

OSHA INSPECTION PROCEDURE CHECKLIST

ACTIVITIES AND RESPONSIBILITIES	GENERAL INFORMATION FOR THE PROCEDURE	ASSIGNED TO
<p>A written procedure is developed to designate responsible parties and requirements. As a <i>minimum the following should be identified:</i></p> <ul style="list-style-type: none"> • <i>Inform everyone that they are NOT authorized to give permission for an OSHA inspection. This authorization must be given by designated person(s)</i> • <i>Identify the area for the opening conference</i> • <i>Identify the walk around party</i> • <i>Keep notes and take pictures</i> • <i>Closing conference attendees and information</i> 	<p>The written procedure should be developed, responsible parties trained, and the procedure reviewed periodically.</p>	
<p>Upon entry to your workplace OSHA will ask for permission to conduct the inspection: <i>Who is designated the responsible managerial representative(s) who can authorize an OSHA inspection?</i></p>	<p>An employer can refuse entry for any reason; however OSHA will return with a search warrant and will most likely conduct a wall to wall inspection.</p> <p>Generally not recommended to refuse entry. However, if a critical operation is in progress and all managerial personnel are engaged in this operation it should be explained to the Compliance Officer and the denial given.</p>	
<p>OSHA should be escorted to an office or conference room while the appropriate management personnel are contacted. <i>Who will escort them, and where will they be taken?</i></p>	<p>Escort OSHA to an immediate office or conference room and make them comfortable.</p> <p>Do NOT engage in conversation about the safety program, allow them to interview anyone or to proceed with the inspection.</p>	
<p>OSHA will request to conduct an opening conference. <i>Who will be notified of the conference? Who will attend and where will it be conducted? Who will be in attendance to take notes of the conference?</i></p>	<p>The process to notify everyone and to start the opening conference CANNOT be delayed and must be completed at least within 1 hr, if not sooner.</p> <p>Subcontractors or others performing work at you workplace should be informed that OSHA is on site. They can decide if they want to attend the opening conference.</p> <p>Someone should be designated to take notes of the conference and to keep a roster of attendees.</p>	

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	Notify Dept managers and other management personnel that an OSHA inspection is in progress.	
Immediately prior to or during the opening conference the OSHA Compliance Officer will identify themselves and request permission to conduct the inspection. <i>Who can authorize the inspection?</i>	Identify the person(s) who will have the authority to allow the inspection.	
OSHA will request documentation and records. <i>Who will be responsible to produce these records? An example of the types of records that will be requested is attached.</i>	Identify who is responsible for these records and where they are filed/maintained. Only the records or documents that are requested should be provided.	
OSHA will conduct a walk around inspection. During this inspection they will ask questions, observe work in progress, take pictures and measurements, and privately interview employees. <i>Who will mirror OSHA during this walk around, i.e., if they take a picture you take the same one, if they take measurements you take the same ones – feel free to ask why they took the picture or the measurement? These records are critical and must be as accurate as possible.</i>	Identify someone or a small group to perform these tasks. The person(s) scribing should pay attention to the events of the inspection to ensure it is well documented. A camera, and note pad is needed. Note: If it is decided that a video will be used permission must be obtained. In most cases OSHA will not approve.	
Walk around findings. OSHA may see or discuss a violation while walking around. Any hazard, i.e., anything or any practice that can cause harm should be addressed immediately, i.e., stop the work and get it addressed. Anything that is corrected immediately should be brought to OSHA's attention so that they can observe the correction. (This can result in a 15% reduction in the penalty later) <i>Who will ensure these hazards are addressed right away?</i>	Develop the list of persons that will accompany OSHA. One or two must be able to address immediate hazards while the entourage continues with the inspection. Immediate feedback is needed for anything that is corrected. Designate the responsible person(s) ahead of time so that it is clear their priority is to address these hazards immediately.	
During the walk around OSHA is going to establish: (1) if a hazard exists; (2) if it is a hazard that can cause serious harm; (3) the	Designate the lead person for the walk around inspection. Questions should be answered or coordinated by the lead person only.	

