

OSHA Emphasis Programs DIOSH 2016

Ed Marshall – OSHA

SCOPE

This session will provide participants a look at OSHA's National and local emphasis programs. Participants will learn how emphasis program inspections are selected and the types of information an OSHA inspector will ask for if a site is inspected.

OSH ACT

- * Under the OSH Act, employers are responsible for providing a safe and healthful workplace. OSHA's mission is to assure safe and healthful workplaces by setting and enforcing standards and by providing training, outreach, education and assistance.

OSHA

OSHA Jurisdiction:

- * Covers private sector employers
- * Excludes self-employed, family farm workers, and government workers (except in State Plan states)
- * Approves and monitors 28 State Plan states which cover private and public sector employees.
- * Assists Federal Agency Programs

OSHA Inspections:

- * Conducted without advance notice
- * On-site inspections, or Phone/Fax investigations
- * Highly-trained compliance officers

Inspection Priorities:

- * Imminent danger
- * Catastrophes / fatalities
- * Worker complaints and referrals
- * ***Targeted inspections - high injury/illness rates, severe violators***
- * Follow-up inspections

Targeted inspections

Inspections aimed at specific high-hazard industries or individual workplaces that have experienced high rates of injuries and illnesses also receive priority.

- * National Emphasis Programs (NEPs)
- * Local Emphasis Programs (LEPs)

National Emphasis Programs (NEPs)

- * NEPs are National in scope.
- * Focus efforts to reduce specific risks and hazards to workers in various industries
- * Provide for planned inspections in high hazard industries
- * Feature a combination of enforcement and educational outreach for employers whose workers face certain hazards.

National Emphasis Programs (NEPs)

OSHA's Active National & Special Emphasis Program Index

- * COMBUSTIBLE DUST
- * FEDERAL AGENCIES
- * HAZARDOUS MACHINERY
- * HEXAVALENT CHROMIUM
- * ISOCYANATES
- * LEAD
- * PRIMARY METAL INDUSTRIES
- * SHIPBREAKING
- * SILICA
- * TRENCHING & EXCAVATION

Combustible Dust

This instruction contains policies and procedures for inspecting workplaces that create or handle combustible dusts. In some circumstances these dusts may cause a deflagration, other fires, or an explosion. These dusts include, but are not limited to:

- Metal dust such as aluminum and magnesium.
- Wood dust
- Coal and other carbon dusts.
- Plastic dust and additives
- Biosolids
- Other organic dust such as sugar, flour, paper, soap, and dried blood.
- Certain textile materials

Federal Agencies

Programmed inspection program focusing on specific federal agency service/operating locations experiencing a high number of lost time cases (LTCs) as reported through the U.S Department of Labor -Office of Workers' Compensation Programs

Hazardous Machinery

To identify and to reduce workplace machinery and equipment hazards which are causing or likely to cause amputations.

Amputation is defined as a “traumatic loss of limb or other external body part.”

(Amputations include a part, such as a limb or appendage that has been severed, cut off, amputated (either completely or partially); fingertip amputation with or without bone loss; medical amputations resulting from irreparable damage; amputations of body parts that have since been reattached. Amputations do not include avulsions, enucleations, degloving, scalping, severed ears, or broken or chipped teeth”).

Hexavalent Chromium

- * Identify & reduce or eliminate the health hazards associated with occupational exposure to hexavalent chromium and other toxic substances commonly found in conjunction with hexavalent chromium.
 - * Inspections under this NEP will generally focus on industries where overexposures to hexavalent chromium are known to occur.
- * *Electroplating Operations*
 - * *Welding*
 - * *Painting*
 - * *Maritime/shipyard*
 - * *Foundry, Steel Mill, and Other Molten Metal Handling Operations.*
 - * *Painting and Surface Preparation (Abrasive Blasting)*
 - * *Welding and Thermal Cutting*
 - * *Miscellaneous Construction Activities with Limited Potential for Cr(VI) Exposures*
 - * *CCA lumber/woodworking*

