

<i>Consultative Services - Bureau Operating Procedures</i>	<i>Effective – 05/01/2019</i>	<i>Revision: 7 – 04/15/2019</i>
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BOP 4D

Document Title: On-Site Consultation – SHARP Logging

Approval Authority: Bureau Chief

A. PURPOSE

The Bureau Operating Procedure (BOP) outlines the process for delivering Consultative Services and awarding SHARP status to an employer.

B. SCOPE

This procedure applies to on-site consultation visits for SHARP Logging.

C. DEFINITIONS

See Bureau Operating Procedure 4A and CPPM for additional definitions if needed.

Consultation Policies and Procedures Manual (CPPM) - The Consultation Policies and Procedures Manual, CSP 02-00-003, which is an electronically maintained document found in the OSHA directive system and the OSH Division One Stop Shop. It became effective in NC on April 8, 2016. It defines the activities and procedures that OSHA-funded consultation programs are to follow.

Logger Safety Checklist Booklet – A booklet that contains sample forms, sample policies and guidelines for maintaining safety records to assist companies with OSHA requirements as related to logging operations. Formats are suggested and can be modified by each operation.

SHARP - Safety and Health Achievement Recognition Program

SHARP – Employer Eligibility and Program Requirements – (from CPPM Chapter 8) Employer must:

- have a single fixed site, such as a shop or office address
- have at least one year of operating history
- have reduced their DART & TRC to below the most recently published BLS industry average
- request a full-service visit & correct all identified hazards
- have implemented and maintained a S/H management system
- score at least 2 on all 50 basic attributes in the Form 33, and stretch attributes must be scored - agree to notify Consultative Services about changes

SHARP Logging – Safety and Health Achievement Recognition Program for the Logging Industry.

SHARP Logging Approval Phase – This phase includes a subsequent on-site visit by each Consultant with a review of the employer’s actions towards SHARP approval. The exemption period is up to 1 year from the date of approval.

SHARP Logging Maintenance Phase – This phase includes subsequent on-site visits by each Consultant once a quarter for a review of the employer’s status and progress in SHARP at an offsite work location. If the employer has more than one site in operation all sites must be reported to the consultants for them choose for site review of the program. The deferral period will be for up to one year from the date of approval. These quarterly visits will replace the annual audit that the employer is to complete and send to the department since the Consultants will be on site each quarter.

D. REQUIREMENTS

1. All consultation activity shall be performed within the accepted guidelines found in the CPPM as well as established bureau and department requirements.
2. The employer must agree to abate all serious and non-serious hazards identified during the survey.
3. The employer must complete an On-site Safety Checklist each active day of operation and provide the most current completed copy to the consultants during the initial survey.

E. ACTION STEPS

SHARP Logging

- A1. An employer who is interested in participating in SHARP and meets all the requirements in CPPM Chapter 8, may request a full service, comprehensive visit by completing and submitting the Consultative Services request form.
- A2. The Processing Assistant processes the Request, processes the interim inspection deferral and forwards to the appropriate supervisor(s).
- A3. The supervisor(s) assigns Consultants to conduct on-site visits.
- A4. The safety consultant and the health consultant conduct full service visits, jointly or individually.

Note: It is not unusual for the Consultant(s) to be requested in person or by phone to conduct the safety and health survey. The Consultants may not know the actual work site until just before the survey. In that case the Consultant(s) will have the employer sign the request form at the jobsite and bring it back to the office for processing. The Consultant(s) will forward the signed request to the Processing Assistant to process the request form after the survey has been conducted.

- A5. The Form 33 is filled out jointly by the Consultants and will constitute the Action Plan to maintain SHARP Logging. All 58 items on the Form 33 shall be scored with a minimum score of 2; however, scores on the 8 “stretch” items do not affect SHARP approval. The Consultant completing the last report will mail the Form 33.
- A6. Each consultant completes a written report for their visit, mails it to the employer, and assembles the case file. The Form 33 is included with the report.

