



BE PREPARED FOR AN OSHA INSPECTION



Before OSHA Arrives

Most employers hate the thought of an OSHA inspection. Aside from the perceived meddling, most employers associate inspections with piles of paperwork and exorbitant fees.

The best way to address OSHA inspections is to prepare in advance by considering the issues that may arise, and deciding to the extent possible how they will be addressed. While every inspection is different and relationships with local OSHA Area Offices may influence the approach to an inspection, there are certain issues which may be anticipated. For reference, see the “OSHA Top Ten Violations FY 2018” at the end of this list.

OSHA Inspection Planning Checklist

The following list is provided as a general overview of policies and items needed to be prepared for an OSHA inspection. It must be modified to meet the laws of your state and specific requirements of your company. You also will need to refer to OSHA standards for complete and specific standards that may apply to your particular work situation.¹

Under OSHA standards and regulations, there are certain documents that an employer is required to make available to OSHA upon request. Failing to produce them could result in separate violations. Examples of these documents include:

- Federal Employer ID Number
- Illness and injury logs.²
- Hazard communication program (HAZ/COM) including safety data sheets (SDS)
- Lockout/tagout program

Note: The information or documents produced for the compliance officer should be limited to the items OSHA is actually requesting. For example, a request for your written Hazard Communication program does not mean producing the HC program *and* training records *and* audits of the program.

¹ This checklist is typical for general industry; not for construction or maritime industries.

² Under federal OSHA regulations, OSHA Form 300 and 301 logs must be produced within four hours after they are requested.



1. Employer Postings

- Are Occupational Safety and Health Administration (OSHA) and state required posters displayed in a prominent location?
- Are safety signs/warnings posted where appropriate?
- Are emergency telephone numbers posted where they can be readily found in case of emergency?
- Are emergency evacuation traffic routes clearly identified?
- Is a first aid kit available and adequately stocked?
- Is a written substance abuse policy in place?
- Is the Summary of Occupational Illnesses posted? (OSHA Form 300 must be posted between Feb. 1 and April 30.)

2. General Worksite

- Are there an adequate number of properly marked Fire Extinguishers (also well maintained and current certifications/inspections records)?
- Are all exits marked with an exit sign and illuminated by a reliable light source? Are the directions to exits, when not immediately apparent, marked with visible signs? Are doors, passageways or stairways, that are neither exits nor access to exits, and which could be mistaken for exits, appropriately marked "NOT AN EXIT," "TO BASEMENT," "STOREROOM," etc.?
- Are proper engineering controls (un-tampered safety guards, dust controls, etc.) installed on machinery?
- Are all cord-connected, electrically operated tools and equipment effectively grounded or of the approved double insulated type?
- Is exposed wiring and cords in good condition (no frays or deteriorated insulation)?
- Are flexible cords free of splices or taps?
- Is hoisting equipment available and used for lifting heavy objects, and are hoist ratings and characteristics appropriate for the task?
- Is fall protection equipment and training available in worksites using man-lifts or ladders?
- Are all work areas clean and orderly?
- Are combustible scrap, debris, and waste stored safely and removed from work areas promptly?
- Are adequate toilets and washing facilities provided?
- Are toilets and wash areas clean and sanitary?
- Are work areas adequately illuminated?

3. Recordkeeping

- Is there documentation that all visitors to the site, including contract and temporary labor, co-op students, interns, vendors, and sales people, have knowledge of site hazards applicable to them and how to protect themselves against those hazards, including emergency alarms and procedures?



- Is there a written documentation that management also ensures that these visitors do not introduce hazards that can be prevented or that are not properly controlled? ³
- Is there evidence of employee involvement, such as committee minutes or other records of employee participation in safety and health program decisions?
- Are OSHA 300/301 logs maintained and posted as required?
- Are medical records and exposure records maintained as required?
- Are training records maintained in accordance with OSHA requirements?
- Are employee records being maintained for the required time frames?
- Are operating permits and records up-to-date for such items as elevators, air pressure tanks, and liquefied petroleum gas tanks?
- Are manufacturer's rating labels and records up-to-date for material storage and handling equipment such as forklifts, overhead cranes, and other lifting equipment?
- Are procedures in place to maintain records and logs?
 - o Safety inspections
 - o Safety meeting minutes
 - o Accident investigations
 - o Emergency response drills
- Have arrangements been made to back-up and preserve required records for the legal period of time for each specific type record? (Some records must be retained for at least 40 years.)

