



# OSHA REGIONAL NOTICE

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

<b>DIRECTIVE NUMBER:</b> 14-05 (CPL 04)	<b>EFFECTIVE DATE:</b> December 23, 2014
<b>SUBJECT:</b> Local Emphasis Program for Off-Shore Oil and Gas Drilling Platforms	
<b>REGIONAL IDENTIFIER:</b> Region 10	

## ABSTRACT

- Purpose:** To renew policies and procedures for scheduling programmed safety and health inspections on off-shore oil and gas drilling platforms.
- Scope:** This Notice applies to the Anchorage Area Office.
- References:**
- OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections, January 4, 1995
  - OSHA Instruction CPL 04-00-001, Procedures for Approval of Local Emphasis Programs, November 10, 1999
  - OSHA Instruction CPL 02-00-150, Field Operations Manual, April 22, 2011.
  - OSHA Memorandum for Regional Administrators, Subject: "Establishment-Targeting Lists for Emphasis Programs," November 13, 2014.
  - OSHA Memorandum for Regional Administrators, Subject: "Procedures for Local and Regional Emphasis Programs," December 3, 2014.
- Cancellation:** OSHA Regional Notice 13-24 (CPL 04), November 26, 2013.
- Expiration Date:** This Notice will expire December 31, 2015, but may be renewed.

**State Impact:** None.

**Significant Changes:** None.

**Action Offices:** Area Offices with jurisdiction and the Office of Federal and State Operations.

**Originating Office:** Office of Federal and State Operations

**Contact:** David J. Baker  
Assistant Regional Administrator  
Office of Federal and State Operations

By and Under the Authority of:

KEN NISHIYAMA ATHA  
Acting Regional Administrator

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## EXECUTIVE SUMMARY

The purpose and intent of this Notice is to provide an inspection scheduling system in Alaska to cover this segment of the high hazard industry within the context of current law and OSHA policy.

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- I. Purpose.** This Notice renews policies and procedures for scheduling programmed safety and health local emphasis inspections on off-shore oil and gas drilling platforms.
- II. Scope.** This Notice applies to the Anchorage Area Office in Region X which has active off-shore oil and gas drilling platforms located within its jurisdiction.
- III. Action Offices.** Anchorage Area Office and the Office of Federal and State Operations.
- IV. State Impact.** None.
- V. Cancellation.** OSHA Regional Notice 13-24 (CPL 04), November 26, 2013.

## **VI. References.**

- A. OSHA Field Instruction CPL 02-00-025, Scheduling System for Programmed Inspections, January 4, 1995.
- B. OSHA Instruction CPL 04-00-001, Procedures for Approval of Local Emphasis Programs, November 10, 1999.
- C. OSHA Instruction CPL 02-00-150, Field Operations Manual, April 22, 2011.
- D. OSHA Memorandum for Regional Administrators, Subject: “Establishment-Targeting Lists for Emphasis Programs,” November 13, 2014.
- E. OSHA Memorandum for Regional Administrators, Subject: “Procedures for Local and Regional Emphasis Programs,” December 3, 2014.

## **VII. Background.**

This LEP supports the DOL 2014-2018 Strategic Plan, Strategic Objective 2.1, to secure safe and healthy workplaces, particularly in high-risk industries. Oil and gas drilling and exploration historically have experienced a Lost Workday Incidence Rate (LWDI) of over twice the average rate for the private sector. The injury and illness data for the oil and gas drilling industry (NAICS code 213111) reported by the State of Alaska in 2012 indicated a TRC rate of 2.9 and a DART rate of 1.6. The Federal injury and illness data for NAICS 213 during 2012 showed a TRC rate of 1.9 and a DART rate of 1.2. This indicates that injury and illness rates for the oil and gas drilling industry in Alaska are higher than the Federal rates for 2012. Injury and illness data for 2013 are not available.

In recent years this high hazard industry has expanded and continues to establish itself off shore on floating drilling platforms located outside the traditional and contractual boundaries of Region X's state plan state jurisdictions. Current national and local inspection scheduling systems do not adequately provide for regular programmed inspections into these establishments, and scheduling has been limited to those inspections which may occur under the longshoring scheduling system.

## **VIII. Policy.**

### **A. Outreach.**

This LEP has been in place for several years and outreach is a continual effort through programs such as meetings with local industry organizations. The Anchorage Area Office will provide updated information to employers on topics such as the OSHA standards that apply to oil and gas operations, how to implement a safety and health program, and details about the LEP.

B. Scheduling.

Affected Area Directors shall use this local emphasis program as the basis for scheduling programmed safety inspections in off-shore oil and gas drilling operations. This targeting and selection inspection program is intended to be used in North American Industry Classification Systems code 211111, Oil and Gas Field Exploration and related activities located off shore and should not be applied to any land-based facilities. Drilling facilities located on man-made, artificial islands are not considered land-based and are covered by this program. Health referral inspections from safety compliance officers making inspections under this program shall be scheduled according to guidelines established in the Field Operations Manual (FOM) and the references listed in section V. of this Notice.

The following procedures will be used when targeting and scheduling inspections under this program.

1. The area director shall establish and maintain a master list of all drilling platforms known to exist within the area office jurisdiction. As new platforms are constructed or become known, they will be added to the master list. Likewise, platforms which cease operations shall be deleted from the list as such information is known.
2. During the annual planning process, the area director shall determine the number of drilling platform inspections to be conducted during the fiscal year. A minimum of five inspections shall be planned for each area office participating in the program where five platforms are available.
3. Inspections shall be scheduled from the list during two six-month inspection cycles. The number of inspections to be conducted during each cycle shall be estimated based on the program plan. For the first cycle, work sites shall be selected from the entire list utilizing standard random number selection procedure. All sites thus selected shall be inspected (or inspection attempted) prior to starting the second cycle. For the second cycle all remaining work sites, plus any additions, shall again be selected using the random number procedure.
4. Work sites selected may be inspected in any order that makes efficient use of available resources. All inspections conducted under this program shall be comprehensive, wall-to-wall inspections of the work site. No records review only inspections will be conducted.

**IX. Procedures.**

- A. Inspections conducted under this program shall be coded on the inspection record with the designation "PLATFORM." Unprogrammed inspections of off-shore drilling platforms shall also be classified and coded under this program.
- B. This LEP will be evaluated in accordance with the guidelines in Appendix A of CPL 04-00-001, Procedures for Approval of Local Emphasis Programs and Experimental Programs.
- C. The Area Director will be asked to provide input concerning special problems that may have surfaced during the year; recommendations to improve the LEP; and recommendations to renew or not renew the LEP.
- D. The Office of Federal and State Operations (FSO) shall review the input and prepare an evaluation to be submitted to the Regional Administrator for review by November 15 of each year. On the approval of the Regional Administrator, the evaluation report will be submitted to the Directorate of Enforcement Programs no later than November 30.