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SELF AUDIT EXERCISES

WORKSHOP I

HOT TOPICS: NEP's, Local Emphasis Efforts, Recordkeeping, Industrial Hygiene Issues & Hexavalent Chromium, Combustible Dust, Construction Focus And Proactive Responses

Self Audit Exercises

1. What is your Standard Industrial Code (SIC)? Do you have more than one SIC classification among your establishments? _____

2. Are you required to maintain Injury & Illness Records (300, etc.)? _____

3. Is your SIC a focus of OSHA? _____

4. List National and Local Emphasis efforts, including among State-OSHA Plans? _____

5. Do you perform work at another employer's establishment or work with other employers at a multi-employer site whose SIC or work activities may come under OSHA Emphasis Efforts? _____

6. Are you affected by the following NEP's in place?
 - Lead
 - Silica
 - Trenching
 - PSM – refineries
 - PSM – chemical plants

- Federal Agency Targeting
 - Amputations (under review)
 - Ship breaking
 - Combustible Dusts
 - Recordkeeping_____
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7. Those under development?

- Primary Metals – smelting and Foundries
 - Flavorings with Diacetyl
 - Occupational Asthma
 - Oil and Gas Well Drilling
 - Industry Sector Inspections_____
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8. Affected by Proposed Rulemaking?

- Hazard Communication/GPS
 - Cranes & Derricks (July?)
 - Silica Proposal (July)
 - ANPRM – Combustible Dust Standard
 - New Walking/Working Surfaces; Fall Protection Proposal_____
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9. Are you aware of the implications of the newly revised Protecting American Workers Act (PAW) for your company and managers?_____

10. Have you considered the effect on your business, especially if you maintain multiple establishments, of (1) the proposed SVEP, (2) the three-fold increase in “Egregious” citations this year, and (3) OSHA’s increased willingness to use willful and repeat classifications?_____

11. How would changes to OSHA’s FOM affect you?_____

12. Do you participate in Alliances, VPP, and other cooperative efforts and how will changes in the Administration’s direction affect you?_____

13. Have you reviewed all past citations to ensure the items remain corrected, and so that you could document when you abated them if challenged? _____

14. Consider an employer's increased exposure for OSHA "repeat" and "willful" items for a three year period after citation at any of the locations. What have you done to not be complacent and to continue to satisfy OSHA's Current Strategic Goals in Construction?

- Falls
- Electrocutation
- Struck-by/crushed
- Caught between _____

15. Combustible Dust NEP

➤ Have you reviewed MSDS's of raw materials and ingredients you utilize for references to dust explosibility? _____

➤ Do any of your processes create dust, such as by grinding, air conveyance, unloading, cutting, buffing, or finishing? _____

➤ Do you have dust accumulation on equipment, floors, electrical fixtures and motors, overhead pipes on ducts, on top of internal silos? _____

➤ Are you aware of OSHA and NEP "tests" to determine impermissible accumulation or accumulation triggering electrical classifications and factors that may affect the calculations? _____

➤ Do you have bag houses, cyclones, or air material separators inside the building? _____

➤ Do you have day bins, silos, or other storage containers with potentially combustible dust? _____

➤ Who designed your dust collection or pneumatic conveying systems, did they consider NFPA consensus standards, and if so, which ones? _____

➤ Describe your housekeeping program, including written schedules, assigned employees and their job descriptions, cleaning methods and procedures, and your approach to inspections and accountability? _____

➤ Have you ever done a Process Hazard Analysis? _____

- Do you train employees for combustible dust hazards in your Haz Comm training?

- Do employees who maintain or work on dust collectors receive training on combustible dust? _____
- Do you maintain Fire Prevention, Fire Extinguisher Training, Evacuation, Emergency Response, or Emergency Action Programs? _____
- Do you utilize classified electrical fixtures anywhere in the establishment, and do you know why? _____

16. What airborne exposures may exist at your workplace and have you tested in the past?

17. What are the routine or most common possible violations for your industry or a particular establishment?

- Lockout
- Annual review and written certification
- Complete and up-to-date machine specific LOTO procedures
- Training for Affected and Authorized Employees
- Guarding _____
- Haz Comm
 - Lack of documented training for all categories of chemical hazards to which employees may be exposed
 - Missing MSDS's _____
- Fire Extinguishers
 - Properly mounted, inspected, charged
 - Employees trained or covered in an EAP, etc?
 - Not obstructed _____
- Exits – Signage
 - Unblocked doors and paths
 - Not-an-Exit signs _____
- PIT
 - Training (documented for all operators)
 - Evaluation and retraining when necessary

- No modifications affecting safety or capacity without approval
- Daily inspections
- Horseplay issues, including pallet jacks _____

- Storage Racks _____

- Electrical
 - Holes in fixtures
 - Frayed, unsupported, damaged wires
 - Unmarked switches in cabinets
 - Temporary wiring used instead of permanent
 - Blocked access _____

