How to Survive an OSHA Audit

Presented by:
Slater Shroyer, Sue Schauls & Shannon Nordstrom
The Audit Process

Presented by:

Slater Shroyer
The Audit Process

- Your inspector (Safety Supervisor) will identify himself/herself and present badge/credentials
- Owner or Manager Pre-Audit Interview
- Actual Inspection
- Employee Interviews
- Post-Audit Wrap-up Interview
- Abatement Process
The Interview is mostly paperwork

- Paperwork
  - Handbooks
  - Safety Training Documentation
  - Hazard Communication Program
  - Lock-out Tag-out Policy (written)
  - Fork-lift Training Certificates
  - Torch-Training Certificates
The Interview (con’t.)

- Paperwork includes signs and PPEAs
  - Safety Posters
  - Accident Reporting Posters
  - MSDS (now SDS) for every chemical
  - Personal Protective Equipment Assessments
Congratulations!

Ready or not, you are now about to be inspected.
The Inspection

- Fire Extinguishers
- Electrical switches and outlets
- Circuit breaker boxes
- Extension cords
- Racking
- Storage containers for chemicals
- Equipment in use
- Equipment not in use
- Jacks and Lifts (labeled for capacity)
- Safety Guards
- LOTO Station
- Posters and Labels
The Inspection - Know Your Rights

• You are allowed to accompany the inspector
• You are allowed to ask questions
• You are encouraged to take notes
• You can appeal or dispute violations during the abatement process
Inspection

- The inspector will be taking notes
- The inspector will take pictures
- The inspector will be able to tell you what type of violation is being written (but not the level of fine/penalty)
- A union representative (if applicable) may accompany the inspection
Employee Interviews

Are your employees prepared?
Interviews with Employees

- Number of interviews is based on number of employees
- Must include employees in various positions
- Must not be managers or family members
- Interviews are private and confidential
Employee Interviews

- Employees will be asked how well they understand safety protocols
- They will be encouraged to report areas of concern
- Their responses are confidential - you will not get individual reports
Post Audit Interview

• Compare notes with the inspector
• Discuss violations and abatement procedures
• Types of violations:
  – Serious
  – Other than Serious
Post-Audit Interview

• This is the time to use your inspector as an asset.
• Inspectors will have information and tools to make compliance easier
  – Templates for written programs
  – PPEAs (Easy to use forms)
  – Website and written materials for education
Post- Audit Interview

- Inspectors can also explain the abatement process
  - How to negotiate lower fines
  - How to document your response
  - Timelines to expect for reports, responses, and abatement procedures
Abatement Process

• You will receive a report in the mail
• You must post a copy of the citation(s) at or near each violation for 3 days or until fixed
• Fix your violations and document the repairs
• This letter will also explain how to appeal citations or the timeline for repairs and how to negotiate for lower fines/penalties
When good intentions go bad...

Presented by: Shannon Nordstrom
Be prepared

These are fire extinguishers that were used in the company response.
We couldn’t get to this one!

But the real lesson is that our safety program prepared us for the emergency by having fire extinguishers readily available.
The Shop

Accidents happen. Being prepared takes conscious effort.

We rely on our Safety Program and the CAR Standards to provide a road map to compliance AND readiness.
Give way to the professionals

You don’t want to see this at your facility unless it is during a training exercise!
Give way to the professionals

But you are glad they came…
Know you did your best

While we anguished over the loss, we also felt pride that we did our best and we did well because we were prepared.
Know you did your best

And we thanked the Lord that no one was hurt.
Hazard Communication Standard

Presented by:
Sue Schauls
Haz Comm is the backbone of your SAFETY PROGRAM

The HCS (29 CFR 1910.1200) is designed to provide employees with the information they need. Under the provisions of the Hazard Communication Standard, employers are responsible for informing employees of the hazards and the identities of workplace chemicals to which they are exposed.

The rule is not new but it has recently been updated…
HCS rule has been updated to meet the United Nations (U.N.) standard through a process called **Globally Harmonized System (GHS)** where U.S. Material Safety Data Sheets will become uniform in what information is available and the format it is presented. They will then be called **SDS or Safety Data Sheets** and will use pictograms to convey hazard identity.
Hazard Communication Standard

1) **Designate a Safety Supervisor**
2) **Prepare a written Hazard Communication Plan**
3) **Create an Inventory of chemicals in the workplace**
4) **Compile an MSDS/SDS for each chemical**
5) **Provide training for employees**
   a) By December 1, 2013 on the new GHS standards
   b) Ongoing on a monthly basis
6) **Cover specific topics that govern our industry**
Identify Responsible Staff

Simply stated this is the Safety Supervisor. Hazard communication is an ongoing program in the facility. In order to have a successful program, it is necessary to assign responsibility for both the initial and ongoing activities that have to be undertaken to comply with the rule.

