



STATE OF WASHINGTON
DEPARTMENT OF LABOR AND INDUSTRIES
Division of Occupational Safety and Health
PO Box 44600 • Olympia, Washington 98504-4600

February 16, 2016

ALASKA AIRLINES INC
Po Box 68977
Attention Howard Thiersch
SEAZL
Seattle, WA 98168-0977

OSHA #: 1094837
Inspection: 317938065
UBI: 578007415
Region: 2-Health
Inspector ID: A8841
Reference: 209475833

Dear Employer:

Enclosed are the results of the safety and health inspection of your workplace. This packet contains:

- **Citation Invoice** – The total assessed penalty is \$7,000.00
- **Citation and Notice of Assessment** – Washington Administrative Code (WAC) Violations.
- **Employer Certification of Abatement instruction and form** - Correct all violations and return written verification or additional penalties may result.
- **Employer Appeal Rights** – You have 15 working days to appeal this citation.

You must immediately post this Citation and Notice of Assessment at or near where the violation(s) occurred, where employees can easily find and read it, or where employees normally receive posted information. All postings must remain until you have corrected all violations, or for three working days, whichever is longer. "Working day" means a calendar day, except Saturdays, Sundays and all legal state holidays.

Because this inspection is public information, the result will be posted online 30 days after the above date by the Department of Labor & Industries. You may view it at <https://secure.lni.wa.gov/verify/>.

If you have questions, call the compliance supervisor, Christopher Jacomme, at (206) 515-2873.

Respectfully,

Anne F. Soiza

Anne F. Soiza
L&I Assistant Director
Division of Occupational Safety & Health

Enclosure(s)



Washington State Department of
Labor & Industries
Division of Occupational Safety and Health

Invoice

Inspection: 317938065

UBI: 578007415
Legal Name: ALASKA AIRLINES INC
DBA Name: ALASKA AIRLINES INC
Inspection: 17801 International Blvd,
Site: SeaTac Airport, Seattle, WA, 98158

Issued: February 16, 2016
Opening Conference: August 25, 2015
Closing Conference: February 10, 2016
Inspector ID: A8841

Summary of Assessed Penalties Due

The Citation and Notice of Assessment includes a full description of each violation.

Violation Item	Violation Type	WAC	Correction Due Date	Penalty Amount
1-1a	Serious	WAC 296-800-11010	4/4/2016	\$7,000.00
1-1b	Serious	WAC 296-800-11005	4/4/2016	\$0.00
<u>Total Penalty Due</u>				\$7,000.00

PAYMENT INFORMATION

Payment is due 15 working days from receipt of this citation.

Make check payable to the Department of Labor and Industries.

Write Inspection number 317938065 on the check and mail to:

**Attn: DOSH Cashier
Department of Labor and Industries
PO Box 44835
Olympia, WA 98504-4835
Or deliver to: Any L&I office**

Post This Document
Citation and Notice of Assessment
Inspection: 317938065

UBI: 578007415

Issued: February 16, 2016

Legal Name: ALASKA AIRLINES INC

Opening Conference: August 25, 2015

DBA Name: ALASKA AIRLINES INC

Closing Conference: February 10, 2016

Inspection 17801 International Blvd, SeaTac Airport Seattle,

Inspector ID: A8841

Site: WA 98158

Violation 1 Item 1a

Violation Type: Serious

WAC 296-800-11010

As a controlling, creating employer, Alaska Airlines (AS) did not provide safety devices, safeguards, work practices, processes and the means to make the workplace safe from hazards that were causing, or likely to cause, serious physical harm to Menzies ramp agent employees who handle cargo and passenger baggage for Alaska Airlines at SeaTac Airport, Seattle, Washington.

Menzies ramp employees are exposed to a high frequency of manual handling tasks during short durations of time. Menzies employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, throwing, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof, which have caused, or are likely to cause musculoskeletal disorders (MSDs).

The following work activities are a brief summary of the hazards identified in the Department's Ergonomic Evaluation of the work site (Please review the complete report for more detail):

Transferring baggage from the baggage piers conveyors to the baggage carts;
Transferring baggage and cargo from the baggage carts to the belt loader;
Loading and unloading the aircraft cargo hold with the belt loader;
Transferring baggage and cargo from the belt loader to the baggage carts;
Unloading baggage carts at the bagwell carousel;
Pulling loaded baggage carts;
Pushing loaded baggage carts;
Pushing empty baggage carts.

