Mock OSHA Survey

XYZ Co.
Anytown USA

Date: June 5, 2008

Participants: xxxxxx and Mr. Stig Ruxlow

Description of operations: Raw milk receiving, pasteurization, production, packaging and distribution of various cultured products such as sour cream, cream cheese, yogurts, cottage cheese and dips. Average number of employees is 48, three shifts of production operating 6 or 7 days a week.

Report on OSHA Required Compliance and Programs:

OSHA Recordkeeping - 300 Log & 301 forms (Part 1904)

OSHA 300 logs maintained and kept on file as required. OSHA 300A Summary was posted as required. Appropriate 301 or state first report of injury forms kept on file. All OSHA posters were posted as required.

Walking and Working Surfaces, Subpart D

There is one floor hole in the basement sump pit that is inadequately protected.

There are no fall protection devices in the milk receiving area. See condition report.

EAP and Fire Prevention Plans, Subpart E

No written documentation of employee required training of emergency action plan.
Note: Plan on file does not appear to be current corporate policy.

There is one instance of a blocked emergency exit. See condition report.

Occupational Health and Environment Control, Subpart G

No copy of the hearing conservation program. No training documents are present.

No records of annual retraining or medical evaluations for those required to wear respirators.

Personal Protective Equipment, Subpart I

No written certification on hazard assessments. No training documents. No PPE hazard assessments for electrical work and arc flash exposures.

No copy of Appendix D of the Respiratory Protection standard is provided to employees who use respirators on a voluntary basis.

General Environmental Controls, Subpart J

No written documentation of accident prevention signage training.

There are confined spaces that lack appropriate signage prohibiting entry.

Confined space policy on site does not reflect the policy as described by the site management.

No confined space rescue team is in place at this time. It was stated that the local fire department would be used for confined space rescues. It was stated that the fire department has been on site and is notified prior to each entry. This appears to be in compliance, but the policy on file does not reflect this procedure.

No written certification of periodic lockout/tagout inspections that are required annually.

No contractor or outside personnel controls are in place for confined space entry and for lockout/tagout procedures.

Medical and First Aid, Subpart K

No written documentation of first aid training for designated employees who may provide First Aid or CPR.

There are several instances of blocked emergency eye wash and shower stations.

Fire Protection, Subpart L

No written documentation of fire extinguisher training. This should be done at initial assignment and annually.

There are a few instances of blocked extinguishers.

Materials Handling and Storage, Subpart N

No frequent and regular inspection of overhead hoists. Written documentation of these inspections should be maintained.

Machinery and Machine Guarding, Subpart O

There are a several machines that have exposed points of operation, in-running nip points or other machine hazards. These are the cup filling machines and the packaging lines along with some motor shafts on milk silos and some maintenance equipment. These are noted in the condition report.

Welding, Cutting and Brazing, Subpart Q

No hot work permitting program in place, this program is currently being written and developed.

Electrical, Subpart S

There are several instances of exposed electrical wiring, temporary wiring and wiring used in wet conditions. There are several instances of materials and items being stored within 3 feet of electrical equipment and disconnects. There are several instances of exposed wiring in circuit boxes, junction boxes and distribution boxes. See condition report.

Employees working in areas where there are potential electrical hazards shall use electrical protective equipment appropriate for the specific parts of the body for the work being performed. This includes nonconductive head protection whenever exposed to electric shock or burns due to contact with

exposed energized parts; use of protective equipment for the eyes or face wherever there is danger of injury to the eyes or face from electric arcs or flashes or from flying objects resulting from an electrical explosion and use insulated tools or handling equipment when working near exposed energized conductors or circuit parts. See notes in PPE section above.

Toxic and Hazardous Substances, Subpart Z

No written documentation of the determination of those employees that have an occupational exposure and an offer of Hepatitis B vaccination, declination forms and post exposure offer of vaccine.

There are instances of containers without appropriate hazard warnings.

No contractor/outside personnel controls and training related to Hazard Communication.

Condition Report and Photos

Condition noted:
Blocked emergency eye wash station and shower.
http://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=1910_0151&src_anchor_name=1910.151(c)**1910.151(c)**
Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.

A Fire Extinguisher is also blocked in second photo.
1910.157(c)(1)
The employer shall provide portable fire extinguishers and shall mount, locate and identify them so that they are readily accessible to employees without subjecting the employees to possible injury.

	http://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=1910_0151&src_anchor_name=1910.151(c)**1910.151(c)** Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.
 	**Condition Noted:** Electrical equipment does not have adequate clear space and working space. **1910.303(g)** **600 Volts, nominal, or less** -- http://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=1910_0303&src_anchor_name=1910.303(g)(1)**1910.303(g)(1)** **Working space about electric equipment**. Sufficient access and working space shall be provided and maintained about all electric equipment to permit ready and safe operation and maintenance of such equipment. **TABLE S-1** indicates a minimum clearance of 3 feet. Footnote 1 to the table indicates: **(1)** Minimum clear distances may be 2 feet 6 inches for installations built prior to April 16, 1981. **1910.303(g)(1)(ii)** **Clear spaces**. Working space required by this subpart may not be used for storage. When normally enclosed live parts are exposed for inspection or servicing, the working space, if in a passageway or general open space, shall be suitably guarded. **Standard Interpretations**

