



# OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR Occupational Safety and Health Administration

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**DIRECTIVE NUMBER:** CPL 2-0.129 | **EFFECTIVE DATE:** August 1, 2001  
**SUBJECT:** OSHA's National Emphasis Program (NEP) on Shipbreaking

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## ABSTRACT

**Purpose:** This directive describes policies and procedures for implementing a National Emphasis Program (NEP) to reduce and eliminate the workplace incidence of hazards associated with shipbreaking operations.

**Scope:** OSHA-wide.

**References:** 29 CFR Part 1910, General Industry Standards.  
29 CFR Part 1915, Shipyard Employment Standards.  
CPL 2.103, Field Inspection Reference Manual (FIRM), Sept. 6, 1994.  
Memorandum of Agreement on Ship Scrapping (i.e., shipbreaking) between DOD/DOT/EPA/DOL-OSHA, November 16, 1999.

**State Impact:** This instruction describes a Federal program change for which State adoption is not required (see paragraph V).

**Action Offices:** National, Regional and Area Offices.

**Originating Office:** Directorate of Compliance Programs.

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By and Under the Authority of  
R. Davis Layne  
Acting Assistant Secretary

## **Executive Summary:**

This Instruction provides guidance to Occupational Safety and Health Administration (OSHA) National, Regional and Area Offices, state programs which choose to implement a similar program, and federal agencies concerning OSHA's policy and procedures for implementing a National Emphasis Program (NEP) to reduce or eliminate workplace hazards associated with shipbreaking operations. In the Strategic Plan, Outcome Goal 1.1, OSHA has committed to focused interventions in the Shipyard industries (29 CFR Part 1915) to reduce injuries, illnesses and fatalities.

OSHA has also entered into a *Memorandum of Agreement (MOA) on Interagency Coordination and Cooperation for Ship Scrapping* (i.e., shipbreaking) with the Department of Defense (DOD) [U.S. Navy (Navy), and the Defense Logistics Agency (DLA) - Defense Reutilization and Marketing Service (DRMS)], Department of Transportation (DOT) [Maritime Administration (MARAD)], and Environmental Protection Agency (EPA). This MOA requires OSHA to develop an emphasis program for scheduling programmed inspections of shipbreaking operations. This instruction supports both OSHA's Strategic Plan goals and the Interagency MOA.

## **Significant Changes:**

This Instruction implements a new National Emphasis Program (NEP). Specifically, it:

- Supports an Interagency MOA requiring OSHA interventions in the breaking of Navy and Maritime Administration (MARAD) vessels under contract;
- Develops a scheduling system for the inspection of Navy and MARAD shipbreaking operations for vessels covered by the Interagency MOA;
- Establishes coordination between the Navy, DLA-DRMS, MARAD, EPA, and OSHA for shipbreaking operations;
- Develops a national reporting system for all OSHA shipbreaking inspections, not just those involving Navy and MARAD vessels; and
- Provides guidance to State Consultation Programs that provide assistance to employers engaged in shipbreaking operations.

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- I. Purpose. This instruction describes policies and procedures for implementing a National Emphasis Program (NEP) to reduce or eliminate workplace hazards associated with shipbreaking operations. In the Strategic Plan, Outcome Goal 1.1, OSHA has committed to focused interventions in the shipyard industries (29 CFR Part 1915) to reduce injuries, illnesses and fatalities. Also, OSHA has entered into a *Memorandum of Agreement (MOA) on Interagency Coordination and Cooperation for Ship Scrapping* (i.e., shipbreaking) with the Department of Defense (DOD) [U.S. Navy (Navy), and the Defense Logistics Agency (DLA) - Defense Reutilization and Marketing Service (DRMS)], Department of Transportation (DOT)[Maritime Administration], and Environmental Protection Agency (EPA) ([www.osha-slc.gov/MOU\\_data/MOU19991116.html](http://www.osha-slc.gov/MOU_data/MOU19991116.html)). This MOA requires OSHA to develop an emphasis program for scheduling programmed inspections of shipbreaking operations. This instruction is issued in support of OSHA's Strategic Plan and the Interagency MOA.
- II. Scope. This instruction applies OSHA-wide to all programmed and unprogrammed compliance inspections of shipbreaking operations. For **scheduling purposes**, only inspections covered by the MOA will be programmed pursuant to this instruction. For **reporting purposes**, all compliance inspections of shipbreaking operations (i.e., MOA programmed, MOA unprogrammed, LEP programmed, LEP unprogrammed, and other unprogrammed) will be reported pursuant to this NEP.
- III. References.
  - A. Title 29 Code of Federal Regulations (CFR) Part 1904, Recording and Reporting Occupational Injuries and Illnesses.
  - B. Title 29 Code of Federal Regulations (CFR) Part 1910, General Industry Standards.
  - C. Title 29 Code of Federal Regulations (CFR) Part 1915, Shipyard Employment Standards.
  - D. OSHA Strategic Plan, FY 1999-2004.
  - E. OSHA FY 2000 Performance Plan.
  - F. OSHA FY 2000 Performance Measures/Strategic Goals (#7).
  - G. OSHA Notice 01-01 (CPL 2), Site Specific Targeting 2001 (SST-01), July 13, 2001.

