



• **Standard Number:** 1904; 1904.30(a); 1904.30(b)(1); 1904.30(b)(2); 1904.35; 1904.40; 1904.46

June 25, 2015

Feliza Guerrero
Excel Building Services
1061 Serpentine Lane
Suite H
Pleasanton, CA 94566

Dear Ms. Guerrero:

Thank you for your recent letter to the Occupational Safety and Health Administration (OSHA) regarding the recordkeeping regulation contained in 29 CFR Part 1904 — Recording and Reporting Occupational Injuries and Illnesses. You asked for clarification on how to maintain the OSHA Form 300, Log of Work-Related Injuries and Illnesses (log), and how to number cases entered on the log(s), at multiple locations across the country.

Scenario: We are a national employer with over 1,800 workers in 26 states, providing janitorial services to large retailers and warehouses. The corporate office is located in Pleasanton, California, and the company does not have any satellite offices. Our workers perform services on the customers' premises at over 150 different work locations.

Question: Do we need to maintain a log at each location where at least one of our employees has sustained a recordable injury or illness? If so, what is OSHA's recommendation for numbering the cases entered on each log?

Response: OSHA's regulation at Section 1904.30(a) provides that employers must keep a separate log for each establishment that is expected to be in operation for one year or longer. Section 1904.46 provides, in part, that "An establishment is a single physical location where business is conducted or where services or industrial operations are performed."

With respect to short-term establishments, i.e., those worksites where employees are expected to be working for less than a year, Section 1904.30(b)(1) provides that employers are required to keep injury and illness records, but are not required to keep separate logs. Instead, employers may keep one log covering all short-term establishments, or may include the short-term establishment records in logs that cover individual company divisions or geographic regions.

Additionally, please know that Section 1904.30(b)(2) allows employers to keep records for separate establishments at the business headquarters or another central location, provided that (1) information can be transmitted from the establishment to headquarters or central location within seven calendar days of the occurrence of the injury or illness, and (2) the employer is able to produce and send the records to each establishment within four hours when Section 1904.35, Employee involvement, or Section 1904.40, Providing records to government representatives, requires such transmission.

Regarding the numbering of cases, you may choose any numbering system as long as the cases listed on any one log each have a unique number. The log for each establishment could simply use sequential numbering starting with the number "1", or you could assign a unique numerical sequence across multiple logs based on the timing of the cases, or you could assign a prefix ID as part of the case number in order to identify the specific establishment (e.g., 086001 for the first case at establishment 086).

We hope you find this information helpful. OSHA requirements are set by statute, standards, and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules. Also, from time to time we update our guidance in responses to new information. To keep apprised of such developments, you can consult OSHA's website at <http://www.osha.gov>.

Sincerely,

Amanda Edens, Director
Directorate of Technical Support and Emergency Management