Isocyanates

- * To identify and reduce or eliminate the incidence of adverse health effects associated with occupational exposure to isocyanates.
- * Jobs that may involve exposure to isocyanates include:
 - * Painting
 - * foam-blowing
 - * manufacture of many Polyurethane products, such as chemicals, polyurethane foam, insulation materials....
- * Occupational exposure to isocyanates is a recognized cause of immune sensitization and asthma.
- * Scientific research indicates that dermal exposure to isocyanates is at least as likely as inhalation exposure to induce isocyanate-related asthma.
- * Inspections shall include an evaluation of the employer's controls (engineering controls, administrative and work practice controls, and personal protective equipment)
- * Also review Hazard Communication, Housekeeping, Flammables & Combustibles

Lead

- * The activities covered under this NEP include inspections and inquiries conducted in any industry or at any work site where the Agency determines that there is potential employee exposure to lead.
- * Employee exposure to airborne lead will be sampled, whenever possible, during both the initial and follow-up inspection. Medical surveillance records will be reviewed, whenever available, by CSHOs during NEP lead inspections.

Primary Metals Industry

- * Identify and reduce or eliminate worker exposures to harmful chemical and physical health hazards in facilities in the Primary Metal Industries.
- * Previous inspections of primary metal establishments have resulted in citations for overexposures to a wide variety of health hazards including chemical exposures in foundry operations as well as physical stressors such as noise and heat.
- * Inspections conducted under this NEP shall focus on facilities with workers in Major Group 33 of the SIC Manual
- * The Primary Metal Industries (PMI) are a group of establishments engaged in the smelting and refining of both ferrous and nonferrous metals. These metals are refined from ore, pig, and scrap, during rolling, drawing, casting, and alloying metal operations.

Shipbreaking

To reduce or eliminate workplace hazards associated with shipbreaking operations.

OSHA has determined that this NEP is needed because of the continuing high incidence of injuries and illnesses related to shipbreaking operations. Shipbreaking of obsolete vessels presents many challenges, including the structural complexity of the ships themselves and environmental, safety, and health issues.

Silica

- * Addresses targeting of worksites with elevated exposure to crystalline silica, as well as silica-related inspection procedures and compliance assistance
- * Each office that does not already have a Local Emphasis Program (LEP) for crystalline silica, will develop and implement a LEP for crystalline silica.

Trenching & Excavating

- * Because of the continuing incidence of trench/excavation collapses and accompanying loss of life, the agency has determined that an increased OSHA enforcement presence at worksites where such operations are being conducted is warranted.
- * All compliance personnel shall be instructed to be on the lookout for trenching or excavation worksites. Every observation of such operations shall be handled as follows:
 - * Regardless of whether or not a violation is observed, whenever a CSHO sights or receives any other notice of a trenching or excavation operation the CSHO shall:
 - (1) Make note of the state and condition of the work operation insofar as it is known, including any apparent serious hazards.
 - (2) Note the name and address or location of the worksite and the contractor performing the operation, if known.
 - (3) Contact the Area Office supervisor for a decision as to whether an inspection is required.

Local Emphasis Program (LEPs)

- * Local Emphasis Programs (LEPs) are enforcement strategies designed and implemented at the regional office and/or area office levels.
- * These programs are intended to address hazards or industries that pose a particular risk to workers in the office's jurisdiction.
- * The emphasis programs may be implemented by a single area office, or at the regional level (Regional Emphasis Programs), and applied to all of the area offices within the region.

Region V - LEPs

REGION V: (IL,** IN,** MI,** MN,** OH, WI)

- * Building Renovation/Rehabilitation and Demolition
- * Powered Industrial Vehicles
- * Fall Hazards in Construction and General Industry
- * Dairy Farm Operations
- * High Rise Building Construction in Chicago, Illinois
- * Grain Handling Facilities
- * Carbon Monoxide Hazards in Construction
- * Federal Agencies
- * Tree Trimming Operations
- * Wood Pallet Manufacturing Industry
- * Maritime Industries
- * Lead
- * Silica



Building Renovation/Rehabilitation and Demolition

- * Due to the fact that most of the activities are being done on the interior of the building, OSHA's ability to conduct inspections in this type of environment has been limited to responding to fatalities, "formal" complaints or referrals. There have been only a limited number of complaints and referrals filed with OSHA considering the number of these types of projects observed.
- * Allows for the identification of hazards which may not be visible from the exterior of a building.
- * The inspections conducted on these types of projects have resulted in numerous citations for such hazards as: open floor holes, ungrounded electrical wiring, unguarded wall openings, and over exposures to airborne contaminants (such as asbestos, silica and lead) while sandblasting or grinding.
- * The sites being targeted will consist of those older buildings requiring extensive interior demolition so as to allow the installation of up-to-date equipment as required by present day building safety codes.

