

Questions an OSHA Inspector Will Ask

Administrative Interview

1. Do you have a written Hazard Communication Plan?

29CFR 1910.1200 requires employers to have a written plan which describes how the training, labeling, MSDS management and other requirements of “Right to Know” will be met. More citations and fines are given for this than anything else.

2. Do you have a complete written inventory list of hazardous materials?

29CFR 1910.1200 requires employers maintain a current list of all hazardous materials used in the workplace. This list must be accessible to employees.

3. Has a specific person been assigned responsibility for your safety program?

29CFR 1910.1200 and other regulations require that you assign responsibility for various aspects of the safety program. Some states specifically require that employers name a person with overall safety responsibility.

4. Do you have a formal disciplinary policy relating to safety?

29CFR1910. Various sections require employers enforce safety rules. Employees may not decide on their own when to follow the rules.

5. Do employees ever complain of headaches, nausea, dizziness or skin problems?

All OSHA standards require that employers evaluate workplace hazards and determine whether material use or employee complaints mean that there is any over-exposure to unsafe conditions. These are typical symptoms of over-exposure.

6. A. Do employees wear respirators or dust masks?
B. If yes”: Do you have written respirator procedures?

29CFR1910.134 requires that if any employee uses a respirator including a dust mask, written procedures must cover use, fit test, cleaning, and maintenance of the respirator.

- C. Do you have records showing the fit testing of respirators and training?

29CFR1910.134 requires employers to test the fit of each respirator on each employee and train the employee to check and properly use the respirator.

7. Do you have written training records?

29CFR1910.1200, .1450, .1030 and virtually all other OSHA regulations require training records which document date, subject, attendees and trainer.

8. A. Do you have more than 10 employees?
B. If “yes”: Do you have a written Emergency Contingency Plan?

29CFR1910.38 outlines the requirements for an emergency contingency plan for those who employ more than 10 at any one time during the year.

- C. Are your form OSHA Logs up-to-date and posted Feb. 1 until April 30?

29CFR1904 requires that employers of more than 10 at one time in the year maintain occupational illness and injury reports on Form 301 or equivalent and summarize them on form OSHA Log which is posted each Feb. 1 until April 30.

9. A. Can you reasonably anticipate that any employees will be exposed to human blood this year due to their job?
B. Have you assigned responsibility for first aid to an employee?
C. If “yes” Do you have written Bloodborne Pathogen Exposure Control Plan?
D. Have employees been trained in protective equipment and procedures?

29CFR1910.1030 requires that employers develop an Exposure Control Plan, train employees, keep records, and offer Hepatitis B vaccinations if it can be reasonably anticipated that one or more employees could be exposed to human blood or blood products as a result of doing their assigned duties. If you have assigned first aid responsibilities to an employee you are required to have a Bloodborne Pathogen Program. Special waste management and use of approved disinfectants are also required. The key is “reasonable anticipation”. Good Samaritan acts are not covered.

Janitorial and Chemical Storage Area Overview

10. Is the area neat and clean, without spills on floor?

29CFR1910.22 requires that all work places be clean, orderly and sanitary.

11. Are there any containers without legible labels?
12. Do all secondary container labels list the product, the hazards and the manufacturer?

29CFR1910.1200 requires that all containers of hazardous be labeled. The manufacturer’s label is fine if legible. If materials are moved from the original to a “secondary” container, it must be labeled. The label must include the name, description of hazard and the manufacturer’s name. Just the name is not enough.

13. Is there an MSDS on hand for each hazardous material?
14. Are MSDSs accessible to all employees at all times?
15. Pick a product. Ask to see the MSDS Could a employee have found it in 4-5 minutes?

29CFR1910.1200 requires that employers have an MSDS for each hazardous material. Employees must have access to MSDSs at all times during the work shift and be able to find a specific one in less than 5 minutes without asking for access to the collection.

