



CANCELLED

**State of Alaska
Department of Labor and Workforce Development
Division of Labor Standards and Safety
Occupational Safety and Health**

AKOSH Program Directive 03-01

Date: September 26, 2002
To: Distribution List
From: Richard A. Mastriano, Director
Subject: **AK-OSH High Hazards Targeting (HHT) Inspection Plan**

This Program Directive, PD 03-01, implements the AK-OSH High Hazards Targeting (HHT) Inspection Plan that annually identifies organizations reporting ten or more Lost Time Injury/Illness (LTII) cases or showing a 10% or higher Lost Time Case Rate (LTCR) in the previous reporting year and implements an inspection plan for those organizations.

The CPL's referred to in the HHT plan are:

CPL 2.103, Field Inspection Reference Manual (FIRM);
CPL 2.25I, Scheduling System for Programmed Inspections;
CPL 2-2.45A, Process Safety Management of Highly Hazardous Chemicals

This new directive cancels AK-OSH Program Directive 02-01, implementing CPL 2 Site Specific Targeting 2001 (SST-10), July 13, 2001.

This program directive becomes effective immediately. Please ensure that all members of your staff receive this program directive, and understand how to implement it.

Attachment: AK-OSH Program Directive 03-01 AK-OSH High Hazards Targeting (HHT) Inspection Plan

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High Hazards Targeting (HHT) Inspection Plan

- I. Purpose. The High Hazards Targeting (HHT) Inspection Plan annually identifies organizations reporting ten or more Lost Time Injury/Illness (LTII) cases or showing a 10% or higher Lost Time Case Rate (LTCR) in the previous reporting year and implements an inspection plan for those organizations.
- II. Scope. This applies statewide to AK-OSH programmed general industry inspections planned under this selection system.
- II. References:
 - ◆ OSHA Instruction CPL 2.103, Field Inspection Reference Manual (FIRM).
 - ◆ OSHA Directives CPL 2.25I, Scheduling System for Programmed Inspections.
 - ◆ OSHA Instruction CPL 2-2.45A, Process Safety Management of Highly Hazardous Chemicals—Compliance Guidelines and Enforcement Procedures.
- IV. Cancellations: AKOSH Program Directive 02-01, CPL 2 Site Specific Targeting 2001 (SST-10), July 13, 2001.
- V. Action: The AKOSH Compliance Program Chief shall ensure that the procedures established in this directive are followed when conducting inspections made under this program.
- VI. Background: Approximately two percent of the organizations doing business in Alaska account for over one half of the workplace injuries that takes place in the state annually. This information, reported quarterly to the Workers' Compensation office, can be used in an unbiased fashion to identify businesses with high injury and illness rates, to target AKOSH enforcement and consultation resources more effectively and efficiently, and to identify program success or failure by collecting and analyzing long-term Workers' Compensation data. The types of information available include legal business name, monthly totals for the number of employees, and the number of reported time loss injury and/or illness cases. Up-to-date information is accessible immediately after the end of the quarter and can be organized as needed. Appendix A is the High Hazards Targeting list for the time period of 7/01/2000 through 6/30/2001.

VI. Definitions.

- A. Establishment: An establishment (a.k.a. workplace or worksite) is a single physical location where business is conducted or where services or industrial operations are performed.
- B. High Hazards Targeting (HHT) List: Locally produced, targeting list developed using the Alaska State Workers Compensation data files crossed referenced to the SIC codes maintained by the State of Alaska, Division of Occupational Licensing. The Workers Compensation files contain information related to the name, address, unemployment insurance ID number and Federal Employer Identification Number (FEIN) of all organizations active in conducting business in the state of Alaska. Information pertaining to the number of employees per month/quarter is included, as is the number of cases reporting lost time injuries and illnesses. These files are organized by quarters (three-month periods) and can be easily manipulated to display information as desired (e.g. by state fiscal year, federal fiscal year, or calendar year).
- C. Lost Time Case Rate (LTCR): This is the rate of lost time cases as determined by dividing the number of cases by the average annual number of employees in the affected organization and then multiplying by 100. The resulting number represents an average percentage injury/illness rate per 100 employees for that organization.
- D. Organization: An entity authorized to conduct business in Alaska at one or more sites. An organization may be listed with the Workers' Compensation office in a variety of ways. It may be listed by corporate ownership, by individual establishments, or by organizational purpose (e.g. administration, production, or etc.). This includes the State of Alaska and all city, municipal and area governmental agencies.
- E. Workers' Compensation Lost Time Injury/Illness Cases (LTIIC): "Lost Time" is defined as a work-related injury or illness that results in any amount of time away from work.

