



DEPARTMENT OF THE NAVY
U.S. NAVAL SUPPORT ACTIVITY, NAPLES, ITALY
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NAVSUPPACT NAPLES INSTRUCTION 5100.1H

From: Commanding Officer, U.S. Naval Support Activity, Naples, Italy

Subj: OCCUPATIONAL SAFETY AND HEALTH (OSH) PROGRAM

Ref: (a) OPNAVINST 5100.23H
(b) OPNAVINST 5102.1E
(c) CNICINST M-5100.1
(d) NAVSUPPACTNAPLESINST 5100.4A
(e) Italian Legislative Decree 81/2008

Encl: (1) Occupational Safety and Health Program Manual

1. Purpose. To implement Navy Occupational Safety and Health (NAVOSH) instructions and to promulgate Safety and Occupational Health regulation pertinent to NAVSUPPACT Naples installation. This instruction and enclosure have been revised substantially and should be reviewed in their entirety.
2. Cancellation. NAVSUPPACT NAPLES INST 5100.1G.
3. Applicability. This instruction applies to all Navy military and Navy appropriated and non-appropriated funds civilian personnel of NAVSUPPACT Naples, tenant/supported commands and other units.
4. Scope. This instruction supplements references (a) through (e) and Enclosure (1).
5. Compliance. All levels of the chain of command are responsible for ensuring compliance with these instructions and with higher directives, and ensuring all personnel are properly trained.
6. Records Management
 - a. Records created as a result of this instruction, regardless of format or media, must be maintained and dispositioned per the records disposition schedules located on the Department of the Navy Assistant for Administration, Directives and Records Management Division portal page at: <https://portal.secnav.navy.mil/orgs/DUSNM/DONAA/DRM/Records-and-InformationManagement/Approved%20Record%20Schedules/Forms/AllItems.aspx>.
 - b. For questions concerning the management of records related to this instruction or the records disposition schedules, please contact the local records manager or the OPNAV Records Management Program (DNS-16)

7. Review and Effective Date. Per OPNAVINST 5215.17A, NAVSUPPACT Naples will review this instruction annually on the anniversary of its effective date to ensure applicability, currency, and consistency with Federal, Department of Defense, Secretary of the Navy, and Navy policy and statutory authority using OPNAV 5215/40 Review of Instruction. This instruction will be in effect for 10 years unless revised or cancelled in the interim and will be reissued by the 10-year anniversary date if it still required, unless it meets one of the exceptions in OPNAVINST 5215.17A, paragraph 9. Otherwise, if the instruction is no longer required, it will be processed for cancellation as soon as the need for cancellation is known following the guidance in OPNAV Manual 5215.1 of May 2016.

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Releasability and distribution:

This instruction is cleared for public release and is available via the NSA Naples website:
<https://cnreurafcnt.cnic.navy.mil/Installations/NSA-Naples/About/Installation-Guide/Department-Directory/N1-Administration-Department/Instruction>

OCCUPATIONAL SAFETY AND HEALTH MANUAL



**U.S. NAVAL SUPPORT ACTIVITY,
NAPLES, ITALY**

ENTERING CHANGES

1. The NAVSUPPACT Naples, Occupational Safety and Health Manual shall be maintained up-to-date as follows:
 - a. Brief changes, such as single-word substitutes, shall be entered by pen-and-ink. More lengthy changes and additions will be done by page replacement.
 - b. Page changes shall be issued as required.
 - c. This manual will be reviewed and updated at least annually.
 - d. Upon completion of a change entry, a pen-and-ink entry shall be made in the record of changes.

SAFETY AND OCCUPATIONAL HEALTH PROGRAM MANUAL

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CHAPTER 1
OCCUPATIONAL SAFETY AND HEALTH PROGRAM

Ref: (a) Occupational Safety and Health Act of 1970 (OSH Act), 29 CFR
(b) OPNAVINST M-5100.23, Section A
(c) CNICINST M-5100.1 CH-3, Chapter 4
(d) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System
(e) Italian Legislative Decree 81/08

1. Policy. NAVSUPPACT Naples is committed to the health and safety of its employees, tenants and guests at all NAVSUPPACT Naples facilities. To protect employees from injury or occupational illnesses, NAVSUPPACT Naples will implement a comprehensive, cost effective safety program in accordance with NAVOSH Program, Italian safety regulations, industry and consensus standards and in compliance with Federal legislative requirements per references (a) through (e). This program is guided by the principles of measurement and continuous improvement as specified in the NAVSUPPACT Safety Management System, reference (d). The command is committed to continuous improvement toward a mishap-free workplace through effective safety administration, inspections, investigations, education and training.

2. Applicability. The provisions of this manual apply to all NAVSUPPACT Naples, personnel and operations. This manual also applies to all tenants receiving safety services support through Base Operating Support (BOS) agreements per references (c) and (d). Exceptions or specified limitations may be made, as required, for military unique equipment, systems, and operations and for conditions governed by other statutory authorities.

3. Scope. This instruction does not implement specific local requirements for hazardous material control and management, ergonomics, respiratory protection, traffic safety, confined space entry, or local national injury reporting. Program requirements for hazardous energy control, hazardous material control and management, ergonomics, respiratory protection, traffic safety, confined space entry, or local national injury reporting may be found in NAVSUPPACT NAPLES INST 5100.3, 5100.6K, 5100.7A, 5100.8A, 5100.11E, 5100.13B and 5100.14B respectively.

4. Chain of Command. The Commanding Officer (CO) via the Safety Manager shall be the focal point for all matters concerning the NAVSUPPACT Naples NAVOSH Program. All correspondence and/or requests associated with this program shall be forwarded through this channel.

CHAPTER 2 ORGANIZATION AND ADMINISTRATION

- Ref: (a) OPNAVINST M-5100.23, Chapter B01
(b) CNICINST M-5100.1 CH-3, Chapter 1
(c) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System
(d) Italian Legislative Decree 81/08

1. General. The Occupational Safety and Health (OSH) Program at NAVSUPPACT Naples is administered under the new Safety Management System (SMS). The Installation Safety Program Director (IPD), acts as the SMS Coordinator and reports directly to the Commanding Officer (CO) as an Operations representative. The NAVSUPPACT Naples Executive Officer is the first-line manager to the IPD. The command also employs a staff Special Assistant, *il responsabile del servizio di prevenzione e protezione* (RSPP), per reference (d). The RSPP works closely with the IPD to provide advisory services relating to Italian safety regulations.

2. Responsibilities

a. CO, NAVSUPPACT Naples. Per references (a) through (d), the CO is responsible for safety within the command. The CO places responsibility for preventing mishaps and injuries directly on department heads and supervisors and holds them accountable for mishaps that occur in areas under their control. Safety is everyone's responsibility and accepting this responsibility is a condition of employment.

b. Tenant Command COs/Officers-in-Charge. Leadership of tenant commands/support units are responsible for implementing the NAVOSH Program to protect their personnel. They are also responsible for the compliance with local safety laws and regulations. The NAVSUPPACT Naples, Safety Department will annually conduct a BOS safety needs assessment survey of all commands supported per reference (c) and provide safety services according to BOS safety agreements. Supported commands are responsible for appointing CDSOs to assist in the management of their OSH programs. Tenant commands should forward a copy of their annual safety program self-assessment executive summary to the safety office for annual roll-up and customer service review no later than 31 December each year.

c. NAVSUPPACT Naples Department Heads and supported tenant commands will appoint Collateral Duty Safety Officers (CDSO) in writing and forward copies of appointment letters to the NAVSUPPACT Naples Safety Department. CDSOs act as the NAVSUPPACT Naples Safety Department points of contact for all OSH related matters. NAVSUPPACT Naples Safety Department will provide CDSOs with a specific training on their responsibilities per NAVOSH Safety Program and NAVSUPPACT Naples directives and safety policy.

d. Supervisors shall be responsible for the health and safety of workers under their supervision and shall halt any operation that places personnel, facilities, or equipment in imminent danger; take immediate corrective action, and notify the Safety Department of conditions that cannot be readily corrected.

e. All employees are responsible for accomplishing their work in a manner that will assure their own safety and the safety of those persons working around them. All employees are empowered with both the right and responsibility to stop work for any operation that they reasonably believe poses an imminent threat to personnel, property, or the environment.

f. NAVSUPPACT Installation Program Manager for Safety will provide day-to-day management and direction to implement and execute the command OSH program.

