AKOSH NARRATIVE REPORT

September 2, 2020 Inspection # 1487336

Copper River Seafoods, Inc

CSHO: Jim Pinder CSHO ID: A3578

SAFETY NARRATIVE

Copper River Seafoods, IncInspection #: 14873361400 E 1st Ave., Anchorage, AK 99501Inspection Dates: 8/7/2020907-522-7806Closing Dates: 9/1/2020

Site Address: 1400 E 1st Ave., Anchorage, AK 99501

AKOSH Representatives:

NameTitle/PositionJim PinderCSHODale WilliamsonCSHO

Management Officials:

Name <u>Title/Position</u>

Chris LaCroix Compliance Director

Terry Abarro HR Director
Dan Dumlao Chief Engineer
Leonard Wheeler General Manager

History:

On 7/31/2020 I, Jim Pinder, was assigned by the Chief of Enforcement, Ronald Larsen to conduct an unprogrammed related inspection with CHSO Williamson in response to a referral from the Department of Health and Social Services

The site is Copper River Seafoods, a fish processing facility located in Anchorage, Alaska.

Opening Conference:

On 8/7/2020, We arrived onsite at approximately 9:45 am. The main door to the facility was locked so we approached an individual that was outside of the building and presented our credentials and asked to speak to the person in charge. The individual called the main office and then informed us that somebody would be out to help us in a few minutes. After waiting a few minutes, we were approached by another individual who escorted us inside.

Chris LaCroix greeted us and introduced himself as the Director of Compliance. We presented our credentials to Mr. LaCroix and explained the reason for my visit. Mr. LaCroix informed us that due to the COVID-19 situation, we had to have our temperature checked and fill out a COVID-19 questioner before we could enter the building.

At approximately 10:00 am CHSO Williamson conducted the Opening Conference with Chris LaCroix. CSHO Williamson explained the nature and purpose of the inspection as well as all of the items on the inspection checklist. Chris LaCroix granted permission to proceed with the inspection.

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Walk-around:

At approximately 10:13 am the walk-around inspection started in the plant. Chris LaCroix, Danilo Recinos, and Criselda Ting accompanied us. Chief Engineer Dan Dumlao was present intermittently. Photographs and measurements were taken in the Dry Storage area, Portion Room, Box Area and the Processing Room. When we observed the fish processing line, employees were observed to be working within 6 feet of each other. No physical barriers were in place.

Interviews were conducted with employees via telephone due to COVID-19 concerns. During each interview employee confidentiality and whistleblower rights were explained

Closing Conference:

On 9/1/2020 at approximately 1:00 PM, a Closing Conference was held at AKOSH Office telephonically with myself, CSHO Williamson, Leonard Wheeler, Criselda Ting, Marco Pasion, Robert Dyett, Chris LaCroix, Hershey Lagaya and Terry Abarro. During the closing conference the 11 items on the closing conference worksheet were read aloud with an emphasis on employee Whistleblower protections and the 15 working-day contest period. I explained and encouraged the use of consultation and training available through AKOSH. Copies of the closing conference, employer responsibilities, OSHA consultation fact sheet, request for consultation, workers compensation memo were provided. Whistleblower fact sheet, and safety websites were provided. I also explained that photos would be reviewed at the office and if any further violations were discovered they would be notified and a second closing conference would be held.

Evaluation of Health and Safety Program

	Code:	0 = Nonexistent	1 = Inadequate	2 = Average	3 = Above Average
A.	LOTO Program		X		
В.	LOTO Training		X		
C.	LOTO Periodic inspection	X			
D.	Forklift Program			X	
E.	Forklift training		X		
F.	Safety Program		X		
G.	Preventative or Corrective Action	X			
H.	Enforce Programs	X			

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September 2, 2020 Copper River Seafoods, Inc CSHO: Jim Pinder Inspection # 1487336

CSHO ID: A3578

Conclusions:

Based on the inspection findings and employee interviews the follow alleged violations were noted.

