



# OSHA REGIONAL INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

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**DIRECTIVE NUMBER:** 20-09 (CPL 04-05) | **EFFECTIVE DATE:** October 1, 2019

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**SUBJECT:** Local Emphasis Program for Wood Manufacturing and Processing Facilities

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**REGIONAL IDENTIFIER:** Region VIII

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## ABSTRACT

- Purpose:** This Instruction renews a Local Emphasis Program (LEP) to reduce the incidence of serious injury or death from hazards associated with the operation of wood working machinery and potential health hazards associated with exposure to wood dusts.
- Scope:** This Instruction applies to the establishments within the Billings Area Office jurisdiction in the NAICS codes listed in this directive.
- Reference:** OSHA Instruction CPL 04-00-002, Procedures for Approval of Local Emphasis Program (LEPs), November 13, 2018.
- Cancellations:** This Instruction cancels Regional Notice 19-09, CPL 04-05, Local Emphasis Program for Wood Manufacturing Facilities.
- State Impact:** None
- Action Offices:** Billings Area Office
- Originating Office:** Billings Area Office
- Contact:** Assistant Regional Administrator for Federal-State Operations  
Cesar Chavez Memorial Building  
1244 Speer Blvd, Suite 551  
Denver, CO 80204  
(720) 264-6559

**By and Under the Authority of:**

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**Rita Lucero**  
**Acting Regional Administrator, VIII**

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## EXECUTIVE SUMMARY

Workers employed in the wood working industry face many hazards that can lead to serious injury, illness, and death. Exposure to amputation hazards and airborne wood dust are major hazards routinely faced by workers in this industry.

The intent of this renewed Local Emphasis Program is to encourage employers to take steps to address these hazards, ensure work sites are evaluated to determine if the employer is in compliance with all relevant OSHA requirements, and to help employers correct hazards, thereby reducing potential injuries, illnesses, and death for their workers.

The Billings Area Office proposes to accomplish this through outreach and enforcement activities. Outreach activities have and will continue to include training and information sharing, including electronic, with industry associations and other stakeholders. Enforcement activities will include, but not be limited to, the comprehensive inspection of wood working operations; such as machine guarding, air sampling, noise exposures, electrical hazards, and use of personal protective equipment to identify and obtain corrections of workplace hazards at all applicable inspection sites.

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- I. **Purpose:** This Instruction renews policies and procedures for implementing a Local Emphasis Program (LEP) for conducting programmed inspections of Wood Manufacturing and Processing Industries. The inspection program will focus on establishments within the NAICS codes listed below.

The goal of this LEP is to identify and reduce or eliminate the workplace incidence of health and physical hazards associated with wood processing which are causing or likely to cause serious illness, physical injury or death.

- II. **Scope:** This Instruction applies to Wood Manufacturing and Processing Industries operating within the Billings Area Office's jurisdiction of Region VIII under the following NAICS codes:

NAICS	Description
321911	<i>Wood door frames and sash manufacturing:</i> Establishments primarily engaged in manufacturing window and door units, sash, window and door frames, and doors from wood or wood clad with metal or plastics.
321214	<i>Truss Manufacturing:</i> Establishments primarily engaged in manufacturing wood I-joists.
321920	<i>Wood Container and Pallet Manufacturing:</i> Establishments primarily engaged in manufacturing wood pallets, wood box shoo, wood boxes, other wood containers, and wood parts for pallets and containers.
337110	<i>Wood Kitchen Cabinet and Countertop Manufacturing:</i> Establishments primarily engaged in manufacturing wood or plastics laminated on wood kitchen cabinets, bathroom vanities, and countertops (except freestanding). The cabinets and counters may be made on a stock or custom basis.
337212	<i>Custom Architectural Woodwork and Millwork Manufacturing:</i> Establishments primarily engaged in manufacturing custom designed interiors consisting of architectural woodwork and fixtures utilizing wood, wood products, and plastics laminates.

- III. **Expiration:** This Instruction expires September 30, 2024.

- IV. **Action:** Billings Area Office compliance personnel shall follow the procedures contained in this instruction when conducting outreach and enforcement activities.

- V. **References:**

- A. OSHA Instruction CPL 02-00-163, *Field Operations Manual (FOM)*, September 13, 2019, or the most recent version at the time of the inspection opening conference.

