

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
Suite 201  
1150 North Curtis Road  
Boise, ID 83706  
Phone: (208)321-2960 FAX: (208)321-2966



## Notice of Unsafe or Unhealthful Working Conditions

**To:**  
U.S. Forest Service, Intermountain Region 4  
324 25th Street  
Ogden, UT 84401

**Inspection Number:** 117886150  
**Inspection Date(s):** 07/23/2003-08/07/2003  
**Issuance Date:** 03/26/2004

**Inspection Site:**  
Cramer Fire, T23N, R15E, Section 20  
North Fork, ID 83466

*The violation(s) described in this Notice is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.*

This Notice of Unsafe or Unhealthful Working Conditions (Notice) describes violations of the Occupational Safety and Health Act of 1970, the Executive Order 12196, and 29 CFR 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters. You must abate the violations referred to in this Notice by the dates listed unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Notice you request an Informal Conference with the U.S. Department of Labor Area Office at the address shown above.

**Posting** - The law requires that a copy of this Notice be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Notice must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

**Notification of Corrective Action** - You should notify the U.S. Department of Labor Area Office promptly by letter that you have taken appropriate corrective action within the time frame set forth on this Notice. Please inform the Area Office in writing of the abatement steps you have taken and of their dates, together with adequate supporting documentation, e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results, etc.

**Informal Conference** - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director within 15 working days after receipt of this Notice. As soon as the time, date, and place of the informal conference have been determined please complete the enclosed "Notice to Employees" and post it where the Notice is posted. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the Notice. In addition, bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to your inspection will be available 30 calendar days after the Citation Issuance Date. You are encouraged to review the information concerning your establishment at [www.osha.gov](http://www.osha.gov). If you have any dispute with the accuracy of the information displayed, please contact this office.



## NOTICE TO EMPLOYEES

An informal conference has been scheduled with the Occupational Safety and Health Administration (OSHA) to discuss the Notice of Unsafe or Unhealthful Working Conditions (Notice) issued on 03/26/2004. The conference will be held at the OSHA office located at Suite 201, 1150 North Curtis Road, Boise, ID, 83706 on \_\_\_\_\_ at \_\_\_\_\_.

Employees and/or representatives of employees have a right to attend an informal conference.



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**Company Name:** U.S. Forest Service, Intermountain Region 4  
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Citation 1 Item 1 Type of Violation: **Serious**

29 CFR 1960.8(a): The agency did not furnish employees employment and a place of employment which was free from recognized hazards that were causing or likely to cause death or serious physical harm, in that employees were exposed to the hazards of burns, smoke inhalation, and death from fire-related causes:

- (a) Cramer Fire: On or about July 21 and 22, 2003, as the fire increased in size and complexity, shifted to extended attack, and the suppression strategies and tactics were not successful, an appropriate complexity analysis was not conducted and reviewed. The agency did not ensure that hazardous fires increasing in complexity are quickly identified and a safe transition occurs to the appropriate level incident response.

Among other methods, one feasible and acceptable abatement method to correct this hazard includes ensuring that national fire policy is implemented all the way down to the incident level and that district or forest level fire managers use and review the complexity analysis to ensure that the level of incident command is commensurate with the complexity of the fire.

- (b) Cramer Fire: On or about July 21 and 22, 2003, when fire behavior thresholds at which large fires typically occur were exceeded, fire program managers did not provide additional supervisory and suppression support.

Among other methods, one feasible and acceptable abatement method to correct this hazard includes ensuring that fire behavior thresholds for large fires are recognized by district and/or forest level fire managers and additional supervision is provided and suppression support is requested as needed.

- (c) Salmon-Challis National Forest: The remote automated weather stations (RAWS) near the fire had not received maintenance and calibration before the start of the fire season. The temperature and relative humidity sensor was reporting incorrect information from the Skull Gulch RAWS, closest to the Cramer Fire.

Among other methods, one feasible and acceptable abatement method to correct this hazard is to ensure that all RAWS are calibrated and maintained prior to the start of the fire season. Periodically monitor throughout the season to ensure the RAWS are functioning properly.

Note: Abatement certification and supporting documentation are required for this item.

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See pages 1 through 3 of this Notice for information on employer and employee rights and responsibilities.



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Date By Which Violation Must be Abated: 04/21/2004

Citation 1 Item 2 Type of Violation: **Serious**

29 CFR 1960.25(c): All areas and operations of each workplace did not receive sufficient unannounced safety and health inspections at least annually, and more frequently where there is an increased risk of accident, injury or illness due to the nature or the work performed:

- (a) Cramer Fire: On or about July 21 and 22, 2003, inspections of the fire operations were not conducted for safety and health hazards on the fire to determine compliance with LCES (Lookouts, Communications, Escape Routes, and Safety Zones), the Ten Standard Firefighting Orders, and Eighteen Situations that Shout Watch Out.

Note: Abatement certification and supporting documentation are required for this item.

Date By Which Violation Must be Abated: 04/21/2004

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Citation 1 Item 3 Type of Violation: **Serious**

29 CFR 1960.57: The agency did not provide training to safety and health inspectors with respect to identifying and evaluating hazards and suggesting general abatement procedures:

- (a) Training provided to District Rangers who conduct supplemental safety and health inspections on the Type 3, 4, and 5 wildland fires was not sufficient to enable them to adequately identify, evaluate, and suggest general abatement procedures related to complex wildland fire safety.

ABATEMENT NOTE: Among other methods, one feasible and acceptable abatement method to correct this hazard is to ensure inspectors receive specialized safety training commensurate with the level of incident complexity, such as the qualifications necessary for a Safety Officer Type 1, 2, or 3. Also, ensure that these inspectors are thoroughly evaluated to ensure maximum competency.

Note: Abatement certification and supporting documentation are required for this item.

Date By Which Violation Must be Abated: 04/21/2004