

# OSHA/HIOSH Preparation

No company or business looks forward to a surprise inspection from OSHA/HIOSH. As a matter of fact, only a handful of companies openly welcome it. The **AIM** of this fact sheet is not to make your organization bullet proof against OSHA/HIOSH citations, but to build a strong base that will put your company in a good light should they knock on your door.

## OSHA/HIOSH visit triggers

- Imminent Danger
- A fatality/ catastrophe investigation
- A complaint by an employee
- Unusually high incident rate
- Programmed inspection

## The Inspection Process

The OSHA/HIOSH inspector has a right to visit any part of your facilities, and request any required OSHA/HIOSH document. In addition to this, they also have the right to interview any employee that may be working during a visit.

### Recommendations:

- Designate one person that is fully knowledgeable about your Safety & Health practices to be the contact point for the visit.
- Plan out a pre-determined inspection route that may bypass areas that you feel may not be ready for an inspection. Unless they specifically ask you to show them.
- Look up your industries 10 most cited OSHA/HIOSH inspected items. Make sure you have all 10 covered.

## Where do they start?

The first place they will start is usually a sit down with the contact person to discuss the purpose

for their visit. You have the right to refuse to be inspected, but that is not recommended. They may then ask for administrative work which can include but may not be limited to:

- OSHA 300 logs
- Company's Safety & Health Program
- Inspection Documentation
- Training Logs
- Regulatory Programs
  - \* Hazard Communication
  - \* GHS
  - \* Lockout/ Tagout
  - \* Respiratory Protection
  - \* Emergency & Fire plans
  - \* Hearing Conservation Program
  - \* Others

### Recommendations:

- Gather and Isolate OSHA/HIOSH documents and keep it separate from proprietary or confidential information.
- Ensure that all safety training is documented
- Have the last 4 yrs of OSHA 3000 logs available



Analyze • Inform • Motivate

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in hard or soft copy.

- Don't feel pressured, if you feel uncomfortable about a document or question, consult a professional or lawyer. You are not required to have an immediate response on everything.

## *The physical inspection*

It is impossible to counter the books upon books of regulations that an inspector has at their disposal to write you a citation. So I will give you the most logical way to ensure that you are ready as you will ever be.

### **Recommendations:**

- Control the route the inspector takes through the facility, and how information is communicated to the inspector.
- Be proactive during the inspection. Inquire about what may be of issue to the inspector.
- If possible, take immediate action on deficiencies that are found. If they can be remedied during the inspection visit, it may not be counted against you.

## *Where it all ends*

When it is all said and done, the inspector will have

a closing conference with the contact to discuss the findings and ask if there are any questions about the visit.

### **Recommendations:**

- If you are sure about a mistaken violation, discuss it to see if can be resolved.
- Highlight the proactive areas of your company's safety program.
- If deficiencies were resolved during the inspection, make sure the inspector knows this.
- You will have your day in court, and the closing interview is not the time to vehemently argue a violation. Take time to gather your facts so you can make a good representation at your follow-up meeting date.
- Show up at the citation meeting to discuss any concerns or how you have addressed citations that were found. In many cases, citation fines have been reduced significantly at these visits.

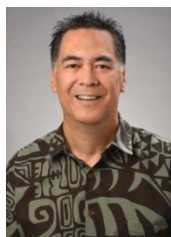
This **AIM** fact sheet should increase your odds of a successful inspection. Don't worry about trying to catch every deficiency, because no matter how hard you try, they will find something. So focus on developing a strong Safety & Health program that will reduce injuries and accidents in the workplace rather than eliminating regulatory citations.

Webpage for most frequently cited violations for your industry:

<http://www.osha.gov/pls/imis/citedstandard.html>

Webpage for HIOSH most cited violations:

[http://ploneadmin.hawaii.gov/labor/hiosh/most\\_cited.shtml](http://ploneadmin.hawaii.gov/labor/hiosh/most_cited.shtml)



**Chad Lindsey**  
*Risk Consulting  
Manager*



**Jason Popejoy**  
*Risk Consulting  
Consultant*

**P:** (808) 951-1772

**E:** [rsc@dtric.com](mailto:rsc@dtric.com)

## About DTRIC Insurance Risk Consulting Services

The Risk Consulting Services team at DTRIC Insurance is designed to help you reduce accidents and injuries in the workplace. Our approach involves our proven **A.I.M.** process that is easy to understand and simple to implement.



### **ANALYZE**

We start by helping you understand and assess your current situation with services including:

- Safety audits
- Property and liability hazard surveys
- Accident investigation training
- Graphical analysis
- Job hazard analysis

### **INFORM**

Keeping your team members informed is essential to success. We'll help you:

- Develop a safety committee
- Provide educational resources
- Work with your management team to develop their skills and knowledge of regulations
- Address loss trends with training on key issues
- Open communications within your organization

### **MOTIVATE**

The more safety is promoted in your workplace, the more motivated your team members will be to make safety a top priority. Whether you motivate with promotions, incentives or recognition, we'll help you develop a results-driven method to encourage safety at all times.

DTRIC's Risk Consulting Services team will work closely with you to create a program to effectively improve your bottom line.