- B. OSHA Instruction CPL 04-00-002, *Procedures for Approval of Local Emphasis Program (LEPs)*, November 13, 2018.
  - C. OSHA Instruction CPL 02-00-025, *Scheduling System for Programmed Inspections*, January 4, 1995.
  - D. November 12, 2014, OSHA Memorandum: Establishments – Targeting Lists for Emphasis Programs.
  - E. Title 29 Code of Federal Regulations, Part 1910.
  - F. OSHA Instruction CPL 02-00-051, *Enforcement Exemptions and Limitations under the Appropriations Act, May 28, 1998; Appendix A*, December 18, 2018, or the most recent version at date of inspection opening conference.
  - G. U.S. Bureau of Labor Statistics, 2017 Annual News Release on Non-fatal Injuries.
  - H. National Center for Biotechnology Information, PubMed Database for Epidemiologic Survey of Woodworking Injuries.
  - I. National Institute for Occupational Safety and Health (NIOSH), *PEL project documentation on Wood Dust*.
  - J. OIS Trending/Statistics Report from January 1, 2014 to September 18, 2019.
- IV. **Cancellation:** This Instruction cancels Regional Notice 19-09, CPL 04-05, Local Emphasis Program for Wood Manufacturing Facilities.
- V. **Action Office:** Billings Area Office.
- VI. **Background:** Employees handling wood and performing cutting, shaping, drilling, milling, and grinding operations in the Wood Manufacturing and Processing Industries are exposed to various safety and health hazards. The types of injuries incurred range from cuts, lacerations, and avulsions to amputations, tears, and punctures. According to the National Institute for Occupational Safety and Health (NIOSH), exposure to wood dust has long been associated with a variety of adverse health effects including allergic respiratory conditions and cancer.

According to the Bureau of Labor Statistics, the average Total Recordable Case (TRC) rate for all industries in the private sector in 2017 was 2.8 per 100 full-time workers. The TRC rate for the industries covered by NAICS codes 321214, 321911 and 321920 ranged from 4.1 to 8.3 which is 46 to 196 percent higher than the average national rate of 2.8. The TRC rate for the industries covered by NAICS codes 337110 and 337212 was 3.7 and 3.5 respectively which is 32 and 25 percent higher than the

above stated average rate in 2017.

The average rate for cases involving days away from work, restricted motion, or transfer to another job (DART) for all private industry was 0.9 per 100 full-time workers in 2017. The DART rate for the industries covered by NAICS codes 321214, 321911 and 321920 is 1.6, 1.1, and 2.3 which ranges from 22 to 144 percent higher than the average DART rate of 0.9. The DART rate for the industries covered by NAICS codes 337110 and 337212 was 0.9 and 1.7 respectively which is the equivalent to and 89 percent higher than the average rate during this time frame.

According to the PubMed database division of the National Center for Biotechnology Information, in an abstract written from an epidemiologic survey on woodworking injuries, woodworking equipment produces approximately 720,000 injuries per year.

From January 1, 2014, to September 18, 2019, the Billings Area Office conducted forty-eight inspections at Wood Manufacturing and Processing Industries. A total of 149 violations were issued for serious safety and health hazards.

**VII. Inspection Scheduling and Site Selection:** The procedures outlined in the November 12, 2014, OSHA Memorandum: Establishments – Targeting Lists for Emphasis Programs will be followed. The Office of Statistical Analysis (OSA) will provide the master list and the area office will make deletions as outlined in sections A and B, below.

- A. Establishments that have received a comprehensive inspection within the previous 60 months of the creation of the current inspection cycle will be deleted from the list.
- B. The Area Office may delete an establishment if it is determined that:
  - 1. The establishment is a residence.
  - 2. The establishment is not in the scope of the NEP (e.g., the establishment is clearly conducting business other than that covered by the LEP).
  - 3. There is no evidence that the facility exists (e.g., no phone or internet listing; no registration with the Secretary of State; Google Earth or Street View shows conclusively that the business is non-existent.)

The criteria used to delete any establishment must be fully documented by the Area Office.

- C. In the event a cycle is not completed on or before expiration of this Instruction, the cycle will be extended into the new fiscal year, provided this Instruction is renewed. The outstanding cycle will be completed by each Area Office before establishments are selected from the new master list. If the Instruction is

not renewed, the outstanding cycle is effectively cancelled and the Area Office will not conduct inspections on the remaining establishments within the cycle.

#### **VIII. Inspection Procedures:**

- A. **Scope:** Inspections under this LEP will be comprehensive in nature and address both safety and health hazards. Inspections will be conducted by appropriately trained CSHOs. The CSHO will make health or safety referrals as appropriate. Inspection procedures outlined in the FOM, OSHA Instruction CPL 02-00-163, will be followed.
- B. **Safety and Health Considerations for CSHOs:** Inspections under this LEP are to be conducted by CSHOs who have received the necessary training on the LEP and the hazards associated with the Wood Manufacturing and Processing Industries. The Area Director will ensure that appropriate training is provided to the CSHOs. Prior to commencing the walk around portion of the inspection, the CSHO shall request a safety briefing of the facility. Personal protective equipment such as respirators, gloves, eye protection, hearing protection, steel-toed shoes, etc., will be utilized based on the information given.
- C. **Coverage:** At the opening conference, the CSHO will determine if the employer performs operations as covered in this LEP and as described under the applicable NAICS code.

