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PREPARING FOR OSHA

Top 10 Things To Do
Before An OSHA Visit





PREPARING FOR OSHA

Surprise! No one likes that experience when OSHA shows up unexpectedly for an inspection. But, being prepared can help you pass an inspection with flying colors. Our list covers the Top 10 things you should do to help prepare for an upcoming OSHA inspection. Of course, you don't want to focus on just these 10 items, but you should keep in mind all OSHA compliance requirements and the larger goals of your safety management system.



Top 10 Things To Do Before An OSHA Visit

1 Job Safety Analysis (JSA)

OSHA requires companies to develop safe work practices for all tasks and all operators of equipment. JSAs must be in writing and can be used repeatedly.

- Develop training steps for the safe operation of all machinery.
- Develop training steps for safe work task practices.
- Develop training steps for all new hires.
- Document and employee signs off on all training.

2 Written Safety Programs

All hazards within a company are to be complimented with a written safety program. This program is tailored to your facility and your hazards.

To determine which written programs you will need, you must perform an assessment/audit of the work and facility. **Examples of written programs include:**

- Hazard Communication
- Confined Spaces
- Machine Guarding
- Personal Protective Equipment (PPE)

Your program determinations will be known after a safety audit of the work, machinery and potential hazards have been identified and completed. We advise that you start with a plant audit.

3 Safety Audit & Assessment

The audit will give a wealth of information regarding both written programs as well as what on-going, OSHA required, and safety training you must do for employees. Again, to know how to proceed, we advise that you start with a plant safety audit that will:

- Determine what PPE is appropriate for employees.
 - Determine what written safety programs are needed.
 - Determine where in your facility you may incur a citation from OSHA, if inspected.
 - Develop a priority list (based on results of audit) of what to repair and make compliant.
 - Show pro-active action if you get inspected by OSHA.
 - Determine if you need noise or air sampling tests.
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4 Safety Training

OSHA Standards (29 CFR 1910) require that you provide to all workers an on-going safety training program. OSHA does not say what on-going shall mean. However, it can mean that you do a longer safety class once per month and a short toolbox safety talk each Monday morning. It's really up to you to create some form of on-going and regular basis training in regards to safety.

- Develop a safety training routine that doesn't miss its dates due to production (OSHA may look at this).
- It's not "lip service" but rather genuine safety and health training. The instructor is versed in the topics and can show some type of competency, training credentials or expertise in the area discussed. Is your trainer competent? Do they have any training they can show?
- All training is documented, every time!
- Documentation shall contain: Date, instructor name, employee name, topic, brief paragraph about what was discussed, signed off by employee. Per OSHA, **IF IT'S NOT IN WRITING, IT DIDN'T HAPPEN!**

5 Noise Survey

Periodically, you need to have someone do a time weighted average on all noise in the different areas of the plant to determine if hearing protection is needed and at what level of protection. This is not a yearly requirement and can be every few years.

- If hearing protection is needed and is at or above 90 dBi, a full hearing conservation program must be instituted per OSHA in affected plant areas.
- A written hearing conservation program must be available with training for employees.
- Employees must have a hearing test annually.
- New employees must undergo a base-line and initial hearing test upon hiring or within six months of being hired.

6 Lockout/Tagout (LOTO)

All equipment, processes or functions of the facility that use or have available to their job a powered source (hydraulics, pneumatics, gravity, capacitors, electrical, springs, etc.) must have the following per OSHA:

- Written LOTO program (reviews and updated each year)
- Written method of LOTO for any and all devices and equipment
- Written step-by-step of de-energizing and re-energizing all equipment and devices
- Documentation to prove employees were trained

7 Power Industrial Truck Training (Aerial Lifts, Forklifts)

All equipment, processes or functions of the facility that use or have available to their job a powered source (hydraulics, pneumatics, gravity, capacitors, electrical, springs, etc.) must have the following per OSHA:

- A formal classroom lecture using video, PowerPoint, booklets, lecture, Q&A and test
- Demonstration of all various lift trucks; license and certificates for all operators
- Review of forklift hazards in the facility and surroundings. This must be documented.
- Documented hands-on training so all employees can demonstrate their skill level.

8 Air Sampling

Does your work environment include scents, strong odors, vapors or particulates like silica and wood fibers? OSHA requires air sampling to determine if your employees need more ventilation, respirators, or dust masks. After identifying the hazards, the exposure levels from the exposure assessment must be compared to the permissible exposure limit, or PEL, as set by OSHA, to determine whether respiratory protection is needed. It is required to have a Certified Industrial Hygienist perform air samples, analyze them and then make recommendations as to the level of PPE and respiratory equipment workers must use. This can be done periodically, but not every year.

9 Safety Data Sheets (SDS)

OSHA requires companies have up-to-date SDS available for review by any employee and located in an area where any employee can read them so as to know how to handle, store or discard chemicals. If you have SDS on a computer, you must train employees on how to access them.

TOP 10 THINGS TO DO BEFORE AN OSHA VISIT

10 OSHA 300 Logs

OSHA requires companies to maintain up-to-date injury logs. There are three logs that must be kept:

- OSHA 300 – This is a general log about injuries incurred each year.
- OSHA 300A – This is the statistical log pertaining to lost days, etc. This log must be posted publicly on February 1 for the preceding year.
- OSHA 301 – This log is similar to OSHA 300 log; however, it is more detailed about what happened to cause an injury and to whom.

Employers with less than 10 employees during all of the calendar year are not required to post OSHA Form 300A.

Safe at Work Means Hugs at Home

From trainings and inspections to audits and PPE fittings, Martin Solutions Plus helps create a safe and healthy work environment where accidents decrease, productivity improves and employees return home to the people they love.

SAFETY TRAININGS ▪ AUDITS ▪ INSPECTIONS

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Consultation!**



SCAN ME



We know the true meaning of a safe workplace.

Safe at work means coming home to family, tailgating with friends, playing fetch with Fred and ensuring the creation of future families. From trainings and inspections to audits and PPE fittings, Martin Solutions Plus helps create a safe and healthy work environment where accidents decrease productivity improves and employees get back to living the life they love.



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