3. Safety Management Program of Record

a. Risk Management Information (RMI). NAVSUPPACT Naples will use the Air Force Safety Application System (AFSAS) RMI, hereafter referred to as "RMI," to manage all SMS documentation. This includes, but is not limited to, risk assessments, hazard abatement plans, mishap reports, safety training, and program audits. The NAVSUPPACT Naples Safety Department will provide training and user account setup for RMI.

b. Enterprise Safety Applications Management System (ESAMS). ESAMS is no longer the primary safety management system. It will be maintained in a read-only capacity for accessing legacy records and historical data during the transition to RMI. New data will not be entered into ESAMS, except for certain occupational health specialties that have not yet transitioned to RMI.

c. Documentation. All official SOH policies, procedures, and instructions will be maintained on the NAVSUPPACT Naples Safety Department's public SharePoint page. Meeting agendas, minutes, and risk statements from the OSH Council will be documented in RMI and distributed directly to council stakeholders for wide dissemination.

**CHAPTER 3
OCCUPATIONAL SAFETY AND HEALTH INSPECTION AND HAZARD
ABATEMENT**

- Ref: (a) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
(b) OPNAV M-5100.23, Chapter B09
(c) 29 CFR 1960, Basic Program Elements for Federal Employee OSH Programs
(d) Italian Legislative Decree 81/08

1. General. NAVSUPPACT Naples implements a proactive hazard identification, risk assessment, and abatement program as a core component of the command's Safety Management System (SMS) per reference (a). This program is designed to continuously identify and assess workplace hazards, implement effective risk controls, and track all deficiencies to final disposition and closure. The goal is to move beyond simple compliance and actively manage risk to ensure a safe and healthy environment for all personnel.
2. Hazard Identification Program. The Installation Safety Department shall conduct comprehensive inspections of all workplaces at least annually, with high-risk and industrial areas inspected more frequently. These inspections will be supplemented by periodic spot-inspections to validate the effectiveness of the SMS. During all inspections, personnel will be encouraged to identify unsafe or unhealthy working conditions. Any situation presenting an imminent danger will be brought to the immediate attention of supervisors for prompt mitigation.
3. Hazard Reporting. All personnel are responsible for and encouraged to report any unsafe or unhealthful working condition. Reports can be made through multiple official channels, ensuring accessibility for all employees:

Method	Description
Immediate Supervisor	Supervisors should forward reports to the Safety Office for recording and abatement.
NSA Naples Safety QR Code	A scannable code posted in facilities for direct mobile reporting. Should be present on the command safety bulletin board.
NSA Naples App	The official command mobile application, which includes a hazard reporting feature. Available from the Google Play and Apple Stores.
OPNAV 5100/11 Form	The formal "Unsafe/Unhealthful Working Condition Report" for written submissions. Results in a formal response if contact information is supplied.
Direct Contact	Walk-ins, phone calls, or emails directly to the Installation Safety Department.
Interactive Customer Evaluation (ICE) Service	Primarily intended as a customer service evaluation tool, but is capable of fielding service complaints. Other methods are preferred for hazard and mishap reporting.

Table 1 Official Hazard Reporting Methods

4. Deficiency Abatement and Risk Management

a. Risk Management Information (RMI). The Risk Management Information (RMI) system is the single program of record for documenting and tracking all identified hazards and deficiencies. The log of all open and closed hazards within RMI constitutes the official NSA Naples Risk Registry.

b. Process. Upon identification, each hazard is entered into RMI and assigned a Risk Assessment Code (RAC) to determine its severity and likelihood of occurrence. The responsible department or supervisor, as the Office of Primary Responsibility (OPR) will develop a Hazard Abatement Plan detailing the corrective actions and timeline. The OPR shall use the RMI recommendations module as the primary means of updating hazard abatement information. The Safety Department will validate all abatement actions upon completion.

c. Oversight and Communication. The OSH Council serves as the official forum for reviewing high-risk deficiencies (RAC 1, 2, and 3) and monitoring the command's overall abatement progress. The Risk Registry will be used to brief leadership and track all hazards through final disposition and closure. Discovery of a RAC 1 hazard requires the immediate stoppage of related work and reporting to the NSA Naples Commanding Officer before work can continue.

5. Responsibilities

a. Installation Safety Department shall:

- (1) Manage the command's Risk Registry within the RMI system.
- (2) Conduct workplace inspections and record all findings in RMI.
- (3) Assist departments in developing effective hazard abatement plans.
- (4) Escalate unresolved or high-risk hazards to the OSH Council.

(5) Validate the completion of all hazard abatement actions in RMI before formally closing the entry.

b. Department Heads and Supported Commands shall:

- (1) Ensure personnel are trained on the methods for reporting hazards.
- (2) Initiate immediate corrective action for hazards under their control.
- (3) For deficiencies requiring external support (e.g., Public Works), ensure a work request is submitted promptly.

(4) Review and take action on deficiencies assigned to them in RMI.

(5) Request closure via the Recommendations Module of RMI when abatement actions are complete.

c. Collateral Duty Safety Officers (CDSOs) shall:

- (1) Accompany inspectors during formal evaluations of their department's spaces.
- (2) Assist their supervisors in tracking and managing their department's open deficiencies within RMI.

CHAPTER 4

OCCUPATIONAL HEALTH AND INDUSTRIAL HYGIENE

- Ref: (a) USNMRTC NAPINST 5100.1, Chapter 8, Occupational Health
(b) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
(c) OPNAV M-5100.23, Chapter B08
(d) Italian Legislative Decree 81/08

1. General. This chapter outlines the integration of Occupational Health (OH) and Industrial Hygiene (IH) services into the command's overall Safety Management System (SMS). Per reference (a), U.S. Naval Medical Readiness and Training Command (USNMRTC) Naples provides specialized OH and IH services to the command. The NAVSUPPACT Naples Safety Department acts as the coordinator for these services, formally requesting workplace surveys for concerns such as indoor air quality (IAQ), heat/cold stress, noise monitoring, and employee exposure assessments. The findings from these surveys are a critical input for the command's risk management process.

2. Safety Program of Record and Medical Information Systems

a. Risk Management Information (RMI). All hazards and deficiencies identified in Industrial Hygiene surveys will be recorded, tracked, and managed in the Risk Management Information (RMI) system. RMI is the official program of record for hazard abatement plans and tracking deficiencies to closure.

b. ESAMS. Medical surveillance requirements (e.g., hearing conservation, respirator use) identified by IH surveys are managed in the Enterprise Safety Applications Management System (ESAMS) Occupational Medical Surveillance System (OMSS). Per CNIC direction, the ESAMS OMSS module will continue to be used for this specific purpose until the system is fully sunset and its functions have been migrated to a new system of record.

3. Responsibilities

a. Installation Safety Department shall:

(1) Serve as the primary liaison and coordinator with USNMRTC Naples for all OH and IH services.

(2) Initiate requests for IH surveys based on workplace risk assessments, introduction of new processes, or as requested by department supervisors or employees.

(3) Receive all formal IH survey reports, enter identified hazards and recommendations into RMI, and disseminate findings to the affected departments.

(4) Work with supervisors to develop and track abatement plans in RMI for all identified IH deficiencies.

