



OSHA INSTRUCTION

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

DIRECTIVE NUMBER: CPL 02-00-136 EFFECTIVE DATE: March 16, 2005

SUBJECT: OSHA's National Emphasis Program (NEP) on Shipbreaking

ABSTRACT

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

Scope: OSHA-wide.

References: A. 29 CFR Part 1910, General Industry Standards.
B. 29 CFR Part 1915, Shipyard Employment Standards.
C. CPL 02-00-103, Field Inspection Reference Manual (FIRM), September 6, 1994.
D. Memorandum of Agreement on Ship Scrapping (i.e., shipbreaking) between DOD/DOT/EPA/DOL-OSHA, November 16, 1999.

Cancellations: CPL 02-00-129, OSHA's National Emphasis Program (NEP) on Shipbreaking, August 1, 2001.

State Impact: State adoption is not required (see paragraph VI).

Action Offices: National, Regional and Area Offices.

Originating Office: Directorate of Enforcement Programs (DEP).

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By and Under the Authority of
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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 an NEP to reduce or eliminate workplace hazards associated with shipbreaking operations. In the OSHA FY 2003-2008 Strategic Management Plan, OSHA has committed to focused interventions in the shipyard industries (29 CFR Part 1915) to reduce injuries, illness and fatalities to support DOL Strategic Outcome Goal 3.1, Reduce workplace fatalities, injuries, and illnesses.

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 Navy and MARAD shipbreaking operations. This instruction supports both OSHA's Strategic Plan goals and the Interagency MOA.

Significant Changes

This instruction continues implementation of an NEP for shipbreaking operations. Specifically, it:

- Supports OSHA's Strategic Management Plan, which is committed to focused interventions in the shipyard industries (29 CFR Part 1915) to reduce injuries, illness and fatalities to support DOL Strategic Outcome Goal 3.1, Reduce workplace fatalities, injuries, and illnesses;
- Continues to support the Interagency MOA requiring OSHA interventions in the breaking of Navy and MARAD vessels under contract;
- Continues to provide a scheduling system for the inspection of Navy and MARAD shipbreaking operations for vessels covered by the Interagency MOA;
- Reaffirms coordination between the Navy, DLA-DRMS, MARAD, EPA, and OSHA for shipbreaking operations;
- Continues to provide a national reporting system for all OSHA shipbreaking inspections, not just those involving Navy and MARAD vessels;
- Continues to provide guidance to State Consultation Programs that provide assistance to employers engaged in shipbreaking operations;
- Delivers available shipyard employment safety and health information in a web-based interactive format.

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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 OSHA FY 2003-2008 Strategic Management Plan, OSHA has committed to focused interventions in the shipyard industries (29 CFR Part 1915) to reduce injuries, illness and fatalities to support DOL Strategic Outcome Goal 3.1, Reduce workplace fatalities, injuries, and illnesses.

Also, OSHA has entered into a Memorandum of Agreement (MOA) on Interagency Coordination and Cooperation for Ship Scrapping (i.e., shipbreaking) between **DOD, DOT, EPA, and DOL-OSHA**. 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 enforcement inspections of shipbreaking operations. For **scheduling purposes**, only inspections covered by the MOA will be programmed pursuant to this instruction. For **reporting purposes**, all inspections of shipbreaking operations (i.e., MOA programmed, MOA unprogrammed, Local Emphasis Program (LEP) programmed, LEP unprogrammed, and other unprogrammed) will be reported pursuant to this NEP.

III. References.

- A. 29 CFR Part 1904, Recording and Reporting Occupational Injuries and Illnesses.
- B. 29 CFR Part 1910, General Industry Standards.
- C. 29 CFR Part 1915, Shipyard Employment Standards.
- D. 29 CFR Part 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters.
- E. OSHA Strategic Management Plan, FY 2003–2008, Occupational Safety and Health Administration (OSHA) Strategic Management Plan for Fiscal Years 2003-2008.
- F. Memorandum of Agreement on Ship Scrapping (i.e., shipbreaking) between **DOD/DOT/EPA/DOL-OSHA**, November 16, 1999.
- G. CPL 02-00-025, Scheduling System for Programmed Inspections, January 4, 1995.
- H. CPL 02-00-103, Field Inspection Reference Manual (FIRM), September 26, 1994.
- I. CPL 02-00-135, Recordkeeping Policies and Procedures Manual, December 30, 2004.

