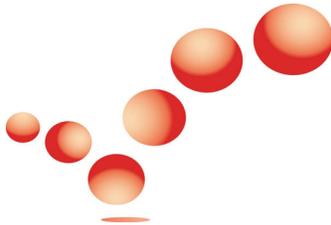


# OSHA Compliance Essentials

## Top 10 Ways to Ensure a Successful OSHA Audit



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## The Top 10 OSHA Compliance Problems

### **10. *Lack of an emergency action plan***

Does your organization have an up to date EAP? OSHA is looking for your plan in the event of emergencies that confront your facilities. This might include fires, tornado, earthquake, terrorism, chemical spills and workplace violence just to name a few. Hint: Don't just think about emergencies that could occur on your property; think also about hazards in your locale that could affect your operations. For instance, if you are located within 50 miles of a dam, do you have a plan in the event the dam is breached? Another example: Are you in the vicinity of a chemical plant? If they had a spill, you could be affected; therefore you must also have a plan for this potential hazard. Don't forget: Your EAP must discuss evacuation procedures, staging areas, areas of refuge and other related issues. Need additional help? Check out "[Emergency Planning For Facilities](#)", a great resource for developing your organizations Emergency Action Plan. 29 CFR 1910.38(a)

### **9. *Failure to use or provide personal protective equipment (PPE)***

OSHA requires that you perform a job hazard analysis and determine the risk involved with potentially dangerous tasks. If the hazard cannot be eliminated or reduced via engineering or work practice methods, appropriate PPE must be provided to employees. When PPE is provided, employees must be trained about the hazard, when PPE is required, how to don and doff the PPE, how to clean, maintain and inspect it and other pertinent issues. Finally, provision of PPE, but failure to require its use is a serious OSHA violation; therefore you must enforce its use. 29 CFR 1910.132 - 1910.140

### **8. *Extension cords that could cause a tripping hazard***

This is an easy area for OSHA to find violations while auditing most organizations. Extension cords are a major cause of tripping and fall hazards and therefore are under a microscope. Extension cords shall not be found passing through hallways, windows and other areas which could cause a tripping hazard. Extension cords must not be used as a substitute for permanent wiring. The removal of the plugs grounding pin is a common violation that could net you a \$7,000 fine. Likewise, frayed wires and insulation that has pulled away from the plug head is a common violation as well. The warning: Regularly inspect your extension cords for damage and train employees how to use the cords without creating a tripping hazard. 29 CFR 1910.310 & 1910.305(G)(2)(iii)

### **7. *Failure to enforce written safety policies***

It's commendable to have company safety policies in place. In fact it's essential; however if you are not enforcing these written policies, you will be found guilty of non-compliance. Sure, employees will break policy, but you must be diligent in enforcing these rules. Employees will test boundaries and if you tolerate certain behavior, you encourage it. Your organization has policies about start time and lunch time. If employees are chronically late or take extended lunches, they will be progressively disciplined and perhaps their employment will even be terminated if the dysfunctional behavior persists. Same is true of safety policies. You must have a form of progressive discipline in place and when the policies are broken – you must address them quickly and consistently. Hint: When safety policies are broken you must retrain the employee concerning the expected behavior.

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**6. *Lack of (or inadequate) safety audits***

OSHA requires regular safety inspections of your facility. OSHA does not dictate how often these audits must be performed, as long as they are regular enough to capture evolving safety issues. For instance: Once a year would not be enough for most organizations; while once a day would likely be overkill for most. The audits must be kept for five years. These safety audits are intended to identify problems and provide a mechanism for solving the unsafe situation. In addition to auditing the facility, the machinery and equipment, the audits should review the safety plan, training, PPE and other activity-based issues. 29 CFR 1910.1200 Note: This regulation applies only to the hazard communication portion of the regular safety audit requirements. Other subparts found within the General Industry regulations require similar regular audits.

**5. *Lack of (or inadequate) employee training***

Before an employee begins a task or working in an area where hazards are present, that employee must be properly trained. They have a right to know the hazards that are present and how to keep safe from them. Even "experienced" employees must be provided training. In addition to being trained at time of initial employment, you must provide training when new hazards are introduced into the workplace or when new processes or equipment are introduced. All training must be documented and kept for five years. Be sure to document employee training by recording the employees signature, identifying the topic, date, trainer and then by attaching copies of the training documents (i.e. handouts, speaker notes, quizzes). 29 CFR 1910.1200 Note: This regulation applies only to the hazard communication portion of the regular safety audit requirements. Other subparts found within the General Industry regulations require similar regular audits.

