

This section will provide a summary of the O.S.H.A. inspection process and the procedures that should be followed by all personnel during an inspection.

I- UPON INSPECTION:

- Notify management of the inspection
- Ask compliance officer to wait until a management representative is present
[If this request is denied, the employee representative should accompany the Compliance officer.]
- Ask to see identification from compliance officer
- Ask what the purpose of the inspection is
- **If you have an active safety program in place, ask to be considered for a Focused Inspection**

II- DO'S AND DONT'S:

Act as a professional and do not argue with the Compliance office. Do not answer any unasked questions or volunteer information.

A- DO:

- Accompany the inspector at all times.
- Take photographs of EVERYTHING the compliance officer photographs.
- **IMMEDIATELY correct ANY items noted as possible violations/citations**

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- Take detailed notes of the inspection:
 - * Who was interviewed
 - * Items noted as violations
 - * Comments made by compliance officer and others

- Act as a professional at all times

- Answer all questions truthfully (Not doing so is a federal offense.)

- Have an employee to tour with you to correct items as needed

DON'T:

- DON'T Allow the CO to walk on site unescorted
- DON'T Argue with the Compliance Officer
- DON'T Become angry
- DON'T Admit that something is a violation
- DON'T Give them documents that were not requested
- DON'T Lie or mislead the CO.
- DON'T Answer question based on your OPINION. (i.e.: Do you think this is unsafe?)
- DON'T Volunteer information
- DON'T Discuss your knowledge of a violation situation. You may convince the CO that it is a Willful violation.

III- FORMAT OF INSPECTION:

1- Opening Conference: The compliance officer will state the purpose of the inspection. Questions the management representative should ask:

- To see credentials of the compliance officer
- The purpose of inspection
- The SPECIFIC areas the officer plans to inspect.

2- Walking inspection: The compliance officer will walk and inspect the areas that are identified at the opening conference. The management representative should accompany the officer during this process.

3- Closing conference: The compliance officer will report the items that were noted and may be subject to a citation. Make sure you identified all citations that were corrected immediately. The rights of the employer involved will also be discussed at this point. The management representative can ask how the alleged violations will be classified. (i.e.: Willful, Serious, Other than Serious.)

V- EMPLOYERS RIGHTS DURING AN INSPECTION:

1- Rights of the EMPLOYER:

Before the Inspection:

- To see the inspectors Identification.
- To have an opening conference.
- To know the purpose of the inspection.
- To receive a copy of the complaint causing the inspection.
- To require an inspection warrant to conduct the inspection. **(This may not be advisable)**
- Time to consult your attorney if you should allow the inspection without a warrant.
(Reasonable amount of time @ 1 hour.)

During the Inspection:

- To accompany the inspector during the inspection.
- To demand the inspection be done in a reasonable manner with respect to time and manner.
- To require the inspector to follow existing safety policies.
- To decline to answer the inspectors questions. **(This may not be advisable)**
- To require that employees be interviewed at a time and place that will not interfere with their work.

After the Inspection:

- To take a reasonable amount of time to turn requested documents to the compliance officer.
- To ask the compliance officer at the closing conference to classify the possible violations as "*willful, serious, other than serious.*"

The Compliance Officer should discuss your rights with you at the closing conference and leave you with a small red pamphlet that will list these items.

It is your responsibility to exercise our rights!

POSSIBLE AREAS OF FOCUS DURING AND INSPECTION

**This list does not cover all possible items, but is a good starting point

Correct State of Illinois posters – Illinois right to know

Life safety code issues – Marked exits, blocked exits, emergency lighting (If employees are there after dark) clear aisle ways

Fire protection – Proper extinguishers, enough for the SQ FT of building, Travel Distances (Standard - shoot for 1/3000 sqft, no more than 50' of travel distance) mark extinguisher locations, distances are closer when flammable/combustible liquids are present (25')

MSDS – Material Safety Data Sheets – Must be available for everything; employees must be able to know where they are and must have free access to them.

Flammable/Combustible storage – Amounts (Large amounts may need to be sprinklered), Storage cabinets, Proper containers – Gas, kerosene, diesel steel safety cans with spark arrestor and self closing lid, Bulk tanks double walled or diked (catch basin) for spills/leaks

Flammable/combustible liquid transfer – Use a bonding wire to transfer liquids from one container to another

Electrical – No exposed/damaged outlets, no damaged extension cords – missing ground pins, excessive repairs (3 per 25'), exposed copper, No cords used as permanent wiring, cover all breaker panels (Refer to NFPA 71E)

Tools and equipment – Look for damage, missing guards, missing ground pins, know what items are double insulated vs. in need of a ground pin, damaged cords, ground pins, exposed copper

GFCI – Ground Fault Circuit Interrupters – Electrical protection Detects amperage drop and cuts power at 5mA bleed-off

Safety Training – Provided for employees for everything / on a regular basis, must have documentation (training outline & sign in sheet for employees)

Bottled gas storage – secured, capped, 25' between oxy & acet. or firewall separator, can be mounted on a torch cart

PPE (Personal Protective Equipment)– Safety glasses, face shields, aprons, welding stuff – coat, gloves, head protection, proper clothing and shoes

First aid – Must have available

Eye wash – Small portable bottles are available

Exposed insulation – Cover any combustible insulation with a fire barrier

Housekeeping – clean work areas free of debris, floors and benches, storage rooms

Dirty rag storage – Greasy and oily rags need to be stored in a fire proof container with a lid

Record Keeping/Documentation – document all trainings, accidents

OSHA 200 & 201 log – Used thru 2002, 200 was internal documentation, 201 was for posting – must post even if there were no injuries

OSHA 300 & 300A log – New for 2003, updated in 2004, watch dates for posting the 300A

HAZ COM – Hazard communication training for employees working with chemicals, clearly mark all bottles/containers, and get rid of all 2-4-d weed killers

General Storage – Eliminate anything that looks unsafe or dangerous

Ladders – No damaged, modified, repaired, or painted ladders, all ladders must have safety feet

Battery charging area – eye wash, fire ext (Proper rating), PPE, no flammable/combustible material, proper battery acid storage (Refer to MSDS)