

WHAT TO EXPECT FROM AN OSHA INSPECTION



OUTLINE

- Introduction to Oregon OSHA
- Different types of OSHA inspections
- The inspection process
- The most cited regulations
- Questions

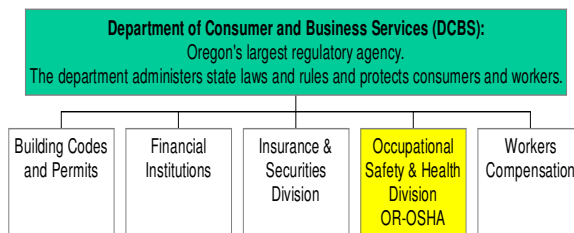


OREGON - OCCUPATIONAL SAFETY AND HEALTH DIVISION (OR-OSHA)

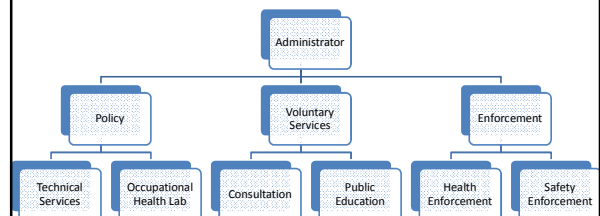
OR-OSHA'S MISSION STATEMENT:

**To advance and improve workplace
safety and health
for all workers in Oregon.**

Organizational Structure

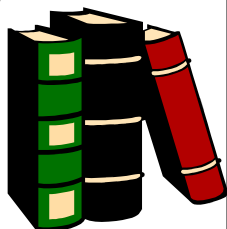


Oregon OSHA Organizational Structure



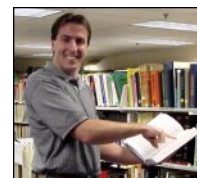
POLICY/TECHNICAL SERVICES

Variances
Regulation Interpretations
Questions/Answers
Technical Information/Regulation History
Statistical Information



TRAINING SERVICES:

ON-Line Training Classes
Lecture Style Classes
Conferences



I found what I was looking for at the OR-OSHA Resource Center!

Oregon OSHA Online Courses

ONLINE COURSE CATALOG

CONSULTATIVE SERVICES:

Safety and Health Management Development
Industrial Hygiene Services/Evaluations
Safety Systems Evaluations
Program Development



ENFORCEMENT SERVICES

Pre-Job Inspections
Complaints
Referrals
Inspections
Abatement Assistance
Regulatory Education



SAFETY Enforcement Officers/Consultants

MCHUMOR.com by T. McCracken



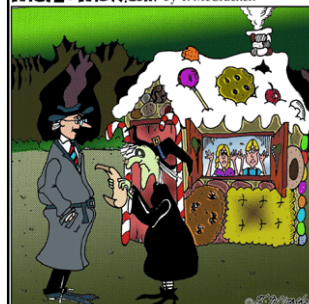
"What code violations?"

Evaluates things that will
"MUNCH-YA, CRUNCH-YA, or EAT-YA"

Lockout/Tagout
Electrical
Equipment Guarding
Cranes
Fall Protection
Industrial Vehicles

HEALTH Enforcement Officer/Consultant

MCHUMOR.com by T. McCracken



"Sorry, but you're in violation of building codes. You can only use lo-cal hi-fiber wood here."

Evaluates things that are the: "Silent Hazards – things that getch-ya @ 65+"

Hearing Loss
Chemical Exposures – Chronic illnesses
Ergonomics
Respirators
Personal Protective Equipment

Types of Inspections

McHUMOR.com by T. McCracken



"I haven't found anything wrong yet, but it's OK for you to go ahead and worry a bit longer."

