

Risk Control Bulletin

Preparing for an OSHA Inspection

RISK CONTROL



Introduction

OSHA inspections can be stressful for manufacturers. They are usually conducted without advance notice. There are, however, special circumstances under which OSHA may give advance warning to the employer, although it will usually be less than 24 hours' notice. Examples of cases where advance warning may be given include:

- Imminent danger situations
- Investigation of a fatality
- Incidences where select persons must be present

Employers who receive advance notice of an inspection must inform their employees' labor representative or arrange for OSHA to do so. If an employer refuses to admit an OSHA compliance officer, or if an employer attempts to interfere with the inspection, the OSHA Act provides for legal action, such as obtaining a Warrant to Inspect.

How the Inspection Happens

OSHA inspectors/officers should come to your facility prepared. They should understand relevant facts about your wood-working shop, such as its inspection history, its known potential hazards and the specific standards that might apply. Inspectors should show appropriate credentials. Likewise, as an owner, you can call the federal or local OSHA office to verify their credentials.

An opening conference including involved parties and the OSHA team and individuals begins the inspection process. The conference covers the purpose of the visit, the scope of the inspection and the applicable standards. A copy of any employee complaint can be given to you at this time. The Act does not require that an employee representative be present for an inspection. However, when no employees are in attendance, the compliance officer must consult with a reasonable number of employees concerning safety and health matters in the workplace.

The compliance officer determines the length of the inspection and the areas to be covered. Safety and health conditions and practices are observed. Employee discussions are private. If necessary, the inspector:

- Takes photos
- Records video
- Measures instrument readings
- Examines records
- Collects air samples
- Measures noise levels
- Surveys engineering controls
- Monitors employee exposure to toxic fumes, gases and dusts.

During the inspection, OSHA pays special attention to posting and recordkeeping requirements, such as totals from the last page of the OSHA Form Number 300 and the OSHA workplace poster (OSHA 3165), which explains employees' safety and health rights. Records of toxic substances and harmful agents are also requested. Remember, under OSHA's Hazard Communication Program, employers must establish a written, comprehensive communication program that includes provisions for container labeling, material safety data sheets and an employee training program.



A closing conference completes the onsite inspection. The employer and all other persons involved then receive a copy of Employer Rights and Responsibilities, (OSHA 3000). The inspector will discuss all unsafe or unhealthy conditions observed.

The inspector will not indicate any specific proposed penalties, but will inform the employer of his or her appeal rights. During this time, the woodworking shop owner may produce records of compliance efforts and information to help the inspector determine abatement time frames. If laboratory results are required, or when the hazard affects employees, OSHA may request one more closing conference.

Preparing for an OSHA Inspection

The woodworking industry is often found on OSHA's target inspection list for hazards associated with machinery, chemicals and dust. **Understanding your woodworking hazards** and controls for injury prevention is key. If you have had any incidents and/or accidents, make sure you have conducted a root cause analysis. Even if the causes are unrelated to your wood shop, make sure you have addressed them, as OSHA may decide to investigate.

Have a clear documented history of all incidents and accidents. Maintain all appropriate recordkeeping, including training programs and training records. If you have a health and safety manual, make sure it is updated with current OSHA standards.

Ensure that your woodworking shop is organized and clean. Hazardous, flammable and combustible materials and products should be properly stored. Have your emergency evacuation plan current. First aid kits and fire extinguishers should also meet current OSHA standards. Worker stress should be avoided, so take care to use ergonomics in your woodworking shop.

An OSHA inspection is not desirable, but it can be completed efficiently if your woodworking shop is prepared.

Resource - www.osha.gov

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