

**OCCUPATIONAL SAFETY AND HEALTH REVIEW COMMISSION  
FREEDOM OF INFORMATION ACT (FOIA) REPORT  
FISCAL YEAR 2012**

**I. Basic Information Regarding Report**

**1. Name, title, address and telephone number of person to be contacted with questions about this report:**

Jennifer D. Marr, Attorney-Advisor  
Occupational Safety and Health Review Commission  
Office of the General Counsel  
1120 - 20th St., NW, 9th Floor  
Washington, DC 20036-3457  
(202) 606-5410

**2. Electronic address for this report on the World Wide Web:**

[http://www.oshrc.gov/foia/foia\\_annual\\_reports.html](http://www.oshrc.gov/foia/foia_annual_reports.html)

This report can be found in the "FOIA" section of the agency's Web site.

**3. Address for requesting paper copies of this report:**

Jennifer D. Marr, Attorney-Advisor  
Occupational Safety and Health Review Commission  
Office of the General Counsel  
1120 - 20th St., NW, 9th Floor  
Washington, DC 20036-3457

**II. Making a FOIA Request**

For basic information on how to make a FOIA request, please visit our Web site at [www.oshrc.gov](http://www.oshrc.gov), click on the "FOIA" section, and then click on the "The Freedom of Information Act Reference Guide" or type <http://www.oshrc.gov/foia/foiaguide.html> in your browser.

**1. Names, addresses, and telephone numbers of all individual agency components that receive FOIA requests:**

Occupational Safety and Health Review Commission  
FOIA Requester Service Center\*  
1120 - 20th St., NW, 9th Floor  
Washington, DC 20036-3457  
(202) 606-5410

\*OSHRC centrally processes all FOIA requests.

**2. Brief description of why some requests are not granted and an overview of certain general categories of the agency's records to which the FOIA exemptions apply:**

Some requests are not granted because no record responsive to the request is located. Requests are also not granted because the request is for records not held by this agency and has to be referred to the proper agency. Some requests are not granted because the records requested are protected by one of the nine exemptions specified in the FOIA. Certain general categories of this agency's records to which the FOIA exemptions may apply

include: OSHRC case files, OSHRC adjudicatory deliberations files, and OSHRC personnel files.

### **III. Acronyms, Definitions, and Exemptions**

#### **1. Agency-specific acronyms or other terms:**

OSHRC, for Occupational Safety and Health Review Commission.

#### **2. Terms used in this Report:**

- a. **Administrative Appeal** – a request to a federal agency asking that it review at a higher administrative level a FOIA determination made by the agency at the initial request level.
- b. **Average Number** – the number obtained by dividing the sum of a group of numbers by the quantity of numbers in the group. For example, of 3, 7, and 14, the average number is 8.
- c. **Backlog** – the number of requests or administrative appeals that are pending at an agency at the end of the fiscal year that are beyond the statutory time period for a response.
- d. **Component** – for agencies that process requests on a decentralized basis, a “component” is an entity, also sometimes referred to as an Office, Division, Bureau, Center, or Directorate, within the agency that processes FOIA requests. The FOIA now requires that agencies include in their Annual FOIA Report data for both the agency overall and for each principal component of the agency.
- e. **Consultation** – the procedure whereby the agency responding to a FOIA request first forwards a record to another agency for its review because that other agency has an interest in the document. Once the agency in receipt of the consultation finishes its review of the record, it responds back to the agency that forwarded it. That agency, in turn, will then respond to the FOIA requester.
- f. **Exemption 3 Statute** – a federal statute that exempts information from disclosure and which the agency relies on to withhold information under subsection (b)(3) of the FOIA.
- g. **FOIA Request** – a FOIA request is generally a request to a federal agency for access to records concerning another person (i.e., a “third-party” request), or concerning an organization, or a particular topic of interest. FOIA requests also include requests made by requesters seeking records concerning themselves (i.e., “first-party” requests) when those requesters are not subject to the Privacy Act, such as non-U.S. citizens. Moreover, because all first-party requesters should be afforded the benefit of both the access provisions of the FOIA as well as those of the Privacy Act, FOIA requests also include any first-party requests where an agency determines that it must search beyond its Privacy Act “systems of records” or where a Privacy Act exemption applies, and the agency looks to FOIA to afford the greatest possible access. All requests which require the agency to utilize the FOIA in responding to the requester are included in this Report. Additionally, a FOIA request includes records referred to the agency for processing and direct response to the requester. It does not, however, include records for which the agency has received a consultation from another agency. (Consultations are reported separately in Section XII of this Report.)
- h. **Full Grant** – an agency decision to disclose all records in full in response to a FOIA request.