IMMINENT DANGER



FATALITY, CATASTROPHE or ACCIDENT



COMPLAINTS



REFERRALS

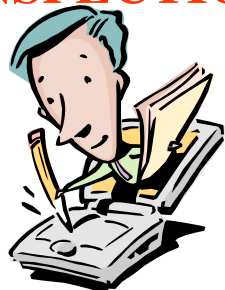


**DANGER
PESTICIDES
KEEP OUT
PESTICIDE STORAGE AREA**

PROGRAMMED INSPECTIONS



FOLLOW-UP INSPECTIONS



EMPHASIS

Fall Protection	Excavations
Lead	Tower Cranes
Methylene Chloride	Pesticides
Silica	
Process Safety Management	
Diisocyanates	
Combustible Dusts	



INSPECTION PROCESS

Opening Conference
Facility Walk
Document Review
Employee Interviews
IH Sampling
Closing Conference



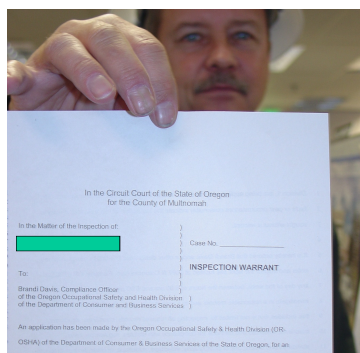
"For a moment there I thought I wasn't going to find any unsafe conditions at this job site."

OPENING CONFERENCE



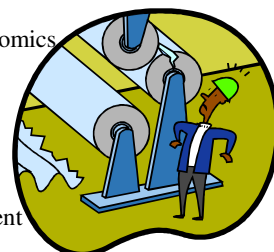
EMPLOYER RIGHTS

- * Refuse entry
- * Participate in inspection process
- * Attend opening conference
- * Attend closing conference



Facility Walk

Housekeeping
Workstation Design – Ergonomics
Machine Guarding
Electrical Hazards
Chemical Exposures
Personal Protective Equipment
Tools
Vehicles
Work Practices



Red Tags



Document Review

Oregon Occupational Safety & Health Division
330 Winter St., SE, Room 430 • Portland, OR 97202 • (503) 227-2777 • Fax: (503) 227-2847

Industrial Hygiene Information

Date: 2.19.09 Report number: 27575-01 Employer: [redacted]

Injury and illness records
☒ OSHA 300 Log 2008 copy ✓
☐ 801s
☒ Hours worked 2008 copy ✓

First aid
☐ Emergency medical plan

Confined space
☐ Permit-required confined-space plan
☐ Entry records
☐ Instruments records/calibration
☐ Training records

Hazardous waste and emergency response
☐ Emergency-response plan
☐ Emergency-action plan
☐ Medical surveillance
☐ Training records

Biohazards
☐ Bloodborne pathogen
☐ Exposure control plan
☐ Hep. B vaccine — declination statements
☐ Sharps injury log

Hazard communication
☒ Written program ✓
☐ List of chemicals
☐ MSDS
☐ Training records

Safety committee
☒ Minutes last meeting 11/10/08 ✓
☐ Quarterly inspection reports

Personal protective equipment
☐ Hazard assessment & certification
☐ Training records & certification

Air contaminants
☐ Air sampling records
☐ Training records/medical surveillance

Respiratory protection
☐ Written program
☐ Fit testing records
☐ Medical-evaluation records
☐ Training records

Noise
☐ Hearing conservation program/audiometric testing program

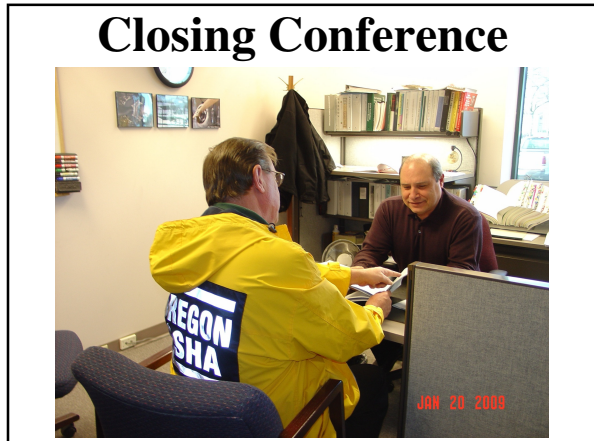
Employee Interviews



IH Sampling



Closing Conference



TYPES OF VIOLATIONS

OTHER THAN SERIOUS
 SERIOUS
 REPEAT
 FAILURE TO ABATE
 WILLFUL



VIOLATION RATING				
Probability	Severity	Probability	Severity	
			Serious	Death
	Other than Serious	LOW	\$300	\$1500
LOW	\$0	MEDIUM	\$500	\$2500
HIGH	\$ 300	HIGH	\$ 1250	\$5000

