

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

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**PROGRAM DIRECTIVE**

Program Directive:     A-49      
Issued     August 10, 1979      
Revised     May 25, 2001    

- SUBJECT:** Citations: Process for Splitting Citations
- PURPOSE:** To facilitate the issuing of citations which involve possible long time delays due to laboratory analysis or other reasons.
- BACKGROUND:** Because of the time necessary to obtain results of field tests taken by the compliance officer during inspections, delays can occur in issuing citations. This, in turn, unnecessarily delays correction of violations not requiring laboratory analysis.
- ACTION:**
- (a) Separate citations will be issued if laboratory analysis or other delays occur.
  - (b) The compliance officer will explain during the closing conference with the employer that two citations may be issued at two different times. The first citation will contain any violations unaffected by sampling or similar circumstances. The second citation will contain any violations related to laboratory results or which were delayed for any other reason.
  - (c) Where an inspection is contingent entirely on sampling or other activity which can delay citation issuance, the citation will not be split. Therefore, hold the inspection package until the remaining information is received and then process it as a single inspection package.
  - (d) First Half - Split Citation Package
    - (A) All Willful, Serious or Other-Than-Serious violations not involving laboratory analysis or other delay will be issued on the first citation.
    - (B) The first citation will inform the employer that a second citation may follow at a later date by the following note written after the last violation:

"This citation contains violations not requiring laboratory analysis. A second citation relating to this inspection may follow when the results of laboratory tests are completed."  
(SAVE No. 641.)

(e) Second Half - No Additional Violations and No Expanded Enforcement

The 91S air sampling forms must be filled out completely for inclusion in the field office and central files, even though no violations exist. Send the air sampling form originals to the central office with a note to Records Management Unit (RMU) to attach them to the first half inspection package. A second copy must also be included so that data entry of the required information into the IMIS system can be completed. No OSHA-1 is necessary, but include the employer identification number and location code on Line 4 after the establishment name on the first 91S form, along with the IMIS or Optional Report Number of the first half inspection.

(f) Second Half - Additional Violations and/or Expanded Enforcement Hazards

- (A) When laboratory results or other information indicate additional violations or hazards, the compliance officer will compile them into a second inspection report.
- (B) The second inspection report will be submitted with a new IMIS number. Write "Split Citation" in red ink along the top margin. The optional report number of the second half will be the same as the first half report number except the first digit following the CO number must be changed to a "9."

**Example:**

First Half optional report number - B2864-035-82

Second Half optional report number - B2864-935-82

(C) Violation Worksheet

- (I) Report No.: Use the second half optional report number.
- (ii) Group No.: Number the group as if this were a stand-alone citation.
- (iii) Item No.: Number consecutively beginning

with "1."

- (iv) The second citation will inform the employer that the inspection is concluded by the following note written by the compliance officer after the last violation: "This citation concludes the inspection begun at your place of employment on (date)." (SAVE 673.)
- (D) Air Sampling Form (OSHA 91S) - Record the 9-digit preprinted inspection report number of the second OSHA-1.
- (E) Weekly Activity Report (Time Summary) - Record the time spent on the second half under the preprinted inspection number of the second OSHA-1.

**EFFECTIVE  
DATE:**

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