 by March 13, 2015, identifying a proposed timeline with which to achieve the established key dates. The timeline should include no less than 1/3rd of assigned sites each year to be completed by the end of FY15, FY16, and FY17.

Background: BLM Manual 1292 requires RMWs be established for all Radio Infrastructure Sites in the BLM. BLM Handbook 1292-3 requires the review of RMWs prior to any RI site visit without distinction to the type of visitor. In May 2013, a program review identified that the BLM Idaho Radio Program has not maintained an RI Site Safety Program in accordance with established BLM Policy, with the keystone of the program being the Risk Management Worksheet. At that time, most if not all RMWs were found to be expired, missing clearly applicable hazards, risks improperly mitigated to too-low a residual risk, etc. The RI Site POCs, as the site subject matter experts, have been notified and trained on this issue. An example RMW was drafted and made available in June 2013 to aid in the development. In February 2014, a training session attended by state and district safety personnel and the RI Site POCs was held. In April 2014, the State Radio Program Supervisor requested that one full RMW set be developed and formally submitted by the end of fiscal year 2014 by each RI Site POC. Telecomm Specialists (POCs) and their supervisors were notified that this IM would be forthcoming. To date, no RMW has been received in response.

An RI Site is any location in which BLM radio system equipment is installed for permanent or seasonal use and configured to receive and/or transmit, and ancillary services used to extend coverage. Examples include mountaintop repeater sites, Guard/Fire Stations, Air Tanker Bases, and District/Field Offices. A single location may contain more than one permanently installed radio. Each physically separated transmitter/transceiver is considered a separate RI Site. For example, a fixed transmitter in the engine shed of a Guard Station is a separate fixed station from the transmitter located in the living quarters of the same Guard Station.

Manual/Handbook Sections Affected: None.

Coordination: This IM was coordinated with State Safety, BLM National Radio Operations Branch Safety, and the State Telecommunications Lead/Tower Climbing Coordinator.

Contact: If you have any questions, please contact Jason W. Parks, State Telecommunications Lead, at (208) 373-3941 or by email at jwparks@blm.gov.

Boise District with Union: Management is reminded to notify and satisfy any bargaining requirements prior to implementation.

Signed:

Peter J. Ditton

For Timothy M. Murphy

Authenticated by

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Program Analyst

2 Attachments:

1 - [Action Plan for Completing Risk Management Worksheets](#) (1p)

2 - [Guidelines and background for completing Risk Management Worksheets](#) (2pp)

cc:

State Safety Manager

State Fire Management Officer