(5) Ensure medical surveillance requirements identified by IH are communicated to supervisors and correctly assigned to employees in the ESAMS OMSS module.

b. USNMRTC Naples shall:

(1) Conduct comprehensive IH surveys as scheduled by mission risk category or upon formal request from the Installation Safety Department.

(2) Provide formal, written IH survey reports detailing findings, exposure data, and recommendations for controlling hazards.

(3) Administer the Occupational Health program, including scheduling and conducting all required medical surveillance examinations.

c. Department Heads and Supervisors shall:

(1) Request IH services through the Installation Safety Department for any new or significantly modified work processes that may introduce new hazards.

(2) Ensure all employees identified for medical surveillance are enrolled in the program via their CDSO and attend all required appointments.

(3) Implement corrective actions and risk controls as identified in IH survey reports and tracked in RMI.

(4) Monitor employees for any changes in health that may be work-related and facilitate a consultation with Occupational Health as needed.

(5) Actively prevent employees from performing work where a required medical surveillance, training, or occupational health constraint renders that employee as out of qualifications.

d. Employees shall:

(1) Keep medical surveillance appointments as scheduled. If an employee is unable to keep a medical appointment, they should notify their supervisor and make a suitable make-up appointment before their qualification lapses.

(2) Provide supervisors with medical surveillance/medical qualifications as provided by the Occupational Health Office.

CHAPTER 5
SAFETY TRAINING

- Ref (a) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
 (b) OPNAV M-5100.23H, Chapter 6
 (c) 29 CFR 1960, Basic Program Elements for Federal Employee OSH Programs
 (d) Italian Legislative Decree 81/08
 (e) CNICINST M-5100.1 CH-3, Chapter 9

1. General. Training and competence are fundamental components of the command's Safety Management System (SMS). The goal of this program is to ensure all personnel, commensurate with their roles and responsibilities, possess the necessary knowledge and skills to perform their duties safely and to actively participate in the SMS. This is achieved through a multi-faceted approach that includes initial orientation, job-specific instruction, and continuous awareness campaigns in accordance with references (a) through (e).

2. Training Program Components. The NAVSUPPACT Naples safety training plan is designed to address all facets of an employee's role, from initial arrival to specialized operational tasks.

Training Type	Description	Method/System
Safety Office Check-In at Arrival	New employees report to the safety office to register for ESAMS and RMI accounts and receive basic information about the program.	Check-In
Initial Employee Orientation (Indoc)	An introduction to the NAVSUPPACT Naples Safety Management System for all new personnel. Covers employee rights and responsibilities (including stop work authority), hazard reporting procedures, and the role of the OSH Council.	Classroom/Instructor-Led
Area Orientation (AO)	Safety portion consists of local hazards brief and driving safety information.	Classroom/Support Site Theater AO
General Safety Awareness Training	Currently delivered in several computer based modules hosted in the ESAMS training system.	Computer-based training delivered through ESAMS.
Job Specific Training	Includes classroom training for primary end-user training such as confined space entry, fall protection, lock out tag out users, and respirator users. Also includes OJT received from supervisors and coworkers as a part of job proficiency and safety.	Classroom Training/OJT
Seasonal Awareness Training	Includes command-wide campaigns like the "101 Critical Days of Summer" and the Annual Winter/Holiday Safety Standdown.	Stand-Downs/Command Conference Center/Support Site Victory Theater

Safety Role-based Training	Training for specific collateral duties and assistant roles such as Collateral Duty Safety Officer, HAZMAT/WASTE Coordinators, and Assistant Program Managers and Qualified Persons (QP)	Classroom Training
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Table 2 NSA Naples Safety Training System

3. Information Systems for Training Records

- a. RMI. RMI is the official system of record for documenting all instructor-led and classroom training sessions.
- b. Enterprise Safety Applications Management System (ESAMS). ESAMS will continue to be used to host and track the completion of general computer-based training modules until the platform is fully sunset.

4. Responsibilities

- a. Installation Safety Department shall:
 - (1) Develop and manage the command's comprehensive safety training plan.
 - (2) Ensure requirements from Industrial Hygiene surveys are translated into specific training needs.
 - (3) Record the completion of all instructor-led classroom training into RMI.
 - (4) Organize and execute command-wide safety awareness campaigns and stand-downs.
 - (5) Calculate and provide performance metrics for safety training to department heads through methods such as the quarterly safety and traffic safety council, by disseminating delinquent lists to department heads and supported command leadership, and by representing the department at the command's Planning Board for Training (PB4T).
- b. Department Heads and Supervisors shall:
 - (1) Ensure all new employees receive a documented Area Orientation brief upon arrival.
 - (2) Ensure personnel attend and complete all required job-specific and recurring training.
 - (3) Verify that employee training records are accurate in the appropriate information system (ESAMS or as confirmed by the Safety Department for RMI).
- c. All Employees shall:
 - (1) Obtain and maintain accounts for the ESAMS and RMI Training Platforms.
 - (2) Actively participate in, attend, and complete all required initial, recurring, and job-specific safety training.

5. Safety Communication and Promotion. Safety awareness is promoted through various channels. Department heads and tenant commands shall provide bulletin boards in high-visibility areas. The Safety Department will provide official posters and materials for these boards in an annual planogram depicting the recommended layout and arrangement of documents. Additional safety promotion will be conducted via notes in the Plan of the Day/Week, command emails, and other official communication channels.

CHAPTER 6

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Ref: (a) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
(b) CNICINST M-5100.1 CH-3, Chapter 23
(c) OPNAV M-5100.23H, Chapter B20
(d) 29 CFR 1910, Subpart I
(d) Italian Legislative Decree 81/08

1. General. As a core component of the command's Safety Management System (SMS), the Personal Protective Equipment (PPE) program ensures that protective equipment is provided, used, and maintained where workplace hazards cannot be eliminated through engineering or administrative controls. PPE is considered the "last line of defense" and its requirement is determined through formal risk assessments and Industrial Hygiene (IH) surveys.

2. Determining PPE Requirements. The need for PPE is not arbitrary; it is the direct result of the risk management process. The Installation Safety Department, in conjunction with supervisors and IH professionals, will conduct workplace hazard assessments to identify physical, chemical, and biological hazards. Based on these assessments, specific PPE requirements will be documented for associated tasks and work areas.

3. Training and Competence

a. General PPE Training. All employees required to use PPE will receive training on its proper use, limitations, maintenance, and disposal in accordance with the command's approved training program.

b. Specialized PPE Training. For specific types of complex PPE, such as fall protection harnesses or respirators, training will be provided in a formal classroom setting. This training will include a mandatory practical assessment where employees must demonstrate their ability to properly don, doff, use, inspect, and care for the equipment.

c. System of Record. Completion of specialized, instructor-led PPE training with a practical assessment will be documented in the Risk Management Information (RMI) system, which serves as the official record for this level of qualification.

4. Responsibilities

a. Installation Safety Department shall:

(1) Serve as the primary technical authority for PPE selection, assisting supervisors in choosing the correct equipment based on risk assessments and IH surveys.

(2) Monitor overall program compliance and effectiveness as part of the SMS.

(3) Provide specialized PPE training and manage training records within RMI.

b. Department Heads and Supported Commands shall:

(1) Ensure funds are available and designated supervisors have the means to procure sufficient and appropriate PPE for all required tasks.

(2) Enforce the PPE program within their areas of responsibility.

c. Supervisors shall:

(1) Ensure a hazard assessment is conducted for all work processes.

(2) Procure and provide all required PPE to employees at no cost.

(3) Ensure employees receive and complete all required PPE training before being exposed to the associated hazard.

(4) Enforce the proper use and maintenance of PPE during operations.

d. Employees shall:

(1) Use PPE in accordance with their training and the manufacturer's instructions for all required tasks.

(2) Properly inspect, maintain, and store their assigned PPE.

(3) Immediately notify their supervisor when PPE is damaged, worn, or in need of replacement.