- H. OSHA Instruction CPL 2.103, Field Inspection Reference Manual (FIRM), September 26, 1994.
  - I. OSHA Instruction CPL 2-0.102A, Procedures for Approval of Local Emphasis Programs (LEPs), November 10, 1999.
  - J. OSHA Instruction CPL 2-1.20, OSHA/U.S. Coast Guard Authority over Vessels, November 8, 1996.
  - K. OSHA Instruction STD 2.1, Application of the Hazard Communication Standard to the Shipyard Employment Industry, January 20, 1987.
  - L. OSHA Instruction STD 2-4.1, 29 CFR 1915 Subpart B, Confined and Enclosed Spaces and Other Dangerous Atmospheres in Shipyard Employment - Inspection Procedures and Interpretive Guidelines, September 27, 1996.
  - M. OSHA Instruction STD 2-4.2, 29 CFR 1915, Subpart I, Personal Protective Equipment (PPE) for Shipyard Employment - Inspection Procedures and Interpretive Guidelines, September 27, 1996.
  - N. OSHA Instruction STP 2.11, Maritime Jurisdiction in State Plan States, October 30, 1978.
- IV. Expiration Date. This NEP Instruction will remain in effect until superseded or canceled by proper authority.
- V. Federal Program Change. This Instruction describes a Federal OSHA program change for which state adoption is not required. However, we encourage federally funded state consultation program support of the outreach activities described in this Instruction.
- Note: In order to effectively enforce safety and health standards, guidance to compliance staff is necessary. Therefore, although adoption of this instruction is not required, states are expected to have enforcement policies and procedures which are at least as effective as those of Federal OSHA. In the interest of national maritime policy, those states which cover shipyard employment activities, as well as those with public sector employees engaged in these activities, are encouraged to follow the provisions in this Instruction.
- VI. Action Information.
- A. Responsible Office. Division of Maritime Compliance Assistance in the Directorate of Compliance Programs.

B. Action Offices. National, Regional and Area Offices.

C. Information Offices. State Plan States, Consultation Project Managers.

VII. Action. The policies and procedures set forth in this directive are effective immediately and will remain in effect until superseded or canceled by proper authority. OSHA Regional Administrators, Area Directors and National Office Directors must ensure that the policies and procedures set forth in this directive are followed. The National Emphasis Program created by this Instruction requires, among other things, annual comprehensive inspections of each Navy and MARAD vessel shipbreaking operation in support of the MOA.

Regional Administrators must also ensure that State Plan State Designees and Consultation Program Managers in their Regions are informed of the requirements of this NEP. Regional Administrators are to encourage the involvement of Consultation Programs in this Agency-wide effort.

VIII. Federal Agencies. This instruction describes a change that affects Federal agencies. Executive Order 12196, Section 1-201, and 29 CFR 1960.16, maintain that Federal agencies must also follow the enforcement policy and procedures contained in this instruction.

IX. Definitions.

A. *Data Initiative (a.k.a. Data Survey)*: The Data Initiative is a nation-wide collection of establishment-specific injury and illness data from approximately 80,000 employers. The Data Initiative is OSHA's Annual Survey Form that is referenced in 29 CFR 1904.17.

B. *Lost Workday Injury and Illness (LWDII) Rate*: This includes cases involving days away from work and restricted work activity and is calculated based on  $(N/EH) \times (200,000)$  where N is the number of lost workday injuries and illnesses combined, EH is the total number of hours worked by all workers during the calendar year and 200,000 is the base for 100 full-time equivalent workers.