Powered Industrial Vehicles

Any referral or complaint classified by OSHA as "serious" which alleges a hazard or a condition that may be a violation of the powered industrial truck standard or a potentially fatal "struck/caught/fall hazard" associated with the operation of a powered industrial vehicle (e.g., struck by falling load, struck against, caught between, caught in, or fall hazard) in general industry or construction will be activated for inspection. Additionally, any ongoing inspection where powered industrial vehicles are observed in use will be expanded to evaluate possible violations of the powered industrial truck standard.

Fall Hazards in Construction and General Industry

Nationally, accidents relating to falls from elevations are one of the leading causes of serious injuries and fatalities. In Region V, over a three year period (FY 2012 - FY 2015), there have been 131 fatalities resulting from falls from elevations. Based on OSHA's experience, a Local Emphasis Program that increases awareness and accelerates enforcement activity reduces injuries. It is also recognized that a tracking mechanism for these types of inspections would prove beneficial in monitoring the area of fall hazards. This LEP is designed to increase inspection activity, provide tracking, enhance training and outreach, and formalize procedures. It will also serve as a means of conducting enhanced outreach regarding ladder safety.

Dairy Farm Operations

Programmed inspections of establishments within the dairy farming industry having operations classified as dairy cattle and milk production under the North American Industry classification System (NAICS) code 112120.

The Notice applies to the jurisdictional area of all Federal Area Offices of the Occupational Safety and Health Administration in the State of **Wisconsin**.

High Rise Building Construction in Chicago, Illinois

A complaint inspection of a multi-story building in downtown Chicago resulted in the issuance of citations to the General Contractor with a proposed penalty of \$296,000. Looking at the building from the surrounding area, one would not have believed there to be any violations present to initiate an inspection under the LEP Fall initiative. Once inside the workplace, documented conditions existed which exposed employees to hazards which could have resulted in serious physical harm or death. These included fall and electrical hazards among many others. Also present was the possibility of silica overexposure.

The inspection list will include those sites involving new construction of 10 stories or greater. The determination to use the 10 story criteria is derived from the type of construction being done within **the City of Chicago in Calumet City's geographic jurisdiction**. The intent of this program is to target large scale construction projects.

Grain Handling Facilities

Programmed inspections of grain handling facilities: Industry Description NAICS (2012)

- * Dog and Cat Food Manufacturing 311111
- * Flour Milling 311211
- * Wet Corn Milling 311221
- * Soybean Processing 311224
- * Grain and Field Bean Merchant 424510
- * Wholesalers
- * Farm Product Warehousing and Storage 493130

Carbon Monoxide Hazards in Construction

To reduce exposures associated with carbon monoxide and related safety and health hazards for construction employees working in enclosed areas such as on scaffolding and in newly constructed or remodeled buildings where temporary heating devices or internal combustion engine equipment are being used.

Currently applies to the **Appleton, Eau Claire, Madison, and Milwaukee Wisconsin Area Offices.**

Federal Agencies

Executive Summary

Federal agencies are not covered directly by the OSH Act and may be inspected by OSHA only through the authorization of Executive Order 12196. Inspection activity in the Federal sector has been limited to unprogrammed inspections and a limited number of "targeted" inspections where advance notice is provided. Region V Area Offices, in their inspection activity at Federal installations via these two means, have identified a multitude of safety and health violations while on site. Numerous complaints have also been received alleging safety and health hazards at Federal agencies. Many of the complaints result in letters being sent to the Federal agency requesting corrective action. Experience and inspection history has found that the Federal agencies are not always responsive in ensuring a safe and healthful work environment for their employees.

Tree Trimming Operations

To continue a Local Emphasis Program to reduce the fatal accident rate for the Tree Trimming Industry.

- * Ohio and Illinois Area Offices
- * NAICS code 561730, Landscape and Horticultural Services
- * In FY-2011, there were eight workplace fatalities in this NAICS code, with 5 occurring in Ohio and 3 in Illinois. The four leading causes of these accidents were listed as struck-by (45%), falls from elevations (32%), caught-in or between (10%), and electrical shock (5%). These accidents involved workers being struck by falling trees and limbs in addition to motorized equipment; falls from trees and ladders; caught in chippers; and electrical shock while working in the vicinity of overhead power lines. Landscaping, specifically tree trimming operations, is a dangerous occupation with several hazards identified in OSHA's focus four (i.e., Falls, Caught-in or Between, Struck-by, and Electrocutation).