**CHAPTER 7
TOXIC METALS**

- Ref: (a) USNMRTC NAPINST 5100.1, Lead and Toxic Metals Program
(b) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
(c) OPNAV M-5100.23, Chapter B21
(d) 29 CFR 1910, Subpart Z, Toxic and Hazardous Substances

1. General. This chapter establishes the program for controlling occupational exposures to toxic metals, which is a critical component of the command's Safety Management System (SMS). This program recognizes that numerous metals, in both elemental and compound form (e.g., lead, cadmium, hexavalent chromium), can introduce significant health hazards. The goal is to prevent overexposure by systematically identifying, evaluating, and controlling these hazards using the hierarchy of controls. Per reference (a), USNMRTC Naples is the responsible activity for assessing health effects and providing technical guidance related to toxic metal exposures.
2. Hierarchy of Controls. All work involving toxic metals will be managed using the hierarchy of controls to minimize employee exposure.

Control Method	Description & Examples
Elimination/Substitution	The most effective method. This involves removing the hazard entirely or replacing it with a less hazardous substance (e.g., using lead-free solder for plumbing and electronics work).
Engineering Controls	Physical changes to the workplace that isolate people from the hazard. This includes installing local exhaust ventilation for welding or abrasive blasting on coated metals, and using thermostatically controlled heating units to prevent overheating.
Administrative Controls	Changes to work practices or procedures, such as isolating hot work operations and limiting exposure times for workers in high-risk areas.
Personal Protective Equipment (PPE)	This includes providing appropriate respirators, gloves, and protective clothing when other controls cannot reduce exposure to safe levels.

Table 3 Hierarchy of Controls for Toxic Metals Abatement

3. Industrial Hygiene, Medical Surveillance, and High-Risk Operations

a. Industrial Hygiene (IH) Surveys. USNMRTC Naples will conduct IH surveys periodically based upon mission risk category and upon request from the Installation Safety Department to evaluate workplaces where toxic metals are used. These surveys are the basis for determining employee exposure levels and prescribing the necessary controls, PPE, and medical surveillance requirements.

b. Medical Surveillance. USNMRTC Naples administers the medical surveillance program for toxic metals. This includes conducting required biological monitoring (e.g., blood lead level tests) for personnel enrolled in the program.

c. Mobile Firing Range Facility (MFRF). Due to the inherent lead exposure risk, personnel assigned to the MFRF are a designated group requiring routine IH and medical surveillance as determined by USNMRTC Naples and documented in facility-specific SOPs.

4. Information System Integration

a. Risk Management Information (RMI). All hazards and required controls identified in IH surveys will be entered into RMI for tracking and management through final abatement.

b. ESAMS (OMSS). Medical surveillance requirements for toxic metals exposure will be managed in the ESAMS Occupational Medical Surveillance System (OMSS) module until the system is fully sunset.

5. Responsibilities

a. Installation Safety Department shall:

(1) Serve as the coordinator with USNMRTC Naples for requesting IH surveys related to toxic metals.

(2) Translate findings from IH reports into the RMI system to ensure hazards are tracked and abated.

(3) Ensure that required training on toxic metal hazards is available to affected employees.

b. USNMRTC Naples shall:

(1) Conduct IH surveys and provide formal reports with detailed findings and recommendations.

(2) Administer the medical surveillance program and notify the command of any abnormal findings.

c. Supervisors shall:

(1) Implement the engineering controls, administrative procedures, and PPE requirements identified in IH surveys.

(2) Ensure their employees complete all required training and attend all scheduled medical surveillance appointments.

d. Employees shall:

- (1) Comply with all control procedures and properly use all required PPE.
- (2) Attend all required training and medical surveillance appointments.
- (3) Report any concerns about potential exposures or changes in health to their supervisor.

CHAPTER 8 MISHAP REPORTING AND RECORDKEEPING

- Ref: (a) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
(b) OPNAVINST 5102.1 (Series), Navy and Marine Corps Mishap and Safety Investigation, Reporting, and Record Keeping Manual
(c) OPNAV M-5100.23, Chapter B14
(d) NAVSUPPACTINST 5100.14B, Local National (LN) Mishap Reporting Program
(e) 29 CFR 1904, Recording and Reporting Occupational Injuries and Illness
(f) Italian Legislative Decree 81/08

1. Policy. Mishap investigation is a cornerstone of the command's Safety Management System (SMS) and is focused on one objective: Prevention, not punishment. The purpose of every investigation is to conduct a root cause analysis to understand why a mishap occurred so that effective corrective actions can be implemented to prevent recurrence. Information gathered is privileged and will not be used for administrative or punitive actions. Mishap information shall be handled and coordinated in accordance with references (a) through (f).

2. What is a Reportable Mishap. A mishap report is required for any of the following events:

- a. Military Personnel: Any injury or illness, that occurs while on or off-duty.
- b. Civilian Personnel: Any work-related injury or illness that occurs during working hours. Local Nationals have compensatory coverage during the commute to and from work. These incidents should be reported to the *il responsabile del servizio di prevenzione e protezione* (RSPP) for proper recording outside of the RMI program of record.
- c. Property Damage: Any event resulting in damage to government property or equipment in excess of \$500 valuation and any damage to government vehicles.
- d. Near Miss: Any event that could have resulted in injury, illness, or damage, but by virtue of chance, did not.

3. Mishap Response and Reporting Process

- a. Immediate Actions at the Scene.
 - (1) Render first aid or activate the emergency medical system if necessary.
 - (2) Stop the hazard, if safe to do so, and secure the scene to preserve evidence if reasonably practicable.
 - (3) Report the event to the supervisor.
- b. Reporting Event Sequence. Use the following reporting sequence to make a formal report. The supervisor is responsible for ensuring appropriate personnel are notified.
 - (1) Employee-to-Supervisor. Primary reporting method. An employee should report any injury, illness, property damage, or near miss to their supervisor first.

(2) Supervisor-to-Command. The supervisor, upon learning of a mishap event should notify the safety office, command duty officer (CDO), and their next-level of supervision.

c. Official Reporting Channels. These are the methods that a supervisor should notify the safety office of a mishap event:

(1) Direct Reporting. The supervisor can call, visit, or walk-in to report a mishap to the safety office directly. The safety office will document the mishap in the RMI system and begin the investigation.

(2) NSA Naples Safety QR Code. For mobile reporting from a user cell phone or tablet. The Safety office will contact the reporting personnel for further details to begin the investigation.

(3) NSA Naples Mobile App. The Mobile App contains reporting functions that work similarly to a submission through the QR Code.

(4) Supervisor's Report of Mishap in the RMI System. The supervisor may begin an initial notification of mishap in the RMI system, if trained to do so by the safety office.

d. Supervisor's required actions. As soon as possible after learning of a mishap a supervisor must:

(1) Notify appropriate personnel in the chain of command as specified above as well as any interested parties and affected employees. Fatalities shall be reported immediately to the CDO and Safety Office via duty cell phones.

(2) Conduct a preliminary investigation to determine immediate and apparent causes. If possible, obtain witness statements and document through photo, video, drawings or other methods.

(3) For US Civilians, provide and complete the Form CA-1 (Notice of Traumatic Injury) and OPNAV 5100/9 (Medical Referral Form). Provide copies of forms to HRO with a copy to the Safety Office.

(4) For LN Civilians, mishap program is handled through separate reporting procedures specified in reference (d). The report must be submitted with the Italian National Insurance Institute (INAIL) within two business days. The RSPP must be notified as soon as an injury or illness is known. The Italian Competent Physician must clear the employee before they return to duty.

