

Oklahoma Department of Labor Public Employee's Occupational Safety & Health

What To Expect from a PEOSH Inspection

Inspectors representing the Oklahoma Department of Labor PEOSH unit have several reasons to be at your worksites. These include: complaint investigations, fatality investigations, consultations requested by your agency, follow-up visits and targeted compliance inspections. This publication specifically addresses **compliance inspections**.

Will a compliance inspection be scheduled in advance?

- No. Employers are not notified of an inspection in advance. However, in certain circumstances, such as potential imminent danger situations, the Director may determine and direct advanced notice to be given.

Who is the initial point of contact for an inspection?

- Regardless of the number of people involved in your safety and health programs, our initial point of contact is the designated safety coordinator or, in the absence of such person, the agency head.

How will the inspection be conducted?

- There will be an opening conference where the inspector will identify themselves and will have credentials identifying them as an ODOL employee. The inspector will discuss the reason for the visit as well as the scope of the visit. The inspector will conduct a document/program review, a walkthrough of the facility and a closing conference to discuss the inspector's findings. PEOSH Inspectors have the authority to take photographs, obtain records, and collect samples necessary to support the inspection. Keep in mind, PEOSH Inspectors are in charge of the inspection and the employer is prohibited from interfering or directing the inspection.

What records will be requested by the inspector?

- The inspector will ask to see copies of your OK 300 logs, OK 301 forms and OK 300A records, along with accident reports and any in-house documentation that address work-related injuries and illnesses. Regulations require the employer provide the OK 300 records within 4 business hours, so the employer should ensure those records are available at all times.
- Mandated safety- and health-related programs are requested for review. The programs will be reviewed and the inspector will identify any deficiencies. Where written programs are required but have not been developed, the inspector can provide sample programs to assist the employer.
- Employee training records will also be reviewed to ensure proper training is conducted and documented.

What areas will the inspector walk through?

- The scope of the inspection depends on the nature of the work being performed at each site, the number of injuries and illnesses recorded and other factors at the inspector's discretion. A walkthrough inspection can encompass the entire facility, including any outbuildings, annex buildings and remote locations.

What happens if an inspector finds hazards?

- Any hazards deemed to pose an imminent hazard to employees must be corrected immediately. This might include (but is not limited to) employees working in unprotected trenches, or working on equipment that is not locked/tagged out. Serious hazards or other non-compliant items (such as lack of or improper documentation) will be addressed in the written report, and a due date for corrective action will be established. The employer is required to correct all hazards identified within the time frames allotted.

Who will the inspector talk to during the visit?

- The majority of the inspection is conducted with the safety coordinator, agency head or their designated personnel. The employer may suggest additional personnel participate in the visit. Approval is at the discretion of the inspector. During the inspection, the inspector may wish to speak with employees. This may include supervisors, maintenance personnel, or other full or part time employees.

How will we know what hazards we are required to correct?

- A closing conference is conducted at the time of the inspection to discuss identified hazards and recommendations. Following the inspection, a written report containing citations of the non-compliant issues and requirements for achieving compliance will be sent to the employer. Reports are typically sent via email, unless you ask your inspector to send them via standard mail. Electronic transmission ensures reports are sent to the employer in a timelier manner. The employer will typically have 45 days to abate the hazards and submit a written corrective action report back to the inspector.

What happens if we can't correct a hazard within the 45-days?

- Extensions are granted on a cases-by-case basis when the extenuating circumstances arise. Interim protections must be in place, and the employer must request an extension in writing (a form is available from your inspector) and must identify and ensure an appropriate action plan and appropriate interim protections are in place before the extension can be granted. Extensions are granted in 30-day increments only.

How do we verify hazards were abated to our inspector?

- The written report contains two lines following each hazard for you to identify 1) what you did to correct the hazard, and 2) the date the hazard was abated. Copies of written programs that were not available for review or were written/revised after the inspection must be submitted with the corrective action report or the inspector may conduct a follow up inspection to view written programs or other records, where appropriate. Follow up inspections may also be conducted to verify hazard corrections.
- When all deficiencies have been corrected, the case will be closed. However, this does not preclude additional enforcement activities in the future.

Can we request on-site assistance from PEOSH if we want to be more proactive?

- The employer may request limited consultation assistance from ODOL at any time. Keep in mind, if a PEOSH Inspector is on site and identifies a hazard, the consultation becomes a compliance inspection and you will be required to correct the hazards identified by the inspector. Also remember, you can always call the Oklahoma Department of Labor – PEOSH Division for assistance over the phone.

HAZARDS COMMONLY FOUND DURING PEOSH SAFETY INSPECTIONS

The following is a partial list (in no particular order) of some of the commonly found hazards during a PEOSH inspection:

Fire extinguishers – annual and monthly inspections not conducted or documented

Breaker boxes – open knockouts or missing breakers, breakers not fully labeled

Power cords – damaged insulation, damaged tension relief, used in place of permanent fixtures, improper cord for the job, trip hazards

Electric heaters – fire hazards (too near to combustible objects, no tip over protection), electrical hazards (not grounded, plugged into a power strip)

Electrical – power strips plugged one into another (daisy chained), ampacity exceeded on power strips, microwaves/refrigerators not plugged into a permanent outlet, cords damaged, cords running through doorways, windows, walls or ceilings

Exit signs – not maintained in required locations, not visible, damaged/not properly maintained

Emergency lighting – not provided where required, not properly maintained (battery backup not maintained)

Chemicals – improperly stored, containers not properly labeled, no safety data sheets (SDS) on file, no eyewash

Information on bulletin boards – no mandatory PEOSH poster, No OK300A form posted between Feb 1 and April 30th for previous year

Written Programs – not available for review, not developed and implemented, not reviewed annually. Personal protective equipment assessment not conducted, documented, and certified.

Ladders – not used in accordance with manufacturer's specifications, damaged, improper type for work being done, not tall enough to reach work area/workers standing on top step

Housekeeping – oily shop rags not properly stored, objects blocking exits or aisle ways, food and chemicals stored in same areas, tools and other equipment not stored properly, accumulated trash, vermin-control issues

Personal protective equipment – not provided where required, not utilized where required, not properly maintained, not stored in a safe and sanitary location, not appropriate for the task being performed

Shop equipment – no guards in place, or guards not properly adjusted, top-heavy machines not secured

Materials storage – overhead storage areas with no posted load limits, no guard rails on overhead storage areas storage racks not properly secured and maintained, materials not properly stored

Cylinders – compressed gas cylinders not properly secured/upright at all times, oxygen stored in the same area as acetylene

Trenching – no shoring or improper shoring in place, no competent person on site, no rescue procedures/equipment on site, no access ladder, standing water in trench, spoil pile too close to the edge of the trench

Recordkeeping – OSHA forms used instead of OK forms, OK 300 not completed in detail as required, OK 301 not maintained for each recordable case, OK 300A doesn't match the totals on OK 300. OK 300 and OK301 not completed within 7 days of the injury/illness being reported, records not provided within 4 business hours of request, required records not submitted to the mandatory public sector survey

For more information, visit our web site at www.ok.gov/odol. You can sign up for Email and text notifications; get copies of mandatory postings and recordkeeping forms, as well as sample programs; learn more about employee rights and employer responsibilities for workplace safety, etc. You can also visit us on Facebook, follow us on Twitter, and visit our YouTube page for more safety and health information.