



OSHA REGIONAL INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: CPL 19/10 (CPL 04) | **EFFECTIVE DATE:** February 5, 2019

SUBJECT: Regional Emphasis Program (REP) for Safety Hazards in Auto Parts Industry – NAICS 3363XX (Motor Vehicle Parts Manufacturing)

REGIONAL IDENTIFIER: Region IV

ABSTRACT

- Purpose:** This instruction continues a Regional Emphasis Program to reduce workplace exposures to safety hazards in the Auto Parts Supplier Industry.
- Scope:** This Directive applies to Atlanta East, Atlanta West, Birmingham, Jackson, and Mobile Area Offices.
- References:** [OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections](#), January 4, 1995
[OSHA Instruction CPL 04-00-002, Procedures for the Approval of Local Emphasis Programs \(LEPs\)](#), November 13, 2018
[OSHA Instruction CPL 02-00-160, Field Operations Manual \(FOM\)](#), August 2, 2016
- Cancellations:** This document replaces CPL 18/10, February 5, 2018.
- State Impact:** None
- Action Offices:** Atlanta East, Atlanta West, Birmingham, Jackson, and Mobile Area Offices
- Originating Office:** Atlanta Regional Office
- Contact:** Christi Griffin, Assistant Regional Administrator
Office of Enforcement Programs
U.S. DOL-OSHA Atlanta Regional Office
(678) 237-0400

By and Under the Authority of

BILLIE KIZER
Acting Regional Administrator

Executive Summary

This instruction continues a Regional Emphasis Program to reduce safety hazard exposures in the Auto Parts Supplier Industry. The REP ensures effective targeting, in the enforcement of safety hazards and outreach for hazardous working conditions in this industry. The most common causes of injury in this industry are Lock Out/Tag Out, Machine Guarding, and Electrical Hazards.

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- I. **SUBJECT:** Regional Emphasis Program for safety hazard exposures in the Auto Parts Supplier Industry.
- II. **PURPOSE:** The purpose of this instruction is to continue a Regional Emphasis Program to reduce workplace exposures to safety and health hazards associated with the Auto Parts Supplier Industry.
- III. **SCOPE:** This REP applies to the Atlanta East, Atlanta West, Birmingham, Jackson and Mobile area offices.
- IV. **REFERENCES:**
[OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections](#), January 4, 1995
[OSHA Instruction CPL 04-00-002, Procedures for the Approval of Local Emphasis Programs \(LEPs\)](#), November 13, 2018
[OSHA Instruction CPL 02-00-160, Field Operations Manual \(FOM\)](#), August 2, 2016
- V. **CANCELLATIONS:** This document replaces CPL 18/10, February 5, 2018.
- VI. **EXPIRATION:** This instruction expires four years from the effective date, unless extended.
- VII. **ACTION:** OSHA compliance personnel shall follow the procedures contained in this instruction when conducting outreach and enforcement activities.
- VIII. **BACKGROUND:** The REP was established to reduce employee exposures to safety related hazards in the Automotive Parts Supplier Industry. Hazards associated with the Auto Parts Supplier Industry that are the focus of this REP continue to be the source of serious injuries, including amputations, and deaths to employees. Establishments in NAICS code 3363xx manufacture motor vehicle parts. Workers in this industry are exposed to caught-in, crushing, struck-by and electrical hazards due to the machinery utilized in the making of these parts.

Data from the Bureau of Labor Statistics (BLS) shows that in 2017 the auto parts supplier industry in Alabama and Georgia had higher injury and illness rates – 3.6 and 3.5, respectively per 100 full-time workers – than private industry nationwide which had a rate of 2.8 per 100 full time workers. Currently, BLS data shows that the 2017 Days-Away, Restricted, Transfer (DART) rate in Alabama dropped to 2.3 from 2.7 in 2016, but is still higher than the national private industry DART rate of 1.5 for 2017.

A review of OIS data from October 1, 2013 to September 30, 2018 revealed that a total of 223 inspections in this industry were completed. Of the 168 inspections that were not in compliance, more than 86% of them resulted in Serious, Repeat, and Willful violations. More than 803 violations were cited. Two hundred and nine violations were associated with lockout/tag-out; and 152 violations were associated with machine guarding.

During FY-18, Region IV conducted 40 inspections coded under the REP. Fifty-three total violations were cited, including violations of the machine guarding and lockout/tag-out standards. Additionally, there were nine employer reported referrals under this program.

This REP will continue to heighten health and safety awareness within the industry and encourage employers to take steps voluntarily to correct hazards and come into compliance with current safety and health regulations and practices. Because of the industry is concentrated in Alabama, Georgia, and Mississippi, the REP is implemented to focus on those jurisdictions affected.