Repeat Serious:

- 1. The control of hazardous energy (lockut/tagout) Periodic inspection
- 2. The control of hazardous energy (lockout/tagout) Training and communication. authorized users

Serious:

- 1. The control of hazardous energy (lockout/tagout). LOTO devices shall be singularly identified;
- 2. The control of hazardous energy (lockout/tagout). Tagout devices shall warn against hazardous conditions
- 3. The control of hazardous energy (lockout/tagout). The employer shall provide training to all other employees
- 4. Powered industrial trucks. Refresher training and evaluation.
- 5. Automatic sprinkler systems. Sprinkler spacing.
- 6. Use of equipment. Visual inspection.

Other-than-serious:

- 1. 600 Volts nominal, or less Space about electrical equipment
- 2. Wiring methods, components, and equipment for general use. Where attached to building surfaces;

Print Date: 09/01/2020

			Insp	ection Number	1487336	
			Opt.	Insp. Number		
Establishment Name	Copper River Sea	foods, INC.				
DBA Name	Copper River Seaf	foods, INC.				
Type Of Violation	Repeat-Serious	Citation Number	1	Item/Group	1/	
Number Exposed	625	No. Instances	1	REC		
Special Enforcement?	Employer's All Relationship to Hazard		All			
Standard	1910.147(c)(6)(i)					
Substance Codes			Photo/Video Number			
Alleged Violation Description	Number 29 CFR 1910.147(c)(6)(i): 147 The control of hazardous energy (lockut/tagout) (c) General (6) Periodic inspection (i) The employer shall conduct a periodic inspection of the energy control procedure at leannually to ensure that the procedure and the requirements of this standard are being followed. EXAMPLE: Employees were exposed to caught in and amputation hazards. The employer failing to conduct inspections/evaluations of the lock-out/tag-out program. Failure to conduct these inspections could hinder the employer from identifying potential lapses in t program and deficiencies in employee training. On 8/26/2020 the employer failed to prov AKOSH with a periodic inspection. Copper River Seafoods was previously cited for a violation of this occupational safety and health standard or its equivalent standard 1910.147(c)(6)(i), which was contained in OSH inspection number 1321714, citation number 2, item number 2aa and was affirmed as a final order on 10/11/2018, with respect to a workplace located at 0.5 Peninsula HWY, Naknek, AK 99633.					
Recommended	Conduct specific o	verviews of lock-ou	t operations thro	ughout the facilit	.y.	

Severity
Severity Justification
Probability
Probability Justification
Number of Times
Repeated

Gravity	Gravity based Penalty
Multiplier	Size
Good Faith	History
Quick Fix	
Calculated Penalty	Proposed Penalty
Proposed Penalty Justification:	

Abatement Details

Days to Abate	15 Wkg Days	Abatement Status	
User-entered Abatement Due Date		Date Abated	
Abatement Documentation Required?	Yes	Date Verified	
Abatement Completed Description:			

MultiStep Abatement

Type/Other Type	Days to abate	User entered	Completed(status)	Verify Date
		Abatement Due		
		Date		

Employee Exposure

Exposure Instance	No. Exposed	Employer	Name and Address Telephone Numbers	Duration	Frequency	Proximity
1	625	Copper River Seafoods		5.00 month	Daily	within 2 feet
1	625	Copper River Seafoods		12.00 hour	Daily	within 1 foot

20. Instance Description: A. Hazard B. Equipment C. Location D. Injury/Illness E. Measurements

a) **Hazards-Operation/Condition-Accident**: No periodic inspection of the energy control procedure was done in the past 12 months

b) **Equipment**: LOTO

c) Location: 1400 E. 1st Ave. Anchorage, AK 99501

d) Injury/Illness (and Justifications for Severity and Probability): Amputations are possible

e) Measurements: None taken

23. **Employer Knowledge:** The employer drafted a basic LOTO Policy that mentioned the annual inspection of the LOTO are required

24. **Comments**: The employer LOTO Policy indicates that the enforcing the companies LOTO Policy. During the employee interview,

