OSHA CROSSTELL 21-01

AFSAS OSHA EVENT # 8335 / OSHA Inspection # 1503405

Joint Base Elmendorf-Richardson (PACAF) | OSHA Region 10

20 November 2020

BLUF: Contractor was not informed of potential health hazards and site emergency response procedures during contaminated soil removal operations.

Severity of Notice(s): Serious

CFR(s) Violated: 29 CFR 1926.65(b)(1)(iv): "Contractors and sub-contractors." An employer who retains contractor or sub-contractor services for work in hazardous waste operations shall inform those contractors, sub-contractors, or their representatives of the site emergency response procedures and any potential fire, explosion, health, safety or other hazards of the hazardous waste operation that have been identified by the employer, including those identified in the employer's information program.

(a) Cape Lisburne, North End Seawall: On or about July 15, 2020, a contractor was retained for services to work in hazardous waste operations removing contaminated soil and placing it into containment. However, they were not informed of the site emergency response procedures and any potential health hazards that had been identified by the employer, exposing employees to inhalation hazards of volatile organic compounds.

Lessons Learned: The Air Force maintains certain responsibilities to the contractors and sub-contractors hired on installations to conduct hazardous waste operations. Ensuring complete documentation of known hazards is important in preventing confusion and possible exposures. Having a plan in place to address unexpected incidents may protect workers.

Preventing Reoccurrences: This Notice was withdrawn during the informal conference since the installation showed OSHA evidence they maintained required documentation, and that good faith efforts were in place to protect workers from fire, explosion, health, safety and other hazards. Informal conferences provide the opportunity for OSHA and the installation to discuss the facts of a case and present any additional evidence. By maintaining good records and using the informal conference process, the installation was able to show their compliance and had the notice withdrawn.