- i. **Full Denial** – an agency decision not to release any records in response to a FOIA request because the records are exempt in their entireties under one or more of the FOIA exemptions, or because of a procedural reason, such as when no records could be located.
- j. **Median Number** – the middle, not average, number. For example, of 3, 7, and 14, the median number is 7.
- k. **Multi-Track Processing** – a system in which simple requests requiring relatively minimal review are placed in one processing track and more voluminous and complex requests are placed in one or more other tracks. Requests granted expedited processing are placed in yet another track. Requests in each track are processed on a first in/first out basis.
  - i. **Expedited Processing** – an agency will process a FOIA request on an expedited basis when a requester satisfies the requirements for expedited processing as set forth in the statute and in agency regulations.
  - ii. **Simple Request** – a FOIA request that an agency using multi-track processing places in its fastest (non-expedited) track based on the low volume and/or simplicity of the records requested.
  - iii. **Complex Request** – a FOIA request that an agency using multi-track processing places in a slower track based on the high volume and/or complexity of the records requested.
- l. **Partial Grant/Partial Denial** – in response to a FOIA request, an agency decision to disclose portions of the records and to withhold other portions that are exempt under the FOIA, or to otherwise deny a portion of the request for a procedural reason.
- m. **Pending Request or Pending Administrative Appeal** – a request or administrative appeal for which an agency has not taken final action in all respects.
- n. **Perfect Request** – a request for records which reasonably describes such records and is made in accordance with published rules stating the time, place, fees (if any) and procedures to be followed.
- o. **Processed Request or Processed Administrative Appeal** – a request or administrative appeal for which an agency has taken final action in all respects.
- p. **Range in Number of Days** – the lowest and highest number of days to process requests or administrative appeals.
- q. **Time Limits** – the time period in the statute for an agency to respond to a FOIA request (ordinarily twenty working days from receipt of a perfected FOIA request).

### 3. Descriptions of the Nine FOIA Exemptions:

- a. **Exemption 1:** classified national defense and foreign relations information
- b. **Exemption 2:** information that is related solely to the internal personnel rules and practices of an agency
- c. **Exemption 3:** information that is prohibited from disclosure by another federal law
- d. **Exemption 4:** trade secrets and other confidential business information
- e. **Exemption 5:** inter-agency or intra-agency communications that are protected by legal privileges
- f. **Exemption 6:** information involving matters of personal privacy
- g. **Exemption 7:** records or information compiled for law enforcement purposes, to the extent that the production of those records (A) could reasonably be expected to

interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions, or (F) could reasonably be expected to endanger the life or physical safety of any individual

h. **Exemption 8:** information relating to the supervision of financial institutions

i. **Exemption 9:** geological information on wells

**IV. EXEMPTION 3 STATUTES**

A. Exemption 3 Statutes Relied upon to Withhold Information

| <b>Statute</b> | <b>Type of Information Withheld</b> | <b>Case Citation</b> | <b>Total Number of Times Relied upon by OSHRC</b> |
|----------------|-------------------------------------|----------------------|---|
| 0              | 0                                   | 0                    | 0   |

**V. FOIA REQUESTS**

A. Received, Processed and Pending FOIA Requests

|                      | <b>Number of Requests Pending as of Start of Fiscal Year</b> | <b>Number of Requests Received in Fiscal Year</b> | <b>Number of Requests Processed in Fiscal Year</b> | <b>Number of Requests Pending as of End of Fiscal Year</b> |
|----------------------|--|---|--|--|
| <b>OSHRC OVERALL</b> | 1  | 84  | 85   | 0  |

