



Be prepared for OSHA!

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Today's discussion



- preparing your facility for an OSHA compliance inspection;
- managing the inspection when (not if) it happens;
- what to do after the inspector leaves;
- how to reduce the odds of inspection.

Why does OSHA show up?



-
- catastrophe
- complaint
- programmed inspection
 - http://www.osha.gov/as/opa/foia/hot_11.html
- invitation

Preparing the facility



● aspects to examine:

- written programs
- training
- recordkeeping
- physical conditions

Preparation - written programs



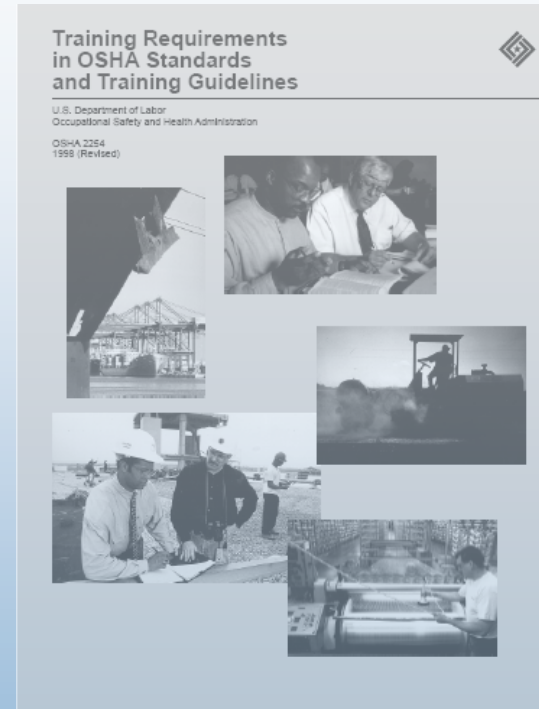
- include but not limited to:

- BBP
- HazCom
- respiratory protection
- hearing conservation
- lockout
- confined spaces

Preparation - training (see OSHA 2254)



- fire extinguishers
- care, use, limitations of ppe, respirators, earplugs
- HazCom
- specific toxics (Subpart Z)
- powered industrial trucks
- electrical safety related work practices
- others



Preparation - recordkeeping



- OSHA Log
- OSHA 301 or equivalent
- exposure records
- training records
- medical records

Preparation - physical conditions



- commitment to housekeeping and maintenance
- machine guarding
- fall protection
- illumination
- order
- sanitation
- signage
- safety equipment
- ppe enforcement

They're at the door!



- managing the inspection
 - there will be no advance notice
 - the employer has rights
 - the employees have rights

Managing the inspection



- invite them in or ask for a warrant?
- ask for identification – call to confirm
- ask the scope
- marshal the troops
- be nice!

Managing the inspection – opening conference



- listen lots, talk little
- paperwork request/review
 - provide documents that are required
 - defer requests for other documents
- be nice!

Managing the inspection – the physical inspection



- who goes along?
- how do they get there?
- take notes
- take photos
- take measurements
- employee interviews
- fix things
- be nice!

Managing the inspection – the closing conference



- ask questions, but don't argue
- listen!
- take notes
- don't make promises or commitments
- be nice!

After the inspection



- #1 – fix what was found before the citation arrives
- when the citation comes:
 - review it
 - post it
 - request an informal conference
 - file Notice of Intent to Contest if you wish



Employee rights



- representation at opening/closing conferences
- representation during inspection
- private interviews with CSHO
- whistleblower protection

Reducing the odds



- one approach:

- participate in OSHA voluntary programs – VPP, etc.
- reduces odds of 'programmed' inspections

Reducing the odds



● a better approach:

- management commitment
- effective EHS process
- employee engagement
- clean, well-maintained workplace
- employees with a high level of satisfaction

Conclusion



Questions/comments?



Thanks!



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