4. Investigation, Analysis, and Continuous Improvement

a. Safety Department Investigation. The Safety Department will lead a formal investigation to conduct a root cause analysis. Findings and recommended corrective actions will be documented in RMI.

b. Trend Analysis. On a recurring basis, the Safety Department will analyze mishap data in RMI to identify trends across the command. These findings are a key input for risk assessments and will be presented to the NSA Naples Safety and Traffic Safety Council.

c. Annual Reporting. Annually, the Safety Department will generate the command's official OSHA 300A summary log from RMI and distribute it. Department Heads and Supported Commands will post this on their safety bulletin boards from 1 February to 30 April for the preceding year. This data provides leadership with a clear metric of the SMS's performance and drives future safety initiatives, forming a crucial part of the "Check-Act" cycle for continuous improvement.

5. Property Damage and Vehicle Mishaps

a. Property Damage. An employee involved in an event causing significant damage to government property shall protect the scene. A property damage report shall be generated in RMI within three (3) working days.

b. Vehicle Accidents. The operator shall protect the scene and notify both Security and their supervisor. Security will conduct the official traffic accident investigation and provide its report to the Safety Department. Any resulting injuries must be reported in RMI as a separate personnel mishap.

CHAPTER 9
RECREATIONAL AND OFF-DUTY SAFETY (RODS)

- Ref: (a) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
(b) OPNAVINST 5100.25 (Series), Recreational and Off-Duty Safety Program
(c) OPNAVINST 5102.1, Navy and Marine Corps Mishap and Safety Investigation, Reporting, and Record Keeping Manual
(d) NAVSUPPACTINST 5100.14B, Local National (LN) Mishap Reporting Program
(e) OPNAV M-5100.23, Chapter B37
(f) CNICINST M-5100.1 CH-3, Chapter 35

1. Policy. The Recreational and Off-Duty Safety (RODS) program is an integral part of the command's Safety Management System (SMS). It is designed to empower all personnel with the risk management skills necessary to ensure their safety and well-being during personal and command-sponsored recreational activities. The goal is to prevent the preventable by fostering a proactive safety mindset that extends beyond the workplace. RODS Management shall be conducted in accordance with references (a) through (f).

2. Applying Risk Management Principles to Off-Duty Activities. While recreational activities have inherent risks, injuries can be significantly reduced by applying the principles of ORM. All personnel should consider the following factors before engaging in any activity:

Factor	Considerations
Personal Conditioning	Are you physically prepared for the activity? Have you properly warmed up?
Competence and Training	Do you know how to perform the activity? What is your skill level?
Proper Equipment	Is your gear (e.g., helmets, life jackets, harnesses) appropriate for the activity and in good working condition?
Environmental Factors	Have you checked the weather forecast? Are you prepared for potential heat, cold, or adverse conditions?
Risk Assessment	Have you thought through the "what-ifs"? Do you have a plan in case something goes wrong?

Table 4 ORM Factors for RODS Activities

3. Program Management. The Commanding Officer shall designate, in writing, a Recreational and Off-Duty Safety (RODS) Officer to manage the command's RODS program.

4. Mishap Reporting. All recreational and off-duty mishaps involving military personnel, or those involving dependents at command-sponsored events or facilities, shall be reported and investigated in accordance with Chapter 8 of this instruction.

5. Responsibilities

- a. Installation Safety Department shall:

(1) Conduct annual safety inspections of all MWR and command recreational facilities (e.g., gyms, pools, fields). All findings and deficiencies shall be documented and tracked to closure in the Risk Management Information (RMI) system.

(2) Investigate reported off-duty mishaps to identify trends and inform future safety awareness campaigns.

(3) Provide seasonal and activity-specific safety awareness training and materials (e.g., 101 Critical Days of Summer, Holiday/Winter safety).

b. Supervisors and Event Coordinators shall:

(1) Utilize ORM during the earliest planning stages for all command-sponsored recreational events (e.g., unit PT, command picnics, sports days).

(2) Ensure personnel are aware of the requirement to self-report participation in high-risk activities.

c. All Active Duty Personnel shall:

(1) Apply ORM principles to all personal and recreational activities.

(2) Notify their supervisor or Chain of Command prior to participating in designated high-risk off-duty activities. This includes, but is not limited to, rock climbing, skydiving, and scuba diving.

(3) Provide copies of required licenses or certifications (e.g., PADI card for diving) to their designated command RODS coordinator upon request.

CHAPTER 10
SIGHT CONSERVATION

- Ref: (a) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
 (b) OPNAV M-5100.23, Chapter B19
 (c) CNICINST M-5100.1, Chapter 22
 (d) ANSI/ISEA Z358.1-2014, American National Standard for Emergency Eyewash and Shower Equipment
 (e) 29 CFR 1910.133, Eye and Face Protection

1. Policy. The Sight Conservation Program is a mandatory component of the command's Safety Management System (SMS) (reference (a)), designed to prevent eye injuries. This program is based on the latest technical guidance in references (b) through (e). This program is based on identifying and controlling eye hazards through Industrial Hygiene (IH) surveys and risk assessments, providing and enforcing the use of appropriate Personal Protective Equipment (PPE), and ensuring access to properly maintained emergency equipment.

2. Identification of Eye Hazards. The Installation Safety Department, in coordination with Industrial Hygiene, will identify and designate all eye-hazardous areas, processes, and occupations. This information will be documented in the area's IH survey and relevant hazards will be entered into the Risk Management Information (RMI) system for tracking and management.

3. Emergency Eyewash and Shower Stations. Properly functioning emergency eyewash and shower stations are critical engineering controls in areas where personnel may be exposed to corrosive materials, such as battery shops, workshops, and laboratories.

Type of Unit	Maintenance Requirement	Responsibility
Plumbed Units	Must be activated weekly for a period long enough to flush the line and verify operation. A signed and dated inspection tag must be maintained at the unit.	Work Center Supervisor
Self-Contained Units (Portable Units)	Must be inspected and maintained in accordance with the manufacturer's instructions. This includes checking fluid levels and replacing fluid/additives at the recommended interval. A written maintenance log must be kept.	Work Center Supervisor

Table 5 Eyewash and Shower Maintenance

4. Protective Eyewear

a. Provision of PPE. As detailed in Chapter 8 of this manual, all required protective eyewear is considered to be PPE and shall be provided to employees at no cost.

b. Prescription Safety Eyewear. A process is established for employees who require prescription safety glasses to perform work.

(1) Employee. Obtains a current eye refraction exam and prescription from a qualified optometrist.

(2) Supervisor. Initiates the procurement process for the prescription safety eyewear through the designated supply channel.

(3) Safety Department. Provides program oversight and assists with determining the most suitable type of protective eyewear.

c. Temporary and Visitor Eyewear. Work centers with identified eye hazards shall maintain a stock of universal-fit safety glasses or over glasses style goggles to be provided to visitors, vendors, inspectors, or other personnel who must temporarily enter a designated eye-hazardous area.

5. Responsibilities

a. Installation Safety Department shall:

(1) Maintain the command's Sight Conservation Program.

(2) Assist supervisors in the selection of appropriate eye and face protection.

(3) Verify the functionality and maintenance of emergency eyewash stations during routine workplace inspections and document findings in RMI.

b. Supervisors shall:

(1) Ensure their designated eye-hazardous areas are properly marked with warning signs.

(2) Enforce the mandatory use of protective eyewear in all designated eye-hazardous areas.

(3) Ensure emergency eyewash stations are inspected and maintained as required and that all records are current.

(4) Initiate the procurement process for employees requiring prescription safety eyewear.

c. Employees shall:

(1) Wear required eye protection at all times when in a designated eye-hazardous area.

(2) Immediately report any damaged or malfunctioning emergency eyewash stations or PPE to their supervisor.

CHAPTER 11 WEIGHT HANDLING EQUIPMENT SAFETY

- Ref: (a) NAVFAC P-307, Management of Weight Handling Equipment
(b) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
(c) OPNAV M-5100.23, Chapter B31
(d) ANSI/ALI ALCTV (2017), Standard for Automotive Lifts – Safety Requirements for Construction, Testing, and Validation
(e) 29 CFR 1910.184, Slings
(f) NAVSUPPACTNAPLESINST 11260.1C

1. Policy. The safe use of Weight Handling Equipment (WHE) is a critical component of the command's Safety Management System (SMS). All operations involving WHE shall be conducted in strict compliance with reference (a), which is the governing document for the Navy's WHE program. The goal is to prevent injuries and property damage through rigorous adherence to inspection, testing, certification, and operator qualification requirements.