C. *Related Employment*: Any employment performed incidental to, or in conjunction with, shipbreaking work, including, but not restricted to, inspection, testing, and employment as a watchman.

D. *Shipbreaking (a.k.a., ship scrapping and ship disposal)*: Any breaking down of a vessel's structure for the purpose of scrapping and disposing of the vessel, including the removal of gear, equipment, or any component of the vessel. This term is synonymous with ship scrapping and ship disposal.

E. *Vessel*: Every description of watercraft or other artificial contrivance used, or capable of being used, as a means of transportation on water, including special purpose floating structures not primarily designed for, or used as a means of, transportation on water.

X. Application. This instruction applies OSHA-wide to all compliance inspections of shipbreaking operations. Area Offices must conduct programmed comprehensive compliance inspections of known shipbreaking operations following either this NEP (for Navy or MARAD vessels covered by the MOA) or an approved Local Emphasis Program (LEP). Each Navy and MARAD vessel undergoing shipbreaking operations must be inspected annually in support of the MOA. When significant shipbreaking operations, not covered by the Interagency MOA, are located on or immediately adjacent to navigable waterways, consideration should be given to developing an LEP. The development of an LEP for shipbreaking operations is at the discretion of the Regional or Area Office.

Inspections of shipbreaking operations not covered by this NEP (MOA) or an approved LEP, will be conducted in accordance with the FIRM. The inspection focus for all shipbreaking inspections will be as specified in this instruction (paragraph XII. D.).

There are currently four Navy locations covered by the MOA:

- Philadelphia, PA (formerly Philadelphia Naval Shipyard and Sun Ship Facility, Metro Machine Corporation);
- Baltimore, MD (Sparrows Point Facility, Baltimore Marine Industries, Inc.);
- Brownsville, TX (International Shipbreaking Limited); and
- San Francisco, CA (Hunters Point Facility, Ship Dismantlement and Recycling Joint Venture: VSE Corporation and Earth Tech, Inc.).

There is currently one MARAD location covered by the MOA: Brownsville, TX (International Shipbreaking Limited).

The National Office (DCP) will notify Regional Administrators of other shipbreaking operations locations covered by the MOA as they are identified by the Navy and DOT-MARAD.

XI. Background. OSHA has determined that this National Emphasis Program is needed because of the continuing high incidence of injuries and illnesses related to shipbreaking operations. This instruction is issued in support of both OSHA's Strategic Plan (Shipyard employment is a targeted high hazard industry) and the *Memorandum of Agreement on Interagency Coordination and Cooperation for Ship Scrapping* (i.e., shipbreaking) between DOD (Navy and DLA-DRMS), DOT (MARAD), EPA and DOL (OSHA).

Shipbreaking of obsolete vessels presents many challenges including the structural complexity of the ships themselves; and environmental, safety, and health issues. Although many recognized problems with past practices have been addressed, much remains to be done to improve the process.

In an effort to reduce work-related injuries and illnesses, along with the environmental hazards associated with shipbreaking operations of government-owned ships, OSHA has entered into a Memorandum of Agreement (MOA) with the DOD [Navy, and DLA-DRMS], DOT [MARAD], and EPA. This MOA was signed in November 1999 and provides for a coordinated effort between the Navy, DRMS, MARAD, EPA and OSHA to use the resources of each Agency to more effectively identify and regulate environmental and hazardous working conditions associated with the shipbreaking of government-owned ships. A copy of the MOA is available at [www.osha-slc.gov/MOU\\_data/MOU19991116.html](http://www.osha-slc.gov/MOU_data/MOU19991116.html).

An environmental and worker protection document has been developed to provide guidance to supervisors at shipbreaking facilities. This document, "A Guide for Ship Scrappers: Tips for Regulatory Compliance," is structured by specific processes (e.g., asbestos removal, metal cutting, fuel and oil removal) that occur in shipbreaking operations. Employers conducting shipbreaking operations can review key environmental, safety and health requirements for each process and readily identify pertinent *Code of Federal Regulations* requirements. A copy of this document is available on the EPA web page: [es.epa.gov/oeca/fedfac/fflex.html](http://es.epa.gov/oeca/fedfac/fflex.html).

