


Mock OSHA Audit – What to Expect and How to be Prepared

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Presented by:
Tony Kuehn, CSP, OHST, ALCM
Vice President of Consulting Services



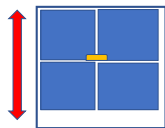

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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared

Decisions Require Trade-offs

Know where your RISK WINDOW is... how open is it?

- We Are In Control, By The Decisions We Make
- Decisions Require Trade-offs
- Do You Know What You Are About To Trade-off?
- **Make An Informed Decision, Minimize The Risk**





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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared

What we will cover:

- Which OSHA will visit you (State or Federal),
- What can trigger a visit,
- What to expect from the onset to closure,
- Opening conferences, records and program reviews,
- Physical inspections (walk-through),
- Employee interviews,
- Closing conference,
- What to do should a citation be issued, and;
- Resources available to you(self-inspection).



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What Are OSHA Standards?

OSHA standards are:


- Rules that describe the methods employers must use to protect employees from hazards
- Designed to protect workers from a wide range of hazards

Where there are no specific standards, employers must comply with the General Duty Clause of the OSH Act.

Four Groups of OSHA Standards

- General Industry*
- Construction
- Maritime
- Agriculture

*General Industry is the set that applies to the largest number of workers and workplaces




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State vs Federal Programs

State Plans are OSHA-approved workplace safety and health programs operated by individual states or U.S. territories. There are currently 22 State Plans covering both private sector and state and local government workers, and there are six (6) State Plans covering only state and local government workers.



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Which OSHA will visit you (State or Federal)?

Federal and State OSHA

- Occupational Health and Safety:
 - Federal OSHA
 - State OSHA

What to expect during enforcement inspections (citations, abatements, etc.) covered in next slides...






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What Responsibilities Does An Employer Have Under OSHA

- Provide a workplace free from recognized hazards and comply with OSHA standards
- Provide training required by OSHA standards
- Keep records of injuries and illnesses
- Provide medical exams when required by OSHA standards and provide workers access to their exposure and medical records
- Not discriminate against workers who exercise their rights under the Act (Section 11(c))
- Post OSHA citations and hazard correction notices
- Provide and pay for most PPE



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Employer Responsibilities (cont.)

REPORTING AND RECORDING CHECKLIST

Employers must:

- ✓ Report each worker death to OSHA*
- ✓ Report each work-related hospitalization, amputation, or loss of an eye *
- ✓ Maintain injury & illness records
- ✓ Inform workers how to report an injury or illness to the employer
- ✓ Make records available to workers
- ✓ Allow OSHA access to records
- ✓ Post annual summary of injuries & illnesses




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What Can Trigger a Visit?

An Employee Complaint
 Follow-up to a Reported Accident- Serious Injury or Fatality*
 An OSHA Planned Visit-Part of an Industry or Exposure Focus (Local or Nationally)
 As Part of a Consultation-VPP

* Mentioned as an Employer Responsibility Previous Slide-This is Required for All Employers




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Employee Files a Complaint With OSHA

- Workers may file a confidential complaint with OSHA if they believe a violation of a safety or health standard, or an imminent danger situation, exists in the workplace
- Workers may request that their name not be revealed to the employer
- If a worker files a complaint, they have the right to find out OSHA's action on the complaint and request a review if an inspection is not made....

Note: Often the best and fastest way to get a hazard corrected is to notify your supervisor or employer.




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Employee Participation in an OSHA Inspection

- Employee representative can accompany OSHA inspector
- Workers can talk to the inspector privately
- Workers may point out hazards, describe injuries, illnesses or near misses that resulted from those hazards and describe any concern you/or they have about a safety or health issue
- Workers can find out about inspection results, abatement measures and may object to dates set for violation to be corrected




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Employees Are Free from Retaliation

- Workers have the right to be free from retaliation for exercising safety and health rights
- Workers have a right to seek safety and health on the job without fear of punishment
- This right is spelled out in Section 11(c) of the OSH Act
- Workers have 30 days to contact OSHA if they feel they have been punished for exercising their safety and health rights




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How Are OSHA Inspections Conducted?

- The OSH Act authorizes OSHA compliance safety and health officers (CSHOs) to conduct workplace inspections at reasonable times
- OSHA conducts inspections without advance notice, except in rare circumstances (e.g. Imminent Danger)
- In fact, anyone who tells an employer about an OSHA inspection in advance can receive fines and a jail term




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**Stages to an OSHA Inspection-
What to expect from the onset to closure**

- Opening Conference
- Walk Around Inspection
- Closing Conference
- Afterwards




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Opening Conference

During the Opening Conference:

- Inspector will ask many questions:
 - Size of company
 - NAICS Code formally SIC Code
 - Union or not
 - Size of building or facility
 - Number of facilities
 - Types of operations
 - Review of safety programs




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Opening Conference cont.