2. Program Management and Oversight. The installation's comprehensive WHE program, which covers cranes, hoists, and rigging gear, is managed by the NAVFAC Public Works Department (PWD). The Installation Safety Department provides SMS oversight in accordance with reference (b) to ensure that all departments and tenant commands comply with the established requirements.

3. Core Requirements

a. Inspection, Testing and Certification. All government-owned or leased WHE and rigging gear must undergo periodic inspection, load testing, and certification as required by reference (a). The equipment's rated capacity and last certification date shall be clearly marked on it.

b. Out-of-Service Equipment. Any equipment found to be deficient, damaged, or out of certification shall be immediately removed from service and tagged with a "DANGER - DO NOT OPERATE" tag. It shall not be returned to service until it is repaired and recertified by a qualified technician.

4. Operator Training and Qualification. Only personnel who have been fully trained, medically qualified, and licensed in accordance with References (a) through (f) are authorized to operate WHE. It is the responsibility of individual departments and tenant commands to ensure their personnel maintain current qualifications.

5. Responsibilities

a. Installation Safety Department shall:

(1) Provide SMS oversight of WHE operations during routine workplace inspections.

(2) Document any observed program deficiencies (e.g., unlicensed operator, use of uncertified gear) in the Risk Management Information (RMI) system for tracking.

(3) Assist with risk assessments for non-routine or critical lifts as requested.

b. Public Works Department (PWD) shall:

(1) Manage the installation's NAVFAC P-307 program.

(2) Conduct or oversee all required inspections, testing, and certifications of WHE.

(3) Maintain the central repository of certification and testing records.

c. Supervisors shall:

(1) Ensure that only trained, qualified, and licensed employees are assigned to operate WHE.

(2) Verify that equipment and rigging gear certifications are current before authorizing a lift.

(3) Enforce the completion of pre-use operational checks by the operator.

d. WHE Operators shall:

(1) Conduct a thorough pre-use visual inspection of the WHE and all rigging gear before the first lift of the day.

(2) Never operate equipment if its certification is expired or if any deficiencies are found.

(3) Never exceed the rated load capacity of the WHE or rigging gear.

(4) Immediately report any equipment damage or malfunction to their supervisor.

CHAPTER 12 SYSTEMS SAFETY AND HAZARD CONTROL

Ref: (a) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
(b) OPNAV M-5100.23, Chapter B38
(c) Italian Legislative Decree 81/2008

1. General. Systems Safety is a proactive discipline within the command's Safety Management System (SMS) used to identify and mitigate hazards throughout the entire lifecycle of all systems, facilities, and processes. The principle is to "design in" safety from the earliest possible stage, rather than "retrofitting" it after a mishap occurs. This approach applies to new construction, renovations, equipment procurement, process development, and major maintenance activities. While these principles are applied command-wide, none of the installation's current processes meet the threshold requiring formal compliance with OSHA's Process Safety Management (PSM) standard.

2. Systems Safety Lifecycle. Safety reviews should be conducted at all stages of a system's life.

a. Design and Planning. All new construction, facility renovation plans, and specifications must be reviewed by the Installation Safety Department. This early review identifies and eliminates hazards at the design stage, which is the most effective and least costly time to implement controls.

b. Procurement. Before any new equipment, hazardous material, or service contract is procured, a safety review must be conducted. This ensures that items and services meet all applicable US and Italian safety standards and do not introduce uncontrolled hazards into the workplace.

c. Implementation. Standard Operating Procedures (SOPs) must be developed for all new equipment and processes. These SOPs must include safety precautions, PPE requirements, and emergency procedures, and be reviewed by the Safety Department.

d. Maintenance and Modification. Any significant modification to existing equipment, facilities, or processes requires a safety review. Procedures for non-routine or major periodic maintenance must also be evaluated to control hazards specific to the maintenance task.

e. Disposal. The process for decommissioning and disposing of facilities and equipment must be reviewed to ensure that any associated hazards (e.g., residual hazardous materials) are managed safely.

3. Responsibilities

a. Installation Safety Department shall:

(1) Serve as the command's technical authority for Systems Safety.

(2) Conduct and document formal safety reviews of plans, specifications, procurement requests, and procedures.

(3) Document all formal reviews and risk acceptance decisions in the Risk Management Information (RMI) system to maintain a historical record.

(4) Provide guidance to ensure that all US Navy, US federal, and European safety standards are incorporated into project and procurement documents.

b. Project Managers, Contracting Officer Representatives (CORs), and Department Heads shall:

(1) Be responsible for initiating the safety review process.

(2) Engage the Installation Safety Department at the earliest possible stage of any new project, procurement, or process development.

(3) Ensure that safety review and hazard control are included as line items in project plans and budgets.

c. Supervisors shall:

(1) Develop and implement safe operating procedures for new systems and equipment within their area of responsibility.

(2) Ensure employees are trained on these procedures before operating any new system.

CHAPTER 13
EMPLOYEE REPORTS OF UNSAFE AND UNHEALTHFUL WORKING
CONDITIONS

Ref: (a) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
(b) OPNAV M-5100.23, Chapter B10
(c) 29 CFR 1960.28, Employee Reports of Unsafe or Unhealthful Working Conditions
(d) Italian Legislative Decree 81/08

1. General. Empowering every member of the command to identify and report hazards is a foundational principle of the Safety Management System (SMS) as defined in reference (a). All personnel have the right and the responsibility to report any working condition they believe is unsafe or unhealthful. The command is committed to ensuring that no employee, military or civilian, is subjected to restraint, interference, coercion, discrimination, or reprisal for reporting a safety concern.

2. How to Report Hazards. Multiple channels are available to ensure all personnel can easily report a hazard. While oral reports to an immediate supervisor are encouraged for rapid resolution of simple issues, employees may use any of the following official methods:

a. To an Immediate Supervisor or Collateral Duty Safety Officer (CDSO). The fastest way to get simple hazards corrected at the lowest level.

b. NSA Naples Safety QR Code. Posted in facilities command-wide for direct, mobile reporting to the Safety Department. Employees should specify that they would like a formal response to invoke the Unsafe Unhealthful Working Conditions response as specified in reference (b). This is not a method of anonymous reporting.

c. NSA Naples Mobile App. The official command mobile application includes a feature for submitting hazard reports. Employees should specify that they would like a formal response to invoke the Unsafe Unhealthful Working Conditions response as specified in reference (b). This method allows anonymous reports.

d. OPNAV 5100/11 Form. The formal "Report of Unsafe/Unhealthful Working Condition" form, available on safety bulletin boards and online, which can be submitted to the supervisor or directly to the Safety Department. If employees include contact information, this form will invoke the Unsafe Unhealthful Working Conditions response. This method allows anonymous reports.

e. Direct Contact. Contact the Installation Safety Department directly via phone, email, or by walking in. Anonymity can be requested through this method.

3. Hazard Abatement Process. Regardless of the reporting method, all identified hazards are managed in accordance with Chapter 4 of this instruction . Upon receipt, the hazard is documented in the Risk Management Information (RMI) system, assigned a risk level, and tracked through investigation, corrective action, and final closure within the NSA Naples Risk

Registry. This ensures every report is formally addressed and contributes to the command's overall risk picture.

4. Responsibilities

a. All Employees shall:

(1) Report unsafe or unhealthful working conditions immediately upon discovery using any of the methods listed above.

(2) Exercise their "stop work authority" as defined in this instruction if they believe a situation poses an imminent danger.

b. Supervisors shall:

(1) Receive and act on all hazard reports from their employees.