Abatement measures include, but are not limited to:

-- Obtain a complete ergonomic assessment, by a certified professional ergonomist, industrial engineer, or other qualified professional, of all the manual material handling tasks. The ergonomist, or other qualified professional, shall make recommendations for reducing or eliminating ergonomic risk factors, of the ramp employees handling baggage in terminals and during aircraft loading and unloading. Implement feasible recommendations identified by the ergonomist.

-- During all construction, renovation, modification and upgrades to airline tenant baggage handling space at the airport, identify and correct current design deficiencies that increase the risk of musculoskeletal injuries. Such hazards are identified in ATA SG 901 Safety Guidelines SG 901: New Baggage Handling Systems for Passenger Terminals, revision 2014.1- or subsequent versions).

A) Engineering controls: Engineering controls may include additional material handling equipment, workplace

redesign, work station redesign, equipment or tool redesign, and changes in work methods, practices, procedures and techniques. The goal is to make the job task fit the worker.

Examples of control measures applicable to the observed job specific tasks may include but are not limited to the following: Devices such as extendable belt loader conveyors (PowerStow, Rampsnake, Bendi-belt , Belly Rollers. Sliding Carpets, RRT Longreach, vacuum lifts, other equipment to enable sliding baggage and cargo.

- 1) Redesign the Alaska piers conveyer system including two tiered conveyors so that conveyors are placed at a height and working distance to reduce bending and extended reaches while handling baggage and cargo.
- 2) Remove the horizontal members of the conveyor bollards such as those identified in the Alaska November piers to ensure ramp employees can move close to the conveyors and use both hands when transferring baggage.
- 3) Reduce the concentration of pulling and pushing forces with one hand during aircraft loading and unloading by improving the scanning equipment currently used that frees both hand for handling baggage. Provide a ring scanner or a scanner mounted to the forearm so workers can use both hands to secure and move bags. This is common in other material handling jobs. The forces that can be safely moved with two hands are considerably higher than those that can be moved with one.
- 4) Reduce the awkward postures, lifting weights, reaching, bending, and twisting hazards in all locations.

B) Administrative Controls: Administrative controls, in addition to engineering controls, can be implemented to reduce the duration, frequency, and magnitude of the ramp employees' exposure to ergonomics risk factors. These controls may include, but are not limited to, reduction of repetitive task rate through additional staffing, and the reduction of work quotas and pace. For any administrative control measure, a detailed job and task analysis must be performed to assure that other stressors, body part movements, or musculoskeletal system usage is not present at a magnitude that would be beyond the capability of the worker.

Submit to the inspector, within 45 calendar days, a detailed written initial plan on how abatement methods will be developed and implemented. This plan must include an implementation schedule.

This will be accomplished through the following steps:

- (1) Evaluation of engineering/administrative control options.
- (2) Selection of optimum and feasible control methods and completion of design.
- (3) Procurement, implementation and installation of control measures.
- (4) Testing, modification, and acceptance of controls.
- (5) Provide quarterly written updates to the inspector detailing abatement progress.

ABATEMENT DOCUMENTATION AND CERTIFICATION IS REQUIRED

The following additional correction documentation is required for this violation: See above.

Correct by: 4/4/2016
Assessed penalty: \$7,000.00

Violation 1 Item 1b

Violation Type: Serious

WAC 296-800-11005

As a controlling creating employer, Alaska Airlines (AS) did not provide a workplace free from recognized hazards that are causing, or likely to cause serious injury to Menzies ramp agent employees who handle cargo and passenger baggage at SeaTac Airport, Seattle, Washington.

Menzies ramp employees are exposed to a high frequency of manual handling tasks during short durations of time. Employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, throwing, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof, which have caused, or are likely to cause musculoskeletal disorders (MSDs). Menzies employees have approximately a 4 times higher injury rate than other employers in their risk class.

The following work activities are a brief summary of the hazards identified in the Department's Ergonomic Evaluation of the work site (Please review the complete report for more detail):

Transferring baggage from the baggage piers conveyors to the baggage carts;
Transferring baggage and cargo from the baggage carts to the belt loader;
Loading the aircraft cargo hold from the belt loader;
Transferring baggage and cargo from the belt loader to the baggage carts;
Unloading baggage carts at the bagwell carousel;
Pulling loaded baggage carts;
Pushing loaded baggage carts;
Pushing empty baggage carts.