VIII. Description of the AKOSH High Hazards Targeting Plan.

- A. Initial Inspection Targeting List. The HHT list is sorted to extract those organizations that reported ten or more LTIIC or show a 10% or higher LTCR in the previous reporting year. (In State fiscal year 2001, these organizations accounted for slightly more than 2% of the total number of businesses in Alaska, but were responsible for over 50% of the lost time cases in the state.) The list will then be compared to the current Appendix A to OSHA Instruction CPL 2-0.51J, Enforcement Exemptions and

Limitations under the Appropriations Act, and all applicable SICs will be removed from the final targeting list. However, these organizations will remain on the master list as a means of comparing prior and future year statistics.

A new inspection-targeting (HHT list) list will be developed for use each year using data collected from July 1 through June 30 each year. This parallels the State of Alaska fiscal year and allows time to compile the list before the start of the federal fiscal year on October 1. Data will be refreshed using the annual Workers Compensation databases and the Division of Occupational Licensing SIC data.

The list will be sorted first by area of responsibility (e.g., Anchorage, Fairbanks, or Southeast) then by Lost Time Case Rate (LTCR). Organizations that conduct business under one corporate name but conduct business out of various locations will be extracted based on the corporate name with the addresses of the various locations listed in notes at the end of the HHT list. Additionally, those organizations that have occurrences of ten or more incidents but whose employee totals are missing from the database will be listed in a section immediately after the full list. This will prevent eligible organizations from being dropped off the list due to clerical/data input errors.

- B. Number of Establishments or Worksites to Inspect. Each listing on the inspection list should generally represent a single establishment or worksite. However, in the case of some industries and in the case of some employers, the listing may represent a central office or data for several sites rather than a single location where hazardous work is taking place. In the event that information relating to the location/s of specific worksites is not readily available through AKOSH resources, it will be the responsibility of the assigned inspecting officer and his/her supervisor to locate this information. If, during the conduct of an inspection, the CSHO determines that there are multiple worksites, he/she will analyze the available data and determine which worksites need to be inspected based on the specific functions of each site, the potential for injuries and/or illnesses, and available historical data.

IX. Scheduling.

- A. Background. Alaska is unique among the 50 states in that it encompasses an area roughly a third of the size of the continental United States but has an overall population smaller than most mid-sized cities. The people of Alaska and their places of work are spread thinly over the entire area.

However, the road network in Alaska is extremely limited, restricting vehicular travel to the four main population areas of Anchorage/Mat-Su, Fairbanks, Kenai Peninsula, and the immediate Juneau area. Travel to other areas of the state can only be accomplished by boat or airplane. Both modes of travel are very expensive.

For a state whose major industries are seafood, oil, and logging, it is not surprising that most of the organizations with high injury/illness rates are located in remote locations and are not accessible by vehicle. Therefore, (with the exception of those establishments that are accessible by vehicle) establishments in remote regions will be assigned as other priorities are assigned. An inspector traveling to a specific remote location to conduct an inspection under the Construction, Logging, and Seafood emphasis program will be assigned establishments from the HHT list that are located in the same area. Priority will be given to those with the highest LTCR first and will continue until the list for that area has been completed or time has been exhausted.

Travel in and around the Kenai Peninsula, Anchorage/ Mat-Su area, Fairbanks, and Valdez can be accomplished by vehicle most of the year with the exception of periods of inclement weather. Worksites within the range of vehicular travel will be assigned to inspectors in that region as time and availability permit, prioritizing by LTCR.