- J. [CPL 02-00-133](#), Shipyard “Tool Bag” Directive, October 22, 2003.
 - K. [CPL 02-01-020](#), OSHA/U.S. Coast Guard Authority over Vessels, November 8, 1996.
 - L. [CPL 04-00-001](#), Procedures for Approval of Local Emphasis Programs (LEPs), November 10, 1999.
 - M. [07-03 \(CPL 02\)](#), Site Specific Targeting 2007 (SST-07), May 14, 2007.
 - N. [CSP 01-03-001](#), Maritime Jurisdiction in State Plan States, October 30, 1978.
 - O. [STD 02-04-001](#), 29 CFR Part 1915 Subpart B, Confined and Enclosed Spaces and Other Dangerous Atmospheres in Shipyard Employment – Inspection Procedures and Interpretive Guidelines, September 27, 1996.
 - P. [STD 02-04-002](#), 29 CFR Part 1915 Subpart I, Personal Protective Equipment (PPE) for Shipyard Employment – Inspection Procedures and Interpretive Guidelines, September 27, 1996.
- IV. [Cancellations](#).
- CPL 02-00-129, OSHA’s National Emphasis Program (NEP) on Shipbreaking, August 1, 2001.
- V. [Action Information](#).
- A. [Responsible Office](#). Directorate of Enforcement Programs (DEP), Office of Maritime Enforcement (OME).
 - B. [Action Offices](#). National, Regional, and Area Offices; Consultation Project Managers.
 - C. [Information Offices](#). State Plan States.
- VI. [Federal Program Change](#). This instruction describes a Federal program change for which state adoption is not required. States are asked to keep their Regional Administrators informed of State-developed local emphasis programs, experimental programs, local problem-solving projects, etc., especially any that relate to State Strategic Plan goals. They should also coordinate the assignment of an IMIS identifier code with their Regional Administrators and submit the coding instructions necessary for Strategic Plan tracking.
- VII. [Significant Changes](#). This instruction provides tools to support intervention and inspection programs related to the implementation of an NEP for shipbreaking operations in a web-based interactive format. This instruction:

- Supports OSHA's Strategic Management Plan, which is committed to focused interventions in the shipyard industries (29 CFR Part 1915) to reduce injuries, illness and fatalities to support DOL strategic Outcome Goal 3.1, Reduce workplace fatalities, injuries, and illnesses;
- Continues to support the Interagency MOA requiring OSHA interventions in the breaking of Navy and MARAD vessels under contract;
- Continues to provide a scheduling system for the inspection of Navy and MARAD shipbreaking operations for vessels covered by the Interagency MOA;
- Reaffirms coordination between the Navy, DLA-DRMS, MARAD, EPA, and OSHA for shipbreaking operations;
- Continues to provide a national reporting system for all OSHA shipbreaking inspections, not just those involving Navy and MARAD vessels;
- Continues to provide guidance to State Consultation Programs that provide assistance to employers engaged in shipbreaking operations; and
- Delivers available shipyard employment safety and health information in a web-based interactive format.

VIII. Action. The policies and procedures set forth in this instruction 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 instruction are followed. The NEP 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 also must 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.

IX. 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.

X. Definitions.

A. Data Initiative (a.k.a. Data Survey): The Data Initiative is a nationwide 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. Days Away, Restricted or Transferred (DART) Rate: This includes cases involving days away from work, restricted work activity, and transfers to another job. The DART rate is calculated based on $(N/EH) \times (200,000)$ where N is the number of cases involving days away and/or job transfer or restriction, EH is the total number of hours worked by all employees during the calendar year, and 200,000 is the base for 100 full-time equivalent employees (2,000 hours per worker x 100 workers). The DART rate replaced the Lost Workday Injury and Illness (LWDII) rate effective January 1, 2002.
 - C. Related Employment: Any employment performed as an incident to, or in conjunction with ship repairing, shipbuilding or shipbreaking work, including, but not restricted to, inspection, testing, and employment as a watchman.
 - D. Shipbreaking: Any breaking down of a vessel's structure to dismantle the vessel, including the removal of gear, equipment, or any component of the vessel. This term is commonly referred to as "ship scrapping" and "ship disposal."
 - E. Shipyard Employment: This includes ship repairing, shipbuilding, shipbreaking and related employments.
 - F. 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.
- XI. Application. This instruction applies OSHA-wide to all enforcement inspections of shipbreaking operations. Area offices must conduct programmed comprehensive enforcement inspections of known shipbreaking operations following either this NEP (for Navy or MARAD vessels covered by the MOA) or an approved 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 XIII.D.).

There are currently two active Navy locations covered by the MOA:

- Metro Machine Corporation, 5195 South 19th Street, Philadelphia, PA 19112 ((757) 543-6801).

