



Preparing for and surviving an **OSHA inspection**

3 steps that could save thousands in penalties

Contents

2 INTRODUCTION

WORKPLACE FATALITIES DROP BY 66 PERCENT DUE TO OSHA RULES BUILDING

3 WHAT IS OSHA LOOKING FOR?

4 THE COST OF NONCOMPLIANCE

PREPARING FOR AN INSPECTION

7 BEING PREPARED GOES A LONG WAY



INTRODUCTION

Managing a manufacturing or other industrial operation requires many different aspects to come together if the facility is to be as efficient as possible. Facility managers and site supervisors have their hands full ensuring that logistics demands are met and personnel needs are seen to, so that the business can operate effectively, safely and according to schedule and budget.

With all the moving parts that go into running a successful operation, time and resources are at a premium. It's understandable that you're wary of any instance that arises that doesn't immediately contribute to producing better results and increasing revenue.

But if ever there was an aspect of managing your organization's operations that required your undivided attention, it's staying on top of your business' OSHA compliance. The Occupational Safety and Health Administration institutes its guidelines for keeping workplaces safe for all employees, and these regulations are updated regularly.

WORKPLACE FATALITIES DROP BY 66 PERCENT DUE TO OSHA RULES

The organization's standards aren't mere formalities. Since 1970, OSHA regulations have helped reduce workplace fatality rates by 66 percent and occupational injury and illness rates by 67 percent. The number of worker deaths per day has fallen from 38 in 1970 to 13 in 2014. Workplace injury and illness rates have also improved, going from 10.9 per 100 workers in 1972 to just 3.2 per 100 in 2014. Clearly, dedicating time and resources to maintaining OSHA compliance and training



your staff is about much more than just checking a box on a list of corporate obligations – it's about maintaining a healthy and secure work environment.

An OSHA inspection is a comprehensive affair. In fact, OSHA penalties can be very costly – simply failing to post OSHA's guidelines according to the organization's standards can result in a fine of \$7,000.

Don't underestimate the importance of an OSHA inspection. Save valuable time and money now by learning what to expect so you can be as prepared as possible.

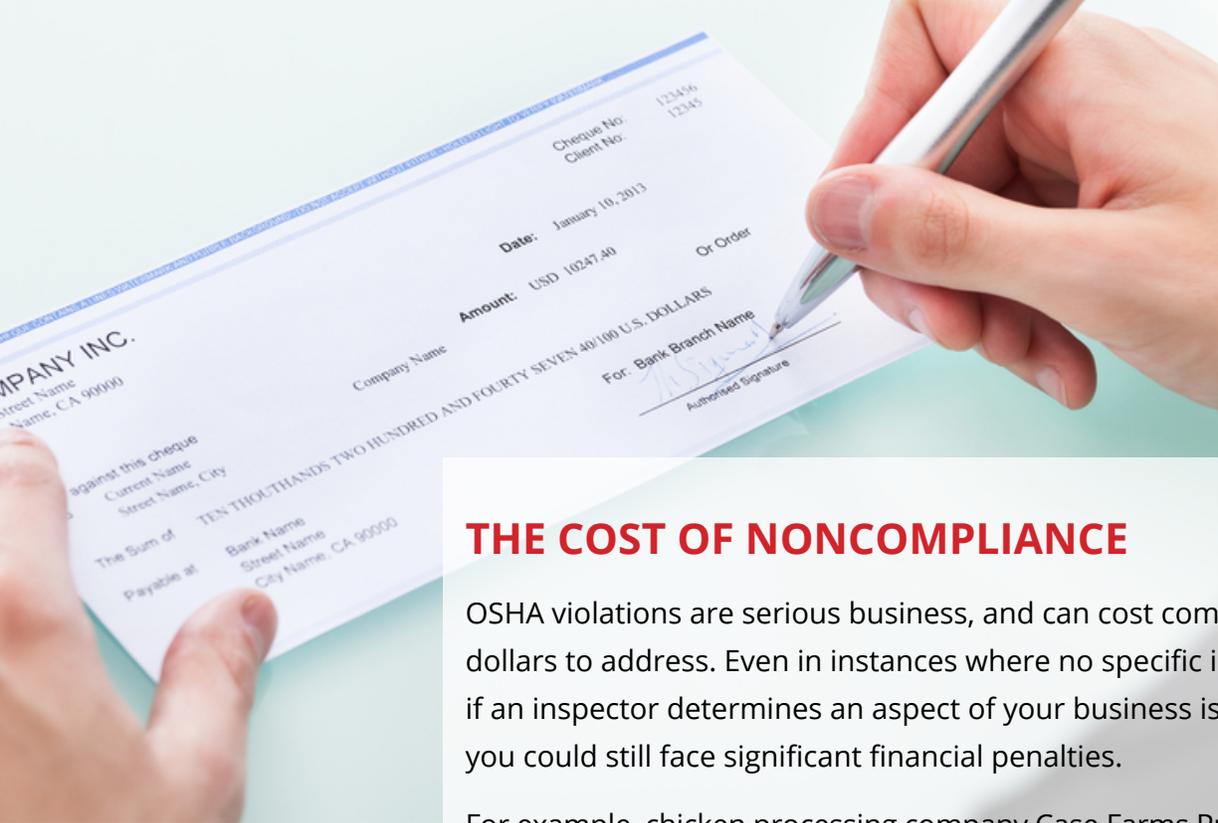
“Simply failing to post OSHA's guidelines according to the organization's standards can result in a fine of \$7,000”

WHAT IS OSHA LOOKING FOR?