- PPE
 - Certification of JSA's for all work requiring PPE
 - PPE available and its use enforced
 - Up-to-date Respiratory Protection Program
 - fit tests
 - medical examinations
 - dust mask issues
 - testing or reliable "history"
 - Hearing Conservation Program
 - testing
 - proper response and recordkeeping regarding threshold shifts
 - Employee – provided PPE _____

- Procedures to recognize and respond to Construction site hazards not covered by vertical standards
 - Struck-by/caught between hazards, especially not involving public motorists _____

- Fall Protection
 - Consistently enforced
 - Man baskets, aerial lifts, etc.
 - Scaffolding
 - Walking and working surfaces, guardrails _____

- Excavation and Trenching _____

- Rigging Management/Cranes
 - Sling and assembly selection
 - Marking, storage, and disposal
 - Trained personnel
 - Contact with electrical hazards
 - Assembly/disassembly
 - Wind/weather issues
 - Site coordination for lifts

- Inspections, lift planning, meetings
 - Signaling and radio use _____
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17. Have you ever reviewed your OSHA History, Insurance, Inspections, or Self Audits before to determine your most likely “low hanging fruit” violations? _____

18. How do you audit for or Catch Violations and Hazards?

- To make out a federal OSHA citation, OSHA must prove that a hazard existed, that an employee was exposed, and that the employer knew of a violation or, having exercised reasonable diligence, could have known of a non-compliant condition.
- In order to prove that an employer should have known of a violation with the exercise of reasonable diligence, OSHA must show that the employer could have discovered the violative condition with the exercise of reasonable diligence.
- Whether a supervisor was reasonably diligent includes: maintaining adequate work rules including safety programs, adequately supervising employees, inspecting the workplace, anticipating hazards to which employees may be exposed, and taking measures to prevent the occurrence of violations.

Do you train supervisors and use self inspections to find and correct issues, and to show that you acted with due diligence in your safety program even though you did not detect the alleged violation? _____

➤ By the Safety Committee

- Check legality under new NLRB of all employee participation committees
 - Role of committee in discipline for unsafe practices?
 - Role of the committee in overall improved employee relations?
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➤ Through Department, Shift, and Other Supervisor Inspections on a regular basis

- Inspection Form?
 - Track corrections?
 - Use in proving “reasonable” diligence”? _____
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➤ Formal Annual, Monthly or other regularly scheduled inspections or audits? _____

➤ Accident Investigations

- Role of counsel?
 - Investigation Forms and how used? _____
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- Outside Auditors
 - Privilege/work product protections
 - Insurance Providers Reports
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19. In order to prepare for the Recordkeeping NEP, consider taking all or some of the following steps:
- a. Determine internally everyone who maintains injury and illness records and their “business” reasons for doing so.
 - b. Consolidate injury and illness recordkeeping into one system (to the extent possible).
 - c. If the corporation maintains a corporate-wide log and analysis, take steps to protect this information (to the extent possible).
 - d. Review site collection procedures and determine whether it is feasible to enter data electronically at every establishment or job site, and alternative methods.
 - e. Conduct webinars or other basic training for employees who would be responsible to record injuries and illnesses at the project site, as well as an overview for all site management who may intentionally or inadvertently interfere with the process.
 - f. Self-audit logs for five (5) years and make corrections where errors are found. In the audit, utilize certain workers compensation records to check to see if some recordable injuries were overlooked. Utilize the process which allows such changes to lawfully be made.
 - g. Review and refine the procedures for where and how to maintain records at active construction job sites and after a job site is completed.
 - h. Determine which State-OSHA plants maintain any additional recordkeeping requirements or different emphasis so as to maintain a consistent corporate approach.
 - i. Determine which State Plans are most likely to actively participate in the Federal recordkeeping NEP.
 - j. Train project and establishment managers to handle OSHA inspections under OSHA’s new approaches.
 - k. Determine how you handle “mobile” employees and employees at sites lasting less than one year.
 - l. Determine if you maintain logs for other contractors on a multi-employer site.

m. Review your handling of temporary employees.

20. Supervisor and Management Safety Training

- What regular safety training do managers receive? _____

- What regular management and supervising training? _____

- Do you utilize webinars and other training methods? _____

- Do manager and supervising pay plans and bonus structures consider safety issues (in addition to tracking injury numbers)? _____

- Do you train managers and supervisors to “Self Audit” their work areas for safety, employment law, and “communications” issues? _____

- Have you updated supervisors and managers about developments under OSHA, Wage-Hour, FMLA, the ADA, workers compensation and whistleblower protections, and the use and regulation of electronic communications and social media, which may affect them? _____

21. Have you developed a “Catastrophe Management” Program and practiced it?

- Who to handle law enforcement, OSHA, emergency responders
- Taking care of the family
- Handling the Press
- Coordination with carriers, legal, etc. _____