- A7. If hazards are found during the visit, they must be successfully abated in a timely fashion, list of hazards posted appropriately, and the consultants notified on the Employer Report of Action Taken form.
- A8. If the Consultants believe the employer shows promise of successfully fulfilling the requirements for SHARP Logging, the employer submit a letter in writing addressed to the Bureau Chief requesting SHARP Logging approval. The employer's letter shall describe the employer's commitment to maintaining an effective safety and health program.
- A9. The Consultants prepare the SHARP Approval Form and provide their recommendation for SHARP Logging approval. All case files are then forwarded to the supervisor(s) for review.

SHARP Logging Maintenance Phase

- R1. Approximately 3 months after the initial SHARP award and each 3 months thereafter, the lead Consultant contacts the Logging Contractor to schedule the next survey. The process for preparing for the survey is similar to steps A1 through A3. R2. The Safety Consultant and the Health Consultant conduct initial visits, jointly or individually.

NOTE: If the Safety Consultant conducts the survey first and addresses all health-related hazards and contacts the assigned Health Consultant, the Health portion of the survey may be discontinued with the supervisor's approval and the SHARP exemption will remain in effect.

- R3. The Form 33 is filled out and will constitute the New Action Plan to maintain SHARP. All 58 items on the Form 33 shall be scored; however, scores on the 8 "stretch" items do not affect SHARP approval.
- R4. If the employer successfully completes the survey and abates hazards in a timely fashion, the employer will automatically stay in SHARP.

NOTE: NCDOL reserves the right to have the company and worksite removed from the SHARP Logging Program at any time. More frequent surveys will result if evaluations are judged to show instability or lack of program effectiveness or improvement.

SHARP Annual Safety and Health Management System Review

- S1. Since the Consultant(s) will be working with the employer at a minimum of every 3 months, a SHARP Annual Safety and Health Management System Review will not be completed annually. In lieu of this, the Consultant(s) will document any reviews of the company's safety and health management system with results/changes noted in the executive summary area of the Consultants reports.

SHARP Logging Denial of Renewal Request or Voluntary Withdrawal

- W1. If a SHARP business is closed the consultants shall write an explanatory memo to their supervisor who will review it with the Bureau Chief. Upon approval by the Bureau Chief the memo shall be added to the latest SHARP files and the site will be removed from the SHARP Log by the Information Processing Assistant. It will not be necessary to follow the procedures W2-W9 below.

However, if during a scheduled SHARP renewal visit or annual evaluation an employer does not meet the minimal SHARP criteria, or if the employer voluntarily withdraws, the following steps will be followed.

- W2. The consultants notify the district supervisor, in writing, that the employer will not qualify or has elected to withdraw.
- W3. The supervisor will review the consultant recommendations, followed by the bureau chief, at which time a decision will be made and consultants notified by the supervisor.
- W4. The consultants will subsequently notify the employer and to inform them that their SHARP status has been withdrawn.
- W5. The consultant will discuss with the employer the reasons for the decision and the procedures for reapplying for SHARP.
- W6. Regarding a scheduled SHARP maintenance visit report, the denial decision, the reasoning and the requirements for future SHARP consideration will be included in the executive summary. The consultants shall also complete a SHARP Approval Form and forward to the supervisor.
- W7. In the event the employer withdraws voluntarily, the consultants will request a letter of withdrawal that includes the employer's reason(s). The employer shall also be requested to return their SHARP certificate (if unexpired) and SHARP Logging banner. Any documents received will be included the latest case file(s).
- W8. In the case of a denial resulting from a scheduled SHARP annual review, the consultants draft a letter from the bureau chief to the employer containing the reason(s) for the denial and outlining the requirements for re-entry into the program. The final copy (signed by the bureau chief) is placed in the latest case files.

