OSHA Visit Protocols

Ask for identification (not business card)

- Write down information from card
- Ask for business card

Escort to job trailer

- Ascertain purpose of visit
 - o Imminent danger
 - o Programmed inspection
 - o Complaint
 - o Follow up
- Contact proper personnel
- Provide requested documents
- Gather personnel to accompany OSHA on walkthrough
 - 1. Note taker
 - 2. Photographer
 - 3. Safety Rep.
 - 4. Supervisor (PM, or Forman)

Opening conference

- Attended by
 - 1. Superintendant
 - 2. Safety Representative
 - 3. Sub Contractor Safety Reps (optional)
 - 4. Project manager or foreman
- Ask for "focused inspection" (optional)
- ** The OSHA representative can wait up to one hour to begin the inspection to allow for arrival of personnel (usually safety).

Site tour

- Take notes
 - 1. Possible citations
 - 2. Personnel talked to
 - o Name
 - o Company
 - 3. Any corrections made
- Take pictures
 - 1. Same shot inspector takes
 - 2. Shots from different angles and distances
 - 3. Shots after corrections are made
- Answer guestions "yes" or "no" if possible
 - 1. Don't volunteer information
 - 2. Don't re-construct a scene
 - 3. Don't ask for clarification
 - 4. DON'T argue

Interviews

- Offer space for interviews
- Usually one on one

Closing conference

- Listen, don't talk
- Document all possible violations
 - o Company
 - o Severity

- o Corrections or improvements needed
- o Possible time frame for investigation

Conduct Post visit meeting

- Attendees
 - 1. Representative from each sub concerned
 - 2. All safety personnel on jobsite
 - 3. Everyone who walked with inspector
 - 4. Company representatives (GC)
- Review list of personnel interviewed
- Discuss all possible violations
 - 1. Corrected immediately
 - 2. Not corrected
 - 3. Time frame for correction
 - 4. Materials/personnel needed to correct
- Set date/time for follow up meeting
 - o Follow all possible citations to completion
 - o Document EVERYTHING

Everything you do from the time you are notified that OSHA is onsite until the citation is delivered should be done with the thought of building your defense if a citation or citations are issued. You cannot build a proper defense after the fact.