Wood Pallet Manufacturing Industry

For safety and health inspections of employers engaged in the manufacturing of wood pallets.

- * Pallet manufacturing has the potential for multiple types of serious safety and health hazards.
- * Wood container and pallet manufacturers experienced a recordable incidence rate of 7.4, versus 3.7 for all industries, according to 2012 Bureau of Labor Statistics (BLS) data.
- * A review of citation history for the state of Ohio indicates approximately 3.4 serious hazards identified per inspection of establishments within this industry (2012 NAICS code 321920), since July 2011.
- * The most common hazards identified were machine guarding, lockout-tagout, powered industrial vehicles, electrical safety, noise, housekeeping and recordkeeping.

Maritime Industries

Programmed inspection of Maritime Industries engaged in shipbuilding and repair, marine cargo handling, navigation services to shipping, port and harbor operations, other support activities for water transportation, boat building, and marinas engaged in recreational boat repair located on or adjacent to navigable waterways.

- * **Indianapolis Area Office**
- * **Lansing Area Office**

Lead

The purpose of this Local Emphasis Program is to reduce occupational exposures to lead in General Industry and Construction.

- * All inspections under this LEP must address all aspects of any potential lead work or exposure; include a review of all related written documentation (recordkeeping, monitoring, compliance program including engineering and administrative controls, medical surveillance, training, as well as respiratory protection, hazard communication, personal protective equipment, hygiene and housekeeping programs) and interface with other applicable OSHA standards.

Silica

The purpose of this Local Emphasis Program is to reduce occupational exposures to silica in General Industry and Construction.

- * On January 24, 2008, OSHA established the National Emphasis Program (NEP) for crystalline silica. The NEP instructed each Area Office or Regional Office to develop a Local Emphasis Program (LEP) for silica based on one or more industries listed in Appendix A for the NEP. Construction and General Industry complaints and referrals will be handled in accordance with the current crystalline silica NEP.



HOT TOPICS

Recent Industry Alerts/Letters:

- Ammonium Nitrate Storage
Bathtub Refinishing-Methylene Cl [PDF*]
Bromopropane
Crowds at Stores on Black Friday
Diesel Exhaust from Vehicles [PDF*]
Poultry Processors
Silica in "Fracking" [PDF*]
All Alerts/Letters to Employers

Enforcement Initiatives:

- Green Jobs - Dr. Michaels' Remarks
Temporary Workers

Targeted Enforcement:

- Recent National Emphasis Programs (NEPs):
Chemical Facilities NEP*
Federal Agency Targeting*
Isocyanates NEP*
Nursing Homes NEP*
All NEPs
Local Emphasis Programs

OSHA ENFORCEMENT

Under the OSH Act, employers are responsible for providing a safe and healthful workplace. OSHA's mission is to assure safe and healthful workplaces by setting and enforcing standards and by providing training, outreach, education and assistance. This page contains information about OSHA's enforcement activities. If you have questions, need additional information, want to file a complaint, or would like to contact OSHA, please call 1-800-321-OSHA (6742). You can also e-mail us your questions (e-mail OSHA). It's confidential. We are here to help.



QUICK LINKS

Compliance Assistance:

- Fact Sheet-OSHA Inspections*
Frequently Asked Questions NEW
Maritime Compliance
Quick Start Guide

Enforcement Data:

- Annual (FY) Summaries - 2009| 2010 | 2011| 2012 | 2013 NEW
Corporate Settlement Agreements
Highest Issued Penalty Cases
OSHA Data Initiative
Search Inspection Stats and Data
Top 10 Standards Violated

Enforcement Policies:

- Administrative Penalty Policy 2012
Aircraft Flight Attendants NEW
Appropriation Exemptions Update NEW
Electric Power Standards NEW
Field Operations Manual*
HCS 6/1/15 Enforcement Guidance NEW

Questions

The image features the word "Questions" in a large, bold, red, 3D font centered on a white surface. The word is surrounded by many grey, 3D question marks of various sizes and orientations, some appearing to float or be scattered around the central text. The overall composition is clean and minimalist, emphasizing the theme of inquiry.