25. Other Employer Information:

Print Date : 08/21/2020

Print Date : 08/21/2	2020						
			Insp	ection Number	1321714		
			Opt.	Insp. Number	240-18		
Establishment Name	Copper River S	eafoods					
DBA Name							
Type Of Violation	Serious	Citation Number	2	Item/Group	2 / aa		
Number Exposed	35	No. Instances	1	REC	Referral		
Special Enforcement?			Employer's Relationship to Hazard	All			
Standard	1910.147(c)(6)(i)						
Substance Codes			Photo/Video Number	1A, 1B.			
Alleged Violation Description	29 CFR 1910.147(c)(6)(i) The control of hazardous energy (lockout/tagout)						
	(c) General.						
	(6) Periodic ins	pection					
	(I) The employer shall conduct a periodic inspection of the energy control procedure at annually to ensure that the procedure and the requirements of this standard are being followed.						
	falling to condu- conduct these is program including points in the face	loyees were exposed to the inspections/evaluate inspections has hindering, but not limited to cility and deficiencies in workers were cleaning	ions of the lock-or ed the employer the recognition or in employee train	out/tag-out prog from identifying of cleaning runnl ning. Periodic ins	ram. Fallure to potential lapses in the ng conveyors at nip		
Recommended Abatement Action	Conduct specific	c overviews of lock-ou	t operations thro	ughout the facili	ty.		

Severity	
Severity Justification	
Probability	
Probability Justification	
Number of Times Repeated	
Gravity	Gravity based Penalty
Multiplier	Size
Good Faith	History
Ouick Fix	

Calculated Penalty
Proposed Penalty
Justification:

Abatement Details

Days to Abate
User-entered Abatement 10/04/2018
Due Date

Abatement
Documentation
Required?

Abatement Completed
Description:

Abatement Status

Abatement Completed

Date Abated

09/14/2018

Date Verified

Osciolaria (Completed)

Date Verified

MultiStep Abatement

Type/Other Type	Days to abate	User entered Abatement Due Date	Completed(status)	Verify Date

Employee Exposure

Exposure Instance	No. Exposed	Employer	Name and Address Telephone Numbers	Duration	Frequency	Proximity
		Copper River Seafoods		0.00		
		Copper River Seafoods		0.00		
		Copper River Seafoods		0.00		

Copper River Seafoods



- 20. Instance Description: A. Hazard B. Equip
 - A. Hazard B. Equipment C. Location D. Injury/Illness E. Measurements
- a) **Hazards-Operation/Condition-Accident**: No periodic inspection of the energy control procedure was done, If one had been done the procedure of cleaning the conveyor belt while in operation would have been obvious.
- b) Equipment: 30" outside tower fish conveyor cleaning operations.
- c) Location: Copper River Seafood's in Naknek.
- d) Injury/Illness (and Justifications for Severity and Probability): Amputations are possible and a full amputation of a hand and forearm did occur.
- e) Measurements: Full Amputation on tail pulley of 30" conveyor.
- 23. Employer Knowledge: The employer did draft a basic Lo/To procedure located in the safety and health manual.

24. Comments:

25. Other Employer Information: None.

LOCKOUT / TAGOUT Annual Procedure Inspection Certification Form

Facility ANChORAGE	Date
LOTO Procedure Inspected (identify muchine/equipment/process)	
Authorized Employee(s) Audited	
Ensure the Following Steps are Taken to Lock/Tag Out the Machine/E	equipment (explain any deficiencies)
Shutdown Preparation (employee familia we procedure, equipment, energy sources	1
Inform All Affected Employees	
Turn Off Machine/Equipment	
Locate / Isolate Energy-Control Device(s)	
Apply Lockout and/or Tagout Device(s) Potential stored/residual energy relieved/disconnected/restrained/re	undered enfe
Test/Verify Control(s) Disabled	
Return Control(s) to Off'/ Safe Position	
Begin Service/Maintenance	
Area/Equipment Cleared of Workers Area Cleared of Tools / Materials Machine Guards Re-installed Lockout/Tagout Devices Removed Restore Power Conduct "Trial Run" Notify Affected Employees Lockout/Tagout Completed	
Ensure each Authorized Employee Affixes / Removes Personal Loc	£k(5)
Ensure each Lock and/or Tag Used Properly Identifies the Worker	
Ensure all Locks and/or Tags in Use are Standardized in Either Size	
Corrective Action(s) Taken (if applicable)	***
anua of thermetor	
Name of Inspector	C-2-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-
Note: Review Procedural Responsibilities With ALL Buthorized Employees, Docume	at on Training Form, Attach to This Sheet