**IX. Outreach:** At least 90 days prior to commencing inspection activity under this LEP, outreach efforts will begin and will continue throughout the duration of the program. The Area Director will send every employer on the primary targeting list the letter in Appendix "A". The Area Director will also reach out to the Montana Wood Products Association and the Lumber Production & Industrial Workers Union and share this information with them. Upon request, outreach materials will be provided to explain this LEP and the hazards associated with the Wood Manufacturing and Processing Industries. In addition, the Area Office will work with the Montana Department of Labor & Industry, Safety and Health Bureau to ensure they are afforded the opportunity to partner with the same employers through their State Consultation Program.

**X. OIS Coding:** The following will address only the changes or additions to OSHA Information System (OIS) coding procedures for inspections conducted under this LEP:

- A. The OIS Inspection Form shall be coded as "WOOD" in the *Local Emphasis Program* block and as "Programmed Planned" in the *Initiating Type* block. Inspections under this LEP will be typically coded as "Safety" inspections in the "Inspection Category" block unless the inspection is predominately health related in nature. In this case the inspection shall be coded as "Health".

- B. Inspections which are initiated as a result of a complaint, referral, or



fatality/catastrophe shall be coded as “WOOD” in the *Local Emphasis Program* block and as the appropriate “unprogrammed” activity in the *Initiating Type* block regardless of whether they are listed on the current cycle.

**XII. Program Report:** No later than midway through the life of the program the Area Offices will provide a report of this REP to the Regional Office.

**DISTRIBUTION:** Directorate of Enforcement Programs  
Regional Office of the Solicitor

## APPENDIX A

Dear Employer:

Employees who work in the Wood Manufacturing and Processing Industries are exposed to a variety of serious hazards and regularly suffer from serious injuries and illnesses. Recently the Billings Area Office conducted inspections at multiple Wood Manufacturing and Processing facilities. Two of the inspections were responses to accidents, including one fatality. Several citations were issued as a result of these inspections, including violations stemming from serious safety and health hazards.

The Wood Manufacturing and Processing Industries present a number of hazards to workers employed in this occupation. Potential risks for workers include, but are not limited to:

- Mechanical and electrical hazards from improper or inadequate lockout/tagout protocols.
- Amputations and crushing injuries from inadequately guarded process machines, conveyor belts and power transmission equipment.
- Lacerations, abrasions and eye injuries from inadequate personal protective equipment.
- Shock hazards from inadequate or deficient electrical installations.
- Occupational hearing loss from overexposure to industrial noise due to the lack of an adequate Hearing Conservation Program.
- Explosions.
- Exposure to wood dust.

The Occupational Safety and Health Administration (OSHA), Billings Area Office has created a Local Emphasis Program designed to reduce occupational injuries, illnesses, and fatalities among wood manufacturing and processing workers through direct interventions by the Agency. This mailing is being sent to you because your company has been identified as being engaged in wood manufacturing and processing within the Billings Area Office's jurisdiction.

Employers are encouraged to utilize the free consultation services provided by the Montana Department of Labor & Industry, Safety and Health Bureau. The program provides occupational safety and health services that are funded by Federal OSHA and are available to eligible employers (establishments with 250 or fewer employees) at no cost. The safety and health professionals in the State OSHA Consultation Program will conduct, at your request, a free on-site safety and health evaluation of your establishment. All employers who avail themselves of this service will be required to abate all serious hazards identified during the consultation visit and to provide the consultation service with verification that these hazards have been abated. The Montana OSHA Consultation Program can be contacted at:

Montana Department of Labor & Industry  
Safety and Health Bureau

1805 Prospect  
PO Box 8011  
Helena, Montana 59604  
Phone: (406)-494-0324

Other useful information can be found on OSHA's web site which includes resources on wood working including an electronic tool (E-tool) available at:

<http://www.osha.gov/SLTC/etools/woodworking/index.html>  
[http://www.osha.gov/SLTC/woodproducts/tech\\_woodworking.html](http://www.osha.gov/SLTC/woodproducts/tech_woodworking.html)  
<http://www.osha.gov/SLTC/woodproducts/index.html>  
<http://www.osha.gov/SLTC/wooddust/index.html>

If you have questions or concerns about this initiative, please contact the Billings Area Office at (406) 247-7494.

Sincerely,

Art Hazen  
Area Director  
Billings Area Office