F. REVISIONS

- Rev. 1 – 03/10/2003 Moved Consultant Checklist from Attachments to References
Added Consultation Case File Reminders Checklist as Attachment
- Rev. 2 – 12/10/2004 SHARP process simplified and clarified.
- Rev. 3 – 01/25/2007 SHARP process revised in accordance with CHAPTER 8 of the CPPM.
- Rev. 4 – 07/11/2007 Make use of "Request for Extension of Original Abatement Date" form mandatory
- Rev. 5 – 09/05/2012 Added the formal procedure in the form of the "Failure to Meet SHARP status and Process of SHARP Status Withdrawal" to Action Steps.
- Rev 6 – 06/01/2014 - updated to reflect OSHA Express language and current personnel structure.
- Rev 7 – 04/15/2019 – clarified quarterly visits and “fixed site” details

EXAMPLE ONSITE SAFETY CHECKLIST

Site Location/Tract: _____ **Date:** _____

General Operation	Yes	No
Overall logging site inspected for danger trees/overhead hazards (*If found, note action taken to remove hazards).	<input type="checkbox"/>	<input type="checkbox"/>
All employees are properly trained in the safest way to perform their job(s).	<input type="checkbox"/>	<input type="checkbox"/>
All employees are in visual or audible contact with another employee.	<input type="checkbox"/>	<input type="checkbox"/>
All employees are wearing hardhats when exposed to overhead hazards.	<input type="checkbox"/>	<input type="checkbox"/>
Proper PPE is used by employees for each specific job task.	<input type="checkbox"/>	<input type="checkbox"/>
All equipment is operating at a safe distance from other equipment/employees.	<input type="checkbox"/>	<input type="checkbox"/>
Adequate handholds and footing surfaces provided on equipment.	<input type="checkbox"/>	<input type="checkbox"/>
Employees maintain 3 points of contact when accessing/exiting equipment.	<input type="checkbox"/>	<input type="checkbox"/>
Proper first-aid kit is available for all employees and located in appropriate areas.	<input type="checkbox"/>	<input type="checkbox"/>
When equipment maintenance is preformed, proper lockout/tagout procedures are being utilized.	<input type="checkbox"/>	<input type="checkbox"/>
Loader/Deck Area	Yes	No
Operator does not swing boom or loads over workers or cabs of trucks.	<input type="checkbox"/>	<input type="checkbox"/>
Employees maintain 3 points of contact when accessing/exiting cabs.	<input type="checkbox"/>	<input type="checkbox"/>
Loader has proper protective cab guarding.	<input type="checkbox"/>	<input type="checkbox"/>
All employees on the ground are at a safe distance away from loading area.	<input type="checkbox"/>	<input type="checkbox"/>
Logs are properly placed on trucks (tightly secured below standards).	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
Skidding Operations	Yes	No
Adequate guarding of cab front, sides and rear and operator has clear view.	<input type="checkbox"/>	<input type="checkbox"/>
Employees maintain 3 points of contact when accessing/exiting cabs.	<input type="checkbox"/>	<input type="checkbox"/>
Safe operating speeds and seat belts are worn.	<input type="checkbox"/>	<input type="checkbox"/>
Passengers prohibited.	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>

Truck Drivers (Haulers)	Yes		No	
Employees maintain 3 points of contact when accessing/exiting truck cabs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If truck drivers exit cab, they are at a safe distance away from loading operation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proper PPE provided necessary for job task (i.e. Hardhat, safety glasses, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proper safety inspections are conducted on vehicles and hauling equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Manual Limbing and Bucking	Yes		No	
Limbing area clearly identified and free of random equipment movement.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Skidder operators have clear view of approach and eye contact with limbers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Limbers/bucker determines direction of limb or log movement before cutting.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Spring poles cut and removed safely.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chainsaw controlled during cuts and while traveling between cuts.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Felling Operations	Yes		No	
Overhead hazards checked before felling.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
All lodged and hung trees pulled down as soon as possible.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chainsaw safety devices present and operational	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Minimum two tree length distance between felling and closest workers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High wind condition avoided when manually felling.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Manual fellers have provided a clear path of retreat.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proper hinge wood is present at two corners or continuous across the stump.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Domino tree felling or using pusher trees prohibited.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
All employees maintain at least 300 feet from high speed disc cutters.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High speed cutter teeth, teeth holders and disc properly maintained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Protective cab structure and guards on mechanical cutters in place.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>