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<p>supervisor or management knew or should have known of the hazard; and (4) that the hazard is addressed by an OSHA standard or can be addressed by the general duty clause.</p> <p>The interviews and discussions during the walk around inspection is geared to determine the above. <i>It is important that the entourage members are aware of the above and that they answer the questions specifically. Entourage members cannot and will not lie or try to exaggerate the truth in any way.</i></p>	<p>Conduct workshop and briefings of the entourage personnel so that it is clearly understood what each person is required to do during the inspection.</p> <p>Lead persons should be able to address the questions and not be afraid or try to come up with an answer that they think OSHA wants to hear.</p>	
<p>OSHA has the right to conduct private interviews with the employees. During these interviews OSHA will be establishing the above for any hazards that they identified, e.g., seriousness of the harm, standard violated, knowledge by the supervisor or employer, etc. At no time can anyone interfere with the private interview. <i>Employees should be informed of their rights for the interview, e.g., if English is a second language they can ask for an interpreter, or they can request to NOT be interviewed, or they can request representation during the interview, or they can refuse to sign any written statements.</i></p>	<p>The entourage should be briefed/trained on the requirement to not interfere with the interview at any time.</p> <p>OSHA can insist on interviewing an employee even if they refuse by issuing an administrative subpoena. This would mean the employee may have to be interviewed at the OSHA office.</p> <p>The person recording the inspection should ensure all aspects of an employee refusal is documented as much as possible.</p> <p>No one who participates in the inspection, interviews or any other portion of the OSHA inspection or the safety program can be discriminated against. There shall be no reprisal action taken against anyone for their participation.</p>	
<p>At the end of the inspection, which can take several days, they should conduct a closing conference. Frequently, they do it over the phone and not in person. This closing will give you a brief summary of their findings.</p>	<p>Whoever participates in the closing conference should document what they are told and also include any abatement dates that are discussed for any of the hazards.</p> <p>It is important for everyone to realize that the citations are allegations until a final order is issued. In the meantime the most critical issue is whether or not a hazard exists and how it is addressed.</p>	
<p>Issuance of citations and penalties will come in the mail. The clock for any actions to be taken starts on the date of receipt of the citations.</p>	<p>Who is responsible for reviewing the citations and the penalties to ensure abatement actions have been taken or underway to meet the abatement dates?</p>	

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<p><i>Whoever receives the citations must ensure it is date and time stamped to ensure an accurate accounting of the start date is available. Immediate actions must be taken to review the citations and ensure that the corrective actions have been taken or are in progress to meet the assigned abatement dates.</i></p>	<p>Who will review the citations and the inspection notes, pictures and measurements to determine the course of action for the company?</p> <p>The action to request an informal conference must be completed within 15 working days of receipt of the OSHA citations. This conference must be conducted within this time frame. Who is responsible for tracking this time and requesting the informal conference (this should be done in writing as well as making the phone call).</p> <p>Who will be responsible to assemble the documentation and the presentation to the Area Director during the informal conference?</p> <p>Who is responsible for reviewing the position that the company will take in regards to the citations and the penalties? Any actions or decisions for contest of the inspection, citations, or the penalties must be decided before the informal conference. Discussion with the company legal team is strongly recommended. The notice of contest must be issued prior to the end of the 15 working day grace period.</p>	
<p>An OSHA inspection is a part of the business and can be threatening and intimidating. Development of a course of action, designation of responsible parties, an understanding of what is happening and why can alleviate some of the threats and intimidations.</p>	<p>The company should develop briefings and workshops with everyone to ensure they understand what is happening and why. Do this at least once per year.</p> <p>The more people are familiar with what is going on the easier and better it would be.</p> <p>The company safety and health program cannot belong to one person. As shown in this summary the program belongs to everyone and everyone must be able to discuss the hazards and the controls in place to protect everyone.</p>	

