

HOW TO HANDLE AN OSHA INSPECTION

WHO YOU GONNA CALL?

WHAT YOU GONNA DO?



MEET THE PRESENTER

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You are encouraged to conduct site specific safety training and periodic workplace inspections. References to specific companies or products are provided for illustrative purposes only and are not intended as endorsement of those companies or products by the Ohio Bureau of Workers' Compensation



WHO EXACTLY IS OSHA?

- **Occupational Safety and Health Administration** – Created in 1971
- **OSHA's mission:**
 - To assure safe and healthful working conditions for working men and women by **setting** and **enforcing** standards and by providing training, outreach, education and assistance.

WHAT EXACTLY IS THE OSHA CONSULTATION PROGRAM?

- We don't issue citations.
- Smaller employers in high hazard industries
- No additional costs!
- Employer controls the visit.
- Employer may terminate the visit at any time.
- Agree to correct "serious" hazards 40 days/extension.

DOES YOUR EMPLOYER KNOW THE CORRECT NAICS NUMBER?

- North American Industrial Classification System
 - www.naics.com

OSHA - INSPECTIONS, CITATIONS & PROPOSED PENALTIES

- Part 1903 at www.OSHA.gov
- Each employer shall post/keep posted a notice (OSHA poster 8.5x14).
- At the beginning of an inspection, **compliance safety and health officers (CSHO)** shall present their credentials to the owner, operator, or agent in charge at the establishment; explain the nature and purpose of the inspection; and indicate generally the scope of the inspection.

PART 1903

- CSHO **may consult with employees** concerning matters of occupational safety and health **to the extent they deem necessary** to conduct an effective and thorough inspection.
- During the course of an inspection, **any employee** shall be afforded an opportunity to bring any violation of the act which he has reason to believe exists in the workplace to the attention of the compliance safety and health officer.

PRIORITY OF OSHA INSPECTIONS

Priority	Category of inspection
1st	Imminent Danger <i>Reasonable certainty an immediate danger exists</i>
2nd	Fatality/Catastrophe <i>Reported to OSHA; inspected ASAP</i>
3rd	Complaints/Referrals <i>Worker or worker representative can file a complaint about a safety or health hazard .</i>
4th	Programmed Inspections <i>Targeted inspections– Local Emphasis Program (LEP), National Emphasis Program (NEP)– industries and employers with high injury and illness rates, specific hazards, or other exposures</i>



WHAT DETERMINES PROGRAMED INSPECTIONS?

Hint!

We have already discussed it!!!!

NATIONAL EMPHASIS PROGRAMS

- Combustible dust
- Heat related hazards
- Hexavalent chrome
- Amputations – 6/30/2025
- Falls

LOCAL EMPHASIS PROGRAMS

- Forklifts (1910.178)
- Wooden pallet manufacturing (1910.213)
- Grain handling facilities (1910.272)

LEP'S

- Noise (1910.95) - **may impact 1904 Recordkeeping**
- Food manufacturing (1910.212 and 1910.147)

NAICS - FOOD MANUFACTURING

- 3113** Sugar/confectionary product mfg.
- 3114** Fruit and vegetable preserving
- 3115** Dairy product mfg.
- 3116** Animal slaughtering and processing
- 3119** Other food mfg. (nuts, coffee/tea, spices)

WHAT EMPLOYERS SHOULD DO IF OSHA VISITS!

- Who to contact within the organization! (mgmt., safety person, private consulting firm, attorney).
- Once credentials have been established take the CSHO person to a conference room.
- OSHA must conduct an “**opening conference**” which lists purpose of their visit, employer rights and obligations.

WHAT EMPLOYER REPS SHOULD KNOW!

- Has your employer recently terminated anyone?
- Current number of employees?
- OSHA will ask about 1904 compliance. May ask for 3-5 years' worth of 300 logs/300A summary forms/301 accident reports
- **Is your employer required to submit injury/illness information electronically based on 1904.41?**

WHAT EMPLOYERS SHOULD DO IF OSHA VISITS!

- Have a clearly defined answer to internal safety management processes (assessments, training, safety team minutes).
- OSHA CSHOs may determine that the employer is making a “**good faith effort**”.
- If the CSHO visits a department and takes pictures, you take the same pictures from the identical angle/perspective!

WORKING WITH THE OSHA CONSULTATION STAFF MAY PROVIDE SOME LEVEL OF PROTECTION

- OSHA consultation staff have had a prior visit, and employer is within the 40 days of abating any “serious” hazards
- Employer with settlement agreements
- Rapid Response Investigations (1904.39 events)
- We don't call OSHA.

TOP 10 OSHA CITATIONS

- 1. Fall protection (construction) 1926.501**
- 2. Hazard communication (general industry) 1910.1200**
- 3. Ladders - 1926.1053**
- 4. Scaffolding - 1926.451**
- 5. Powered industrial trucks 1910.178**

TOP 10 OSHA CITATIONS

6. Lock Out/Tag Out - 1910.147
7. Respiratory Protection - 1910.134
8. Fall Protection Training - 1926.503
9. Eye and Face Protection - 1926-102
10. Machinery and Machine Guarding – 1910.212

QUESTIONS?

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**Bureau of Workers'
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NEED MORE INFORMATION?

Contact us for additional support and resources:

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OFFICE OF SAFETY SERVICES – WE ARE HERE TO HELP

On-site safety consultations

Workplace hazard assessments

Ergonomics and process safety reviews

Training and education courses

Grant opportunities for safety equipment



THANK YOU

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