

Occupational Safety and Health Administration

Doing an HCS 2012 Inspection: OSHA's Perspective

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The Mission

To assure so far as possible that every worker has a safe and healthful work environment.



If today is a typical day in America, 13 workers

will get up and leave for work, **never** to *return* home again.

And Thousands others will be injured.



OSHA estimates its revised Hazard Communication Standard, 2012 will prevent

43 fatalities

and

585 injuries and illnesses per year.



Reasons OSHA Inspects

- Imminent Danger
- Fatalities
- Complaints/Referrals
- Emphasis Programs
- Follow-up
- Recordkeeping



What Will Happen If OSHA Visits Me?

- Inspection is unannounced.
- Inspector will present credentials and state purpose of visit.
- Inspector will hold opening conference with management official.
- Walkthrough of the workplace will be conducted to evaluate workplace conditions.



What Will Take Place During OSHA Inspection?

- Employees are interviewed confidentially.
- Air Samples may be collected.
- Written Programs will be reviewed.
- Photographs of worksite conditions may be taken.
- Closing Conference is held with employer.



What Written Programs Might OSHA Ask For?

- Hazard Communication
- Lock Out/Tag Out
- Bloodborne Pathogens
- Confined Space
- Respiratory Protection
- Emergency Action Plan
- Personal Protective Equipment



What Written Programs Might OSHA Ask For?

- Fall Protection Plan.
- Asbestos Management Plan.
- Process Safety Management
- Substance Specific Standards



What Else?

- OSHA 300 logs and number of hours worked for past 3 years.
- Miscellaneous equipment inspection records, such as hoist, sling inspections, or assured equipment grounding program.



What's Next?

- Employer receives written notification, a citation.
- Citation is a legal document, employers have legal rights to contest or request informal conference.
- Employers have 15 working days to exercise their rights.



Top Ten Violations

Most frequently cited OSHA standards during FY 2016 inspections

- 1. Fall Protection
- 2. Hazard Communication
- 3. Scaffolding
- 4. Respiratory Protection
- 5. Lockout/Tagout
- 6. Powered Industrial Trucks
- 7. Ladders
- 8. Machine Guarding
- 9. Electrical Wiring Methods
- 10. Electrical General Requirements



Top Ten Violations in Construction FY 2016

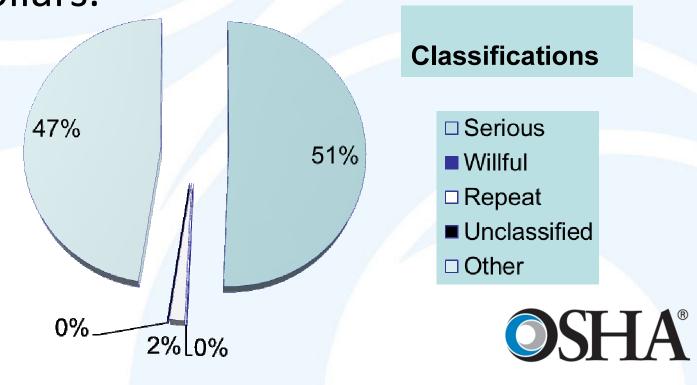
- 1. Fall Protection, Duty to Have (1926.501)
- 2. Scaffolding (1926.451)
- 3. Ladders (1926.1053)
- 4. Fall Protection, Training (1926.503)
- 5. Eye and Face Protection (1926.102)
- 6. Hazard Communication (1910.1200)
- 7. Head Protection (1926.100)
- 8. General Safety and Health Provisions (1926.20)
- 9. Aerial Lifts (1926.453)
- 10. Fall Protection, Systems Criteria and Practices (1926.502)

In FY 2016 OSHA cited 11063

violations of the Hazard Communication

Standard for penalties totaling over 4

Million Dollars.



- 1. 1910.1200(e)(1)
- 2. 1910.1200(h)(1)
- 3. 1910.1200(h)(3)
- 4. 1910.1200(g)(8)
- 5. 1910.1200(g)(1)
- 6. 1910.1200(f)(6)
- 7. 1910.1200(f)(5)*
- 8. 1910.1200(h)(2)
- 9. 1910.1200(j)(1)
- 10.1910.1200(h)

Top 10 Violations Of Hazard

Communication Standard

FY 2016



Written Hazard Communication Program

#1 - 1910.1200(e)(1) [4109 violations] "The employer shall develop, implement and maintain at each workplace, a written hazard communication program..."



Employee Information and Training

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#2 - 1910.1200(h)(1) [2589]
    Effective information & training at initial assignments & new chemicals introduced

#3 - 1910.1200(h)(3) [1037]
    Training

#8 - 19101200(h)(2) [ 106]
    Information

#10 - 1910.1200(h) [ 81]
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Safety Data Sheets

- #4 1910.1200(g)(8) [895]

 Maintain copies of SDS in workplace;
 Ensure accessibility
- #5 1910.1200(g)(1) [827]

 Manufacturer & Importers SDS for each chemical they produce or import Employer SDS in workplace for each chemical used



Labels and other Forms of Warning

- #6 1910.1200(f)(6) [826]

 The employer shall ensure each container is labeled, tagged or marked.
- #7 1910.1200(f)(5)* [302]

 Before June 1, 2016, cited for employers failing to label each container







Effective Dates

9 –1910.1200(j)(1) [92]
Employers shall train employees
regarding new label elements and SDS
format by 12/1/13.



How OSHA May Help

- Fact Sheets
- Guidance Documents
- Small Entity Compliance Guide
- Compliance Directive
- Letters of Interpretations



How OSHA May Help

- OSHA Consultation
- Alliances
- Strategic Partnerships

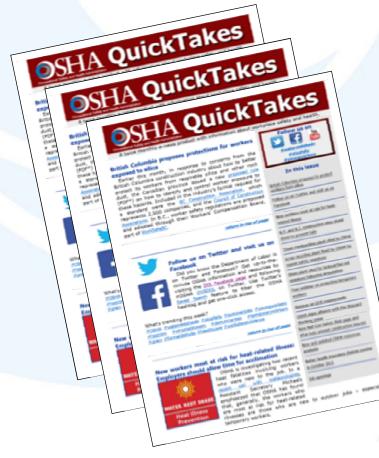


New OSHA Resources

For a listing of new OSHA publications, web pages, videos, and other resources, visit OSHA's Help for Employers page (www.osha.gov/employers), and click on "New Products" in the Quick Links box.







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