
MIOSHA

Michigan Occupational Safety and Health Administration
Department of Labor and Economic Opportunity (LEO)

AGENCY INSTRUCTION

DOCUMENT IDENTIFIER:
MIOSHA-COM-14-3R2

DATE:
August 10, 2022

SUBJECT: Metal Industries – National Emphasis Program (NEP)

- I. Purpose. This instruction describes agency enforcement policies and provides instruction to ensure compliance with the federal Occupational Safety and Health Administration (OSHA) NEP for primary metal industries.
- II. Scope. This instruction applies to the General Industry Safety and Health Division (GISHD) and the Consultation Education and Training (CET) Division.
- III. References.
 - A. Division Instruction, GISHD-COM-16-3, [Companion and Expanded Inspections](#), as amended.
 - B. Executive Office of the President, Office of Management and Budget, [North American Industry Classification System \(NAICS\) Manual](#), as amended.
 - C. GISHD, [General Industry Inspection Priority System – Programmed Scheduled Inspections \(Private Sector\)](#), November 2019.
 - D. OSHA Directive CPL-03-00-018, NEP – [Primary Metal Industries](#).
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.
- V. Cancellations. All previous versions of this agency instruction.
- VI. Next Review Date. To be reviewed in five (5) years from date of issuance.
- VII. History. History of previous versions includes:
 - MIOSHA-COM-14-3R1, August 1, 2017
 - MIOSHA-COM-14-3, December 22, 2014
 - MIOSHA-MEMO-ADM-11-11R1, March 1, 2012
 - MIOSHA-MEMO-ADM-11-11, December 9, 2011
 - MIOSHA-MEMO-ADM-11-5, November 23, 2011
- VIII. Contact. [Adrian Z. Rocskay](#), Division Director, GISHD and [Sherry Scott](#), Acting Division Director, CET Division.
- IX. Originator: Barton G. Pickelman, Director.
- X. Background. In 2014, federal OSHA re-issued an instruction describing policies and procedures for implementing an NEP to identify and reduce or eliminate worker exposures to harmful chemical and physical health hazards in facilities in the primary metal industries. With this instruction, MIOSHA adopts the federal OSHA NEP on primary metal industries and the associated federal OSHA compliance directive, CPL-03-00-018 NEP - [Primary Metal Industries](#). This MIOSHA instruction and the federal OSHA CPL contain directions for identifying and inspecting workplaces where workers are

likely to be exposed to harmful chemical and physical health hazards in facilities in the primary metal industries.

In lieu of creating a new site targeting system for primary metal industries, MIOSHA will use its current inspection priority system, which already encompasses establishments with primary metal exposures. The current targeting system is described in the document, [General Industry Inspection Priority System – Programmed Scheduled Inspections](#).

- XI. Enforcement Activities. On all inspections (e.g., programmed, complaint, referral), the safety officer (SO)/industrial hygienist (IH) will determine if the establishment has processes that fall under the [NAICS](#) codes that are listed in Appendix B of the OSHA CPL.

In general industry, if the potential exposure is discovered during a complaint or referral investigation, the investigation shall be expanded to address primary metals using the procedures in GISHD-COM-16-3, [Companion and Expanded Inspections](#), as amended. All investigations under this NEP will be conducted by an IH from GISHD. If an SO discovers potential exposure, the SO will contact the appropriate health supervisor to make an Interoffice Assistance (IOA) Request. The IH will inspect the targeted facility in accordance with procedures outlined in Section XIV of the OSHA CPL.

- XII. OSHA Information System (OIS) Coding.

- A. GISHD Programmed Inspection. On the Inspection Tab on the Inspection Type subtab, the inspection must be marked “Programmed Planned” as the Initiating Type. For NEP, select “PMETALS.” The State Emphasis would be coded “Priority List,” “Reinspection,” or “Injury Illness.” That field may have multiple entries. In those cases, “Priority List,” “Reinspection,” “Injury/Illness” etc., would be selected as the Primary Emphasis Program.
- B. Complaint, Referral, and Fatality Inspections. Whenever a complaint, referral or fatality alleges the presence of worker exposures to harmful chemical and physical health hazards in facilities in the primary metal industries, the inspection may be expanded to address the issues covered under this NEP. If so, select “PMETALS” as the NEP on the Inspection Type subtab.
- C. CET Division Onsite Hazard Surveys. When an initial visit involves worker exposures to harmful chemical and physical health hazards in facilities in the primary metal industries, select “PMETALS” as the NEP on the Visit Emphasis tab.

- XIII. Outreach Activities. MIOSHA’s consultation program will use the same strategic approach as the enforcement division for targeting workplaces and activities for reducing health effects associated with occupational overexposure to air contaminants covered by the NEP and other safety and health hazards covered by this NEP.