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February 29, 2024

William “Dale” Williamson, Chief of Enforcement
Occupational Safety and Health Enforcement
Labor Standards and Safety Division
Department of Labor and Workforce Development
1251 Muldoon Road, Suite 109
Anchorage, AK 99504

Sent via email to: Anchorage.LSS-OSH@Alaska.Gov

Ref: Permanent Variance Request – Offsite Employee Bunkhouse
AKOSH Inspection No. 1679251
Sitka Facility

Dear Chief Williamson:

In accordance with Alaska’s OSH Program Directive No. 85-6 (PD 85-6), Variance Policy and Procedures, and OSHA’s 29 CFR 1905.11 variance standard, North Pacific Seafoods, Inc. (NPSI) is hereby requesting a permanent variance for our offsite company living quarters. We believe that the information provided, and our proposed solution satisfies the concerns identified in the two AKOSH Hazard Alert Letters (HALs) cited in the referenced inspection.

The bunkhouse was constructed in the late 1960s to provide worker housing during the construction of Sika’s John O’Connell Bridge completed in 1971. Since acquiring the property in 2001, the company has maintained the building in good condition. Building and living quarter maintenance is performed annually and as necessary to ensure the wellbeing of our housed employees. The bunkhouse is essential to our operations as housing is very limited and expensive in Sitka.

Applicant Company
North Pacific Seafoods, Inc.
Sitka Sound Seafoods Facility
329 Katlian Street
Sitka, AK 99835

Applicant’s Authorized Representative
Robert Torres, VP Operations
(206) 790-6591

We have posted a summary of this application on our information boards specifying who to contact onsite to examine a copy of this permanent variance application.

<u>Alaska Pacific Seafoods</u>	<u>Pederson Point</u>	<u>Sitka Sound Seafoods</u>	<u>Togiak Fisheries</u>	<u>Red Salmon</u>
627 Shelikof St	PO Box 99	329 Katlian St	PO Box 4062	PO Box 10
Kodiak, AK 99615	Naknek, AK 99633	Sitka, AK 99835	Twin Hills, AK 99576	Naknek, AK 99633
P (907) 486-3234	P (907) 246-4461	P (907) 747-6662	P (907) 493-5331	P (907) 246-6809
F (907) 486-5164	F (907) 246-6657	F (907) 747-6268	F (907) 493-5133	F (907) 246-6810

The two HALs listed in the inspection report pertained to: 1) AAC 61.1040(a) and 29 CFR 1910.142(b)(2) – Size of Room Used for Sleeping Purposes, and 2) 29 CFR 1910.142(b)(7) – Size of Living Quarter Windows. As shown in the attached drawings, and unit area and window size data for the two bunkhouse floors, the available square footage in several of the units is marginally below the required 60 square feet per occupant threshold with most units providing 57 square feet and some well over 60 square feet. The ceiling height in each unit is above seven feet. Each window can be opened, and all are kept in good working condition. Most of the windows are 7% of the total floor area and slightly below the 1/10th (10%) requirement.

For mitigation of the issues identified in the two HALs, we have reduced the number of occupants in some of the units, we will designate certain units for limited occupancy to meet the 60 consecutive day vacancy in a year allowance, and each unit will be supplied with a portable mechanical ventilation device equipped with an air purifier. The device is a free-standing bladeless fan with a California Air Resources Board (CARB) certified air purifier meeting the H13 HEPA grade at all fan speeds. The fans have an air turnover rate of five times per hour for 350 square feet and operate at 32 decibels.

We believe that the addition of this equipment, along with the reduced number of occupants in some units and the relatively slight differences in the floor space areas and the proportional window areas, should address agency concerns about the health and wellbeing of our housed employees.

The signed certification statement identifying that we are not contesting the standards cited in the two HALs subject to this permanent variance request is attached.

Please contact me at (206) 707-6555 or Robert Torres, if you have any questions or need additional information.

Sincerely,

NORTH PACIFIC SEAFOODS, INC.



Margaret deGravelle
Environmental, Health & Safety Manager

Enc: As stated

c: Robert Torres, VP Operations
Bill Grant, Plant Manager

**Bunkhouse Room Area - Second Floor
Sitka Sound Seafoods**

Room No.	Total Area (ft²)	Flooring Replacement Area (ft²)	Number of Occupants	Area per Occupant (ft²)	Windows (ft²)	Proportional Window Area %
210*	417	407	6	68	51	12
211	240	229	4	57	16	7
212	240	229	4	57	16	7
213	236	224	3	75	16	7
214*	289	289	2	145	20	7
215*	520	480	5	96	100	21
216	240	229	4	57	16	7
217	238	227	3	76	16	7
218	240	229	4	57	16	7
219	240	228	4	57	16	7
220	240	228	4	57	16	7
221	240	228	4	57	16	7
222	228	228	4	57	16	7
223	240	229	4	57	16	7
224	240	228	4	57	16	7
225	236	224	3	75	16	7
226*	286	286	2	143	31	11

*Rooms with a kitchen; 100 ft² per person required.