Lockout - Tagout (LOTO) Annual Inspection and Training Assessment Checklist

Department:		
Shop:		
Location:		
Equipment:		
	Yes	No
1 A) Has there been a change in job assignments, machines, equipment or processes?		
B) If so, have employees been re-trained when job assignments, machines, equipment or processes have changed?		
2) Are the locks uniquely identified, uniquely keyed, and only used for the purpose of LOTO?		
3) Does the tag used with the lock identify the worker servicing the machine or equipment?		
Have equipment and machine-specific LOTO procedures been documented in writing?		
5) Does the employee know where the written LOTO procedures are located?		
6) Does the employee notify affected employees and all other employees in the area before starting the LOTO procedure?		
7) Can the employee identify all hazardous energy sources and associated hazards for the equipment or machine to be locked out?		
8) Does the employee follow the proper LOTO procedures for de- energizing the equipment or machine?		
9) Does the employee demonstrate the proper steps for the placement, removal and transfer of LOTO devices?		
10) Does the employee use the proper methods to verify the equipment or machine was de-energized?		
11) Before releasing the machine or equipment from LOTO, does the employee do the following:		-
A) Inspect the machine or equipment to ensure it is operationally intact?		
B) Ensure that all employees are safely positioned?		
C) Notify affected employees and all other employees in the area that the LOTO devices have been removed?		
12) If you answered "No" to questions 2-11, has the employee been retrained?		

Print Date: 09/01/2020

			Insp	ection Number	1487336
			Opt.	Insp. Number	
Establishment Name	Copper River Seaf	foods, INC.			
DBA Name	Copper River Seaf	oods, INC.			
Type Of Violation	Repeat-Serious	Citation Number	1	Item/Group	2/
Number Exposed	625	No. Instances	3	REC	
Special Enforcement?			Employer's Relationship to Hazard	All	
Standard	1910.147(c)(7)(i)(A)				
Substance Codes			Photo/Video Number		
	(c) General. (7) Training and control progressive for the semployees. The training and the methods EXAMPLE: Employemployer's failure available and the employer provide 8/11/2020 which	shall provide training ogram are understo afe application, usa raining shall include ed employee shall resources, the type and means necessary to train employees means necessary to LOTO training verwas 4 days after the foods was previously its equivalent star	ig to ensure that od by employees ge, and removal the following: eceive training ir and magnitude ory for energy iso to caught in and in the type and o control the eneification of authore inspection that y cited for a violated 1910.147(and to the enemal control that are ty cited for a violated 1910.147(and types).	the purpose and and that the knoof the energy continued in the recognition of the energy availation and control amputation hazamagnitude of the rigy hazard. On some conducted ation of this occupi(7)(i)(A), which number 13217	owledge and skills introls are acquired by of applicable ilable in the workplace of. ards as a result of the e energy and hazards 8/26/2020 the that was dated on 8/7/2020. Ipational safety and h was contained in 14 and was affirmed
	as a final order of Naknek, AK 9963	n 10/11/2018, with	respect to a wor	kplace located at	t 0.5 Penin

Severity	
Severity Justification	
Probability	

Probability Justification		
Number of Times Repeated		
Gravity	Gravity based Penalty	
Multiplier	Size	
Good Faith	History	
Quick Fix		
Calculated Penalty	Proposed Penalty	
Proposed Penalty Justification:		

Abatement Details

Days to Abate		Abatement Status	Corrected During Inspection		
User-entered Abatement Due Date		Date Abated	08/11/2020		
Abatement Documentation Required?	No	Date Verified 08/26/2020			
Abatement Completed Description:	The employer provided training verification of LOTO training for authorized employees.				

MultiStep Abatement

Type/Other Type	Days to abate	User entered Abatement Due	Completed(status)	Verify Date
		Date		

Employee Exposure

Exposure Instance	No. Exposed	Employer	Name and Address Telephone Numbers	Duration	Frequency	Proximity
1	625	Copper River Seafoods, INC.		5.00 month	Daily	within 2 feet
1	625	Copper River Seafoods, INC.		11.00 year	Daily	within 1 foot

1	625	Copper River Seafoods, INC.	12.00 hour	Daily	within 2 feet
		03			

A. Hazard B. Equipment C. Location D. Injury/Illness E. Measurements

a) Hazards-Operation/Condition-Accident: Applying LOTO device without receiving proper training

b) **Equipment**: LOTO training

20. Instance Description:

c) Location: 1400 E. 1st Ave. Anchorage, AK 99501

d) Injury/Illness (and Justifications for Severity and Probability): Amputation

e) Measurements: Training requirement

23. **Employer Knowledge**: Chief Engineer, stated that he is responsible for implementing LOTO program for the company.