IX. **PROCEDURES:** Inspections conducted under this program shall be scheduled and conducted pursuant to the following criteria:

- A. **Outreach:** The area offices will mail the letter in Appendix A to each employer initially appearing on their establishment list or added to their establishment list at a later date to inform them of this outreach and targeting plan, no later than **15 days** after this emphasis program becomes effective. The Area Directors will provide educational and compliance assistance information relevant to the industry along with other applicable outreach materials to appropriate stakeholders (employers, employees, unions and trade associations) to explain this REP and the hazards associated with the Auto Supplier Industry. Compliance Assistance Specialists and Area Directors will include information about this emphasis program in all of their outreach efforts, as well as providing information on the hazards of the industry, such as the major safety hazards associated with the industry.
- B. **Enforcement:** All inspections under this program will be comprehensive safety inspections, focusing particularly on Lock Out/Tag Out, Machine Guarding and Electrical Hazards. Additionally, when health hazards are identified, the compliance officer will make a referral to an Industrial Hygienist. The referral inspection is to be opened within 5 working days.
- C. **Scheduling:** All inspection activity will begin thirty days after the outreach and notification letters have been mailed to the employers in order to give employers the opportunity to contact consultation services for an on-site visit. Each of the affected Area Directors will compile and maintain a list of establishments in NAICS Code for establishments within their jurisdictional area. This list will be developed from various sources available to the Area Office, including OSHA inspection history from OSHA's inspection database, automobile manufacturers, the internet, local knowledge and available manufacturer's directories.
 - 1. **Inspections:** If an establishment becomes known after the list is completed, it will be added at the end of the list. Those establishments covered by this REP which have received a **comprehensive** safety inspection within the past two years from the effective date of this REP will be deleted from the list. Establishments which are found to not operate under this NAICS will be deleted from the listing and a NO INSPECTION report shall be submitted into the OIS, unless the facility is also covered by another emphasis program. In that case, the inspection may be conducted under the

applicable emphasis program. All establishments, with 10 or more employees, will be inspected. Based upon observations and information obtained during the inspection, assistance may be requested for technical or specialized support.

2. **Unprogrammed Inspections:** All fatalities, complaints and referrals will be handled according to the FOM. If the occasion for an unprogrammed (i.e., complaint, fatality, amputations, hospitalizations, loss of an eye, etc.) inspection arises with respect to an establishment that is also on the REP's inspection list to receive a programmed inspection under this REP, the two inspections may be conducted either concurrently or separately.

- C. **Sampling Requirements:** Inspecting industrial hygiene compliance officers shall be prepared to perform any required sampling at the time the referral inspection is initiated (within 5 days of receipt from a safety compliance officer) if the referral is based on potential airborne contaminants or issues related to noise exposure. If sampling cannot be performed, the reasons shall be discussed with the Area Director and concurrence received. This information shall be documented in the case file narrative.

- D. **Citations:** Violations will be cited according to the FOM and other guidance documents, such as current directives.

- E. **Recording in OIS:** The Inspection Forms shall be coded as local emphasis program (LEP) inspections, and marked "AUTOSUP".

- F. **Evaluation:** An evaluation of the program will be conducted midway through and at the completion of the effective period that includes:
 1. The goal of the program.
 2. Data and information used to support the continuation or cancellation of the program. Data may include enforcement statistics, serious hazards identified and abated, the number of employees removed from hazards, and any impact on covered, non-inspected employers.
 3. Specific data on citations issued related to lock out/tag out, machine guarding and electrical hazards.
 4. Statement and rationale of whether the program should be continued.
 5. Description of any legal issues that arose which would necessitate a review by the Solicitor before renewal of the program.
 6. Any other comments or recommendations, including findings, which might have an impact on how the industry conducts business.
 7. Data associated with outreach sessions in which this emphasis program is addressed.

DISTRIBUTION: Atlanta East, Atlanta West, Birmingham, Jackson and Mobile Area Offices
Enforcement Programs
Cooperative and State Programs
Administrative Programs
Regional Solicitor
Region IV Intranet Website

APPENDIX A
SAMPLE OUTREACH LETTER

Dear Employer:

The Occupational Safety and Health Administration (OSHA) has initiated a Regional Emphasis Program (REP) focusing on hazards related to automotive supply manufacturing operations. As a result of this, the *(Area Office Name)* Area Office will be conducting inspections of workplaces that have been identified as having operations and possible worker exposures to common hazards found in this industry. The most common causes of injury are machine guarding, lockout/tagout (LOTO), and electrical hazards. We are notifying you of our intent to conduct these inspections because your company may be covered by this emphasis program.

OSHA continues to offer compliance assistance focusing on prevention of occupational injuries and illnesses. As part of this new emphasis program, compliance assistance products are readily available to assist your company in enhancing its safety and health program. You can obtain information about electrical safety, emergency action plans, hazard communication, hearing conservation and noise, lockout/tag-out, machine guarding, respiratory protection, and safety and health programs from OSHA's website at www.osha.gov. Specific information about the hazards of working in manufacturing facilities can be obtained from OSHA's area offices. If you do not have access to the Internet, please contact our office and we will provide copies of this information to you. You may contact our office at any time for further assistance: *(insert phone number and address for the Area Office)*.

OSHA also offers a free Consultation Service under Section 21(d) of the Occupational Safety and Health Act to small employers. The 21(d) Consultation Service helps employers to identify (and correct) potential hazards at their worksites and improve their occupational safety and health management systems. This service is delivered by universities using well-trained safety and health professionals.

To schedule this consultation service, please contact the 21(d) Consultation Program at:

(Insert contact information for the local Consultation Program including the Address and Telephone Number for the State Consultation Program)

Your interest in protecting your employees from safety and health hazards is appreciated.

Sincerely,

Area Director