Rooms without a kitchen; 60 ft² per person required.

Floor replacement area was used to more accurately depict the open space of each unit.

Window size to floor space area; 1/10th or 10% of total floor space required.

**Bunkhouse Room Area - Third Floor
Sitka Sound Seafoods**

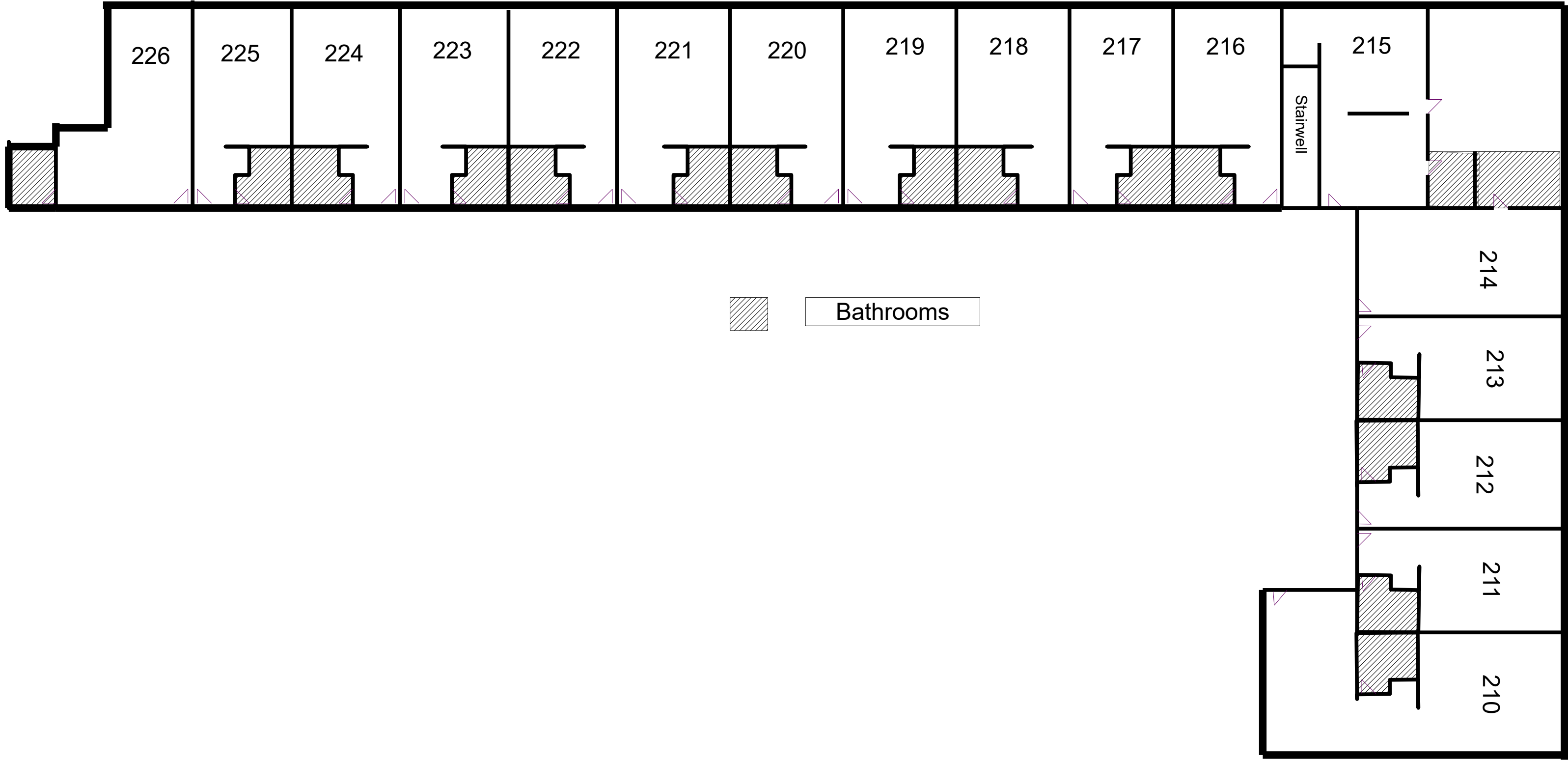
Room No.	Total Area (ft²)	Flooring Replacement Area (ft²)	Number of Occupants	Area per Occupant (ft²)	Windows (ft²)	Proportional Window Area %
310*	417	407	6	68	51	12
311	240	229	4	57	16	7
312	240	229	4	57	16	7
313	236	224	3	75	16	7
314	242	230	2	115	20	9
315*	609	590	5	118	130	22
316	240	229	4	57	16	7
317	240	229	3	76	16	7
318	240	229	4	57	16	7
319	240	228	4	57	16	7
320	240	228	4	57	16	7
321	240	228	4	57	16	7
322	238	226	4	57	16	7
323	240	229	4	57	16	7
324	240	229	4	57	16	7
325	237	224	3	75	16	7
326*	424	407	2	204	46	11
327	245	239	3	80	16	6

*Rooms with a kitchen; 100 ft² per person required.