REPEAT VIOLATIONS		
1st Repeat	X 2	
2nd Repeat	X 5	
3rd Repeat	X 10	
4th Repeat	Discretion of Administrator	

FAILURE TO ABATE

Before the State of Oregon Department of Consumer & Business Services
Oregon Occupational Safety & Health Division (OR-OSHA)
350 Winter St. NE, Rm. 430
Salem, OR 97310

In the Matter of the Alleged Violation of ORS 654, the OREGON SAFE EMPLOYMENT ACT }
To: } NOTICE OF FAILURE TO CORRECT VIOLATION

On _____, 19____, Citation Number _____ was issued to you in accordance with the provisions of ORS 654, the Oregon Safe Employment Act, notifying you of violation(s) of the Act and the date(s) by which it was to be corrected.

Based on a reinspection on _____, 19____, it is alleged that you have failed to correct the violation(s) specified below within the time prescribed and you are now accumulating daily penalties.

Item number	Date correction was required	Accumulated non-abatement days	Central office use only		
			Additional days	Penalty per day	Total penalty
			X		
			X		
			X		
			X		
			X		

WILLFUL VIOLATION

A willful violation is a violation that is committed knowingly by an employer or supervisory employee who, having a free will or choice, intentionally or knowingly disobeys or recklessly disregards the requirements of a statute, regulation, rule, standard or order.

The employer committed an intentional and knowing violation if: An employer representative was aware of the requirements of the OSEAct, or the existence of an applicable rule or regulation, & was also aware of a condition or practice in violation of those requirements.

An employer representative was not aware of the requirements of the OSEAct or rules, but was aware of a comparable legal requirement (e.g., state or local law) & was also aware of a condition or practice in violation of that requirement.

The employer committed a violation with plain indifference to the law

APPEAL RIGHTS

EMPLOYERS CAN APPEAL CITATIONS:


Must be filed within 30 days

Can Appeal for any reason:

- * PENALTY AMOUNT
- * ABATEMENT TIME
- * THE ALLEDGED VIOLATION

Two Avenues for Appeals

- * Informal
- * Formal



Top 10 Violations 07-08

#1: General Fall Protection
#2: Written Hazard Communication
#3: Establish a Safety Committee
#4: Develop a Safety Program
#5: Employees receive training
#6: Hazardous Waste Operations and Emergency Response
#7: Hazardous Waste Site Assessments
#8: Hazardous Waste Site Assessments
#9: Hazardous Waste Site Assessments
#10: Hazardous Waste Site Assessments

Top 10 Health Violations

#2: Written
#4: Medical Evaluation
#7: MSDs Ready
#8: Respiratory
#9: Hazardous
#10: Safety Training
#11: Written Respiratory
#12: Fall Protection
#13: Machine Guards
#14: Hot Surfaces
#15: Noise

To carry out its responsibilities, OR-OSHA does the following:

- Inspects places of employment
- Investigates industrial accidents, fatalities or catastrophes
- Issues citations for violations
- Identifies safety and health hazards which may or may not be violations and bring them to the attention of employers and employees
- Issues reasonable correction orders

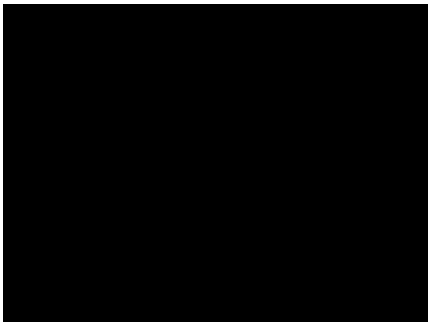
To carry out its responsibilities, OR-OSHA does the following:

- Assists employers and employees in safety and health matters
- Assesses and collect civil monetary penalties for violations
- Holds informal conferences with employers or employees to discuss citations, penalties or correction orders and other safety and health matters without limiting or extending the employer's appeal rights
- Grants or denies extensions of the times set by correction orders

So when your company has an OR-OSHA inspection.....

WILL THEY - - - - -

FLOP



With a little work - SUCCEED