For any safety and health program, success depends on commitment and possibly a change in behavior. This will only occur if employers understand the program, and are committed to its success, and if employees are motivated by the people presenting the information to them.
Preparing and Implementing a Hazard Communication Program

All workplaces where employees are exposed to hazardous chemicals must have a written plan which describes how the standard will be implemented in that facility.

The plan does not have to be lengthy or complicated. It is intended to be a blueprint for implementation of your program--an assurance that all aspects of the requirements have been addressed.

A template is provided in your handout. Use this guidance to develop a plan that reflects the safety program at your facility.
Hazard Communication Standard

*Identify Hazardous Chemicals in the Workplace*

The Standard requires a list of hazardous chemicals in the workplace as part of the written hazard communication program. The list will serve as an inventory of everything for which a MSDS/SDS must be maintained.

The best way to prepare a comprehensive list is to survey the workplace. Purchasing records may also help. Employers should establish purchasing procedures that result in MSDS/SDSs being received before a material is used in the workplace.
Hazard Communication Standard

Establish and maintain a chemical inventory and Safety Data Sheet program

What is a Compliant SDS Program?
SDS must be readily accessible to employees when they are in their work areas during their work shifts. This may be accomplished in many different ways. Many employers keep the SDSs in a loose-leaf binder in a central location at the facility.

In workplaces with large numbers of chemicals, SDS information may be kept electronically and accessed through computer terminals. As long as employees can get the information when they need it, any approach may be used.
Hazard Communication Standard

Provide training for employees

- By December 1, 2013 on the new GHS standards
- Ongoing on a monthly basis
Hazard Communication Standard

*Provide training for employees*

By December 1, 2013 on the new GHS standards

A template is provided in your handout. Use this guidance to conduct the training for employees. Basically covering the information we are discussing now is adequate training. Augment the training with a sample SDS (download one for gasoline at [www.SueSchauls.com/msds.html](http://www.SueSchauls.com/msds.html)) and show a sample of the new labels that will be fixed to barrels and tanks as the SDS become available.
Provide training for employees
Ongoing on a monthly basis

Conduct monthly safety training as recommended by OSHA.
OSHA applies standards (29 CFR PARTS 1910 and 1926) as adopted by in each state.

This agency or it’s state counterpart investigates safety and health complaints in construction and general industry, fatalities/catastrophes and performs general scheduled inspections in each state including a review of an employer’s Safety Training documentation.
Provide training for employees
Ongoing on a monthly basis

Conduct monthly safety training as recommended by OSHA.
Many standards promulgated by the Occupational Safety and Health Administration (OSHA) explicitly require the employer to train employees in the safety and health aspects of their jobs.

Other OSHA standards make it the employer’s responsibility to limit certain job assignments to employees who are “certified,” “competent,” or “qualified”—meaning that they have had special previous training, in or out of the workplace.
Hazard Communication Standard

Cover specific topics that govern our industry

- Hazard Communication Standard
- Personal Protective Equipment
- First Aid Kit
- Eye Wash
- Fire Extinguisher
- Spill Cleanup Kit
- Hoist Inspection
- Fire Escape Plan
- Forklift Certification

If applicable in your shop:

- OSHA 300 Log
  (if 10 or more employees)
- Cutting Torch Protocol
- Lockout / Tag Out
- Machine Guarding
- Bloodborne Pathogens
Hazard Communication Standard

1) **Designate a Safety Supervisor**
2) **Prepare a written Hazard Communication Plan**
3) **Create an Inventory of chemicals in the workplace**
4) **Compile an MSDS/SDS for each chemical**
5) **Provide training for employees**
   a) **By December 1, 2013 on the new GHS standards**
   b) **Ongoing on a monthly basis**
6) **Cover specific topics that govern our industry**

Sue Schauls – [www.SueSchauls.com](http://www.SueSchauls.com) – cell 319-290-7843
THANK YOU FOR ATTENDING!

ARA 70th Annual Convention & Exposition

Diamond Sponsors

Brock

Hollander

Panhandle

Wells Fargo

Insurance Services