Preparing for an OSHA Inspection
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Overview

Most companies probably agree that they don’t want to have OSHA at their workplace; however, being prepared for an OSHA Inspection can help save your company time and money in the event you have an inspection. It is important to remember that employers and OSHA should have the same goal – preventing accidents and injuries.

Reasons for an Inspection

OSHA will show up to your project for a number of reasons including: complaints, accidents, sweeps / programmed inspections, follow-ups, referrals, or drive by observations. Determine why an OSHA Inspector is at your project and what the scope of the inspection will be. If an inspector is there because of a complaint, they may only want to see one particular area or process. If they are there for a programmed inspection it may be a “wall-to-wall” inspection. Remember that an inspector can expand the scope of their inspection at any time. The inspection may also include multiple employers.

Preparation

- **Formal Procedure:** Every company should have a formal procedure detailing what should be done before, during and after an OSHA Inspection. This procedure should be available to all supervisors and made site specific. Site specific information could include contacts for the project if OSHA arrives, location of documents like OSHA 300 logs and the Injury Illness Prevention Program (IIPP).

- **Audits:** Thorough and complete safety inspections should be done to ensure a safe workplace and to verify OSHA compliance. Utilize resources that OSHA publishes such as the “Cal/OSHA 1A” form. This form is utilized by compliance officers during an inspection and can be used to help ensure your company has all the required documents that may be asked for during an inspection.

- **OSHA Inspection Kit:** An OSHA Inspection Kit should be developed and available at each project. Items to include in this kit are: written program for OSHA Inspections, company contact list, cameras, tape measure, caution / danger tape, paper, and pens.

- **Training:** OSHA Inspection Training should be conducted on each project at least annually. It is important that all supervisors know what to do in the event OSHA comes to a project because inspections can happen on weekends, when employees are on vacation, or when team leaders are away for meetings. The training should include where all documents are located, assignments to be made during an inspection in accordance with your written program, and who to contact. Another good resource that can be used during training is Cal/OSHA’s Policy and Procedures Manual pertaining to “Inspection Procedures”. This is available on Cal/OSHA’s website.
• **Complaints:** Employees have every right to notify OSHA if there are unsafe conditions on your project. Employers should encourage open communication about safety hazards and give employees the opportunity to communicate their concerns to their supervisor. An anonymous safety suggestion box should also be placed strategically on the project for those employees that still do not feel comfortable expressing their concerns. When an employee expresses safety concerns, it is important to take it seriously and address it quickly. Once the item has been fixed, talk to the employee and make sure they are comfortable with the solution.

**The Inspection**

Advanced noticed will not be given to an employer before an inspection. The representative at the front desk should know who to contact when an OSHA Compliance Office comes to your site. Once the management team arrives, verify the credentials of the Compliance Officer and try to determine why they are at your project. Before the opening conference, the employer should assign individuals specific assignments that include a note taker and photographer. It is also important to remind everyone involved to be professional and treat the compliance officer with respect.

Once the Compliance Officer completes the opening conference and has been given consent to inspect the site, the walk around will begin. It is likely pictures will be taken by the compliance officer. The photographer should take the same picture and possibly additional pictures from different angles. The note taker should take detailed notes.

During the exit conference it is important to determine whether citations will be issued. In many cases the Compliance Officer may not know and might request additional documents using a Document Request Form (Cal/OSHA 1AY).

**Follow-up**

If you are told that no citations will be issued, contact the compliance officer and obtain a Notice of No Violation after Inspection (Cal/OSHA 1AX). If you receive a citation it is important to take immediate action because a company only has 15 working days to notify the Appeals Board they are appealing the citation. A citation can be issued up to six months after the inspection so it is important to watch your mail closely.

**Resources and Partnership Programs**

The Cal/OSHA Consultation service has a lot of great information on their website that can help employers. The consultation service can also perform onsite visits to help with OSHA compliance and has partnership programs for construction including SHARP and the prestigious VPP-Construction Program. This information is available at www.dir.ca.gov/dosh/consultation.html.