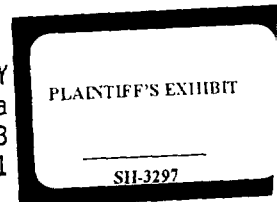


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8115

SHELL OIL COMPANY
One Shell Plaza
P. O. Box 2463
Houston, TX 77001



Date: January 12, 1989

To: See Distribution List

Subject: Mandatory Posting of OSHA Log by February 1 and
Other Compliance Postings and Notifications

The beginning of the year is an appropriate time to review mandatory compliance postings and notifications. Some of the more notable ones are listed below.

- The OSHA Log must be posted each year by February 1 and must remain posted for the full month of February. This is explained in detail in the attached (which also includes some additional information on OSHA Recordkeeping).
- The official OSHA Poster must be permanently posted (CFR 1903.2).
- Access to Medical and Industrial Hygiene Records must be posted or informed annually (CFR 1910.20). A revised final rule was sent to the field December 28, 1988. Notification requirements were clarified, but not changed. A model bulletin board announcement is attached.
- OSHA Noise Standard mandatory posting (CFR 1910.95).

In addition, certain areas must be marked for personal protection or as regulated areas (e.g. asbestos, benzene) when appropriate.

A copy of the October 1988 Compliance Assessment Review check sheets is included to assist your review. More detailed information is included in the Compliance Assurance Review Resource Manuals (two volumes in blue ring binders).

Very truly yours,

K. C. Crawford
K. C. Crawford
Sr. Staff Engineer
Products Health & Safety

KCC:bjd

Attachment

cc: J. L. Rivard

LAM 016556

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DFMC-13286

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ATTACHMENT

Checklist for OSHA Injury and Illness Record Keeping and Posting Requirements

Each Shell Oil Company and Shell Oil subsidiary location designated as an "establishment" for OSHA record keeping purposes must post a summary of work-related injury and illness experience after the end of each year. For the past several years, OSHA inspections have included detailed examination of location injury and illness records and systems, with costly penalties proposed by OSHA for any alleged record keeping violations found. The following may be helpful in assuring that required actions are accomplished in a timely manner:

1. The right-hand portion of each establishment's OSHA "Log and Summary" form (OSHA Form 200, or Shell Oil Form S-10957) showing 1988 totals, must be posted, even if the totals are all zeroes (i.e., no recordable case for 1988). The left-hand portion of the form (Columns A through F, the "log") is not to be posted.
2. The summary must be posted by February 1, 1989, in the place or places where notices to employees are customarily posted. The summary must remain posted throughout February and may be removed on or after March 1, 1989.
3. Employees who do not report to their establishments on a regular basis must be given or mailed a copy of the summary during February.
4. Establishments are not to send copies of summaries to Shell Oil Company, Personnel Reports and Statistics. This requirement, from earlier years, is no longer in effect.
5. OSHA requires that original Log and Summary forms (OSHA 200 or Shell Oil S-10957), as well as the supplementary record for each recordable case (OSHA 101 or an equivalent "First Report of Injury" form, such as Shell Oil Form SR-172, EP-322, SR-5804, or S-11013), must be preserved at the establishment for five years plus the current year. Consequently, during 1989 these forms must be maintained for the years 1984 forward.

Note that each case entered on the OSHA 200 forms (including lined-out cases) must be documented in a supplementary record. The Shell "first report" forms mentioned are acceptable as supplementary records and are therefore subject to the 5-year retention requirements.

Also note that some of the pre-1984 information may be required for workers' compensation or legal (lawsuit) purposes. Functions are advised to retain such records or to assure that the information is retrievable elsewhere before destroying pre-1984 records.

6. OSHA regulations permit employees, former employees, and their representatives to review (and copy) the OSHA 200 log for their establishment. Reasonable requests to view or copy the establishment log should be honored. This right to review and copy does not apply to the supplementary records (Item 5) or the survey form (Item 10).
7. Every injury or illness to a Shell Oil employee which occurs (or is alleged to have occurred) in the work environment should be reported and documented in some written form.
8. OSHA requires each recordable injury and illness be recorded on the "Log and Summary" (OSHA 200) as early as practicable, but no later than six working days after receiving information that a recordable injury or illness has occurred. Supplemental forms (OSHA 101 or Shell Oil first report forms) also must be completed and available for inspection within six working days. All cases which may be recordable should be entered within the six days. If later information indicates the case is non-recordable, the entry should be lined out. There are some exceptions to these requirements where logs are prepared at a centralized location.
9. If, during the 5-year period for which the log (OSHA 200) must be retained, there is a change which affects entries in columns 1, 2, 6, 8, 9 or 13 in the extent or outcome of an injury or illness, then such affected entries are to be updated on the master log form. The entries on the posted copy of the annual log are frozen and are not to be updated.
10. The records of any establishment that moved, merged, or closed during the 5-year retention period must be transferred and maintained at some other location.
11. Any establishment receiving an OSHA 200-S "Annual Occupational Injuries and Illnesses Survey" form for 1988 (several dozen Shell Oil locations probably will), must complete the form and return it as instructed to the requesting state or federal agency. Do not send a copy of the form to Regulations & Safety Services.

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Mont. Regulator - Compliance
Aud. - OSHA Auditing 130320
1989 8/15

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