

A Weekly e-mail Promoting the Health & Safety of Workers in the Scrap Recycling Industry

HOW TO HANDLE AN OSHA INSPECTION

Let's say "Sam", an OSHA inspector, shows up at your workplace. Here's what you should do:

- 1. Make Sam comfortable. Greet him as you would any guest. Offer him coffee or something else to drink. Don't make Sam wait in an area where he can view your entire operation. Lead him to a conference room or private office where you can have an uninterrupted conversation. Sam should show his official identification.
- 2. Notify your safety manager and executive management. One thing you don't want is every 2way radio on the property immediately crackling that an OSHA inspector is here. Let everyone know what's going on in a business-like, orderly, and calm fashion.
- 3. If Sam hasn't already stated the purpose for his visit, ask him. He may have received a complaint about your operation. You have the right to see a copy of the complaint, although you will not be told who it's from. Sam's visit might be the result of a programmed inspection. These include national and regional emphasis programs such as combustible dust or forklift operation. It's possible your name was "pulled out of a hat".
- 4. Sam will probably start with your paperwork. He'll want to see your training records pertaining to the reason for his visit. He will also want to see your OSHA Logs for the past 3-5 years.
- 5. Escort Sam to the specific area he wants to see. If possible, take him there in a (clean) vehicle. In most cases you will not be required to show him your entire operation. Keep in mind that while he may be there for one specific issue, if he sees other non-compliance problems on the way, he has the right to inspect those other areas.
- 6. Sam might take pictures. If he does, you take pictures of the same thing. If possible, take pictures over his shoulder of Sam taking pictures. If Sam takes samples, such as lead, you take samples. He may want to return at a later date to do air sampling. If you use a consultant for this or any other compliance matter, get them involved in this process so you can do your own air sampling at the same time.
- 7. When Sam's done, he'll sit down with you and have what's known as a "closing conference". He should discuss his findings along with any future visits he might have in mind. He should be able to give you an idea of the magnitude of the infractions he viewed in your operation.
- 8. Ask Sam for his recommendations for corrective action. You also have the right to "abate" or correct a non-compliance issues on the spot. For instance, if he sees an extension cord with no ground prong, throw it away.
- 9. Finally, be honest. Be courteous. OSHA inspectors are people, too. Like all of us, they have good days and bad days. Even in the days of a tougher OSHA, they can be a resource for better safety performance in our industry.

This e-mail was produced by the Institute of Scrap Recycling Industries, Inc. For more information, visit us on the Web at <u>www.ISRI.org</u>



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