

<b>Garmong Construction Services</b>					
<i>EMPLOYEE SAFETY POLICY HANDBOOK – OSHA Inspection Procedures</i>					
<b>Last Revised:</b>	<b>January 24, 2012</b>	<b>By</b>	<b>Douglas Mahurin, MS, CSP</b>	<b>This Copy Printed:</b>	<b>2/7/2012 4:49:00 PM</b>

## OSHA Inspection Procedures

### **Introduction:**

This document is to serve as an instructional guide covering the procedures to be followed in the event of an unanticipated visit from OSHA. Please be familiar with this policy and, should OSHA arrive on your job site, be prepared to respond appropriately and as directed herein.

### **Who to notify of an OSHA request for inspection:**

***When OSHA arrives at the job site, Company officials are to be notified in the following order:***

1. the site specific Superintendent
2. the site specific Project Manager
3. the Company Director of Safety
4. the Company Director of Operations

### **What to do while awaiting the Company spokesperson's arrival:**

- Be courteous to the OSHA representative(s) as you would toward any other site visitor.
- Do not volunteer information.
- Do not give the inspector access to Company files.
- Have a conference room available for an opening conference between the inspector and the Company spokesperson. Have the inspector wait inside the conference room, not outside observing the construction site if at all possible.

### **Who the spokesperson is to be for the Company:**

***Unless he cannot be reached, the spokesman for the Company in the event of an inspection by OSHA is to be the Director of Field Operations. If he is not available, the site specific Project Manager will be the spokesperson. OSHA will be patient with regard to a reasonable wait for the Company spokesperson to arrive. The Company spokesperson should always be prepared for such an event, having read, studied, and been regularly briefed so as to have the following information and equipment ready.***

#### ***Before the Inspection:***

- Be familiar with CHG's history.
- Know about any previous OSHA inspections.
- Know what the most cited violations within our scope of construction responsibilities are.
- Know our Company's workers' compensation experience and OSHA log entries.
- Have a camera or camcorder ready. Documentation of the inspector's concerns are critical.
- Be able to contact a maintenance worker to accompany you on an inspection to make any immediate necessary repairs the inspector may point out.

#### ***During the Inspection:***

- Be courteous and polite to the inspector.
- Do not request OSHA to obtain a search warrant.
- Examine the credentials of the inspector and anyone who may accompany the inspector.

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**OPENING CONFERENCE:**

- Immediately ask for an opening conference, in which:
  - Information is not volunteered.
  - The specific reason for the inspection is obtained.
  - The scope of the impending inspection is determined.
  - Direct, specific answers are provided to the compliance or health officer.
  - The OSHA inspector is provided requested documents (do not give the inspector open, unrestricted access to company files).
  - Remind OSHA of the confidentiality of anything seen, heard, or recorded. Have the inspector sign a simple *non-disclosure* agreement and label the report *confidential*.
  - If a complaint is involved, ask for a copy of the complaint to be presented.
  - The conference will give you time to get all the appropriate people together for the tour:
    - Any management people who may be helpful.
    - A representative chosen by the employees.
    - The maintenance worker to affect changes requested by the compliance officer.

Note: be certain to take very specific, accurate, and detailed notes of all conversation that occurs throughout the inspection process.

**THE INSPECTION TOUR:**

- The route and duration are determined by the compliance officer, but are usually limited to the scope of the opening conference.
- Be sure to bring a camera or camcorder, documenting details of the inspection as appropriate.
- The compliance officer will observe conditions and behaviors.
- Testing, monitoring and sampling may be done. If so, CHG should attempt to duplicate all the inspector's tests.
- Employees are very likely to be questioned. Do not attempt to restrict and/or direct the employee's responses to the inspector.
- Written programs, materials, postings, documentation and record keeping are virtually always checked.
- The compliance officer will discuss likely violations and even offer recommendations for corrective actions.
- Ask the maintenance worker to make these corrections immediately if possible.

**THE CLOSING CONFERENCE:**

- All findings will be discussed with recommendations made by OSHA.
- No penalties will be discussed. The area director will determine penalties at a later date.
- The length of time needed to correct the problems may be discussed.
- Show proof of ongoing attempts to come into compliance. Current and continuous training related to the deficiencies identified should be disclosed by the Company spokesperson to the inspector. Programs in process but not yet complete can be shown, but only for items mentioned by the compliance officer.
  
- Multiple closing conferences may occur if:
  - Videos or photographs must be reviewed;
  - Samples must be analyzed by a laboratory;
  - Written programs and paperwork are taken for further evaluation
  - The employees or labor union wish to have a private conference with the inspector.

Once all closing conferences are completed, the compliance officer and area director will discuss the report and

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findings. The area director will then discuss possible citations, penalties, and abatements.

In the event of non-compliance, a formal **Notice of Citation** will be forwarded by certified mail. Abatement dates and appeal windows begin upon the date the **Notice of Citation** is received.

Be certain that all correspondence from OSHA is directed through to the main corporate office and to the attention of the Director of Field Operations and Safety Director.