- Will describe OSHA's General Duty Clause or 5(a)
 - *All employers shall provide a workplace free from recognized hazards.*
- OSHA will talk to employees alone or with union representatives, no management representatives allowed.
- These employees need to be free from any type of retaliation, discrimination, etc. from talking to the inspector.

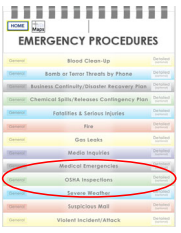



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OSHA Visit

- **OSHA was Here = Emergency??**
- Why Me? (Misery Does Not Love Company)
 - Types of Visits and how they are generated
 - Follow-up
 - Industry Best Practice





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Walk Around Inspection

- OSHA inspector has various inspection tools including a camera.
- Take Pictures & Notes as you walk with the inspector.
- OSHA will document hazards and ask questions about operations.




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Employee Interviews

- Take notes as you walk with the inspector and they openly interview employees.
- OSHA will ask questions about operations, programs and training.




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What Are They Looking For?

- The OSHA inspector has been trained in hazard recognition. *The CO is looking for hazards.*
- Several areas that the OSHA inspector will likely be looking for will be covered in the next slides...




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Opening Conference Program Review

- Health & Safety Program – AWAIR
- OSHA 300 (usually the past three years)
- Hazard Communication / Right To Know
- Powered Industrial Trucks (Forklifts)
- Lock Out Tag Out or LO/TO
- Emergency Action Plan / Fire Prevention
- Confined Space Entry Program
- Hearing Conservation Program
- Overhead Crane Inspection Program

These are general examples




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OSHA Closing Conference

- OSHA will tell you the violations they are citing and set abatement dates that must be met. Also, may make suggestions to fix items noted during the walk around.
- Describe the types of violations:
 - Serious, Non-Serious, Repeat, Willful, Criminal
 - Failure to Abate
 - De minimus




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OSHA Closing Conference

- Penalty Calculation
- Discounts are given:
 - Size Credit, Good Faith, & History
 - They look at number of employees exposed, duration of the exposure, proximity to hazard, and work conditions
 - Lesser vs. Greater
 - Can be multiplied for being repeat, willful or criminal violation type.




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Afterward – Aftermath

- Will receive citation packet via certified mail (someone has to sign for it)
- It is important to know when this comes as all of the dates OSHA set up is off of this delivery date.
- Abatement Verification & Progress Report
- Expedited Informal Settlement Agreement (EISA)



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5. Serious Willful Penalty Reductions.
 The reduction factor for history shall be applied as usual. The reduction factors for size for serious willful violations shall be applied as shown in Table 3:
 Table 3- Serious Willful Penalty Reductions

Employees	Percent reduction
10 or fewer	80
11-20	60
21-30	50
31-40	40
41-50	30
51-100	20
101-250	10
251 or more	0

State Plans are required to adopt maximum penalty levels that are at least as effective as Federal OSHA's.

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Contesting OSHA

- What if you don't agree with OSHA's findings?
 - Employer has the opportunity & right to contest OSHA's findings
 - Is it worth it?

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Contesting OSHA

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OSHA Visit In Conclusion

- Be polite, don't argue.
- Only show them what they ask to see while at the same time not trying to hide anything.
- *Conduct regular inspections before OSHA shows up to help minimize the chance of them finding issues.*




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Observing Exposures/Self-Inspections

Review OSHA items relating to compliance and those items recommended, discuss options for remediation (e.g. items open to CO interpretation, any contested items, non-compliance items, best industry practice). Collect photos to document exposure and facilitate discussion.




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Observing Exposures/Self-Inspections

Develop means and methods to sustain hazard observation process

Develop Employee Hazard Awareness Recognition training program from prior inspections, lessons learned and consider training for safety contacts, employee safety committee members, all employees (e.g. on-boarding orientation).




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Examples-Following the Various OSHA Sub Parts of the OSHA Rules (e.g. 1910 and 1926)

General Industry Subparts (1910.xxx)

Construction Industry Subparts (1926.xxx)



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General Industry

Subpart D: Walking/Working Surfaces

- Fall exposures of >4', falling object hazards adequately guarded,
- Portable ladders and stairs in good condition and used correctly?