Abatement measures include, but are not limited to:

-- Obtain a complete ergonomic assessment, by a certified professional ergonomist, industrial engineer, or other qualified professional, of all the manual material handling tasks. The ergonomist, or other qualified professional, shall make recommendations for reducing or eliminating ergonomic risk factors, of the ramp employees handling baggage in terminals and during aircraft loading and unloading.

-- During all construction, renovation, modification and upgrades to airline tenant baggage handling space at the airport, identify and correct current design deficiencies that increase the risk of musculoskeletal injuries. Such hazard are identified in ATA SG 901 Safety Guidelines SG 901: New Baggage Handling Systems for Passenger Terminals, revision 2014.1- or subsequent versions).

A) Engineering controls: Engineering controls may include additional material handling equipment, workplace redesign, work station redesign, equipment or tool redesign, and changes in work methods, practices, procedures and techniques. The goal is to make the job task fit the worker.

Examples of control measures applicable to the observed job specific tasks may include but are not limited to the following: the PowerStow, Rampsnake, Bendi-belt, Belly Rollers, Sliding Carpets, RRT Longreach, vacuum lifts, and other equipment to enable sliding baggage and cargo.

- 1) Redesign the Alaska piers conveyer system including two tiered conveyors so that conveyors are placed at a height and working distance to reduce bending and extended reaches while handling baggage and cargo.
 - 2) Remove the horizontal members of the conveyor bollards such as those identified in the Alaska November piers to ensure ramp employees can move close to the conveyors and use both hands when transferring baggage.
 - 3) Reduce the concentration of pulling and pushing forces with one hand during aircraft loading and unloading by improving the scanning equipment currently used that frees both hand for handling baggage. Provide a ring scanner or a scanner mounted to the forearm so workers can use both hands to secure and move bags. This is common in other material handling jobs. The forces that can be safely moved with two hands are considerably higher than those that can be moved with one.
 - 4) Reduce the awkward postures, lifting weights, reaching, bending, and twisting hazards in all locations.
- B) Administrative Controls: Administrative controls, in addition to engineering controls, can be implemented to reduce the duration, frequency, and magnitude of the ramp employees' exposure to ergonomics risk factors. These controls may include, but are not limited to, reduction of repetitive task rate through additional staffing, and the reduction of work quotas and pace. For any administrative control measure, a detailed job and task analysis must be performed to assure that other stressors, body part movements, or musculoskeletal system usage is not present at a magnitude that would be beyond the capability of the worker.

Submit to the inspector, within 30 calendar days, a detailed written initial plan on how abatement methods will be developed and implemented. This plan must include an implementation schedule.

This will be accomplished through the following steps:

- (1) Evaluation of engineering/administrative control options.
- (2) Selection of optimum and feasible control methods and completion of design.
- (3) Procurement, implementation and installation of control measures.
- (4) Testing, modification, and acceptance of controls.
- (5) Provide quarterly written updates to the inspector detailing abatement progress.

ABATEMENT DOCUMENTATION AND CERTIFICATION IS REQUIRED

The following additional correction documentation is required for this violation: See above.

The violations above have been grouped because they involve similar or related hazards that may increase the potential for illness or injury resulting from an exposure or accident. A single penalty is applied to the first item in the group.

Correct by: 4/4/2016
Assessed penalty: Included in Violation 1 Item 1A

Employer Certification of Abatement Instructions Inspection: 317938065

What you must do now:

- Check the correction due date(s) shown on the enclosed Employer Certification of Abatement Form. You must fully correct the hazards by these dates.
- Describe on the form how you corrected each hazard, rather than what you *intend to do* in the future. Examples:

Right: *All staff have received the required training.*

Wrong: *All staff will receive the required training next week.*

Use attachments if you need more space. Submit additional documentation of hazard correction if requested in the citation packet.

- Fill in the date you corrected the hazard and sign.
- Post a copy of the completed form for at least three working days, or until you have corrected all violations, whichever is longer. It must be posted near the hazard location or in a place that is readily accessible by affected employees and their representatives.
- Send your completed form to the address provided.

Note: If we do not receive written confirmation you have corrected the hazards, we will take follow-up action, which may include additional penalties. If you provide us with false information, you may face criminal penalties.

If you are unable to fix the hazard(s) by the correction due date(s):

We must receive your written request for an extension **before** the correction due date(s) listed for the hazard(s). Correction due dates are shown on the enclosed Citation and Notice of Assessment and on your Employer Certification of Abatement Form(s).

