

PREPARING FOR AN OSHA INSPECTION

It is always best to think about how your facility would respond to OSHA knocking at the door *before* it happens. An overview of who should be involved, what should be done and what to expect follows:

Advance Planning: Planning for an inspection in advance -

- makes an inspection go smoother
- allows *you* to be in control of the inspection
- creates a positive impression on an inspector
- results in fewer violations

Inspection Team:

- who will be the person to greet the inspector
- who will accompany the inspector during an inspection
 - Management
 - Photographer
 - Document Controller

The team should have notepads to record everything that happens during an inspection. If photographs are taken by the inspector, your team should try to duplicate the picture with your own camera at the same time. The purpose of an inspection is for the agency to gather evidence that violations are occurring or have occurred.

Ensure that likely areas of concern have been addressed *before* the inspection:

- adequacy of training documented
- housekeeping
- compliance with regulations
- paperwork
 - Injury/illness records in order for the past 5 years
 - Hazard communication program
 - Emergency preparedness and evacuation procedures
 - Lockout program
 - Respirator program
 - Access provisions for exposure and medical records
 - Posting requirements

Documents: Documents should only be provided to the inspector when specifically requested. The document controller should be the only person to present the requested material. Do not leave documents in plain sight -- anything an inspector notices can be used against you. The requested documents should be logged. All documents not in use should be put away.

Employee interviews: Make sure that all employees are prepared to answer questions truthfully but that they do not volunteer any information. Questions should be answered specifically as they are asked in order to keep the inspection focused. No one should speculate if they are not sure of an answer. They should state that “I’ll check the facts and get back to you.”

Any employee has the right to refuse to speak to an inspector, request that management be with him or may speak to the inspector in private. An impromptu, on-site interview should *never* last more than ten minutes.

Inspector arrives: Greet the inspector cordially. Ask him to be seated so that he does not stroll around the premises. The inspection team should be notified of the inspector’s arrival. If management is not available, politely ask if the inspector could reschedule his/her visit.

Ask the inspector for his/her credentials, phone up his office for verification and make copies of them.

Purpose of the inspection: You have the right to know why the inspector is visiting your facility. Is it due to an employee complaint or is it a programmed inspection?

Scope of the inspection: Determine the intended scope of the inspection. If it is due to a complaint, ask for a copy of the complaint. Negotiate the scope of the inspection to only address the specific complaint or question.

A wall-to-wall inspection is usually required only when *all* four criteria are met:

- an employee complaint is received
- the business is in a high injury rate industry (boat-building is!!)
- the employer has a lost workday rate at or above the national average
- OSHA has not carried out a complete safety inspection during the last two years

Opening conference: Request an opening conference.

- introduce the members of the inspection team
- ask how the establishment was selected
- determine the scope of the inspection (see above)
- explain the company’s document procedures
- ask for the length of inspection. Work interruptions are to be kept to a minimum
- advise inspector of plant safety procedures and require them to be followed

Facility walk-through: Show as little of the facility as possible. Legally, compliance officers can use anything in “plain view”. They are permitted to observe areas not covered by the employer’s consent or by the inspection and can cite them whenever possible.

- be courteous and business-like. Give no information unless it is asked for specifically
- produce no documents during the walk-through. Insist that the document control procedures be adhered to
- Insist that inspectors not wander off alone
- learn what you can about the inspector's background
- note all of the inspector's observations
- if possible, correct any deficiencies the inspector notes *before* he leaves
- do not argue with the inspector about whether something is a violation

Closing conference:

- insist on one
- decide who will attend
- take comprehensive notes
- use the conference to correct errors and misunderstandings *before* any citation is issued
- ask inspector to specify citations that will probably be issued and how the violations will be characterized
- make no abatement date promises

Following inspection:

- review the inspection with the team
- correct any deficiencies noted by inspector. A follow-up letter should be written to the inspector addressing his concerns
- inspection team should compare notes. If deficiencies are noted that the inspector did not appear to see, correct them as soon as possible. Make notes of when and how

For OSHA's perspective on inspections, a booklet entitled "OSHA Inspections", reprinted in 2000, can be located at www.osha.gov/Publications/Osha2098.pdf.

OSHA STANDARDS CITED FOR SIC 3089 - Plastics Products, N.E.C

Listed below are the Federal OSHA standards which were cited for SIC 3089 during OSHA's fiscal year 2000, October 2000 through September 2001 in order of frequency. In trying to prioritize where to start in setting up a safety program, this list indicates what OSHA tends to target first within the composites industry. Other SIC Codes' frequently cited OSHA Standards can be located at www.osha.gov/oshastats/std1.html.

Lockout/Tagout	Air contaminants
Hazard communication	Welding & cutting
Machines, general requirements	Access to employee exposure records
Electrical, writing methods, etc.	Formaldehyde
Respiratory protection	Fixed industrial stairs
Powered industrial trucks	Hand protection
PPE, general requirements	Electrical, training
Electrical systems designs	Bloodborne pathogens
Mechanical power-transmissions	Fixed ladders
Log & summary	HAZWOPER
Occupational noise exposure	Slings
Flammable & combustible liquids	Electrical, hazardous locations
Abrasive wheel machinery	Sanitation
Portable fire extinguishers	Electrical, selection and use
Spray finishing	Supplementary record
Walking-working surfaces	Compressed gases
General Duty Clause	Storage and handling of LP gas
Guarding floor & wall openings	Specifications, signs and tags
Means of Egress	Annual Summary
Methylene chloride	Record retention
Eye and face protection	Fatality/Mult. Injury Accident Reporting
Overhead & gantry cranes	Ventilation
Mechanical power presses	Occupational head protection
Electrical, wiring design	Safety Color Code
Woodworking machinery	Automatic sprinkler systems
Hand & portable powered tools	Guarding of portable powered tools
Permit-required confined spaces	Arc welding & cutting
Medical services & first aid	Electrical, safeguards for personnel
Lead	Construction, safety training & education
Employee emergency plans	
Material Handling	
Means of egress	

If you would like a list specifying your SIC code and employee size, please contact the Composites One's Department of Health, Safety & Environment at 800/621-8003.