Workplace safety comprises a large number of areas, but there are specific issues that tend to generate more concern than others. OSHA attempts to encourage greater compliance by highlighting the most problematic areas of operation from a safety standpoint. Each year, the administration compiles its list of top 10 safety violations from the previous year. In 2015, these areas and the number of citations were as follows:

1. Fall protection: 7,402
2. Hazard communication: 5,681
3. Scaffolding: 4,681
4. Respiratory protection: 3,626
5. Lockout/tagout: 3,308
6. Powered industrial trucks: 3,004
7. Ladders: 2,732
8. Electrical – wiring methods: 2,624
9. Machine guarding: 2,540
10. Electrical – general requirements: 2,181

“7,402 fall protection violations were cited by OSHA last year”



“A processing company was hit with one of the year’s largest OSHA fines – \$860,000 – due to occupational hazards found by an inspector on-site”

THE COST OF NONCOMPLIANCE

OSHA violations are serious business, and can cost companies millions of dollars to address. Even in instances where no specific incident has occurred, if an inspector determines an aspect of your business is out of compliance, you could still face significant financial penalties.

For example, chicken processing company Case Farms Processing was recently hit with an OSHA fine for more than \$860,000, not because of a specific incident, but just due to occupational hazards found by an inspector on-site.

Depending on the categories and severity of the violations, the stakes can be even higher. If OSHA determines that an institution has committed a “willful violation,” then company leaders could face prison time. Incarceration is also a potential punishment for employers who falsify records.

PREPARING FOR AN INSPECTION

Because of the potential for serious financial and legal repercussions, an OSHA inspection shouldn’t be treated lightly. While you may be able to brute-force your way through a surprise inspection, having a comprehensive system in place will make it easier not just to maintain compliance, but to avoid future inspections as well. Here are three steps you can take that should prove valuable.

1. Have a designated OSHA team

OSHA regulations and reporting requirements can be subject to change, so it can be something of a full-time job just staying on top of your company’s responsibilities. But an OSHA inspection is something you want handled by



DANGER

CONSTRUCTION AREA
KEEP OUT

the deftest hands possible, so it's a good idea to choose a person or a team of people to be your organization's dedicated OSHA liaison.

This role is essential all the time - not just when an inspector is knocking on your door. The staff members who are put on OSHA duty will not only be responsible for liaising with the inspector during the walkthrough, but also for keeping up-to-date with changing regulations and legislation surrounding an employer's rights and responsibilities. These employees should be the ones leading any meetings, particularly the opening conference where the inspector will highlight the details of your specific inspection.

Personnel requirements may impose limitations on how many employees you can dedicate to this task, but it's important to have more than one person well-versed in OSHA procedure in the event that your point person is out of the office when the inspector arrives.

2. Make prevention a priority

Anyone in the maintenance or industrial industries knows that prevention is crucial to smooth operations, so you should take the same approach for dealing with your OSHA inspection. Generally, OSHA gets involved in response to a specific incident or complaint, so you may already have a good idea of which aspects of your operation will be under scrutiny. This will give you the lead time you need to ensure you have all the necessary documentation together. Accident reports, illness logs, employee complaints and even maintenance records may all be requested, and one of the best ways to ensure the process runs smoothly is to work closely with the inspector to help the process along.



Being amiable and cooperative isn't just a tactic to score you points with your inspector. Having a handle on your paperwork and legal requirements can help shed a positive light on your company. More importantly, failing to produce requested information in a timely way can actually open the door to a more involved and extensive process. If you give the OSHA inspector any reason to believe there is an element of your company's operation that may not be running safely and efficiently, chances are he's going to want to poke around deeper to see what other problems exist.

3. Be courteous

Industrial administrators bristle at the sight of an OSHA inspector as a matter of course. But don't let your nervousness get in the way of pleasantries. Not only will being polite and courteous make the process more pleasant for everyone involved, but it is also a good way to score points with your inspector.

This doesn't mean you have to be a doormat – you have some leeway when it comes to making sure your ducks are in a row. For example, OSHA inspectors can show up unannounced, only being required to give you advanced notice if they are responding to a specific injury or incident. It's perfectly acceptable to request to wait for your legal department or your designated OSHA team before beginning the walkthrough. Just emphasize the fact that doing so will make the operation run much more smoothly.



BEING PREPARED GOES A LONG WAY

Failing an unexpected OSHA inspection can be a severe blow to an organization's reputation and finances. However, by following the three pieces of advice outlined above – establishing an OSHA team, focusing on prevention and being courteous – your organization might not just survive, but thrive as well. Beyond these three steps, providing regular training can go a long way in building a smarter, safer workforce.

SOURCES

ehstoday.com/news/ehs_imp_33364

www.safetyandhealthmagazine.com/articles/11995-preparing-for-an-osh-a-inspection

www.isri.org/safety-best-practices/isri-safety/isri-safety-resources/osh-a-resources/osh-a-inspection-checklist#.VmHWSbgrJph

www.safetyandhealthmagazine.com/topics/804-osh-a

www.safetyandhealthmagazine.com/articles/13283-nschome?page=2

www.americanbar.org/newsletter/publications/law_trends_news_practice_area_e_newsletter_home/0705_business_dealingwithosha.html

www.patriotinsuranceco.com/pdf/safety_SERVICES/OSHAInspections.pdf

www.industrialsafetysolution.com/osh-a_faq.php?aid=47

www.safetyandhealthmagazine.com/articles/13283-osh-as-top-10-most-cited-violations-for-fiscal-year-2015

www.osh-a.gov/oshstats/commonstats.html



**4890 West Kennedy Blvd.
Suite 300
Tampa, Florida 33609**

Phone **1-866-546-1212** | Fax **812-286-7992**

www.redvector.com