B. (1) Disposition of FOIA Requests – All Processed Requests

|               | Number of Full Grants | Number of Partial Grants/ Partial Denials | Number of Full Denials Based on Exemptions | Number of Full Denials Based on Reasons Other than Exemptions |   |                   |                    |                                  |  |                   |                   |                               | TOTAL |
|---------------|-----------------------|---|--|---|---|-------------------|--------------------|----------------------------------|--|-------------------|-------------------|-------------------------------|-------|
|               |                       |   |  | No Records  | All Records Referred to Another Component or Agency | Request Withdrawn | Fee-Related Reason | Records not Reasonably Described | Improper FOIA Request for Other Reason | Not Agency Record | Duplicate Request | Other *Explain in chart below |       |
| OSHRC OVERALL | 33                    | 22  | 2  | 9   | 0   | 19                | 0                  | 0                                | 0                                      | 0                 | 0                 | 0                             | 85    |

B. (2) Disposition of FOIA Requests – “Other” Reasons for “Full Denials Based on Reasons Other than Exemptions” from Section V, B (1) Chart

| <b>Component</b>     | <b>Description of “Other” Reasons for Denials from Chart B (1) &amp; Number of Times Those Reasons Were Relied upon</b> | <b>TOTAL</b> |
|----------------------|---|--------------|
| <b>OSHRC OVERALL</b> | 0   | 0            |

B. (3) Disposition of FOIA Requests – Number of Times Exemptions Applied

|                      | <b>Ex. 1</b> | <b>Ex. 2</b> | <b>Ex. 3</b> | <b>Ex. 4</b> | <b>Ex. 5</b> | <b>Ex. 6</b> | <b>Ex. 7(A)</b> | <b>Ex. 7(B)</b> | <b>Ex. 7(C)</b> | <b>Ex. 7(D)</b> | <b>Ex. 7(E)</b> | <b>Ex. 7(F)</b> | <b>Ex. 8</b> | <b>Ex. 9</b> |
|----------------------|--------------|--------------|--------------|--------------|--------------|--------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|--------------|--------------|
| <b>OSHRC OVERALL</b> | 0            | 0            | 0            | 8            | 2            | 19           | 2               | 0               | 2               | 0               | 0               | 0               | 0            | 0            |

**VI. ADMINISTRATIVE APPEALS OF INITIAL DETERMINATIONS OF FOIA REQUESTS**

A. Received, Processed and Pending Administrative Appeals

| <b>Number of Appeals Pending as of Start of Fiscal Year</b> | <b>Number of Appeals Received in Fiscal Year</b> | <b>Number of Appeals Processed in Fiscal Year</b> | <b>Number of Appeals Pending as of End of Fiscal Year</b> |
|---|--|---|---|
| 0   | 0  | 0   | 0   |

B. Disposition of Administrative Appeals – All Processed Appeals

| <b>Number Affirmed on Appeal</b> | <b>Number Partially Affirmed &amp; Partially Reversed/Remanded on Appeal</b> | <b>Number Completely Reversed/Remanded on Appeal</b> | <b>Number of Appeals Closed for Other Reasons</b> | <b>TOTAL</b> |
|----------------------------------|--|--|---|--------------|
| 0                                | 0  | 0  | 0   | 0            |

C. (1) Reasons for Denial on Appeal – Number of Times Exemptions Applied

| <b>Ex. 1</b> | <b>Ex. 2</b> | <b>Ex. 3</b> | <b>Ex. 4</b> | <b>Ex. 5</b> | <b>Ex. 6</b> | <b>Ex. 7(A)</b> | <b>Ex. 7(B)</b> | <b>Ex. 7(C)</b> | <b>Ex. 7(D)</b> | <b>Ex. 7(E)</b> | <b>Ex. 7(F)</b> | <b>Ex. 8</b> | <b>Ex. 9</b> |
|--------------|--------------|--------------|--------------|--------------|--------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|--------------|--------------|
| 0            | 0            | 0            | 0            | 0            | 0            | 0               | 0               | 0               | 0               | 0               | 0               | 0            | 0            |



