

**State of Alaska
Department of Labor
Division of Labor Standards and Safety**

AKOSH Program Directive 99-08

Date: October 22, 1999

To: Distribution List

From: Alan W. Dwyer, Director

Subject: **Child Labor Policy Memoranda**

This Program Directive, PD 99-08, will implement as a supplement the attached Interpretation memoranda dated July 13, 1999, to the following sites:

- Standard number 1903.11, OSHA Instruction CPL 2.115, Complaint Policies and Procedures incorporates the attached Interpretation memoranda *Responding to Complaints Alleging Hazards to Workers Under 18 Years of Age*;
- Standard number 1903.15, OSHA Field Inspection Reference Manual (FIRM) C.2.f.(2)(f) page IV-10 and C.2.i.(5)(b) on page IV-14 incorporates the attached Interpretation memoranda *Probability Assessment and Good Faith Penalty Adjustment Considerations*; and
- Standard number 1903.15, OSHA Instruction CPL 2.80, H.2.b., Handling of Cases To Be Proposed for Violation-By-Violation Penalties incorporates the attached Interpretation memoranda *Guidance Criteria Considerations for Handling of Cases To Be Proposed for Violation-By-Violation*

This program directive is effective 10/27/99. Please ensure that all members of your staff receive this program directive and understand how to implement it.

Attachments:

Federal Program Change Two-Way Memo

3 Interpretation memoranda dated July 13, 1999 for Child Labor Policy

Distribution List w/attachments:

Richard S. Terrill, Regional Administrator, USDOL, Region X, OSHA

Barry Noll, Alaska Area Administrator, USDOL, Region X, OSHA

Thomas Stuart, Chief, LS&S, AKOSH

Mike Russell, Assistant Chief, LS&S, AKOSH, Enforcement

Timothy Bundy, Assistant Chief, LS&S, AKOSH, C&T

Hali Denton, Administrative Manager, LS&S

Marcia Etheridge, Administrative Assistant, LS&S, OSH