General Work Areas Overview

16. Is the fire extinguisher tag marked for monthly inspections and service in the last year?

20CFR 1910.157 requires that all portable fire extinguishers be visually inspected monthly and serviced annually. If the tag isn't marked it is difficult to prove inspections.

17. Are they clean and uncluttered?

29CFR 1910.22 requires that all work places be clean, orderly, and sanitary.

18. Are oily rags kept anywhere but in metal cans with closed lids?

29CFR 1910.38 requires employers to identify and correct fire hazards. Oily rags should be kept in a closed container.

19. Are coffee, drinks or food kept near any hazardous materials?

29CFR 1910.142 requires that no employee be allowed to have food or beverages in an area where they could be contaminated with toxic or infectious materials.

20. Are there any unlabeled containers?

29CFR 1910.1200 requires that all containers of hazardous materials be labeled. The manufacturer's label is fine if legible. If materials are moved from the original to a "secondary" container, it must be labeled. The label must include the name of the material, a description of the hazard and the manufacturer's name. Just the name is not enough.

21. Are any respirators stored which are not in bags or cabinets?

29CFR 1910.134 requires that respirators be stored and maintained in a way that they will be cleaned, protected, and ready for use. Respirators left in the open may absorb contaminants and become unusable.

22. Are gloves, goggles, or safety glasses clean and in good repair?

29CFR 1910.132 requires that safety equipment be maintained in clean and sanitary condition and that it be used only if in good repair. Broken or dirty equipment raises questions in an inspector's mind and leads to a more intensive inspection.

23. Are there extension cords across aisles or walkways?

29CFR 1910.22 requires that all work place be clean, orderly, and sanitary. Cords across aisles present a slip and fall hazard as well as a potential electrical hazard.

24. Look at ladders. Are there broken steps or parts in bad repair?

29CFR 1910.25 requires employers to “inspect ladders frequently and those which have developed defects shall be withdrawn from service for repair or destruction and tagged or marked as ‘Dangerous, Do Not Use’.”

25. Are there any broken or missing electrical switch or outlet covers?

29FR 1910.305 requires that pull boxes, junction boxes and fittings have plates or covers. Broken plates and covers do not provide adequate protection.

Employee Area Overview

26. Is the OSHA Poster or state equivalent posted?

27. Are emergency phone number posted by telephones?

28. Is an evacuation route map posted?

29. CFR1910.38.

30. Is there a fully stocked first aid kit?

9CFR 1910.262 requires that there be a first aid kit stocked with supplies appropriate to the situation. It must be continuously stocked for any emergency.

31. Are lunches, snacks, or drinks stored in a cabinet or refrigerator with chemicals?

29CFR 1910.142 requires that no employee be allowed to have food or beverages in an area where it could be contaminated with toxic or infectious materials.

Employee Interview

OSHA uses “performance based” standards for its enforcement of safety regulations. The best program on paper will mean nothing if your employees cannot do the right thing or do not know where to get information. Whether your employees can answer questions correctly (or not) is the test OSHA inspectors use to evaluate your compliance with OSHA rules.

32a. Please show me the MSDS for (name a product)_____.

Did the employee answer – “What’s an MSDS?”

32b. Did the employee know where the MSDSs are kept?

32c. Did it take less than 5 minutes for the employee to find the correct MSDS?

29CFR 1910.1200 Employees should know that an MSDS is and be able to locate a specific one in less than 5 minutes. MSDSs should be indexed and stored in an organized fashion.

33a. When were you last trained on safety issues?

Did the employee say “I don’t remember” or “Never”?

33b. Has training been in the last year?

29CFR 1910.1200 states that “employers shall provide information and training on hazardous chemicals...at the time of their initial assignment and whenever a new hazard is introduced into their work area.” Some states also specifically require annual retraining.

34. If you had to evacuate the building where would you go for a head count?

Did the employee know a pre-determined specific place?

29CFR 1910.38 requires that emergency contingency plans specify the means of accounting for all employees after an evacuation of the facility.