



State of Alaska
Department of Labor and Workforce Development
Division of Labor Standards and Safety

AKOSH Program Directive #19-04

Date: October 10, 2018

To: All AKOSH Staff

From: Deborah Kelly, Director ^{DK}

Subject: Local Emphasis Program to reduce and/or eliminate occupational safety and health hazards associated with the seafood processing industry in Alaska

This Program Directive establishes enforcement procedures to implement the AKOSH Local Emphasis Program (LEP) for the seafood processing industry in Alaska. This emphasis program supports the AKOSH Fiscal Years 2019-2023 Strategic Plan. The goal is to reduce the number of worker injuries and illness in the seafood processing industry by focusing compliance and consultation efforts on the causes of “falling”, “caught in or between”, “pinching”, and “amputation” incidents.

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: AKOSH Seafood Emphasis Program FFY 2019-2023

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EXECUTIVE SUMMARY

This directive provides the framework for an emphasis program to reduce and/or eliminate occupational safety and health hazards associated with seafood processing in Alaska.

- I. Purpose.** The purpose of this directive is to establish enforcement policy and procedures for programmed safety and health emphasis inspections at seafood processors.
- II. Scope.** This directive applies AKOSH-wide.
- III. References.**
- A. Alaska Occupational Safety and Health Field Operation Manual (AKOSH FOM) Program Directive PD # 18-05, May 1, 2018 or current update.
 - B. OSHA Instruction CPL 04-00-001 (CPL 2-0.102A), Procedures for Approval of Local Emphasis Programs (EPs), November 10, 1999 or current update.
 - C. AKOSH Program Directive PD # 18-04 Inspection Procedures for Hazard Communication Standard, December 18, 2017 or current update.
 - D. AKOSH Program Directive PD # 16-06 Inspection Procedures for Respiratory Protection Standards, September 27, 2016 or current update.
 - E. AKOSH Program Directive PD # 19-03 National Emphasis Program on Amputations, October 10, 2018 or current update.
 - F. AKOSH Program Directive PD # 14-01 OSHA Strategic Partnership Program for Workers Safety and Health, April 25, 2014 or current update.
 - G. Alaska Statutes AS 18.60.010 through AS 18.60.105
 - H. Alaska Administrative Code (AAC) all safety and health standards enforced by AKOSH and contained in Title 8, Chapter 61 of the Alaska Administrative Code.
 - I. 29 CFR 1910 General Industry Standards
 - J. 29 CFR 1926 Construction Standards
- IV. Expiration.** This directive expires on September 30, 2023, but may be renewed as necessary.
- V. Background.** During normal operations at seafood processing facilities one or more of the following conditions could exist:
- 1. Excessive noise levels
 - 2. Extreme temperatures
 - 3. Bacterial and parasitic infections
 - 4. Bioaerosols containing seafood allergens, microorganisms, and toxins
 - 5. Poor housekeeping
 - 6. Unguarded machinery

7. Uncontrolled energy (electrical, mechanical, hydraulic, pneumatic, chemical, thermal)
8. Pinch points
9. Electrical hazards
10. Ergonomics
11. Fire
12. Hazardous chemicals (ammonia, disinfectants)
13. Inappropriate personal protective equipment
14. Slips/trips/falls
15. Workplace stress

Additional worksite conditions such as extended hours, limited breaks, and living conditions may also negatively contribute to employees' wellbeing.

VI. Procedures. The following procedures shall be followed for the scheduling and inspection of work sites under this program:

1. AKOSH Seafood EP inspection list. The Chief of OSH will compile a list of establishments based on the North American Industry Classification System (NAICS) 311711 Seafood Canning and 311712 Fresh and Frozen Seafood Processing. Prior to the start of each seafood season, the Chief will contact the Commercial Fisheries Division of the Alaska Fish and Game Department and obtain "intent to operate" documents issued by the department to companies operating processing plants. These documents will be used to determine whether a facility is likely to be in operation prior to scheduling an inspection.
2. Inspection scheduling. Inspection scheduling will be in accordance with applicable provisions of the AKOSH FOM.
3. Relationship to Other Programs. Reports of imminent danger, fatality/catastrophe, complaints and referrals shall be scheduled as unprogrammed inspections and shall be inspected in accordance with the applicable provisions of the AKOSH FOM.

Establishments actively participating in the Alaska OSH recognition and exemption programs Alaska OSH Safety and Health Achievement Recognition Program (SHARP) and Alaska OSH Voluntary Protection Program (VPP) will be exempted from programmed inspections in accordance with the applicable provisions of the AKOSH FOM.

VII. Enforcement. Inspections conducted under the AKOSH Seafood EP will be conducted pursuant to the following procedures:

The CSHO will review the OSHA 300 logs and OSHA 300A Forms for the three most current years; review the employer's PPE hazard assessment to ensure CSHO is equipped with the appropriate PPE; follow the procedures outlined in the AKOSH FOM for conducting an opening conference; then proceed as quickly as possible with the walk around inspection. Unusual circumstances shall be handled in accordance with the AKOSH FOM.

Scope of the inspection under this program.

Both Safety and Health Officers will determine during the opening conference if the facility falls under the 29 CFR 1910.119 Process Safety Management (PSM) scope and application. If the facility is covered under PSM, the CSHO will notify their supervisor but will not expand the inspection to a comprehensive PSM evaluation.

The following areas should be evaluated by the CSHO:

- Safety – Injury and Illness records, machine guarding/pinch points, unprotected working/walking surfaces, operation of powered industrial trucks.
- Health – Injury and Illness records, hazardous chemicals/hazard communication, ergonomics, noise, proper selection and use of personal protective equipment.
- The CSHO shall also evaluate the employer's overall safety and health management system, in accordance with the AKOSH FOM.

Inspections under this LEP shall normally be limited to evaluating worker exposure to these safety and health hazards. However, a CSHO may expand the scope of an inspection if other safety and health hazards or violations are observed in plain view and/or brought to their attention. CSHOs shall follow the guidelines in the FOM when expanding the scope of any inspection (Chapter 3.III.B.).

VIII. Recording in OIS. The OSHA Information System (OIS) identification code to be used in the Inspection Activity will be "Seafood". Inspections shall be recorded as being "Partial".

IX. Outreach. AKOSH Consultation and Training consultants will provide outreach to employers in accordance with appropriate provisions of the AKOSH Consultation Policies and Procedures Manual (CPPM).

X. Evaluation. No later than October 30 each federal fiscal year this LEP is in effect, the Chief of OSH will submit an evaluation report to the Director. The report will address the following elements: the number of enforcement inspections conducted; the number, type and classification of violations; and the number of consultation visits and training events.