- XII. Program Procedures, Scheduling and Resource Allocation. This NEP is directed to all sites which conduct shipbreaking operations. For **scheduling purposes**, only inspections covered by the MOA will be programmed pursuant to this instruction. For **reporting purposes**, all compliance inspections of shipbreaking operations (i.e., MOA programmed, MOA unprogrammed, LEP programmed, LEP unprogrammed, and other unprogrammed) will be reported pursuant to this NEP. Regional Administrators must conduct annual programmed comprehensive inspections of each Navy and MARAD vessel covered by the MOA which is undergoing shipbreaking operations.

Where a referral or complaint inspection is conducted subject to the MOA, a copy of the referral or complaint form will be provided to the Navy/DRMS/MARAD contracting office and to the employer during the opening conference. Copies of all citations issued for shipbreaking operations of government-owned ships subject to the MOA will be forwarded to the National Office, Directorate of Compliance Programs (DCP), and the appropriate Navy/DRMS/MARAD Administering Contracting Officer. Copies of all citations issued for shipbreaking operations not covered by the MOA (i.e., LEP and unprogrammed inspections) will be forwarded to the National Office, DCP.

- A. Resources. Regional Administrators must ensure that adequate resources are designated for this NEP. The use of experienced field personnel from other OSHA Regions is encouraged. In order to properly communicate with the shipbreaking work force, bilingual capability may be necessary.
- B. Priority. Inspections conducted under this NEP, both programmed and unprogrammed, have priority over all inspections except those conducted under the Data Initiative – Site Specific Targeting (SST). [OSHA Notice 01-01 (CPL 2) Site Specific Targeting 2001 (SST-01), July 13, 2001 until canceled or superseded by a more current version].
- C. Type of Inspections. Programmed inspections conducted under this NEP for shipbreaking operations will be comprehensive. Unprogrammed inspections will be conducted in accordance with the requirements of the FIRM.
- D. Inspection Focus. Inspections of shipbreaking operations will emphasize the following hazards or workplace activities:
  - 1. Asbestos exposure (permissible exposure limits, exposure assessments and monitoring, respiratory protection, protective clothing, hygiene facilities and practices, medical surveillance, and training for workers and supervisors).
    - a. Asbestos hanger liners.
    - b. Asbestos mastic under insulation.
    - c. Asbestos cloth over insulation.
    - d. Asbestos in cable.
    - e. Asbestos lagging and insulation on pipes and hull.
    - f. Asbestos adhesive.
    - g. Asbestos gaskets on piping connections.
    - h. Asbestos valve packing.
  - 2. Polychlorinated biphenyls (PCBs) exposure (exposure limits, inhalation and dermal protection, training of workers and supervisors).
    - a. PCBs in rubber products such as hoses.
    - b. PCBs in plastic foam insulation.
    - c. PCBs in cables.
    - d. PCBs in silver paint.
    - e. PCBs in habitability paint.
    - f. PCBs in felt under septum plates (plates on top of hull bottom).
    - g. PCBs in primary paint on hull steel.

3. Lead exposure (e.g., burning through lead-coated surfaces, permissible exposure limits, exposure assessments and monitoring, respiratory protection, protective clothing, hygiene facilities and practices, medical surveillance, and training for workers and supervisors).
  - a. Lead/Chromate paint.
  - b. Lead ballast.
  - c. Batteries.
  - d. Generators.
  - e. Motor components.
4. Confined, enclosed and other dangerous atmospheres, space entry.
5. Paint removal operations.
6. Metal cutting and disposal processes.
7. Hazard communication/hazardous material and chemicals.
  - a. RCRA heavy metals (e.g., ship transducers, ballast, paint coatings).
  - b. Mercury (e.g., fluorescent light tubes, thermometers, electrical switches, light fittings, fire detectors, tank level indicators).
  - c. CFCs (e.g., self-contained refrigeration devices including water coolers and small freezer units).
8. Powered industrial truck operations.
9. Guarding of deck openings/edges and fall protection.
10. Hearing Conservation (i.e., noise).
11. Bilge and ballast water removal.
12. Oil/fuel removal and tank cleaning.
13. Removal and disposal of ship's machinery.
14. Cranes, gear and equipment for material handling.
15. Cutting and welding, compressed gas.
16. Fire prevention.

17. Personal protective equipment (PPE).
18. Emergency response, rescue, and first aid.
19. Scaffolds, ladders and working surfaces.