C. (2) Reasons for Denial on Appeal – Reasons Other than Exemptions

| <b>No Records</b> | <b>Records Referred at Initial Request Level</b> | <b>Request Withdrawn</b> | <b>Fee-Related Reason</b> | <b>Records not Reasonably Described</b> | <b>Improper Request for Other Reasons</b> | <b>Not Agency Record</b> | <b>Duplicate Request or Appeal</b> | <b>Request in Litigation</b> | <b>Appeal Based Solely on Denial of Request for Expedited Processing</b> | <b>Other<br/>*Explain in chart below</b> |
|-------------------|--|--------------------------|---------------------------|---|---|--------------------------|------------------------------------|------------------------------|--|--|
| 0                 | 0  | 0                        | 0                         | 0                                       | 0   | 0                        | 0                                  | 0                            | 0  | 0  |

C. (3) Reasons for Denial on Appeal – “Other” Reasons from Section VI, C (2) Chart

| <b>Description of “Other” Reasons for Denial on Appeal from Chart C (2) &amp; Number of Times Those Reasons Were Relied upon</b> | <b>TOTAL</b> |
|--|--------------|
| 0  | 0            |

C. (4) Response Time for Administrative Appeals

| <b>Median Number of Days</b> | <b>Average Number of Days</b> | <b>Lowest Number of Days</b> | <b>Highest Number of Days</b> |
|------------------------------|-------------------------------|------------------------------|-------------------------------|
| 0                            | 0                             | 0                            | 0                             |

C. (5) Ten Oldest Pending Administrative Appeals

|  | 10 <sup>th</sup> Oldest Appeal | 9 <sup>th</sup> | 8 <sup>th</sup> | 7 <sup>th</sup> | 6 <sup>th</sup> | 5 <sup>th</sup> | 4 <sup>th</sup> | 3 <sup>rd</sup> | 2 <sup>nd</sup> | Oldest Appeal |
|--|--------------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|---------------|
| <b>Date of Receipt of Ten Oldest Appeals</b> | N/A                            | N/A             | N/A             | N/A             | N/A             | N/A             | N/A             | N/A             | N/A             | N/A           |
| <b>Number of Days Pending</b>                | 0                              | 0               | 0               | 0               | 0               | 0               | 0               | 0               | 0               | 0             |

**VII. FOIA REQUESTS: RESPONSE TIME FOR PROCESSED AND PENDING REQUESTS**

**A. Processed Requests – Response Time for All Processed Perfected Requests**

|                      | SIMPLE                |                        |                       |                        | COMPLEX               |                        |                       |                        | EXPEDITED PROCESSING  |                        |                       |                        |
|----------------------|-----------------------|------------------------|-----------------------|------------------------|-----------------------|------------------------|-----------------------|------------------------|-----------------------|------------------------|-----------------------|------------------------|
|                      | Median Number of Days | Average Number of Days | Lowest Number of Days | Highest Number of Days | Median Number of Days | Average Number of Days | Lowest Number of Days | Highest Number of Days | Median Number of Days | Average Number of Days | Lowest Number of Days | Highest Number of Days |
| <b>OSHRC OVERALL</b> | 10                    | 11.2                   | 1                     | 20                     | 30                    | 30                     | 30                    | 30                     | 0                     | 0                      | 0                     | 0                      |

**B. Processed Requests – Response Time for Perfected Requests in Which Information Was Granted**

|                      | SIMPLE                |                        |                       |                        | COMPLEX               |                        |                       |                        | EXPEDITED PROCESSING  |                        |                       |                        |
|----------------------|-----------------------|------------------------|-----------------------|------------------------|-----------------------|------------------------|-----------------------|------------------------|-----------------------|------------------------|-----------------------|------------------------|
|                      | Median Number of Days | Average Number of Days | Lowest Number of Days | Highest Number of Days | Median Number of Days | Average Number of Days | Lowest Number of Days | Highest Number of Days | Median Number of Days | Average Number of Days | Lowest Number of Days | Highest Number of Days |
| <b>OSHRC OVERALL</b> | 14                    | 12.4                   | 1                     | 20                     | 30                    | 30                     | 30                    | 30                     | 0                     | 0                      | 0                     | 0                      |