24. Comments: General Manager, is responsible of enforcing the LOTO program

25. Other Employer Information:

Print Date: 08/21/2020

Inspection Number 1321714

Opt. Insp. Number

240-18

Establishment Name

Copper River Seafoods

DBA Name

Type Of Violation

Serious

Citation Number Item/Group 3 / aa

Number Exposed

35

No. Instances

REC Referral

Special **Enforcement?**

Employer's Relationship to Hazard

All

Standard

1910.147(c)(7)(i)(A)

Substance Codes

Photo/Video Number

1 A, 1 B, 1 C, 1D.

Alleged Violation Description

29 CFR 1910.147(c)(7)(i)(A)

The control of hazardous energy (lockout/tagout)

- (c) General.
- (7) Training and communication.
- (1) The employer shall provide training to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees. The training shall include the following:
- (a) Each authorized employee shall receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control.

EXAMPLE: Employees were exposed to caught in and amputation hazards as a result of the employer's failure to train employees in the type and magnitude of the energy and hazards available and the means necessary to control the energy hazard. This was observed during the AKOSH inspection when an employee had his right, hand and forearm amputated as a result of no LOTO utilization during cleaning on an unguarded conveyor. Employer was not able to provide documentation of suitable training. Throughout the facility the employer is failing to ensure that all authorized employees are adequately trained in regards to this standard. Employees are required to maintain equipment including cleaning conveyors throughout the facility.

Recommended Abatement Action

Clarify in policy and training the magnitude of importance and procedures for locking out the fish tower conveyors. Perhaps add a way to lock out the units at the controllers at the top of the fish tower at the control array.

Penalty

Severity **Severity Justification Probability Probability Justification**



Number of Times
Repeated

Gravity
Gravity based Penalty

Multiplier
Size

Good Faith
History

Quick Fix

Calculated Penalty

Proposed Penalty

Justification:

Abatement Details

User-entered Abatement 10/04/2018 Date Abated 09/14/2018

Abatement Yes Date Verified

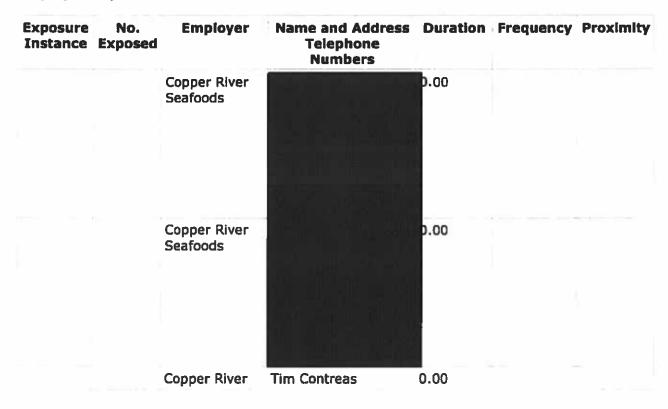
Documentation Required?

Abatement Completed Season Over, follow upDescription:

MultiStep Abatement

Type/Other Type	Days to abate	User entered Abatement Due Date	Completed(status)	Verify Date	
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Employee Exposure





- 20. Instance Description:
- A. Hazard B. Equipment C. Location D. Injury/Illness E. Measurements
- a) **Hazards-Operation/Condition-Accident**: An authorized person who was untrained was conducting cleaning work on an energized conveyor that was not locked or otherwise tagged out or had the energy controlled before cleaning near the tail pulley roller with a green dry sponge. This action resulted in his right full arm amputation.
- b) **Equipment:** 30" conveyor. A 5x6" 1/4" thick green dry sponge to clean up foam at the running tail pulley on the outside fish tower in Naknek.
- c) Location: Copper River Seafood's outside fish tower in Naknek. On the top deck cleaning before processing season started.
- d) Injury/Illness (and Justifications for Severity and Probability): A hand and forearm amputation did happen. The hand and arm were not able to be reattached.
- e) Measurements: Running 30" conveyor. A 5x6" 1/4" thick green dry sponge.
- 23. **Employer Knowledge:** Duties were assigned to clean the tower. Management had addressed some lock out and tag out Issues in a distributed manual.
- 24. Comments:
- 25. Other Employer Information: None.

