

OSHA Inspections

This procedure provides guidance for managing the OSHA inspection process. OSHA could show up at the project site for several different reasons including complaints, accidents, sweeps/programmed inspections, follow-ups, referrals or drive-by observations.

Subpart 1: Preparation

OSHA Inspection/Accident Kit:

The Kit will be developed before employees start work on a Crain Construction project. At a minimum, items to include in this kit are listed below.

OSHA Inspection/Accident Kit	
Flashlight	Pens/Pencils/Marking Pens
100' Measuring Tape	Notepad/Blank Paper
Air Horn	First aid/CPR Handbook
Voltage Tester	Portable First Aid Kit
Red Danger Tape/Yellow Caution Tape	Accident Response Document Pack

Training:

OSHA Inspection training should be conducted on each project and reviewed on an annual basis. It is important that all supervisors understand company procedure in the case of OSHA arriving on site. Inspections can be unscheduled and even happen on weekends in special cases. The importance of all project supervision understanding these procedures is crucial for a successful visit.

Complaints:

Employees have every right to notify OSHA of any unsafe condition existing on a project. Injury, near miss, and accident report should also be encouraged in

order to promote open communication about safety hazards. When an employee expresses a safety concern, it is important to take them seriously and address them immediately. Once the item has been addressed, talk to the employee and make sure they are comfortable with the solution. In no way or manner will Crain retaliate against any employee for expressing a concern, reporting an injury, or making a suggestion.

Understand the Client Notification Requirements:

Clients and building owners have unique notification and action requirements, which may vary by location.

Subpart 2: Inspection Process

Verify Credentials:

Ask politely for a business card and/or badge. It is important to verify that the person is an OSHA inspector.

Notify Management:

Employees are to call the onsite supervisor to arrange an escort to the company jobsite trailer. The following individuals should be notified before the sit down by the onsite supervisor:

- Director of Safety & Health:
- General Superintendent:
- CEO:

Continue to inform the inspector of updates and be sure to convey the times responsible parties will be arriving. The inspector should expect to wait a reasonable amount of time for personnel to arrive on the project.

Opening Conference:

*Assign someone to **take notes**. Obtain the following information from the inspector:*

- Politely ask the reason for the inspection (focused, comprehensive, complaint, programmed, etc.). Try to determine scope/reason for the inspection.
- Ask if any trade partners need to attend
- Document the following:
 - Inspectors name
 - Address (as on business card)
 - Date and time arrived
 - Attitude of the inspector
 - Employees who will accompany the inspector
 - Scope of the inspection

The OSHA inspector may decide to ask for documentation during the audit. Only provide the documents that are specifically requested. Do not make or provide copies of the documents to the inspector without first consulting the company safety director.

Walk Around:

*Assign someone to **take notes** and someone to **take pictures**.*

- Ensure the inspector has signed in as a visitor to the jobsite
- All required PPE must be present before the inspection begins
- Bring the OSHA Inspection/Accident kit
- Ask the inspector which area specifically they would like to walk. Take the inspector to the specific area but be sure to take the shortest path possible
- Take notes on the following:
 - Anything the inspector noted as wrong
 - Note equipment that was/was not in operation
 - Housekeeping. Note if the area was in the process of dismantling or cleanup
 - Tasks being done in the area, trade partner employees around, etc.
- Take pictures
 - If the inspector takes a picture, the employee assigned to take pictures should take the same picture as well as additional pictures

from other angles. Look at different views/angles that may assist if there is a citation

- If the inspector takes noise, air or similar readings, take notes and record the readings. If similar equipment is available on the project site, take the same readings and record the readings obtained
- Take measurements of anything the inspector measures. Take pictures of the measurements and focus on how they're being taken (e.g., where a trench is being measured from, distance scaffold is away from a wall, etc.)

Closing Conference

Assign someone to take notes. During the conference, obtain a record of the following information.

- Determine whether violations were observed
NOTE: Even though the inspector may say that no citations will be issued, there is a potential for citations to be issued.
- *Date and time the inspector left the job*

Subpart 3: Following an OSHA Inspection

Complete a summary of the walk and send it to the director of Safety and Health immediately. This should be a summary of all the notes taken, pictures, conversations, sample readings, etc.

Citations may be mailed to the project. Inform all project staff to watch the mail closely for anything from the Department of Labor, Department of Industrial Relations, OSHA, etc. If received, open such correspondence immediately regardless of to whom the letter is addressed. The company only has 15 working days to appeal a citation.

If a citation is issued, contact the director of Safety and Health immediately. Be aware that citations may be issued up to six months following an inspection

Contesting OSHA Citations Information

How To Fight OSHA Citations and Monetary Penalties (oshatraining.com)