Records	OSHA/HIOSH	Location
Company safety and health program	HAR §12-60 or §12-110	
OSHA 300 log and OSHA 300A summaries	1904	
OSHA 301 or equivalent. These may be the supervisor incident investigation reports	1904	
Hazard Communication program	1910.1200 or 1926.59	
Hazard materials inventory and copies of the MSDS or SDS. Use of electronic file is acceptable.	1910.1200 or 1926.59	
Respirator program – medical evaluations, training, and fit test records.	1910.134 or 1926.103	
Hearing conservation program/training if required	1910.95 or 1926.52/101	
Inspection reports conducted by the company management	HAR §12-60-3 or §12-110-3	
Inspection reports conducted by subcontractors	HAR §12-60-3 or §12-110-3	
Records of safety meetings		
Employee medical records are available upon request. Any employee who wants a copy of their medical records will be provided the copies. Requests for medical records must be submitted to the Personnel Dept. at the main office. Their own companies maintain subcontractor personnel records. Records are provided to OSHA upon request.		
Inspection and preventive maintenance of trucks, forklifts, scissors lifts, aerial lifts, etc.		
Lockout/tagout procedure and records of lockout/tagout		
Confined space program if permit required confined spaces are on the property where employees work		
Emergency action plan	1926.35	
Fire prevention plan, including hot work		
PPE assessment (1910.132)		
Air receiver inspections and certificates	1926.306	
Ground assurance protection program if used.		
Commercial diving		
Asbestos program		
Lead program	1926.62	
Hazardous materials training for specific substances, e.g., chromium, cadmium, etc		
Bloodborne pathogens exposure control plan, medical surveillance, evaluation of exposure		
.Procedure for access to medical records		
Crane documentation, i.e., inspections, certifications, testing, etc.		
Disciplinary action program/policy – records of actions taken to enforce the safety program		
Training Records (See table below)		

Training Topics	Attendance Rosters	Certifications	Competent Persons	Location
Initial training of new employees				
First aid/CPR				
AED				
Scaffolding users			x	
Scissors lift				
Fork lift		X		
Aerial lift				
Crane operator		X	x	
Qualified rigger		X	x	
Hazcom				
Respirator users				
Hearing conservation				
Fall protection		Required	x	
Powder actuated tool users				
Laser users				
Workers in and around excavations and trenches			x	
Work zone safety workers and flaggers				
Lockout/tagout			X	
Confined space worker training including CP			X	
Ladder user training				
HAZWOPER training			X	
PPE for work activities				
Use of portable fire extinguishers if required				
Machine guarding training if required.				
Fire Watch				
Electrical work practice training for electricians, including arc flash protection				
Dive team training and certifications		Required	x	
Asbestos worker				
Asbestos awareness trng				
Lead worker				
Lead awareness trng				
Hazardous materials training for specific substances, e.g., chromium, cadmium, etc.				
Bloodborne pathogens training				
Access to medical records				

OSHA REQUIRED PROGRAMS AND PROCEDURES			
Program or Procedure	Standard	Competent Person	Trng
Written OSH program	§12-110 or §12-60		Yes
Inspection procedures for daily inspections	§12-110(3)	Yes	
Scaffolding	1910.28	Yes	Yes
Manually propelled scaffolds, e.g., scissors lifts	1910.29		Yes
Emergency Action Plan	1910.38		Yes
Fire Prevention Plan	1910.39		Yes
Powered platforms	1910.66		Yes
Noise Exposure	1910.95		Yes
Hazwoper	1910.120	Yes	Yes
Certified PPE Assessment	1910.132	Yes	Yes
Respiratory protection program	1910.134	Yes	Yes
Permit required confined spaces	1910.146	Yes	Yes
Lockout/tagout	1910.147	Yes	Yes
First aid/CPR	1910.151	Yes	Yes
Portable Fire Extinguishers	1910.157		Yes
Air Receivers	1910.169 & HIOSH		
Powered Industrial Trucks	1910.178	Yes	Yes
Cranes	Subpart N & HIOSH	Yes	Yes
Machine Guarding	1910.212		Yes
Welding, Cutting, Brazing (Fire Watch)	Subpart Q	Yes	Yes
Electrical Safety	Subpart S	Yes	Yes
Bloodborne Pathogens	1910.1030	Yes	Yes
Hazard Communications	1910.1200	Yes	Yes