TRAINING ACKNOWLEDGEMENT RECORD

8-45-20 START TIME	STOP TI	ME DURATION	DAY DOW	INFR(S)		
DESCRIPTION OF TRA (List All Categories According to Tra		LOCKOUT /TAGO	UT			
PROCEDURE &/or RESOL USED FOR TRA	INING:	(Method, Document #, Procedure #, Materials Referenced) CRS Combined Safety and Health Program				
By signing the Training A with the materials/ inform	.cknow nation p	ledgment Log provided to im-	, I acknowledge that I undo e.	erstand and shall comply		
Printed Name	5	Signature	Printed Name	Signature		
Isa's oxtiz	Et ve		16			
mILAP			17			
3	·	- V	18			
			19			
			20			
·			a			
			2			
			n			
			24			
10			25			
11			26			
12			27			
13			28			
14			29			
16			30			

**PLEASE RETURN THIS FORM TO THE COMPLIANCE DEPARTMENT OF HUMAN RESOURCES AFTER EACH TRAINING SESSION

		CREATED BY: Chris LaCross	REVISED BY:	Chris LaCro x	APPROVED BY:	Chris LaCrore	VER #: 04
DOC NAME:	QMR 002 Training Record	DATE: 25/UN2013	DATE:	22MAY2017	DATE:	22MAY2017	Page 1 of 1

. •				Inspe	ction Number	1487336
				Opt.	Insp. Number	
Establishment Name	Copper River S	Seafoods, INC.				
DBA Name	Copper River S	Seafoods, INC.				
Type Of Violation	Serious	Citation Number	2		Item/Group	1/
Number Exposed	625	No. Instances	2		REC	
Special Enforcement?			Employ Relation to Haza	nship	All	
Standard	1910.147(c)(5)(i	i)(D)				
Substance Codes			Photo/ Numbe		5483, 5483	crop, 5486
Alleged Violation Description	147 The control (c) General - (5) Protective (ii) Lockout dedevices(s) use the following in the following	le. Lockout devices and lying the device(s). ployees were exposed are that a lockout or taglentity of the employee 8/7/2020 when a locko	e. es shall b y; shall n tagout d to health gout devic	e singul ot be us evices s and saf- ces shal the dev	arly identified; s ed for other purp hall indicate the ety hazards due l be singularly id- ice(s). The was	identity of the to the employer's entified and shall observed during the
Recommended Abatement Action	Ensure all Loc	kout devices and tagou	ıt devices	have th	e identity of the	employee applying

Severity		
Severity Justification		
Probability		
Probability Justification		
Number of Times Repeated		
Gravity	ravity based Penalty	
Multiplier	Size	

Good Faith	History	
Quick Fix		
Calculated Penalty	Proposed Penalty	kš Eug
Proposed Penalty Justification:		

Abatement Details

Days to Abate	15 Wkg Days	Abatement Status	
User-entered Abatement Due Date		Date Abated	
Abatement Documentation Required?	Yes	Date Verified	
Abatement Completed Description:			

MultiStep Abatement

Type/Other Type	Days to abate	User entered	Completed(status)	Verify Date
		Abatement Due		
		Date		

Employee Exposure

Exposure Instance		Employer	Name and Address Telephone	Duration	Frequency	Proximity
2	625	Copper River Seafoods, IN		12.00 hour	Daily	within 1 feet
						in the state of th

20. Instance Description: A. Hazard B. Equipment C. Location D. Injury/Illness E. Measurements

a) **Hazards-Operation/Condition-Accident**: Locking out an isolating device with a lock that is missing identity of the employee applying the device

b) Equipment: Lockout device

c) Location: 1400 E. 1st Ave. Anchorage, AK 99501

d) Injury/Illness (and Justifications for Severity and Probability): Amputation

e) Measurements: None taken

23. **Employer Knowledge:** Chief Engineer, stated that he is in charge of the company LOTO Policy. During the inspection, was present when a locking device was discovered and the identity of the

employee applying the device was missing. place.	admitted that the lock was his and that he put the lock in
24. Comments : Chief Engineer, it.	stated that he knew that the lock should had to have his identity on

25. Other Employer Information: