

**OREGON OCCUPATIONAL SAFETY AND HEALTH DIVISION
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES**

PROGRAM DIRECTIVE

Program Directive A-265
Issued February 21, 2008
Revised January 3, 2019

SUBJECT: National Emphasis Program (NEP): Trenching and Excavation

AFFECTED STANDARDS/

DIRECTIVES: 1926.650 through 1926.653, OSHA instruction CPL-02-00-161

PURPOSE: To establish an updated National Emphasis program for the safety inspection of trenching and excavation operations.

BACKGROUND: Because of the continuing incidence of trench and excavation collapses and accompanying loss of life nationwide, federal OSHA determined that an increased enforcement presence at such worksites is warranted. Oregon OSHA, which has through its efforts, maintained a record of few fatalities for many years in trenching and excavation will join in OSHA's national emphasis program to further safety efforts in this industry.

Trenching and excavation work creates hazards to workers that are extremely dangerous. Compliance with Oregon OSHA's construction standards for such operations is frequently bypassed because of economic pressures, a misconception that compliance is unnecessary, or an expectation that these short-term operations will go undetected.

After more than 40 years of fatal cave-in events and enforcement activities, some employers still do not adhere to shoring and sloping requirements to protect their employees. Oregon OSHA believes that the rate of deaths and serious injuries resulting from trench/excavation accidents (mostly cave-ins) can be significantly reduced by a continued concentration of compliance resources within the area of trenching and excavation operations.

The construction scheduling procedures outlined in the FIRM cannot be used in scheduling inspections of trenching and excavation operations because the timing of such inspections is extremely important. These operations tend to begin and end quickly and should be inspected while they are in operation. Consequently, the following procedures apply when scheduling these inspections.

ACTION:

Compliance Safety and Health Officers (CSHOs) will initiate inspections under this NEP whenever they observe an open trench or an open excavation, regardless of whether or not a violation is readily observed.

If the CSHO observes imminent danger at a trench or excavation site, the CSHO must address the exposure immediately without exposing themselves to a hazard.

An inspection scheduled under this NEP does not necessarily need to be inspected by the person making the original observation. A CSHO referral may be appropriate under the guidelines given in the FIRM.

The scope of inspections conducted under this NEP will normally be limited to the trenching or excavation operation. If the inspection is to be expanded, follow the principles given in the FIRM.

OTIS/ORCA:

- A. All enforcement activities (inspections, complaints, and referrals) conducted under this NEP must be coded with the NEP code, "TRENCH," entered in OTIS. Consultation request forms will also be completed with the NEP code "TRENCH" in ORCA.
- B. All consultation activities (request, visit, and compliance assistance) conducted in response to this NEP will also be coded "TRENCH" into ORCA.
- C. Enforcement and consultation activities related to trenching and excavation hazards under other NEPs and/or LEPs must be coded for all the NEPs and LEPs. For example, consultation activities related trenching and excavation hazards conducted under the Amputations NEP must be coded "AMPUTATE" as well as "TRENCH."

FIRM:

Inspections under this NEP shall normally be limited to evaluating worker exposures to safety and health hazards associated with the excavation, including exposures to unprotected underground utilities, such as electric and gas lines, which if struck, could potentially result in serious injury or death. However, a CSHO may expand the scope of an inspection if other safety and health hazards or violations are observed in plain view and/or brought to their attention. CSHOs shall follow the guidelines in the FIRM when expanding the scope of any inspection. See Chapter 1, heading: Special Emphasis Programs.

At the end of each NEP inspection, the CSHO will provide the employer with information concerning trenching and excavation hazards. For example, the CSHO may give the employer the website address for Oregon OSHA's excavation standards and related outreach materials,

Oregon Utility Notification Center contact information, or provide copies of printed publications from OSHA.

OUTREACH: Consultation Services are available to employers.

Publications are available on the Oregon OSHA website, at field office locations, and from the Resource Center.

Videos are available on the Oregon OSHA website and from the Resource Center.

Education and training materials are available on the Oregon OSHA website.

EFFECTIVE

DATE: This directive is effective immediately and will remain in effect until canceled or superseded.

History: Issued 2-21-2008 Revised 1-3-2019