



OSHA Regional Instruction

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: 19-04 (CPL 04) | **EFFECTIVE DATE:** December 31, 2018

SUBJECT: Local Emphasis Program for Off-Shore Oil and Gas Drilling Platforms

REGIONAL IDENTIFIER: 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 Instruction applies to all area offices within Region X which have active off-shore oil and gas drilling platforms located within their jurisdiction.
- References:**
- OSHA Instruction CPL 04-00-002, Procedures for Approval of Local Emphasis Programs, dated November 13, 2018.
 - OSHA Instruction CPL 02-00-160, Field Operations Manual, dated August 2, 2016.
 - OSHA Memorandum for Regional Administrators, Subject: “Establishment-Targeting Lists for Emphasis Programs”, dated November 13, 2014.
 - OSHA Memorandum for Regional Administrators, Subject: “Procedures for Local and Regional Emphasis Programs”, December 3, 2014.
- Cancellations:** OSHA Regional Notice 17-04 (CPL 04), dated December 31, 2017
- Expiration Date:** This Instruction will expire December 31, 2021, but may be renewed.
- State Impact:** None.
- Significant Changes:** None.

Action Offices: Area Offices with jurisdiction and the Office of Enforcement Programs.

Originating Office: Office of Enforcement Programs

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Assistant Regional Administrator
Office of Enforcement Programs

By and Under the Authority of:

BARBARA YEE GOTO
Acting Regional Administrator

EXECUTIVE SUMMARY

The purpose and intent of this Instruction 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 Instruction renews policies and procedures for scheduling programmed safety and health local emphasis inspections on off-shore oil and gas drilling platforms.
- II. **Scope.** This Instruction applies to all area offices within Region X which have active off-shore oil and gas drilling platforms located within their jurisdiction.
- III. **Action Offices.** Area Offices with jurisdiction and the Office of Enforcement Programs.
- IV. **References.**
 - OSHA Instruction CPL 04-00-002, Procedures for Approval of Local Emphasis Programs, dated November 13, 2018.
 - OSHA Instruction CPL 02-00-160, Field Operations Manual, dated August 2, 2016.

OSHA Memorandum for Regional Administrators, Subject: “Establishment-Targeting Lists for Emphasis Programs”, dated November 13, 2014.

OSHA Memorandum for Regional Administrators, Subject: “Procedures for Local and Regional Emphasis Programs”, December 3, 2014.

- V. **Cancellation.** OSHA Regional Notice 17-04 (CPL 04), dated December 31, 2017.
- VI. **Expiration.** This Instruction will expire December 31, 2021, but may be renewed.
- VII. **Background.** This LEP supports the DOL 2018-2022 Strategic Plan, Strategic Objective 2.1, to secure safe and health workplaces, particularly in high-risk industries. Decline in any injury, illness, and fatality rates: The State of Alaska in 2017 reported a TRC rate for NAICS 21, Mining, Quarrying, and Oil and Gas Extraction, of 1.1 and a DART of 0.6. Alaska did not report injury rates for the NAICS 21311 in 2017. The Federal injury and illness data for NAICS 213111, Drilling Oil and Gas Wells, during 2017 showed a TRC rate of 1.3 and a DART rate of 0.7. The Federal 2017 TRC rate for all private sector industry was 2.8 and the 2017 DART rate was 1.5. There is not enough Alaska injury data to determine how the injuries sustained by Alaska employees engaged in drilling oil and gas wells compares to the national data.

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. The State of Alaska in 2017 reported a TRC rate for NAICS 21, Mining, Quarrying, and Oil and Gas Extraction, of 1.1 and a DART of 0.6. Alaska did not report injury rates for the NAICS 21311 in 2017. The Federal injury and illness data for NAICS 213111, Drilling Oil and Gas Wells, during 2017 showed a TRC rate of 1.3 and a DART rate of 0.7. The Federal 2017 TRC rate for all private sector industry was 2.8 and the 2017 DART rate was 1.5. There is not enough Alaska injury data to determine how the injuries sustained by Alaska employees engaged in drilling oil and gas wells compares to the national data.

The purpose of this Instruction is to provide an inspection system to cover this high hazard industry.

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 IV. of this Instruction.

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. Inspections conducted under this program shall be coded as "Programmed Planned" with the LEP designation "PLATFORM". Unprogrammed inspections (i.e. Complaints,

Referrals from Outside OSHA, Fatalities/Catastrophes, Employer reported hospitalization or amputation) shall be classified as “Unprogrammed” and coded under this local emphasis program designation of “PLATFORM”.

- B. This LEP will be evaluated in accordance with the guidelines in, Procedures for Approval of Local Emphasis 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 Enforcement Programs shall review the input and prepare an evaluation to be submitted to the Regional Administrator for review at the midpoint, and at the completion of the program.