

DC OFFICE OF RISK MANAGEMENT INDUSTRIAL SAFETY AND HEALTH INSPECTION/AUDIT SOP

OSHA'S PURPOSE

Occupational Safety and Health Administration (OSHA) was created within the Department of Labor to:

- Encourage employers and employees to reduce workplace hazard and to implement new or improve existing safety and health programs.
- Provide from research in occupational safety and health to develop innovative ways of dealing with occupational safety and health problems.
- Establish "separate but dependant responsibilities and rights" for employers and employees for the achievement of better safety and health conditions.
- Maintain a reporting and recordkeeping system to monitor job-related injuries and illnesses.
- Establish training programs to increase the number of competence of occupational safety and health personnel.
- Develop mandatory job safety and health standards and enforce them effectively.
- Provide for development, analysis, evaluation and approval of state occupational safety and health programs.

While OSHA continually reviews and redefines specific standards and practices, its basic purposes remain constant. OSHA strives to implement its mandate fully and firmly with fairness to all concerned. In all its procedures, from standards development through implementation and enforcement, OSHA guarantees employers and employees the right to be fully informed, to participate actively and to appeal actions.

Work Place Inspections:

To ensure that all DC Government buildings meet the minimum Occupational Safety and Health requirements, DCORM follows the Code of Federal Regulations, International Fire Code, and Environmental Protection Agency Guidelines.

Inspections are conducted with advance notice to Agency Risk Management Representatives. There are, however, special circumstances under which DCORM may not give any advance notice to an Agency. These special circumstances are:

- Imminent danger situations which requires corrections soon as possible.
- Inspections that require special preparation during office hours.

Inspection Priorities:

Imminent Danger

Imminent Danger situations are given top priority. An imminent danger is any condition where there is a reasonable certainty that danger exists, that can be expected to cause serious physical harm and even death immediately.

Catastrophes and Fatal Accidents

The second priority is given to investigation of fatalities and catastrophes resulting in hospitalization of three or more employees and/ or the general public.

Employee Complaints

Third priority is given to employee complaints of alleged violations of standard work rules, unsafe or unhealthy working conditions. Also included in this category are serious referrals of unsafe or unhealthful working conditions from other sources, such as local or state agencies or Regulatory Agencies like EPA.

Programmed High-Hazard Inspections

Next priority are programmed and/or planned inspections aimed at specific high hazard agencies, occupations and health circumstances. Agencies are selected for inspections based on their Injury Trend Analysis, Illness incidence rates and employees exposure to toxic environments.

Follow-up Inspections

Follow-up inspections determines whether previously cited violations have been corrected. If the Agency has failed to mitigate the violations, the Occupational Safety and Health Specialist thru the Occupational Safety and Health Operations Manager will inform the ARMRs that failure to

rectify the violations will be forwarded to the Director, Office of Risk Management who will in turn will forward the "Notification of Failure to Mitigate" to the Agency Director which in most cases depend on the seriousness of the violations.

Inspection Process

Occupational Safety and Health Specialist prior to inspection becomes familiar with as many relevant facts as possible about the building and/or the workplace taking into account such things as the history of the establishment, the nature of their business and what particular CFR, IFC, State and Local Regulations to apply.

Preparing for an inspection also involves selecting the appropriate equipment for detecting and measuring fumes, gases, toxic substances, and noise.

Note: Please be advised that circumstances may exist that prevent one or more of the steps to occur

Opening Conference

In the opening conference, DCORM Occupational Safety and Health Specialist will explain the reasons for the visit to the management staff.

Inspection Tour

At the conclusion of the opening conference, the Occupational Safety and Health Specialist accompanied by a site staff member will commence the inspection/audit. The route and the duration of the inspection are determined by the Occupational Safety and Health Specialist. The Specialist observes conditions, consults with employees, may take pictures, take instrument readings and may asked and examines records and also explains the requirements for Hazard Communication.

During the inspection/audit, the Occupational Safety and Health Specialist will point out any unsafe conditions and acts. At the same time, the Occupational Safety and Health Specialist will discuss possible solutions/corrective actions to mitigate the violations.

Closing Conference

At the conclusion of the inspection, a closing conference is held with the site management staff. It is a time for free discussion of the problems and needs; a time for questions and answers. The Occupational Safety and Health Specialist will discuss the Agency's unsafe acts and conditions will make recommendations.

Inspection Documents

The Occupational Safety and Health Specialist must send his or her findings in form of written documentation to the Occupational Safety and Health Operation Manager for his review and approval. Upon his review; the document is forwarded to the Agency's Risk Management Representative, the Director and Office of Property Management official in charge of the building.

Conclusion

The findings indicates if the workplace satisfy Occupational Safety and Health Act (29 CFR1910) standards for a comfortable work environment. The classification of the OSHA violations are based on the severity of the injury or illness that could result from the violations. These classifications constitute the first steps in determining the gravity of the violations. A classification shall be assigned to a hazard according to the most serious injury and/or illness which could reasonably be expected to result from an employee's exposure as follows:

- **Imminent Danger:** Conditions or practices exist in any place of employment which could reasonably be expected to cause death or serious physical harm. Recommended abatement period: Immediately
- **High Severity:** Death from injury or illness; injuries involving permanent disability; chronic, irreversible illnesses. Recommended abatement period: Immediately
- **Medium Severity:** Injuries or temporary, reversible illnesses resulting in hospitalization or a variable but limited period of disability. Recommended abatement period: 30 to 60 days.
- Low severity: Injuries or temporary, reversible illnesses not resulting in hospitalization and requiring only minor supportive treatment. Recommended abatement period: 60 to 90 days.
- **Minimal Severity:** Other than serious violations, all such violations reflect conditions which have a direct and immediate relationship to the safety and health of employees, the injury or illnesses most likely to result would probably not cause death or serious physical harm. Recommended abatement period: 90 to 120 days.

Inspection Checklist:

General Industry Inspection Checklist (CFR 1910)