- B. Inspection Order. Organizations on the list may be scheduled and inspected in any order that makes efficient use of available resources. It will not be necessary to exhaust the list before a new list is put into action and the old list retired. However, organizations that are not inspected on the old list will be prioritized higher on the new list, as allowed by this and other applicable directives.
- C. Inspection Priority. Normally, inspection priorities as described in the FIRM will be followed. The AKOSH Strategic Plan and Annual Performance Plans provide relative guidance with regard to program priorities. However, the Compliance Program Chief has overall responsibility for this program and has the authority to adjust priorities to meet specific needs. In general:
 - 1. The first inspection priority is to conduct unscheduled inspections.
 - 2. The second priority is to conduct other scheduled inspections such as the construction, logging and seafood processing emphasis program and other local emphasis/ initiative programs.
 - 3. The third priority is to this directive.

- X. Deletions. The Compliance Program Chief will be responsible for making appropriate deletions to the inspection list. Appropriate reasons for deletion are:
- A. Establishment is no longer in business.
 - B. Establishment on the list is in federal rather than state jurisdiction.
 - C. Establishments that are exempted due to VPP or SHARP certifications.
 - D. Establishment having had a recent comprehensive inspection. If an establishment has had a comprehensive safety (alternatively, health) inspection during the previous federal fiscal year, only a comprehensive health (alternatively, safety) inspection needs to be considered. However, the Compliance Program Chief will determine the need for subsequent inspections based on the inspection history, the hazards of the industry and the injury and illness data for the establishment.
 - E. Establishments actively receiving consultation assistance.
 - F. Process Safety Management (PSM) partners. (Note: Deletions apply only to that part of the seafood plant that falls under PSM.)

XI. Inspection Procedures.

- A. Scope. Inspections conducted under this plan will be comprehensive programmed safety and or health inspections as defined by the FIRM (OSHA Instruction CPL 2.103) and conducted in accordance with the procedures described there and in other guidance documents. The Compliance Program Chief will determine the need for whether both a comprehensive safety and health inspection would reflect efficient use of resources based on any inspection history, the hazards of the industry, and the injury and illness data for the establishment. Compliance personnel must be sure to review the worksite for all potential hazards in order to make effective referrals to the other discipline.
- B. Citations. Violations will be cited according to the FIRM and other guidance documents.
- C. Collect OSHA 200/300 Data. During inspections under this notice, the OSHA 200/300 log data will be collected for inclusion in the IMIS database. Compliance officers should check injury and illness records that support the OSHA 200/300 log, as they deem appropriate, to validate the OSHA 200/300 Forms.

If recordkeeping violations are discovered, they shall be cited in accordance with OSHA Instruction CPL 2.111. Regardless of the scope of

the inspection, a partial walkthrough may be conducted to interview workers in order to confirm and verify the injury and illness experience. Any serious violations that are observed in the vicinity, or any violations brought to the attention of the compliance officer, shall be investigated and may be cited.

XII. Relationship to Other Programs.

- A. Unscheduled Inspections. Unscheduled inspections will be conducted according to the FIRM (OSHA Instruction CPL 2.103) or other guidance documents. If the occasion for an unscheduled (e.g., complaint, fatality, imminent danger, or catastrophe) inspection arises with respect to an establishment that is also to receive a scheduled inspection under the AKOSH HHT plan, the two inspections may be conducted either concurrently or separately.
- B. National Emphasis Programs. Some establishments may be selected for inspection under the AKOSH HHT plan and also under one or more other initiatives (National Emphasis (NEP) or Local Emphasis (LEP) programs). Programs based upon particular hazards (such as silica, lead or amputations) or on particular industries can be run concurrently with the AKOSH HHT plan; however, the AKOSH HHT plan inspections have priority. Wherever an establishment shows up on the plan and on another inspection list, the inspections should be scheduled at the same time. Compliance officers will apply all applicable IMIS codes to the inspection.

XIII. Recording and Tracking.

The OSHA 1 Forms for all scheduled inspections conducted under this targeting inspection plan shall be marked as “planned” in item 24h and “HHT” recorded in item 25c. If the reason for going to the HHT site is an unscheduled activity, and a comprehensive HHT inspection was conducted concurrently, then OSHA-1 will be marked Complaint, Fatality, etc., and also coded “HHT” in item 25c.