(2) Take immediate corrective action for hazards within their ability to control.

(3) For hazards that cannot be immediately corrected, ensure a formal report is entered into RMI and the Safety Department is notified.

(4) Never discourage reporting and actively foster a climate where employees feel safe raising concerns.

c. Installation Safety Department shall:

(1) Manage the command's hazard reporting program.

(2) Ensure all reports received, regardless of source, are documented in RMI.

(3) Conduct formal investigations for complex hazards or when requested.

(4) Protect the anonymity of any employee who requests it.

(5) Provide feedback to the originator on the status and final resolution of their report.

5. Formal Response Process. When an employee submits a formal written report of an unsafe or unhealthful working condition through an OPNAV 5100/11 Form or by requesting that a formal response is given, the command must follow a strict timeline and procedure in accordance with references (b) through (d).

a. **Imminent Danger**. If the report alleges an imminent danger, the supervisor and safety office must investigate within 24 hours.

b. **Serious Hazards**. For potentially serious hazards, the investigation must be initiated within three (3) working days.

c. **Other Hazards**. For all reports of "other-than-serious" hazards, the investigation must be initiated within ten (10) working days.

d. **Written Response.** Following the investigation, the command must provide a written response to the employee who submitted the report. The response shall include:

- (1) The findings of the investigation.
- (2) A description of any corrective actions taken or planned.
- (3) A timeline for the abatement of the hazard(s).

6. **Appeals Process.** Reference (b) guarantees an employee's right to appeal if they are not satisfied with the command's response or lack thereof.

a. **Right to Appeal.** If the employee believes the final decision is inadequate (e.g., the hazard was not properly identified, the corrective actions are insufficient, or the timeline is too long), they have the right to appeal.

b. **Where to Appeal.** The appeal is made to the next higher echelon of command. For tenant commands making an appeal, the next higher authority is the NSA Naples Commanding Officer. For host command departments, the next higher authority is Commander, Navy Region Europe, Africa, Central (CNREURAFCENT), N35.

c. **How to Appeal.** The employee must submit a written appeal to the next higher authority, explaining why they are dissatisfied with the initial outcome and request a subsequent investigation.

d. **Higher Level Review.** The higher level command must then conduct its own review of the situation, including the initial investigation and the employee's appeal, and issue its own findings in writing to both the lower investigating authority and the employee making the appeal. Additional appeals may be initiated up the command. The final authority for health and safety appeals is Code 20, Shore Safety Director, NAVSAFECOM.

CHAPTER 14
OCCUPATIONAL REPRODUCTIVE HAZARDS

- Ref: (a) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
(b) OPNAV M-5100.23, Chapter B29
(c) USNMRTC NAPINST 5100.1, Occupational Health Program
(d) NAVSUPPACTNAPLESINST 5100.2, Hearing Conservation Program

1. General. As part of a comprehensive Safety Management System (SMS), the command is committed to providing a work environment free from recognized reproductive hazards for all personnel. This program's goal is to identify and mitigate workplace exposures that could affect an employee's reproductive health or that of a developing fetus. This is a confidential, voluntary program that relies on cooperation between the employee, the command, and occupational health professionals. Administrative matters regarding work status for pregnant employees are managed in consultation with the Human Resources Office (HRO).

2. Identifying Reproductive Hazards. Reproductive hazards are not limited to chemicals. Physical and biological agents, identified through industrial hygiene surveys, can pose a risk. All potential exposures are evaluated by occupational health professionals to determine if they present a hazard. The table below provides some examples of the types of occupational reproductive hazards:

Agent	Examples
Physical Agents	Noise: High-intensity noise, as managed under the Hearing Conservation Program (reference (d)). Ionizing & Non-Ionizing Radiation Thermal Stress (extreme heat or cold) Vibration (whole-body or hand-arm)
Chemical Agents	Heavy Metals (e.g., lead, mercury) Certain Organic Solvents Pesticides Anesthetic Gases
Biological Agents	Certain viruses and bacteria known to be teratogenic.

Table 6 Occupational Reproductive Hazards (not all-inclusive)

3. Confidential Evaluation Process

a. Employee Notification (Voluntary). An employee is encouraged to voluntarily and confidentially notify their supervisor of a pregnancy, plans to conceive, or concerns about reproductive hazards in their workplace.

b. Supervisor Action. The supervisor's role is to immediately and confidentially refer the employee to the Installation Safety Department to initiate a formal occupational health evaluation. The supervisor shall not ask for private medical details.

c. Formal Evaluation. The Safety Department will coordinate with USNMRTC Occupational Health (OH). An OH physician will conduct a private, one-on-one consultation with the employee. This evaluation will include:

- (1) A review of the employee's specific job duties.
- (2) An analysis of the relevant IH survey data for their workspace.
- (3) A confidential discussion of the employee's health.

d. Recommendation. The OH physician will then provide a formal written recommendation regarding the employee's work placement. This recommendation will state whether the employee can continue in their current role or if work modifications or temporary reassignment are medically advised to avoid specific hazards. These recommendations will not contain confidential medical information.

4. Responsibilities

a. Employees should:

- (1) Notify their supervisor of a pregnancy or reproductive health concern as early as possible to initiate the confidential evaluation process.
- (2) Participate openly with the occupational health physician to ensure an accurate risk assessment.

b. Supervisors shall:

- (1) Understand the potential reproductive hazards present in their workspaces by reviewing their area's IH survey.
- (2) Immediately refer an employee who has given notice to the Installation Safety Department for a formal evaluation, while maintaining strict confidentiality.
- (3) Implement any work modifications or duty restrictions recommended by the occupational health physician.

c. Installation Safety Department shall:

- (1) Serve as the confidential coordinator between the command and USNMRTC Occupational Health.
- (2) Ensure that reproductive hazards identified on IH surveys are noted in the Risk Management Information (RMI) system.
- (3) Provide training to supervisors and employees on this program and the importance of identifying all types of reproductive hazards.

d. USNMRTC Occupational Health shall:

- (1) Serve as the sole medical authority for evaluating occupational reproductive risks.

(2) Conduct confidential medical consultations and provide official, actionable recommendations to the command regarding employee safety.

CHAPTER 15
BLOOD-BORNE PATHOGENS

- Ref: (a) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
(b) OPNAV M-5100.23, Chapter B28, Bloodborne Pathogens
(c) 29 CFR 1910.1030, Bloodborne Pathogens
(d) NMCPHC-TM-OEM 6260.7, Prevention of Bloodborne Diseases
(e) NAVSUPPACTNAPLES Form 5100/28, Exposure Incident Investigation

1. Policy. This chapter establishes the command's Bloodborne Pathogens (BBP) Exposure Control Plan (ECP), a critical element of the Safety Management System (SMS). The policy is to eliminate or minimize occupational exposure to BBPs and Other Potentially Infectious Materials (OPIM) in accordance with references (a) through (e). This plan provides the framework for identifying at-risk personnel, implementing control measures, providing training, and outlining the mandatory procedures for responding to an exposure incident.

2. Applicability and Scope. This ECP applies to all NAVSUPPACT Naples and supported tenant command personnel whose job duties may result in occupational exposure to BBP or OPIM.

a. NAVSUPPACTNAPLES and BOS-Supported Commands shall follow this instruction in its entirety.

b. Tenant commands with Organic Safety must ensure their own ECP is at least as protective as this instruction. Any significant differences must be reconciled with the NAVSUPPACT Naples Installation Safety Program Director (IPD).