XIII. Coordination.

- A. National Office (DMCA). This NEP will be coordinated by the Division of Maritime Compliance Assistance, Directorate of Compliance Programs. Questions and comments should be directed to the Division of Maritime Compliance Assistance.
- B. Navy/DRMS/MARAD. Where a referral inspection is initiated by Navy/DRMS/MARAD, a copy of the OSHA referral form will be provided to the originating Navy/DRMS/MARAD contracting office. If, upon arrival at the vessel, right of entry is an issue, the Navy/DRMS/MARAD Administering Contracting Officer will be notified immediately. Such notification will be accomplished by the most expeditious method available, including, but not limited to, telephone or fax machine.

The Navy/DRMS/MARAD Administering Contracting Officer, or designated representative, will be invited to the closing conference with the employer at the completion of any inspection covered by the MOA. Following completion of inspections initiated under the provisions of the MOA, the respective OSHA Area Office will transmit copies of citations issued to the Navy/DRMS/MARAD Administering Contracting Officer, as well as to the National Office, Directorate of Compliance Programs (DCP).

- C. EPA. For inspections conducted pursuant to the MOA, where appropriate OSHA field offices will conduct joint coordinated inspections with the EPA. Such coordinated inspections should provide a more comprehensive and efficient approach to monitoring compliance with all applicable occupational safety and health, and environmental requirements.

XIV. Program Evaluation. Area Offices will collect data and information relevant to the effectiveness of this NEP and approved LEPs, and submit it to the Regional Office. Data and information on effectiveness includes, but is not limited to: reductions in fatalities, reductions in the LWDII rate, safety and health programs implemented, employees trained, and outreach activities.

At the end of each fiscal year (September 30th), after summarizing the data and information, the Regional Office will forward the shipbreaking program evaluation to the National Office, Directorate of Compliance Programs (DCP) **no later than the end of December**. At a minimum, the evaluation should respond to the requirements of CPL 2.102A, Section D. DCP will serve in a coordinating role, collecting information from the applicable field offices on best practices in shipbreaking operations and, after review and evaluation, disseminating necessary information back to field offices and to the OSHA Training Institute.

- XV. IMIS Coding. All inspections (programmed and unprogrammed) for shipbreaking must be coded in the IMIS by marking “**Shipyards**” in the Strategic Plan Activity item 25f on the OSHA-1.

Any settlement agreement (formal or informal) where the employer commits to implementing or improving a safety and health program must be designated as such by entering the informal conference date in item 13A on the OSHA Form 167I and then marking item 13D, “**Safety and Health Program Initiated.**” Any settlement agreement where the employer commits to providing OSHA-200 data in future years must be identified by entering the informal conference date in item 13A on the Form 167I and then marking item 13C, “**OSHA-200 Required,**” and entering the number of years the data must be provided.

Instructions for completing the OSHA-1, OSHA-7, OSHA-36, and OSHA-90 Forms; and Consultation Request Form-20 and Visit Form-30 are as follows:

A. Enforcement -- Inspections Covered by MOA:

1. The OSHA-1 Form for any programmed inspection covered by the MOA for shipbreaking operations must be marked “**Planned**” (item 24h) and “**National Emphasis Program**” (Item 25d). Record “**BreakMOA**” in the space in item 25d (NEP). Record “**Shipyards**” in the space in item 25f (Strategic Plan Activity). Also record in item 25f other strategic plan priority activities as appropriate (e.g., “Lead,” “Silica,” “Amputations”).
2. The OSHA-1 Form for any unprogrammed inspection covered by the MOA for shipbreaking operations must be marked “**Unprogrammed**” (items 24a through 24l as appropriate). In addition, it will be marked “**National Emphasis Program**” (Item 25d). Record “**BreakMOA**” in the space in item 25d (NEP). Record “**Shipyards**” in the space in item 25f (Strategic Plan Activity). Also record in item 25f other strategic plan priority activities as appropriate (e.g., “Lead,” “Silica,” “Amputations”).