C. Processed Requests – Response Time in Day Increments

**Simple Requests**

|                          | 1-20<br>Days | 21-40<br>Days | 41-60<br>Days | 61-80<br>Days | 81-100<br>Days | 101-120<br>Days | 121-140<br>Days | 141-160<br>Days | 161-180<br>Days | 181-200<br>Days | 201-300<br>Days | 301-400<br>Days | 401+<br>Days | TOTAL |
|--------------------------|--------------|---------------|---------------|---------------|----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|--------------|-------|
| <b>OSHRC<br/>OVERALL</b> | 81           | 0             | 0             | 0             | 0              | 0               | 0               | 0               | 0               | 0               | 0               | 0               | 0            | 81    |

**Complex Requests**

|                          | 1-20<br>Days | 21-40<br>Days | 41-60<br>Days | 61-80<br>Days | 81-100<br>Days | 101-120<br>Days | 121-140<br>Days | 141-160<br>Days | 161-180<br>Days | 181-200<br>Days | 201-300<br>Days | 301-400<br>Days | 401+<br>Days | TOTAL |
|--------------------------|--------------|---------------|---------------|---------------|----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|--------------|-------|
| <b>OSHRC<br/>OVERALL</b> | 0            | 2             | 0             | 0             | 0              | 0               | 0               | 0               | 0               | 0               | 0               | 0               | 0            | 2     |

**Requests Granted Expedited Processing**

|                          | 1-20<br>Days | 21-40<br>Days | 41-60<br>Days | 61-80<br>Days | 81-100<br>Days | 101-120<br>Days | 121-140<br>Days | 141-160<br>Days | 161-180<br>Days | 181-200<br>Days | 201-300<br>Days | 301-400<br>Days | 401+<br>Days | TOTAL |
|--------------------------|--------------|---------------|---------------|---------------|----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|--------------|-------|
| <b>OSHRC<br/>OVERALL</b> | 0            | 0             | 0             | 0             | 0              | 0               | 0               | 0               | 0               | 0               | 0               | 0               | 0            | 0     |



## VIII. REQUESTS FOR EXPEDITED PROCESSING AND REQUESTS FOR FEE WAIVER

### A. Requests for Expedited Processing

|                          | <b>Number<br/>Granted</b> | <b>Number<br/>Denied</b> | <b>Median<br/>Number of<br/>Days to<br/>Adjudicate</b> | <b>Average<br/>Number of<br/>Days to<br/>Adjudicate</b> | <b>Number<br/>Adjudicated<br/>Within Ten<br/>Calendar Days</b> |
|--------------------------|---------------------------|--------------------------|--|---|--|
| <b>OSHRC<br/>OVERALL</b> | 0                         | 0                        | 0  | 0   | 0  |

### B. Requests for Fee Waiver

|                          | <b>Number<br/>Granted</b> | <b>Number<br/>Denied</b> | <b>Median<br/>Number of<br/>Days to<br/>Adjudicate</b> | <b>Average<br/>Number of<br/>Days to<br/>Adjudicate</b> |
|--------------------------|---------------------------|--------------------------|--|---|
| <b>OSHRC<br/>OVERALL</b> | 0                         | 0                        | 0  | 0   |

**IX. FOIA PERSONNEL AND COSTS**

|                          | PERSONNEL                                     |   |   | COSTS               |                                 |                |
|--------------------------|---|---|---|---------------------|---------------------------------|----------------|
|                          | Number of<br>“Full-Time<br>FOIA<br>Employees” | Number of<br>“Equivalent<br>Full-Time<br>FOIA<br>Employees” | Total<br>Number of<br>“Full-Time<br>FOIA Staff” | Processing<br>Costs | Litigation-<br>Related<br>Costs | Total<br>Costs |
| <b>OSHRC<br/>OVERALL</b> | 0   | 2.07  | 2.07  | \$238,780.22        | 0                               | \$238,780.22   |

**X. FEES COLLECTED FOR PROCESSING REQUESTS**

|                          | Total Amount of Fees<br>Collected | Percentage of Total Costs |
|--------------------------|-----------------------------------|---------------------------|
| <b>OSHRC<br/>OVERALL</b> | \$2,623.41                        | 1.1%                      |

