

Appendix A
FY 2010 State of Connecticut (CONN-OSHA) Enhanced FAME Follow-up Report
Summary of New and Continuing Findings and Recommendations

Rec #	Findings	Recommendations	Related FY 09 Rec #
10-1	Complaint and Referral Response (SAMM#1) —CONN-OSHA must continue to strive to meet the five-day standard for average number of days to initiate a complaint inspection.	Meet the five-day standard for complaint and referral response time.	09-1
10-2	Diary Sheets —Case file diary sheets do not sufficiently document important events and actions related to the case.	Ensure that all case diary sheets contain all entries and information required by the FOM, Chapter 5.	09-2
10-3	Case File Review Check List —CONN-OSHA has not implemented the case file review check list, as required by its Corrective Action Plan (CAP).	Implement the case file review check list as required by its CAP by May 1, 2011.	09-2
10-4	Case File Organization — Some case files' documents were not in the order established by Appendix C of ADM 03-01-005.	Ensure that case files are organized in accordance with Appendix 2 of ADM 03-01-005.	09-3
10-5	SAMM#8 —CONN-OSHA did not meet the standard for safety during the first quarter of FY2011 (but did exceed the standard for safety in FY2010). For health, CONN-OSHA has only conducted one programmed inspection in the past several months so the program's performance will have to have to be monitored in subsequent quarters of FY2011.	Meet the standards for SAMM#8 for both safety and health inspections. The SAMM report for the 4 th quarter (FY2011) will reflect that CONN-OSHA has met the standards.	09-4
10-6	Classifying/Grouping Violations —CONN-OSHA's percentage for all violations classified as serious continue to be too low (in comparison to Federal OSHA's percentage) and its percentage for all violations classified as other-than-serious continues to be too high.	Align more closely with Federal OSHA's percentages for violations classified as serious and those violations classified as other-than-serious. The Inspection Summary report for the third quarter of FY2011 will show that CONN-OSHA's percentages for serious and other-than-serious violations are at least within a few percentage points of Federal OSHA's percentages.	09-5
10-7	PMA Tracking Sheet —CONN-OSHA has not yet implemented the sample tracking sheet developed by Region I for ensuring that abatement information is received from the employer by the required due dates.	Implement use of the PMA tracking sheet by June 1, 2011.	09-11
10-8	Whistleblower Cases —Due to its complex regulatory system for handling Whistleblower cases, CONN-OSHA has advised that it cannot realistically meet the 90-day deadline for completing Whistleblower cases.	Explore the possibility of simplifying the state's procedures for handling Whistleblower complaints. CONN-OSHA should discuss its findings in regard to modifying this process during the fourth quarterly meeting with Region I.	09-17

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10-9	Standards/Federal Program Change Adoptions —CONN-OSHA has not implemented the FOM.	Complete a review of the FOM and submit a comparison document (which describes the changes it has made to the Federal FOM) to the Region by June 1, 2011. Once the Region approves this comparison document, CONN-OSHA may fully implement the FOM.	09-18
10-10	Average Number of Days between Consultation Closing Conference and Issuance of the Written Report — CONN-OSHA did not meet the 20-day standard for health visits.	Meet the 20-day standard for safety and health visits.	09-22
10-11	Percentage of Programmed Inspections —CONN-OSHA's percentage for programmed inspections was far below Federal OSHA's percentage in FY2010.	Align percentages for programmed (and unprogrammed) inspections with Federal OSHA's percentages.	N/A
10-12	Average Number of Days to Initiate Complaint Investigations —With an average of 5.50 days, CONN-OSHA did not meet the one-day standard for SAMM#2.	Meet the one-day standard for average number of days to initiate complaint investigations (SAMM #2).	N/A
10-13	Site Specific Inspection Targeting —CONN-OSHA has not developed a site specific inspection targeting system in accordance with OSHA's SST Directive 10-06 (CPL 02).	Develop its own site specific inspection targeting system and provide documentation to the Region showing that it is as least effective as the Federal program by June 1, 2011.	N/A
10-14	Percentage of Inspections with Violations Cited/Percentage of Inspections Not In-Compliance with Serious Violations —CONN-OSHA is not in line with Federal OSHA's percentages for inspections with violations cited and inspections not in-compliance with serious violations cited.	Align percentages more closely with Federal OSHA for these two indicators by citing more serious violations per inspection.	N/A
10-15	Willful Violations —CONN-OSHA has not classified any violations as willful since at least FY2005. FY2010 was the first time since at least FY2005 that the plan classified a violation as repeat.	As of the end of FY2011, CONN-OSHA's percentages for serious, willful, repeat and S/W/R violations should be comparable to Federal OSHA's percentages.	N/A
10-16	Average Number of Lapse Days from Opening Conference to Citation Issue (SAMM#7) —CONN-OSHA did not meet the standard for the average number of calendar days from the opening conference to citation issue.	Meet the standards for SAMM #7.	N/A
10-17	Adoption of the Severe Violator Enforcement Program — CONN-OSHA has failed to adopt the SVEP FPC within six months of issuance.	Adopt the SVEP by June 1, 1011.	N/A

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10-18	PSM Training —CONN-OSHA has no staff who have completed the three courses at the OSHA Training Institute on PSM (Course #3300—Safety and Health in Chemical Processing Industries; Course #3400—Hazard Analysis in the Chemical Processing Industries; and Course #3410—Advanced Process Safety Management).	(A) Ensure that at least one CSHO completes all of the three PSM training courses by the end of FY2012. (B) Determine which facilities on the EPA RMP list are actually operated by municipalities (and therefore are subject to CONN-OSHA’s jurisdiction), and which facilities contract with private firms to operate their plants. (C) Investigate further to determine if there are any other state or municipal facilities (aside from those that appear on this particular list) that may be covered under OSHA’s PSM standard. The latter two recommendations should be completed by the end of the 4 th quarter (FY2011).	N/A