Rooms without a kitchen; 60 ft² per person required.

Floor replacement area was used to more accurately depict the open space of each unit.

Window size to floor space area; 1/10th or 10% of total floor space required.



226

225

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Stairwell

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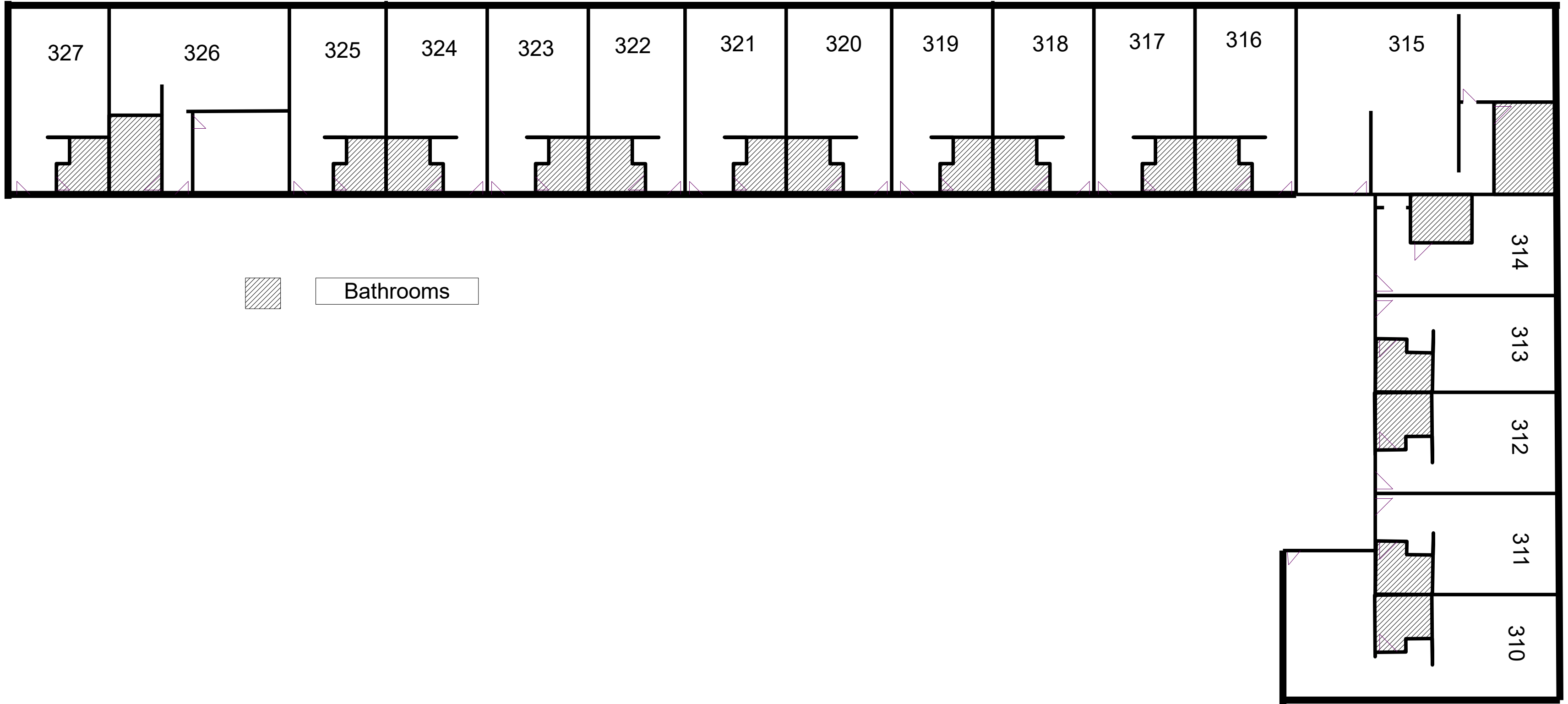
212

211

210



Bathrooms



Summary of Permanent Variance Request Application – Offsite Employee Bunkhouse

Sitka Sound Seafoods

AKOSH Inspection No. 1679251, June 22, 2023

This summary is to notify our employees residing in our offsite bunkhouse that the company has submitted a permanent variance request to Alaska Occupational Safety & Health (AKOSH) for certain requirements pertaining to our employee housing. The variance request is in response to issues identified during the referenced inspection concerning; 1) the size of some of the living quarters, and 2) the size of some of the windows.

Because the building cannot easily be modified to meet these temporary labor camp standards, we are providing a ventilation fan equipped with an air purifier for each unit. We believe that this action will satisfy the agency's concerns about our company-housed employee's health and well-being.

Please contact Bill Grant, Marcia Cook or Gordon Grant for any details or to review a copy of the variance request application.

Certification Statement

North Pacific Seafoods, Inc., Sitka Sound Seafoods facility hereby certifies that we, as the applicant for this permanent variance request, are not contesting the standards cited in the two Hazard Alert Letters that are the subject of this application.

Robert Torres

Signature

Date

Robert Torres
Printed Name

VP of Operations
Title