



VOSH PROGRAM DIRECTIVE: 14-222B

ISSUED: March 1, 2005

SUBJECT: Local Emphasis Program: Lumber and Wood Products, SIC Group 24 Lynchburg, Roanoke, Abingdon and Verona Offices Only

A. Purpose

This directive provides revised procedures to be followed for this general industry local emphasis program (LEP) and transmits this LEP to field personnel. This directive also cancels VOSH Program Directive 14-212D, the Local Emphasis Program for "Operation Lifesaver" in the Logging Industry.

This Program Directive is an internal guideline, not a statutory or regulatory rule, and is intended to provide instructions to VOSH Personnel regarding internal operation of the Virginia Occupational Safety and Health Program and is solely for the benefit of the Program. This document is not subject to the Virginia Register Act or the Administrative Process Act; it does not have general application and is not being enforced as having the force of law.

B. Scope

This Directive is limited in scope and only applies to VOSH personnel in the Lynchburg, Roanoke, Abingdon and Verona offices.

C. Reference

Not Applicable.

D. Cancellation

VOSH Program Directive 14-212D (April 1, 2003)

E. Action

Directors and Managers shall ensure that procedures established in this Directive are adhered to in conducting inspections involving this local emphasis program.

F. Effective Date

March 1, 2005

G. Expiration Date

Not Applicable.

H. Background

Because of the continuing incidence of SIC Group 24 injuries and fatalities in Virginia in the areas covered by the Lynchburg, Roanoke, Abingdon and Verona offices, VOSH has determined that a special emphasis program effort only for these offices is warranted. The emphasis program will require increased VOSH presence to inform general industry operations of the hazardous conditions existing on their worksites.

I. Summary

This LEP will focus on all of SIC Group 24 including:

- 241 Logging
- 242 Sawmills and Planing Mills
- 243 Millwork, Veneer, Plywood and Structural Wood Members
- 244 Wood Containers
- 245 Wood Buildings and Mobile Homes
- 249 Miscellaneous Wood Products

Added emphasis will be placed on inspections of companies with 100 or fewer employees as nearly 80 percent of fatalities occurred in companies with less than 100 employees.

J. Procedures

The VOSH Director shall ensure that the Northern Virginia and the Southwest Regional Directors develop a general industry list to include establishments covered by this LEP.

1. All compliance personnel shall be instructed to be on the lookout for SIC Group 24 activities. Every observation of these activities shall be handled as follows:
 - a. Regardless of whether a violation is observed, whenever a CSHO sights or receives any other notice of a related general industry or construction operation, including other government referrals and reports from members of the public), the CSHO shall:
 - (1) Make note of the state and condition of the work operation insofar as it is known, including any apparent serious hazards.
 - (2) Note the name and address or location of the worksite and the contractor (where applicable) performing the operation, if known.
 - b. All work activities shall be inspected. The CSHO shall immediately notify his supervisor that an inspection has been opened pursuant to this LEP.

- c. Complaints and other referrals involving general industry and construction operations where violative activities are occurring shall be scheduled as unprogrammed inspections under the LEP conducted in accordance with procedures found in the VOSH FOM. Such notices, therefore, need not be responded to with the usual letter to the employer.
2. Although sightings will normally be those which occur during the course of routine travel during duty or nonduty hours, the discovery of these work activities may be the result of a specific search to find related activities at the discretion of the Commissioner. Verification of information received from sources other than CSHO observation, as indicated in J.1.a. of this directive, is also permitted under this LEP.
3. Documentation of the events leading up to the observation or the reporting of applicable activities shall be maintained by the Regional Office in case of denial of entry.
4. When an inspection is not conducted because of denial of entry, a warrant shall be sought in accordance with the current procedures for handling such cases. A warrant may not be necessary, however, if the violations are in plain view. In such situations, the Regional Compliance Manager shall contact the Office of Legal Support for guidance.
5. The scope of inspections conducted under this LEP shall normally be limited to SIC Group 24 activities. If the inspection is to be expanded, the principles given in the VOSH FOM shall be followed.

K. Scheduling Inspections

The following guidelines shall be adhered to in scheduling inspections:

- (1) All establishments on the "Lumber and Wood Products" list shall be inspected except those establishments deleted from the list, pursuant to the FOM. There will be no exemption for employers with 10 or fewer employees.
- (2) Establishments selected for inspection may be scheduled in any order that makes efficient use of available resources.
- (3) When an inspection is not conducted because the employer has refused entry, a warrant shall be sought in accordance with the current procedure for handling such refusals.
- (4) Inspections conducted under this LEP normally shall be comprehensive.

L. Recording in IMIS

The following guidelines shall be followed when recording inspections conducted under this LEP .

1. For IMIS purposes, the VAOSH-1 will be completed as follows:

For Inspection Type, find item 24, and enter an "H" after the colon. (This will yield "**Programmed Planned**" on the screen.)

For Inspection Classification, find item 25c and enter a “Y” after the colon. (This will yield “**Local Emphasis Program**” on the pop-up box. Enter “SAWMILLS” in all caps in the left-hand column of the pop-up box.

2. No Inspection Conducted: When no inspection is conducted, the VAOSH-1 form shall be marked “No inspection” (Item 35, marked “D” after the colon; “Close” (Item 44, marked “A”); “No Citations Issued: (Item 44, marked “B”); and “Other” (Item 45, marked “I.”). Record “SAWMILLS” in the space 45I. “Opening Conference date” (Item 20) which will be the date of entry (enter the date–month/day/year) and “Closing Conference Date” (On Site) (Item 46) will be the date of exit (enter the date - month/day/year). Opening and closing dates are the same date when no inspection is conducted.

Note: If you have any questions regarding the proper way to record in IMIS, please contact the VOSH IMIS section.

C. Ray Davenport
Commissioner

Attachment: None

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