



# OSHA REGIONAL NOTICE

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

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DIRECTIVE NUMBER: CPL 04-00 (LEP 011) | EFFECTIVE DATE: October 1, 2016

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**SUBJECT:** LEP for High Rise Building Construction Inspections in Chicago, Illinois

**REGIONAL IDENTIFIER:**Region V

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## ABSTRACT

**Purpose:** Continue a Local Emphasis Program (LEP) for safety and health inspections of high rise construction projects in Chicago.

**References:** OSHA Instruction CPL 02-00-160, Field Operations Manual (FOM), OSHA Instruction CPL 04-00-001Procedures for Approval of Local Emphasis Programs

**Action Offices:** Calumet City Area Office

**Originating Office:** Calumet City Area Office

**Contact:** Assistant Regional Administrator  
Enforcement Programs  
USDOL-OSHA  
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Chicago, IL 60604  
(312) 353-2220

By and Under the Authority of

Ken Nishiyama Atha  
Regional Administrator

- I. Purpose. The purpose of this Notice is to continue a Local Emphasis Program (LEP) for safety and health inspections of high rise construction projects in Chicago, Illinois.
- II. Scope. This Notice applies to the Calumet City Area Office in Illinois.
- III. References. OSHA Instruction CPL 02-00-160, Field Operations Manual (FOM), OSHA Instruction CPL 04-00-001, Procedures for Approval of Local Emphasis Programs.
- IV. Expiration. This Notice expires September 30, 2017.
- V. Action. The Area Director will use the procedures described in Paragraph VIII of this Notice as the basis for developing and implementing inspection activity of high rise construction projects.
- VI. Policy. The Area Director shall use the LEP as described herein as the basis for scheduling safety and health inspection activity at high rise construction projects. The targeting and selection program is intended to be used on those new construction projects which are 10 stories tall or greater.
- VII. Background. A complaint inspection of a multi-story building in downtown Chicago resulted in the issuance of citations to the General Contractor with a proposed penalty of \$296,000. Looking at the building from the surrounding area, one would not have believed there to be any violations present to initiate an inspection under the LEP Fall initiative. Once inside the workplace, documented conditions existed which exposed employees to hazards which could have resulted in serious physical harm or death. These included fall and electrical hazards among many others. Also present was the possibility of silica overexposure.
  - A. Inspections of large scale jobs in the Chicago area are typically initiated in response to a complaint or through Construction Targeting lists. However, because these lists do not provide information which details the stage of development of the new construction project, and recent history shows that there have been few complaints filed on large scale construction jobs, OSHA's ability to conduct inspections of these high hazard workplaces is limited.
  - B. The inspection list will include those sites involving new construction of 10 stories or greater. The determination to use the 10 story criteria is derived from the type of construction being done within the City of Chicago in Calumet City's geographic jurisdiction. The intent of this program is to target large scale construction projects. Developers of the program determined that the sites being targeted were multi-story complexes and the 10 story initiation point would help ensure that the intent of the project was met.
- VIII. Procedures. The following procedures will be used in targeting and scheduling of inspections conducted under this LEP.
  - A. The inspection will be scheduled once visual observation assures that the structure has reached or exceeded the 10<sup>th</sup> story level.

B. The boundary area for the downtown Chicago area has been determined to be: the City of Chicago within the geographic jurisdiction of the Calumet City Area Office.

C. The inspection list will be developed and updated on a bi-monthly basis by visual observation of applicable sites.

D. The inspections will be conducted using the Focused Inspection Initiative criteria.

E. Compliance Officers shall collect OSHA 300 logs on all worksites where the general contractor maintains a log for the entire worksite. This information will be used to develop a baseline of comparison for reduction in injuries and illnesses.

IX. OIS Coding. Inspections conducted under this program will be coded as “Programmed Planned” and Local Emphasis Program “HIRISE.”

X. Evaluation Procedures

The Calumet City Area Office will prepare a written evaluation of this LEP in the format specified by OSHA Instruction CPL 04-00-001. Evaluations will be submitted annually for the previous Fiscal Year.