



OSHA Regional Instruction

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: 21-04 (CPL 04) | **EFFECTIVE DATE:** December 31, 2021

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

REGIONAL IDENTIFIER: Region 10

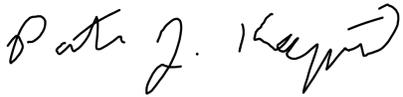
ABSTRACT

- 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 the Anchorage Area Office within Region X, which has active off-shore oil and gas drilling platforms located within its jurisdiction.
- References:**
- OSHA Instruction CPL 04-00-002, Procedures for Approval of Local Emphasis Programs, dated November 13, 2018.
 - OSHA Instruction CPL 02-00-164, Field Operations Manual, dated April 4, 2020.
 - 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 19-04 (CPL 04), dated December 31, 2018.
- Expiration Date:** This instruction will expire December 31, 2026, but may be renewed.
- State Impact:** None.
- Significant Changes:** None.
- Action Offices:** Anchorage Area Office and the Office of Enforcement Programs.

Originating Office: Office of Enforcement Programs

Contact: Assistant Regional Administrator
Office of Enforcement Programs

By and Under the Authority of:

A handwritten signature in black ink, appearing to read "Patrick J. Kapust". The signature is written in a cursive style with a large initial "P" and a stylized "K".

Patrick J. Kapust
Acting Regional Administrator

Executive Summary

The purpose and intent of this instruction is to renew 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 the Anchorage Area Office which has active off-shore oil and gas drilling platforms located within its jurisdiction.

III. Action Offices.

Anchorage Area Office 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 02-00-164, Field Operations Manual, dated April 4, 2020.

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 19-04 (CPL 04), dated December 31, 2018.

VI. Expiration.

This instruction will expire December 31, 2026, but may be renewed.

VII. Background.

This LEP supports the Occupational Safety and Health Administration (OSHA) Fiscal Year (FY) 2022 Agency Management Plan (AMP), Agency Theme 1, Assure Safe and Healthful Workplaces, including the agency’s theme to protect the most vulnerable workers in high hazard industries, by targeting industries with higher than average illness and injury rates. This LEP also supports OSHA’s Fiscal Year 2022 AMP, Agency Theme 3, Target Enforcement, Compliance Assistance, and Training Resources to Essential Worksites in the oil and gas industry.

Decline in any injury, illness, and fatality rates: The State of Alaska in 2019 reported a TRC rate for NAICS 21, Mining, Quarrying, and Oil and Gas Extraction, of 0.8 and a DART of 0.3. Alaska did not report injury rates for the NAICS 2111, Oil and Gas Exploration in 2019. The Federal injury and illness data for NAICS 2111, Drilling Oil and Gas Wells, during 2019 showed a TRC rate of 0.6 and a DART rate of 0.4. The Federal 2019 TRC rate for all private sector industry was 2.8 and the DART rate was 1.5. Because OSHA's FY 2022 AMP targets the oil and gas industries, this LEP will remain active.

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 the Region X's state plan jurisdictions. Current national and local inspection scheduling systems do not adequately provide for regular programmed inspections into these establishments.

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 and 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. The Area Director and staff will highlight this LEP during speaking events and other outreach opportunities.

B. Scheduling

The Anchorage Area Director 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 (NAICS) 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.

IX. Procedures.

A. Targeting and Scheduling

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 that 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 the area office.
3. Inspections shall be scheduled from the list during two six-month inspection cycles. 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.

B. OIS Coding

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".

C. Evaluation

1. This LEP will be evaluated in accordance with the guidelines in, Procedures for Approval of Local Emphasis Programs. 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.
2. 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.