**4. *Hazard Communication issues such as Labeling & MSDS***

OSHA's Hazcom standard requires that all containers be labeled. Proper labeling is not satisfied simply by providing the chemical name on the outside of the container. In a secondary container, the health warning (i.e. "harmful if ingested") must also be identified. In a primary container the name and address of manufacturer and target organs must be identified, in addition to the chemical name and health warning. 29 CFR 1910.1200 (F)

Another component of the HazCom standard that OSHA often cites is the inclusion of Material Safety & Data Sheets (MSDS). These documents must be kept in a place, readily assessable in the event of an exposure to chemicals. Think a chemical isn't hazardous? Be careful, because OSHA is very conservative in this area. A relatively "safe" chemical such as Windex could be harmful if ingested, especially if in great quantity. Hint: If an MSDS exists for the product, include it in your log. 29 CFR 1910.1000 - 1910.1450

**3. *Failure to keep injury & illness records***

Most employers with more than 10 employees are required to keep records of workplace related injuries and illnesses. These injuries and illnesses are recorded on the OSHA 300 & 301 forms. At the beginning of each year you must summarize these injuries and illnesses on the OSHA 300A form and display that form next to the OSHA safety poster (Form 3165 or state equivalent). When determining if an injury is recordable or not, ask "did the injury require medical treatment beyond basic first aid?" If the answer is yes, and it was the result of a work related activity, the injury must be recorded. 29 CFR 1904.4

## **2. *Failure to display the OSHA safety poster***

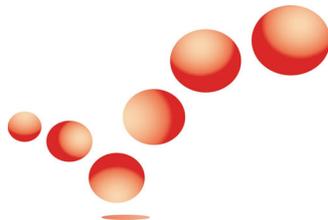
An important OSHA directive is to inform employees of their rights to a safe workplace. As a vehicle to advertise this right, OSHA requires employers to post the Federal OSHA safety poster in a conspicuous place. [Click on this link to download the Federal OSHA Safety poster \(Form 3165\)](#). If your facility is in a state with a state OSHA plan, you must display the state plan poster. Not sure? Visit OSHA at [www.OSHA.gov](http://www.OSHA.gov).

29 CFR 1910.1200 Note: This regulation applies only to the hazard communication portion of the regular safety audit requirements. Other subparts found within the General Industry regulations require similar regular audits.

### **And the number one OSHA compliance issue:**

#### ***Lack of (or inadequate) health & safety plan***

Too often many organizations are without written safety policies and procedures. OSHA considers this a serious violation of regulations and will not hesitate to write a citation (with fine). Your organizations safety plan must address the hazards that are present, employer and employee involvement in safety programs, PPE, fire and emergency action plans, accident reporting and investigation plan and other issues that relate to your organization and its business. The plan must be comprehensive and speak directly to your business, not something generic and simply copied from another source. 29 CFR 1910.1200 (e)



#### **Interested In OSHA Compliance Information?**

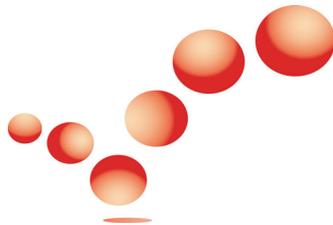
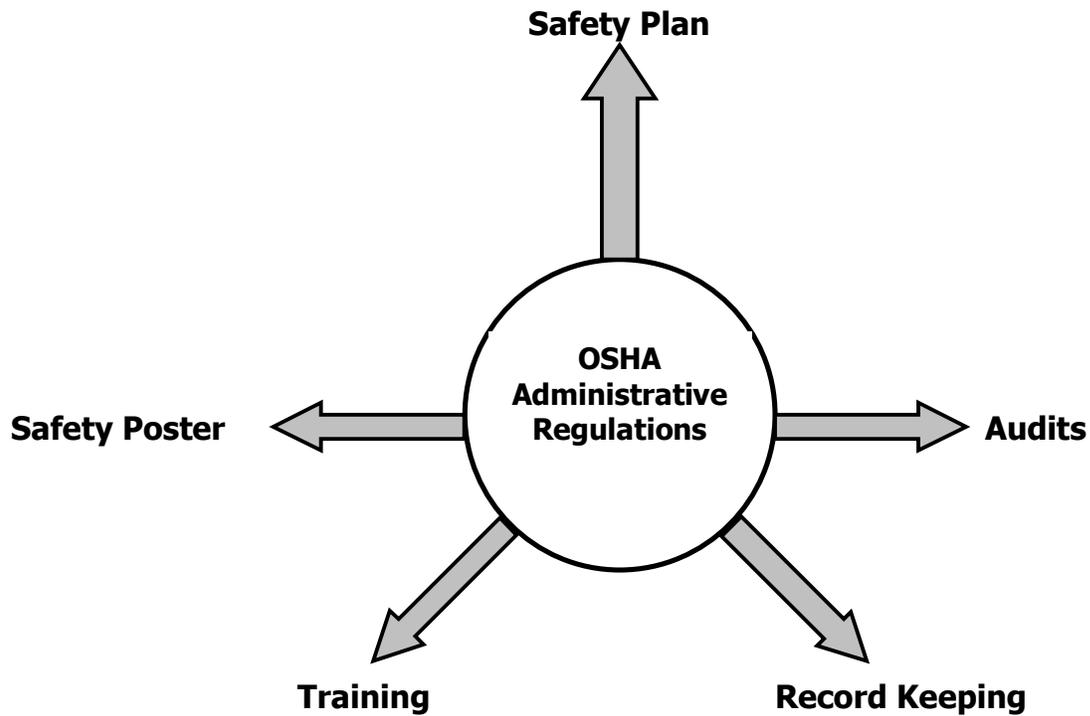
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## The OSHA Safety Wheel



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