3. Exposure Determination. The following job roles have been identified as having occupational exposure. This list will be reviewed annually and updated as needed.

a. DEFINITE Occupational Exposure

(1) Firefighter/Emergency Medical Technician

(2) Police Officer

(3) Child Care Provider

b. POTENTIAL Occupational Exposure

(1) Pass & ID Staff

(2) Recreation Aid

(3) Sports & Fitness Staff

4. Program Management and Responsibilities

a. Installation Safety Department shall:

- (1) Manage all facets of the installation ECP and serve as the final authority on its implementation.
- (2) Review and update this ECP at least annually or after any significant process change.
- (3) Manage BBP-related mishap reports in the Risk Management Information (RMI) system.
- (4) Oversee command training and medical surveillance compliance.

b. Department Heads and Supervisors shall:

- (1) Ensure all necessary engineering controls (sharps containers), labels, and PPE are available and maintained for their personnel.
- (2) Enforce all work practices and procedures outlined in this ECP.
- (3) Ensure their personnel receive all required training and medical evaluations.
- (4) Initiate the mishap report in RMI following any exposure incident.

c. Employees with potential exposure shall:

- (1) Adhere to all engineering controls, work practices, and PPE requirements at all times.
- (2) Immediately report all exposure incidents to their supervisor.
- (3) Properly inspect and maintain their issued PPE and work areas.

5. Methods of Control. Universal Precautions shall be observed at all times. This means treating all human blood and OPIM as if known to be infectious.

a. Engineering & Work Practice Controls:

(1) Handwashing: Employees must wash hands with soap and water immediately after removing PPE or after any skin contact with blood or OPIM. If facilities are unavailable, an antiseptic hand cleanser may be used, but hands must be washed with soap and water as soon as possible.

(2) Sharps: Never bend, break, or recap used needles. Immediately dispose of all contaminated sharps in a designated, closable, puncture-resistant, leak-proof, and properly labeled container.

(3) Personal Habits: No eating, drinking, smoking, or applying cosmetics is permitted in areas with a potential for exposure.

(4) Housekeeping: All equipment and surfaces must be cleaned and decontaminated with an approved disinfectant after contact with blood or OPIM.

b. Personal Protective Equipment (PPE): PPE will be provided at no cost.

- (1) Gloves: Must be worn when any potential contact with blood or OPIM exists.

(2) Eye/Face Protection: Must be worn when splashes, spray, or spatter pose a hazard.

(3) Gowns/Aprons: Must be worn to protect work clothes from contamination.

(4) Respirators (N-95): Required for certain aerosol-generating procedures. Personnel must be medically qualified, trained, and fit-tested to wear respirators.

c. Regulated Waste and Laundry:

(1) All regulated waste must be placed in closable, leak-proof, labeled (biohazard symbol), or color-coded (red-bagged) containers.

(2) Contaminated laundry must be handled with gloves, agitated minimally, and placed in labeled or color-coded leak-proof bags for transport to a designated laundering facility.

6. Hepatitis B Vaccination Program. The HBV vaccination series is mandatory and will be made available at no cost to all employees with occupational exposure within 10 working days of their initial assignment. An employee may decline the vaccination by signing a formal declination statement, but they retain the right to receive the vaccine at any later date at no cost. The vaccination program is managed by USNMRTC Occupational Health.

7. Post-Exposure Evaluation and Follow-Up. In the event of an exposure incident (e.g., a needle stick, splash to the eyes), the following non-negotiable procedure must be followed:

a. Employee shall immediately wash the affected area with soap and water (for skin) or flush with water (for mucous membranes) and report the incident to the supervisor immediately.

b. Supervisor shall refer the employee immediately to medical evaluation and initiate mishap reporting actions specified in chapter 8 of this manual. Provide the evaluating healthcare professional with a copy of this instruction and a description of the employee's duties and the exposure incident using form 5100/28.

c. Medical Evaluation. A confidential medical evaluation will be performed, including documenting the exposure route, identifying and testing the source individual (with consent), and collecting and testing the exposed employee's blood (with consent).

d. Safety Department Investigation. A Base Safety Specialist will conduct a formal investigation of the mishap report in RMI. This review will analyze the controls, work practices, and equipment in use to determine the root cause and identify corrective actions to prevent recurrence. Findings will be used to update this ECP.

8. Training. All employees with occupational exposure will receive initial training upon assignment and annual refresher training thereafter. Training will be assigned and tracked via the Enterprise Safety Application Management System (ESAMS) until that system is fully sunset, with records ultimately transitioning to RMI. Training covers the BBP standard, this ECP, hazard recognition, control methods, and post-exposure procedures.

9. Recordkeeping. Certain types of medical reports have extensive retention policies as follows:

- a. Employee medical and exposure records. Duration of Employment + 30 years.
- b. Training records. 3 years from date of training completion.
- c. Mishap Report and Sharps Injuries. 5 years following end of calendar year.

CHAPTER 16
SAFETY COUNCIL CHARTER

Ref: (a) NAVSUPPACTNAPLESINST 5100.4A, Safety Management System (SMS)
(b) OPNAV M-5100.23, Chapter B04
(c) CNIC M-5100.1 CH-3, Chapter 7

1. Purpose. To formally charter the U.S. Naval Support Activity (NSA) Naples Safety and Traffic Safety Council and establish its membership, responsibilities, and procedures. The council serves as the primary forum for safety governance, providing a platform for leadership to review performance, discuss risks, analyze trends, and make informed decisions to ensure the effectiveness of the installation's Safety Management System (SMS) in accordance with references (a) through (c).

2. Mission and Scope

a. Mission. The mission of the council is to provide executive-level oversight of the NSA Naples SMS. It will guide the installation's efforts in all safety-related matters, including occupational health, traffic safety, and recreational and off-duty safety, to preserve operational readiness and the well-being of the community.

b. Scope. This charter applies to all departments and personnel involved in the planning, execution, and oversight of safety programs at NSA Naples.

3. Membership. The Council shall be composed of the following personnel:

Role	Position/Command
Chair	Command XO
Core Membership	Command Master Chief (CMC) Integrated Program Initiator Installation Safety Program Director Public Works Officer Security Officer Fire Chief Emergency Manager Port Operations Officer Air Operations Officer Environmental Director Morale, Welfare, and Recreation (MWR) Director Fleet and Family Support Center (FFSC) Director
Invited Members	Leadership from all Tenant Commands are invited and strongly encouraged to attend. Collateral Duty Safety Officers (CDSOs) are required to attend at least one meeting annually. Other subject matter experts may be invited as needed.

Table 7 Safety Council Membership

4. Council Proceedings

a. Frequency. The council shall meet quarterly, typically on the second Tuesday of March, June, September, and December from 1300-1400. A virtual attendance option will be available.

b. Standard Agenda. The agenda shall include, but is not limited to, the following required topics:

(1) SMS Performance Review: An overview of overall program effectiveness and initiatives.

(2) Risk Presentation: A detailed brief of the official NSA Naples Risk Registry, managed within the Risk Management Information (RMI) system, covering new risks, abatement status, and residual risk.

(3) Mishap & Trend Analysis: A discussion of recent mishaps, near misses, and statistical trends derived from RMI data.

(4) Risk Owner Briefs: Presentations from key departments (e.g., Fire, Security) on significant installation or community risks.

(5) Program Reviews: Updates on Traffic Safety, Recreational and Off-Duty Safety (RODS), and other key programs.

(6) Open Forum: A period for any member to raise safety and health concerns for discussion and tasking.

5. Administrative Procedures and Governance

a. Minutes. The Installation Safety Department is responsible for drafting and maintaining the official minutes of each council meeting.

b. Attendance. The Installation Safety Department is responsible for accurately recording the attendance of Core and Invited Members.

c. Risk Acceptance. The minutes, which document all significant risks and programmatic deficiencies, will be routed to the Commanding Officer to obtain a signed statement of risk acceptance. This formalizes leadership's acknowledgment of the installation's safety posture.

d. Task Management. Action items assigned during the council will be formally documented in the minutes and tracked by the Safety Department to ensure accountability and completion.

e. Dissemination. Once signed by the CO, the official minutes shall be disseminated to all Department Heads, Tenant Command leadership, and CDSOs. This ensures enterprise-wide awareness and facilitates action at all levels of command.