**XI. FOIA REGULATIONS**

- The agency’s regulations implementing the FOIA, which include its fee schedule, can be found at 29 C.F.R. Part 2201 and at the agency’s Web site:  
[http://www.oshrc.gov/foia/regs\\_implementing\\_foia.html](http://www.oshrc.gov/foia/regs_implementing_foia.html)

**XII. BACKLOGS, CONSULTATIONS, AND COMPARISONS**

A. Backlogs of FOIA Requests and Administrative Appeals

|                      | <b>Number of Backlogged Requests as of End of Fiscal Year</b> | <b>Number of Backlogged Appeals as of End of Fiscal Year</b> |
|----------------------|---|--|
| <b>OSHRC OVERALL</b> | 0   | 0  |

B. Consultations on FOIA Requests – Received, Processed, and Pending Consultations

|                      | <b>Number of Consultations Received from Other Agencies that Were <u>Pending</u> at OSHRC as of <u>Start</u> of the Fiscal Year</b> | <b>Number of Consultations <u>Received</u> from Other Agencies During the Fiscal Year</b> | <b>Number of Consultations Received from Other Agencies that Were <u>Processed</u> by OSHRC During the Fiscal Year</b> | <b>Number of Consultations Received from Other Agencies that Were <u>Pending</u> at OSHRC as of <u>End</u> of the Fiscal Year</b> |
|----------------------|---|---|--|---|
| <b>OSHRC OVERALL</b> | 0   | 0   | 0  | 0   |



C. Consultations on FOIA Requests – Ten Oldest Consultations Received from Other Agencies and Pending at OSHRC

| OSHRC Overall | 10 <sup>th</sup> Oldest Consultation and Number of Days Pending | 9 <sup>th</sup> | 8 <sup>th</sup> | 7 <sup>th</sup> | 6 <sup>th</sup> | 5 <sup>th</sup> | 4 <sup>th</sup> | 3 <sup>rd</sup> | 2 <sup>nd</sup> | Oldest Consultation and Number of Days Pending |
|---------------|---|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|--|
|               |   | 0               | 0               | 0               | 0               | 0               | 0               | 0               | 0               | 0  |

D. Comparison of Numbers of Requests from Previous and Current Annual Report – Requests Received, Processed, and Backlogged

|                      | NUMBER OF REQUESTS <u>RECEIVED</u>                                |   | NUMBER OF REQUESTS <u>PROCESSED</u>                                |  |
|----------------------|---|---|--|--|
|                      | Number Received During Fiscal Year from Last Year's Annual Report | Number Received During Fiscal Year from Current Annual Report | Number Processed During Fiscal Year from Last Year's Annual Report | Number Processed During Fiscal Year from Current Annual Report |
| <b>OSHRC OVERALL</b> | 76  | 84  | 76   | 85   |

|                      | Number of Backlogged Requests as of End of the Fiscal Year from Previous Annual Report | Number of Backlogged Requests as of End of the Fiscal Year from Current Annual Report |
|----------------------|--|---|
| <b>OSHRC OVERALL</b> | 0  | 0   |

E. Comparison of Numbers of Administrative Appeals from Previous and Current Annual Report – Appeals Received, Processed, and Backlogged

|                      | <b>NUMBER OF APPEALS <u>RECEIVED</u></b>                                 |  | <b>NUMBER OF APPEALS <u>PROCESSED</u></b>                                 |   |
|----------------------|--|--|---|---|
|                      | <b>Number Received During Fiscal Year from Last Year's Annual Report</b> | <b>Number Received During Fiscal Year from Current Annual Report</b> | <b>Number Processed During Fiscal Year from Last Year's Annual Report</b> | <b>Number Processed During Fiscal Year from Current Annual Report</b> |
| <b>OSHRC OVERALL</b> | 0  | 0  | 0   | 0   |

|                      | <b>Number of Backlogged Appeals as of End of the Fiscal Year from Previous Annual Report</b> | <b>Number of Backlogged Appeals as of End of the Fiscal Year from Current Annual Report</b> |
|----------------------|--|---|
| <b>OSHRC OVERALL</b> | 0  | 0   |