Extensions are not automatically granted. To be considered for an extension, you must provide the following:

- Inspection number, employer name, telephone number, and site address.
- Violation and Item number for each requested extension.
- Correction due date on the citation and additional time needed.
- Steps taken to fix the hazard by the correction due date.
- Why you cannot correct the hazard by the correction due date.
- How you will protect your employees until you fix the hazard.

For more information, contact:
Or call: (206) 515-2873

Christopher Jacomme, Compliance Supervisor
Department of Labor and Industries
315 5th Avenue South
Suite 200
Seattle, WA 98104-2607

You must post all documentation associated with your request for extension with your citation packet. All postings must remain until you have corrected all violations, or unless you have appealed and received and posted your hearing notice.



Employer Certification of Abatement Form Inspection: 317938065

UBI: 578007415

Issued: February 16, 2016

Legal Name: ALASKA AIRLINES INC

DBA Name: ALASKA AIRLINES INC

Site Address: 17801 International Blvd, SeaTac Airport, Seattle, WA, 98158

You must complete this form and return it to: Janine Rees, Department of Labor & Industries
315 5th Ave South, Ste 200, Seattle, WA 98104
Or Fax to: (206) 515-2830

Violation(s) are fully described in the Citation and Notice of Assessment section.

Violation, Item & Group#	Type of Violation	WAC# Violated	Correction Due Date
1-1a	Serious	WAC 296-800-11010	4/4/2016

How you corrected the hazard →

Date you corrected the hazard →

1-1b	Serious	WAC 296-800-11005	4/4/2016
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How you corrected the hazard →

Date you corrected the hazard →

I certify that the hazards described in this Employer Certification of Abatement Form have been corrected as described above. Affected employees and their representatives have been informed of the correction activities. I am aware that knowingly providing false information may result in criminal penalties (RCW 49.17.190(2)).

Signature

Name

Title

Date

Phone No.

DOSH USE ONLY

DOSH Reviewer's Signature

Date

For Employers

If you are cited for a violation of Occupational Safety and/or Health rules, you have the right to appeal the citation. **You have 15 working days from the date you receive this citation to appeal.** (RCW 49.17.140(1)) "Working day" means a calendar day, except Saturdays, Sundays and all legal state holidays. Your appeal must be in writing. It may be mailed, faxed, or personally delivered.

For violations classified as serious, willful, repeat serious, or failure to abate serious, an employer must correct the violations by the date listed on the Citation and Notice / Employer's Certification of Abatement form unless a stay of abatement date is requested in the appeal as described on this page. A stay of abatement date means the employer's requirement to abate or correct the hazard is put on hold until the appeal is resolved. All general and repeat general violations under appeal automatically have stay of abatement dates until a final order on those violations has been issued. If you only need an extension of an abatement date, please see the above section entitled, **"If you are unable to fix the hazard(s) by the correction due date(s)"**.

Your appeal must include:

- Name, address, telephone number, and fax number if available of the employer who is appealing, and for the employer's representative, if any, such as an attorney or interpreter.
- Inspection Number (You will find this nine-digit number in the top right corner of this page.)
- Statement explaining:
 1. What you think is wrong with the citation and any related facts.
 2. How you think the citation should be changed.
 3. What relief you are seeking and why.

If you are requesting a stay of abatement date for serious, willful, repeat serious or failure to abate serious, you must also include:

- Each violation and item number for which a stay of abatement date is requested; and
- The reason for the stay of abatement date request.

Note: Employees and/or employee representatives may elect to participate in appeal hearings.

Posting requirement:

You must post your appeal documents (along with this citation packet) until the appeal is resolved.
You must also post all other documents related to this appeal.

For Employees or Their Representatives

If your employer is cited, you may only appeal the correction due date(s).

Your appeal must include:

- Your name, address, telephone number, and fax number if available and the same information for anyone who is representing you, if any.
- Inspection number.
- Statement explaining why the correction due date should be changed.

Send all appeals to:

Assistant Director for DOSH
Attn: Appeals Program
PO Box 44604
Olympia, WA 98504-4604
Fax to: **(360) 902-5581** or deliver to: **Any L&I office**

For more information call the Appeals Program: **(360) 902-5486**.

ALASKA AIRLINES INC
Po Box 68977
Attention Howard Thiersch
SEAZL
Seattle, WA 98168-0977

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