National Occupational Safety, Health,
and
Environmental Compliance Committee (OSHECCOM) Meeting Minutes

The second National OSHECCOM meeting was held in Washington, DC, on October 9, 1996. Note this is not an official transcript of the meeting as discussions and individual's comments are paraphrased.

OSHECCOM Members in Attendance

Gary O'Toole for Louise Maillett, API-1
Donald J. Wiener for Alan Gershon, ANE
Pete Sweers, ATX-1
Kevin Dermody for Kay Frances-Dolan, AHR11
Steve Zaidman, ASD-1
Bill White, AFS-2
Bogdan Dzakovic for Leo Boivin, ACS
Shirley R. Edwards for D. Fuller, AGC-620
Tony Becker, AEA-475
Bill Kansier, ANS-500
Jeanne Kosch, AEE-200
Maryalice Locke, AEE-200
George Darrough, PASS Union Rep
Keith Messina, PASS Union Rep
Suzanne Pellosmaa, NAATS Union Rep
Donald Oliveira, NATCA Union Rep
Donald Parker, NAGE Union Rep

Other Attendees

James Erickson, AEE-1
Gary Ridgway, AEE-200
Sue Green, AEE-200
Tom Holloway, AEE-200
Bob Rams, ANS-500

The meeting was called to order by Gary Ridgway of AEE-200. Highlighting the introductions and opening remarks was James Erickson, AEE-1, reminding everyone that the idea of the Committee was to pull together a broad cross-sectional team to deal with relevant issues.

OLD BUSINESS

HAZMAT Training Committee

The HAZMAT Training Committee had met earlier in the week. Bill Kansier of ANS-500 discussed the results of the meeting.

- safety training needs coordination and consistency
- a five-year strategic plan will be developed for a future business model (document is due out in early December 1996)
- an audit will be conducted of existing courses to determine where safety, health and environmental considerations are needed.

A discussion took place regarding the safety awareness course for all employees. The training committee is looking at the best way to accomplish the training. No final decision has been made.

Regional OSHECCOMs

Several of the regions still have not formed their committees. A suggestion was made to set a time limit for all regions to have their committees in place. Mr. Kansier told the members that after the last meeting a letter dated August 26, 1996, signed by Stanley Rivers and Ronald Morgan was sent, directing managers to participate in establishing committees. They had 6 months to set up the committees. Ms. Locke suggested that AEE write a new letter restating the need for the committees, responsibilities of each facility manager, and a definitive date for having the committees established. No decision was made to move forward on the suggestion.

An issue was raised regarding the difficulty of communications, and the crossing of organizational lines. Some regions who have started their committees, claim the system breaks down when it gets to the facilities. The regions feel that they do not have the proper guidance and do not know whom to call. The RPMESs and ROSHMs are the appropriate contacts for guidance. A request was made for a list of the Regional Safety Personnel.

ACTION: Mr. Kansier will provide a list for the members at the next meeting.

Union members voiced concern over access to office equipment when dealing with OSHECCOM issues. This matter needs to be referred to appropriate Labor Relations personnel for resolution.

The question was raised by the union members why there were not given proper notification of when they were to travel. Sue Green commented by saying the travel orders were delayed because they could not be signed before the beginning of the new fiscal year (October 1). In addition, Tom Holloway stated that in the future the meeting would not be held close to the beginning of the fiscal year.

NEW BUSINESS

Environmental Overview/Role of Environmental Compliance in OSHECCOM - Tom Holloway

Dr. Holloway stated that the Agency's focus is on the safety and health of employees as well as the flying public. The presentation gave an overview of how environmental compliance is a component of OSHECCOM. He explained how regulation drives the compliance issue and presented a quick summary of the different types of environmental laws covering the past, present and future actions of the Agency. He also illustrated the massive rise of legislation from 1920s to present day. He outlined the compliance process. Congress passes laws, which mandate EPA and OSHA regulations, which affect DOT and in turn FAA. Within FAA, AEE translates the regulations into FAA policy, ANS provides implementation guidance and budget

advocacy, and field facilities carry out the needed compliance activities. The field is subject to inspections from EPA/OSHA. The field is also subject to regulations and inspections from States which can be more stringent than Federal requirements. Dr. Holloway reviewed the civil and criminal penalties associated with environmental violations, what triggers liability, and how to minimize liabilities. He concluded the presentation by handing out the Executive Guide to Facility Environmental Management and stating that at the next meeting there will be a video on Environmental Liabilities.