Subpart E: Means of Egress

- Exits are clearly marked, well lit, unlocked, unobstructed

Subpart G: Occupational Health and Environmental Control

- Confined spaces labeled? Entry procedures followed?


Subpart H: Hazardous Materials

- Compressed gas cylinders (including those in use) are secured,
- segregated, valve caps in place, protected from damage, vandalism?

Subpart N: Material Handling

- Forklift operators displayed safe driving habits. Seatbelt worn?

This is only a sample not all the Subparts



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Construction Industry

1926-Subpart D: Occupational Health and Environmental Controls

- Medical facility location available within reasonable distance for the treatment of injured employees?
- First aid trained employee(s) on-site when required?

1926-Subpart F: Fire Protection and Prevention

- Fire extinguishers are provided in close proximity to hazards
- Fire extinguishers are mounted, and in designated locations.

1926-Subpart J: Welding, Cutting and Brazing

- Valve protection caps in place and secured when valves removed and tanks are not in use?


1926-Subpart L: Scaffolds

- Scaffolding and scaffolding components have been evaluated for meeting 4 times the intended maximum load?

1926-Subpart M: Fall Protection

- Fall protection plan has been established and communicated to employees with fall exposures?

This is only a sample not all the Subparts




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Polling Question: Inspections

Who is most often utilized to perform hazard evaluation (inspection) at your facility?

- A. The insurance carrier Loss Control representative
- B. The employee safety committee
- C. Team Leads
- D. OSHA when they visit the facility due to a complaint




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Polling Question: What is OSHA looking for?

What do you think OSHA will want to review when they visit your facility?

- A. A written Administrative Program or AWAIR
- B. OSHA 300 Injury and Illness Records
- C. Hazard Communication-Right to Know Program
- D. Certification of PIT, MEWP-Forklift, Scissors Lift Operators
- E. All the Above




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What standards are triggered by the structure, operations and hazards of your organization?

- OSHA Standard May be Administrative (AWAIR, 300 logs)
- OSHA Standard Industry/Task Specific (1910, 1926 Others)
- OSHA Standard May be Lateral
 - Right to Know (some are state specific as in MN)
 - Hearing Conservation-Noise
 - Respiratory Protection (Voluntary and Mandatory)
 - PPE
- OSHA Standard May be Chemical Specific
 - Lead
 - Respirable Crystalline Silica
 - Benzene
 - Methylene Chloride
- Best Industry Practice (Above OSHA Minimum)





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Review Your Compliance Programs

- Determine which OSHA program(s) apply
- Recognize, Evaluate & Develop
- Not All Programs Required to be In Writing-*But Why Not Write them Down?*
- All Programs Require a Certain Level of Training
- Many Programs Require Documentation of Completed Tasks

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Administrative Health and Safety Review Guide

Items to review:


OSHA RELATED INFORMATION

- OSHA OSHA OSHA (OSHA Regs. 1910 and 1926) – current year plus 2 years
- Any OSHA citations, penalties and any OSHA orders
- OSHA 3050 (Safety and Health Program Review)
 - Safety Training/Concentration Training record
- Safety Data Sheets (SDS) for all chemicals used
- Safety Data Sheets (SDS) for all chemicals used
- Personal protective equipment (PPE) to company safety policy
- Copy of current written Health and Safety Program which includes all relevant compliance
- List of all hazardous materials, hazardous physical agents and chemical agents
- Safety Committee record (agenda, minutes, or logbook)

GENERAL ORGANIZATION BACKGROUND INFORMATION

- OSHA 3050 (Safety and Health Program Review) and reporting relationship
- Number of employees
- Types of operations
- Location (state of office, equipment, vehicles, vehicles, or mobile / transportation)
- Number of established work locations (office, facility locations, etc.)

Mock OSHA Audit-
General Info to Have
on Hand



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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared

Administrative Health and Safety Review Guide

Checklist-Which OSHA program(s) apply to your operations?

- General Duty (1910.2 and 1926.55)**
- Occupational Safety and Health Act (OSHA)**
- OSHA 3050 (Safety and Health Program Review)**
- OSHA 3051 (Safety and Health Program Review)**
- OSHA 3052 (Safety and Health Program Review)**
- OSHA 3053 (Safety and Health Program Review)**
- OSHA 3054 (Safety and Health Program Review)**
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- OSHA 3199 (Safety and Health Program Review)**
- OSHA 3200 (Safety and Health Program Review)**

Checklist-Which OSHA
program(s) apply
to your operations?