3. Whenever an OSHA-7 Form is completed by a Federal office, and the applicable complaint involves shipbreaking operations covered by the MOA, complete the OSHA-7 Form in the usual manner and record “**BreakMOA**” in the space in item 50 (NEP), and “**Shipyards**” in the space in item 52 (Strategic Plan Activity). Also record in item 52 other strategic plan priority activities as appropriate (e.g., “Lead,” “Silica,” “Amputations”).
  4. Whenever an OSHA-36 Form is completed by a Federal office and the fatality/catastrophe site is a shipbreaking operation covered by the MOA, complete the OSHA-36 Form in the usual manner and record “**BreakMOA**” in the space in item 36, and “**Shipyards**” in the space in item 38 (Strategic Plan Activity). Also record in item 38 other strategic plan priority activities as appropriate (e.g., “Lead,” “Silica,” “Amputations”).
  5. Whenever an OSHA-90 Form is completed by a Federal office and the applicable referral case involves shipbreaking operations covered by the MOA, complete the OSHA-90 Form in the usual manner and record “**BreakMOA**” in the space in item 30 (NEP), and record “**Shipyards**” in the space in item 32 (Strategic Plan Activity). Also record in item 32 other strategic plan priority activities as appropriate (e.g., “Lead,” “Silica,” “Amputations”).
- B. Enforcement -- All Other Inspections (Those not covered by MOA):
1. The OSHA-1 Form for any programmed LEP inspection of shipbreaking operations not covered by the MOA must be marked “**Planned**” (item 24h) and “**Local Emphasis Program**” (Item 25c), and “**National Emphasis Program**” (Item 25d). Record the LEP designator in item 25c (LEP), record “**BreakSHP**” in the space in item 25d (NEP). Record “**Shipyards**” in the space in item 25f (Strategic Plan Activity). Also record in item 25f other strategic plan priority activities as appropriate (e.g., “Lead,” “Silica,” “Amputations”).
  2. The OSHA-1 Form for any unprogrammed inspection of shipbreaking operations not covered by the MOA must be marked “**Unprogrammed**” (items 24a through 24l as appropriate). If the unprogrammed inspection is covered by an LEP, record the LEP designator in item 25c (LEP). In addition, it will be marked “**National Emphasis Program**” (Item 25d). Record “**BreakSHP**” in the space in item 25d (NEP). Record “**Shipyards**” in the space in item 25f (Strategic Plan Activity). Also record in item 25f

other strategic plan priority activities as appropriate (e.g., “Lead,” “Silica,” “Amputations”).

3. Whenever an OSHA-7 Form is completed by a Federal office and the applicable complaint involves shipbreaking operations not covered by the MOA, complete the OSHA-7 Form in the usual manner and record “**BreakSHP**” in the space in item 50 (NEP), and “**Shipyards**” in the space in item 52 (Strategic Plan Activity). Also record in item 50 other strategic plan priority activities as appropriate (e.g., “Lead,” “Silica,” “Amputations”).
4. Whenever an OSHA-36 Form is completed by a Federal office and the fatality/catastrophe site is a shipbreaking operation not covered by the MOA, complete the OSHA-36 Form in the usual manner and record “**BreakSHP**” in the space in item 36, and “**Shipyards**” in the space in item 38 (Strategic Plan Activity). Also record in item 38 other strategic plan priority activities as appropriate (e.g., “Lead,” “Silica,” “Amputations”).
5. Whenever an OSHA-90 Form is completed by a Federal office and the applicable referral case involves shipbreaking operations not covered by the MOA, complete the OSHA-90 Form in the usual manner and record “**BreakSHP**” in the space in item 30 (NEP), and record “**Shipyards**” in the space in item 32 (Strategic Plan Activity). Also record in item 32 other strategic plan priority activities as appropriate (e.g., “Lead,” “Silica,” “Amputations”).

C. Consultation.

1. Whenever a visit is made which involves shipbreaking operations, a Consultation Request Form and/or Visit Form must be completed as follows:
  - a. Complete the Consultation Request Form-20 in the usual manner and in the space for item 25 (NEP) record: “**BreakMOA**” for activities covered by the MOA, and record “**BreakSHP**” for activities not covered by the MOA. Record “**Shipyards**” in the space in item 27 (Strategic Plan Activity). Also record in item 27 other strategic plan priority activities as appropriate (e.g., “Lead,” “Silica,” “Amputations”).

- b. Complete the Visit Form-30 in the usual manner and in the space for item 28 (NEP) record: “**BreakMOA**” for activities covered by the MOA, and “**BreakSHP**” for activities not covered by the MOA. Record “**Shipyards**” in the space in item 30 (Strategic Plan Activity). Also record in item 30 other strategic plan priority activities as appropriate (e.g., “Lead,” “Silica,” “Amputations”).

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