Tony Becker reminded the committee that besides the laws and regulations mentioned by Dr. Holloway, the Agency is also subject to the Federal Facilities Compliance Act which treats Federal government agencies the same as any other entities.

George Darrough asked who was the appropriate person to report compliance issues to. Mr. Ridgway told him the local RPMES should be contacted.

ECAP/OSHCAP Program in the FAA - Bob Rams presented for William Kansier.

Bob Rams stated that the objective of the program was to obtain baseline information through inspections performed by the U.S. Army Corps of Engineers under an Interagency Agreement. He went on to define ECAP and OSHCAP and to explain why a baseline was needed and what was driving the need. The objectives of the program include identifying problem areas, increasing the awareness of compliance issues, and developing corrective actions throughout all levels of the Agency. ECAP and OSHCAP protocols were established to ensure inspections were conducted in a systematic manner and covered the same issues at each facility. The current status and future plans were discussed. One problem area was the software program which has been fixed and with enhancements, should render more information than originally anticipated. ECAP/OSHCAP efforts are not going away in the future, therefore, headquarters and facilities need a road map for budgeting and implementing compliance programs. Examples were presented showing the way problem areas can be identified at all levels of the Agency. In the near future they hope to eliminate contractor bias with upgrades of the software.

Mr. Oliveira stated that the facility labor representatives were not notified of inspections for both AEA and AGL.

Mr. Rams said that they want union representatives on the team to represent employees. They also want the protocol followed and the protocol calls for union representation and involvement. He said he would contact the Army Corp of Engineers (ACOE) and get a list of the upcoming inspections and the current findings. He also noted that the inspections were divided up into different parts: Centers-- sure to involve NATCA, and GNAS which did not need NATCA. Mr. Kansier said he would remind ACOE that there was more than one union.

Mr. Darrough asked if these were "No Notice" inspections? Mr. Rams replied no, the regions were notified prior to the inspections. Mr. Rams went on to say that Flight Inspection Field Offices (FIFOs) were not covered at this time as they wanted to work out the bugs, both administrative and process, before tackling a larger facility. They were doing a good job at

structural types of inspections but not so good at employee inspections. They wanted to have the protocol down before they took on the AF piece.

Wrap-up/Next Steps

Mr. Ridgway explained that the charter called for a Chairperson and a Vice Chairperson/Secretary with each position to alternate between management and labor every two years. He suggested that the committee choose one position as a management position and the other as a union position or vice versa. The Charter delineates responsibilities. Mr. Ridgway said he will communicate with each member of the committee after the minutes are distributed and take names of those interested in the position of chairperson as well as nominations for the positions. George Darrough offered his name for consideration of the co-chair position.

Next Meeting

After some discussion regarding the next meeting date and funding for travel, it was decided that the next meeting would be in February 1997. The Charter authorizes travel only twice in the year. It was also stated again that no meetings will be held at the beginning of the fiscal year.

Other

Ms. Pellosmaa brought to everyone's attention a quarterly publication from ANS, *HazMat News Letter,* which could be used to let the members know about up-coming meetings and to print messages from the chairperson. Mr. Kansier said the publication came out of his office and he could get any articles published and that everyone on the committee would be put on the mailing address.

Handouts

- Agenda
- Memorandum to: Assistant Administrators, Associate Administrators and Chief Counsel, dated 3/18/96, from David R. Hinson, Subject: Implementation of the FAA Occupational Safety, Health, and Environmental Compliance Committee (OSHECCOM)
- Memorandum to: All Regional Airway Facilities Division Managers and All Regional Air Traffic Division Managers, dated 8/26/96, from Ronald E. Morgan and Stan Rivers, Subject: Implementation of the FAA Occupational Safety, Health, and Environmental Compliance Committee (OSHECCOM).
- Memorandum to: Assistant Administrators, Associate Administrators, Chief Counsel, National OSHECCOM Members, dated 10/4/96, from Gary W. Ridgway, Subject: National Occupational Safety, Health, and Environmental Compliance Committee (OSHECCOM) Meeting Minutes.
- OSHECCOM Status listing Regions and their Implementation Status regarding establishment of committees.
- Executive Guide to Facility Environmental Management, November 1995.

- OSHECCOM Training Outline, National Meeting 9 July 1996.
- Overheads for Role of Environmental Compliance in OSHECCOM, presented by Tom Holloway.
- Overheads for ECAP/OSHCAP Program in the FAA, presented by Bob Rams (for William Kansier).
- Overheads for Review of the OSHECCOM Charter (not presented due to time constraints)