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The Good Faith Effort...

- Does it Meet Compliance?
 - *Again Look at the Standard*
- Who Was Involved?
- What Was Done?
- Records Available?

No Pandemic Amnesty or "free pass" due to the epidemic.




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What About the General Duty Clause 5 (a)-non Subpart Specific

- Is there an industry best practice that will apply?
- Incorporation by Reference??





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Hazard Identification and Control

- "The methods used to identify, analyze and control new or existing hazardous conditions or operations."
- Suggestions:
 - Periodic inspections (in-house or outside resources).
 - Employee reports, suggestions.
 - Accident investigations.
 - Include "invisibles" (i.e. air, noise, ergonomics)
- Four types of controls (Eng., Substitution Admin., PPE.)
- Importance of Job Safety Analysis and process.
- Review Applicable OSHA Subparts





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Facility Hazard Specific Checklists

See if can identify the following examples in the checklists provided....



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Identifying a Hazard-OSHA Violation



Source-ILC


Subpart D-Walking Working Surfaces



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Identifying a Hazard-OSHA Violation



Source-ILC


Subpart E-Means of Egress



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Identifying a Hazard-OSHA Violation



Source-ILC

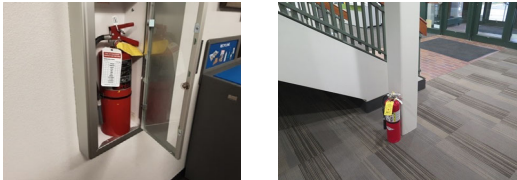
Subpart S-Electrical. Equipment is Not Adequately Grounded or GFCI Protected



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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared

Identifying a Hazard-OSHA Violation



Source-ILC

Subpart L : Fire Prevention



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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared

Identifying a Hazard-OSHA Violation



Source-OSHA

Unguarded lower blade and arbor end of radial saw.



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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared

Identifying a Hazard-OSHA Violation



Improperly Labeled Containers


Source-ILC



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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared

Identifying a Hazard-OSHA Violation



Guard removed from chain rail exposing pins on the spiked chain and sprocket.


Source-OSHA



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Identifying a Hazard-OSHA Violation



Improper Repair of a Powered Lift Truck

Source-OSHA



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Identifying a Hazard-OSHA Violation



Damaged Sling, Chains without Legible Ratings, and Damaged Wire Rope


Source-OSHA, TEEX Hardwood



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Identifying a Hazard-OSHA Violation



Unstable Stacked Materials, and Poor Housekeeping

Source-OSHA, TEEX Hardwood



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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared

Identifying a Hazard-OSHA Violation



Defective or Improperly Repaired Tools

Source-OSHA, ILC



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Identifying a Hazard-OSHA Violation



Source-OSHA, ILC

Subpart P: Excavations

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Taking Credit for Prior Activities.....

- What Does the Document Trail Look Like?
- Keep Relevant Source Documents, Training Aids, etc.

Moving from Failure to Success

- Draw a New Line in the Sand to Move Forward

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“Rules and tips”

- No such thing as total compliance with all regulations.
 - *It can't be done, it's not even a good goal.*
- Focus on hazards, not regulations.
 - Likely to cause injury/illness,
 - Likely to be cited by OSHA, or
 - Likely to be a concern for insurance carrier.
- Don't nitpick.
- It's not a contest.
 - The goal is not to find all violations.
 - Focus on 5-10 important ones.
- Leave personalities out of it.


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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared

“Am I liable if I miss something?”

- In general, No.
- You are not considered “experts” and there is no “duty” to find all violations/hazards. *Especially in a dynamic work environment*
- **The greater liability is:**
 - Not doing inspections, or
 - Doing inspections but not correcting issues.





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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared

Resources for Help


- Service Organization
- Standards and Specifications Groups
- Fire Protection Organizations
- Insurance Associations
- Internet
- Professional Societies
 - Trade Associations
 - Emergency & Specialized Information
 - U.S. Government Agencies
 - Educational Institutions
 - Safety and Health Related Periodicals

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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared


Recap and Questions



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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared


- a) Which OSHA will visit you (State or Federal),
- b) What can trigger a visit,
- c) What to expect from the onset to closure,
- d) Opening conferences, records and program reviews,
- e) Physical inspections (walk-through),
- f) Employee interviews,
- g) Closing conference,
- h) What to do should a citation be issued, and;
- i) Resources available to you.



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Mock OSHA Audit – Understanding What to Expect and How to Be Prepared

Thank You



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