- International Shipbreaking Limited, 18501 R.L. Ostos Road, Brownsville, TX 78526 ((956) 831-2299).

There are currently six active MARAD locations covered by the MOA:

- All Star Metals LLC, 101 Boxcar Road, Brownsville, TX 78521 ((956) 838-2110);
- Bay Bridge Enterprises, LLC, 4300 Buell Road, Chesapeake, VA 22324 ((757) 543-7464);
- Esco Marine, Inc., 16200 Joe Garza Sr. Road, Brownsville TX 78521 ((956) 831-8300);
- International Shipbreaking Limited, 18501 R.L. Ostos Road, Brownsville, TX 78526 ((956) 831-2299);
- Marine Metals, 16901 R.L. Ostos Road, Brownsville, TX 78526 ((956) 831-4284);
- North American Ship Recycling LLC, 600 Shipyard Road, Baltimore, MD 21219 [Sparrows Point Shipyard] ((410) 477-6260).

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

- XII. Background. OSHA has determined that this NEP 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 Management Plan (Shipyard employment is a targeted high hazard industry) and the Memorandum of Agreement on Interagency Coordination and Cooperation for Ship Scrapping.

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, an ongoing effort is required to further 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 an 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.

An environmental and worker protection document has been developed by the EPA to provide guidance to supervisors at shipbreaking facilities. This document, "[A Guide for Ship Scrappers: Tips for Regulatory Compliance](#)," is structured by specific processes (such as asbestos removal, metal cutting, and 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.

- XIII. 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 enforcement inspections of shipbreaking operations (i.e., MOA programmed, MOA unprogrammed, LEP programmed, LEP unprogrammed, and other unprogrammed inspections) will be reported via the IMIS (see paragraph XVI).
- A. Resources. Regional Administrators must ensure that adequate resources are designated for this NEP. The sharing of experienced field personnel between OSHA Regions is encouraged. In order to effectively communicate with the shipbreaking workforce, bilingual capability may be necessary.
- B. Priority. Inspections conducted under this NEP have priority over all programmed inspections except those conducted under the Data Initiative – Site Specific Targeting (SST). ~~[05-05 (CPL 02), Site Specific Targeting 2005 (SST 05), August 5, 2005~~ [Updated reference 07-03 (CPL 02) - Site Specific Targeting 2007 (SST 07) , May 14, 2007. (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 with emphasis on the hazards and activities listed in paragraph XIII.D. Unprogrammed inspections will be conducted in accordance with the requirements of the FIRM (CPL 02-00-103).
- D. Inspection Focus. Inspections of shipbreaking operations will focus on the following identified hazards and workplace activities:
1. Asbestos exposure (permissible exposure limits, exposure assessments and monitoring, respiratory protection, communication of hazard to employees, methods of compliance, protective clothing, hygiene facilities and practices, medical surveillance, training for workers and supervisors, housekeeping and recordkeeping).
 - 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 materials 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 watercoolers and small freezer units).
 8. Powered industrial truck operations.
 9. Guarding of deck openings/edges and fall protection.
 10. Hearing conservation (i.e., noise exposure).

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.
20. Illumination of work areas.
21. Other identified work activities and practices that create significant occupation hazards.

XIV. Coordination.

- A. National Office (DEP/OME). This NEP will be coordinated by the Directorate of Enforcement Programs, Office of Maritime Enforcement. Questions and comments should be directed to the Office of Maritime Enforcement.
- 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 any citations issued to the employer to the

Navy/DRMS/MARAD Administering Contracting Officer, as well as to the National Office, Directorate of Enforcement Programs (DEP).

C. EPA. For inspections conducted pursuant to the MOA, where appropriate, OSHA has agreed to 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, as well as environmental requirements.

XV. 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 DART rate,
- safety and health programs implemented,
- employees trained,
- 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 Enforcement Programs (DEP/OME) **no later than the end of December**. At a minimum, the evaluation should respond to the requirements of CPL 04-00-001, Section VIII.D. DEP 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.

XVI. 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 Form.

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 – 300 data in future years must be identified by entering the informal conference date in item 13A on the Form 167I and then marking item 13 C, “**OSHA-300 Required,**” and entering the number of years over which the data must be provided.

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,” “General Construction”).
 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,” “General Construction”).
 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,” “General Construction”).
 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,” “General Construction”).
 5. Whenever an OSHA-90 Form is completed by a Federal office and the applicable referral case involved 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,” “General Construction”).
- 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,” “General Construction”).

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,” “General Construction”).
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,” “General Construction”).
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,” “General Construction”).
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,” “General Construction”).

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,” “General Construction”).

- 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,” “General Construction”).

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