



OSHA REGIONAL NOTICE

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: CPL 04-00 (LEP 011)

EFFECTIVE DATE: October 1, 2004

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

REGIONAL IDENTIFIER: Region V

ABSTRACT

Purpose: Continue a Calumet City Area Office Local Emphasis Program(LEP) for safety and health inspections of high rise construction projects in downtown Chicago, Illinois and redefine the boundaries.

References: OSHA Notice CPL 2.103 Field Inspection Reference Manual (FIRM), OSHA Instruction CPL .102A Procedures 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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By and Under the Authority of
Michael G. Connors
Regional Administrator

1. Purpose. The purpose of this Notice is to continue a Calumet City Area Office Local Emphasis Program (LEP) for safety and health inspections of high rise construction projects in downtown Chicago, Illinois.
2. Scope. This Notice applies to the Calumet City, Illinois Area Office.
3. References. OSHA Notice CPL 2.103 Field Inspection Reference Manual (FIRM), OSHA Instruction CPL 2.102 Procedures for Approval of Local Emphasis Programs
4. Expiration. This Notice expires September 30, 2005.
5. Action. The Area Director will use the procedures described in Paragraph 8. of this Notice as the basis for developing and implementing inspection activity of high rise construction projects.
6. 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 or greater.
7. Background. A recent 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 illness due to silica overexposure.
 1. Inspections of large scale jobs in the downtown area are typically initiated in response to a complaint or through "Dodge reports," which consist of construction work sites on a list randomly generated by a computer owned and operated by the University of Tennessee. However, because Dodge reports 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.
 2. 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 downtown area. 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.

8. Procedures. The following procedures will be used in targeting and scheduling of inspections conducted under this LEP.
 1. The inspection will be scheduled once visual observation assures that the structure has reached or exceeded the 10th story level.
 2. The boundary area for the downtown Chicago area has been determined to be:
 1. Cermak Road(2200 South)
 2. North Avenue(1600 North)
 3. Lake Shore Drive(400-500 East)
 4. Damen Avenue(2000 West)
 3. The inspection list will be developed and updated on a bi-monthly basis by visual observation of applicable sites.
 4. The inspections will be conducted using the Focused Inspection Initiative criteria.
9. IMIS Coding. Inspections conducted under this program will be coded as "h.Planned" in item 24, and item 25c, Local Emphasis Program, will be coded "HIRISE."
10. Evaluation Procedures. It is important that this program be evaluated in a timely manner in order to assess its potential future value and to make any necessary modifications.
 1. The Calumet City Area Office Area Director shall submit an evaluation report to the ARA/EP no later than October 31, 2004. The evaluation shall be in accordance with CPL 2.102A and include a brief description of inspections conducted, results of the inspections and an evaluation of the program in general.