4. Safety and Health Training

The most important step to take when planning for the inevitable OSHA inspection is to select a company representative who will be responsible for the company's interests during an OSHA inspection.

- All job descriptions should include clearly written safety and health responsibilities.
- Performance evaluations should include a written evaluation of the accomplishment of assigned safety and health responsibilities.
- Is one person clearly responsible for administering the Safety and Health Program?
- Is there documentation that all new employees received safety orientation training?
- Are there records that employees participate in regularly scheduled safety meetings?
- Are adequate training resources available, and is management committed to employee training?
- Is it documented that all employees have received required training?
 - o Work area hazards
 - o Emergency action plan
 - o Equipment operation
 - o Personal protective equipment
 - o Location and use of emergency equipment

³. A written orientation outline for all site visitors, including contractors, is helpful.



- o Hazard Communication (HC)/Safety Data Sheet (SDS)
- o Airborne Crystalline Silica
- o Hearing conservation

- Do all employees receive refresher training at least annually? How is this documented?
- Have employees received instruction on procedures to report unsafe conditions, defective equipment, and unsafe acts?

This list is a general guideline and does not supersede existing lists or current law. You are encouraged to customize this general list to accommodate your specific situation and state law.

OSHA Announces Top Ten Violations FY 2018

OSHA recently released the top ten violations for fiscal year 2018, which ended September 30, 2018. This list does not change much from year to year except in numbers of citations and total dollars. These violations are typical for fabricators classified as general industry; they do not include the construction or maritime industries.

Frequently Cited OSHA Standards

NAICS Code: 327991 *Cut Stone and Stone Product Manufacturing*

Listed below are the standards which were cited by Federal OSHA for the specified NAICS Code during the period October 1, 2017 through September 30, 2018. Penalties shown reflect current rather than initial amounts.

Standard	Citations	Inspections	Penalty	Description
19100134	62	27	\$53,744	Respiratory Protection.
19101200	52	26	\$50,509	Hazard Communication.
19100178	43	28	\$83,014	Powered industrial trucks.
19100095	30	15	\$37,987	Occupational noise exposure.
19100147	19	10	\$148,308	The control of hazardous energy (lockout/tagout).
19101053	19	3	\$36,602	Respirable Crystalline Silica.
19101000	14	7	\$15,497	Air contaminants.
19100305	10	6	\$5,362	Wiring methods, components, and equipment for general use.
19100037	9	6	\$13,840	Maintenance, safeguards, and operational features for exit routes.
19100132	8	7	\$102,255	General requirements (PPE).
Total Top Ten	266		\$547,118	<i>Top Ten Standards cited for Cut Stone and Stone Product Manufacturing</i>
Total - All	346	63	\$890,990	All Standards cited for Cut Stone and Stone Product Manufacturing



Safety and health officials recommend that you meet with your employees on a regular basis to discuss steps in keeping compliant with regulations as well as any safety issues employees want to address.

Take time now to review your safety policies and procedures before OSHA asks to see them! ⁴

⁴ Data in the table show Federal OSHA citations issued during the period October 1, 2017 through September 30, 2018.

- **Citations** represents the number of times the specified standard was cited. The number in the total line is the sum of the #Cited for each standard.
- **Inspections** represents the number of inspections in which the specified standard was cited. For the total line, it represents the number of inspections in which one or more citations were issued. Note that the total is not the sum of the number of inspections associated with each standard cited: multiple standards may be cited in one inspection.
- **Penalty** represents the total penalty amount currently assessed for the specified (#cited) citations. The number in the total line is the sum of the \$Penalty for each standard. The amounts reflect what exists at the current time, taking into consideration any settlement action adjustments which may have taken place.
Example: If #Cited = 120 and #Insp = 40, then the average number of times per inspection that the specified standard was cited is 3. If \$Penalties is \$60,000, then the average current penalty amount per standard cited is \$500.