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<tr>
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<td><u>05/28/1999 - Access and working space requirements for electric equipment (600V or less).</u>

Section 1910.303(g)(1)(ii) elaborates on the clear spaces requirement for such working spaces. Additionally, the working space clearances required by this subpart may not be used for storage. This access and working space shall be kept clear at all times for operation and maintenance personnel and may not be used for intermittent/incidental storage of nonpermanent equipment or furniture, which could interfere with ready access to the electric equipment in the event of an emergency.</td>
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<td>Condition Noted:
Exposed electrical wiring at circuit boxes, junction boxes and outlets.
1910.305(b)(1)
Conductors entering boxes, cabinets, or fittings. Conductors entering boxes, cabinets, or fittings shall also be protected from abrasion, and openings through which conductors enter shall be effectively closed. Unused openings in cabinets, boxes, and fittings shall be effectively closed.</td>
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	**Condition noted:** Exposed floor hole at sump pit in basement. **1910.23(a)(9)** Every floor hole into which persons cannot accidentally walk (on account of fixed machinery, equipment, or walls) shall be protected by a cover that leaves no openings more than 1 inch wide. The cover shall be securely held in place to prevent tools or materials from falling through.
	**Condition Noted:** Hoses laying on floor creating a slip and fall hazards throughout the plant. **1910.22(a)(1)** All places of employment, passageways, storerooms, and service rooms shall be kept clean and orderly and in a sanitary condition.
 	**Condition Noted:** Exposed power transmission shafts at milk silos. http://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=1910_0212&src_anchor_name=1910.212(a)(1)**1910.212(a)(1)** Types of guarding. One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks. Examples of guarding methods are-barrier guards, two-hand tripping devices, electronic safety devices, etc.

Condition noted:
Process tanks that are not identified as confined spaces.

1910.146(c)(2)
If the workplace contains permit spaces, the employer shall inform exposed employees, by posting danger signs or by any other equally effective means, of the existence and location of and the danger posed by the permit spaces.

NOTE: A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language would satisfy the requirement for a sign.

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Condition noted:
Several containers without labels or inadequate hazard warnings.

1910.1200(f)(5)
Except as provided in paragraphs (f)(6) and (f)(7) of this section, the employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with the following information:

1910.1200(f)(5)(i)
Identity of the hazardous chemical(s) contained therein; and,

1910.1200(f)(5)(ii)
Appropriate hazard warnings, or alternatively, words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program,

  	will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.
	**Condition noted:** Bottom side rails (Cleats) of step ladders are damaged and defective. **1910.26(c)(2)(vii)** Ladders having defects are to be marked and taken out of service until repaired by either maintenance department or the manufacturer.

Condition Noted:
Unguarded machines, most noted in the cultured products packaging area, exposing employees to the point of operation, in-running nip/pinch/crush points, rotating parts and reciprocating parts. These exposures may lead to severe injuries to the hands, arms, head or face. Exposed machine hazard appeared to be present on each of the packaging lines.
http://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=1910_0212&src_anchor_name=1910.212(a)(1)**1910.212(a)(1)**
Types of guarding. One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks. Examples of guarding methods are-barrier guards, two-hand tripping devices, electronic safety devices, etc.

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 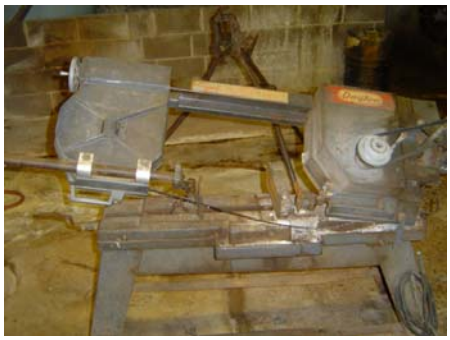	http://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=1910_0212&src_anchor_name=1910.212(a)(1)**1910.212(a)(1)** Types of guarding. One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks. Examples of guarding methods are-barrier guards, two-hand tripping devices, electronic safety devices, etc.
	**Condition Noted:** Hoist with no records of inspection. **1910.179(a)(50)** "Rated load" means the maximum load for which a crane or individual hoist is designed and built by the manufacturer and shown on the equipment nameplate(s). **1910.179(j)(1)(ii)** Inspection procedure for cranes in regular service is divided into two general classifications based upon the intervals at which inspection should be performed. The intervals in turn are dependent upon the nature of the critical components of the crane and the degree of their exposure to wear, deterioration, or malfunction. The two general classifications are herein designated as "frequent" and "periodic" with respective intervals between inspections as defined below: **1910.179(j)(1)(ii)(a)** Frequent inspection - Daily to monthly intervals. **1910.179(j)(1)(ii)(b)** Periodic inspection - 1 to 12-month intervals.

	**Condition noted:** Battery charging station located directly above and adjacent to eye wash station and emergency shower. This is an electrical hazard near water sources and it appears that when the batteries are being charged, the eye wash station and emergency shower would be blocked and inaccessible. Additionally, the flexible cords appear to be passing through the doorway to the other side on a regular basis. **1910.305(e)(1)** Cabinets, cutout boxes, fittings, boxes, and panelboard enclosures in damp or wet locations shall be installed so as to prevent moisture or water from entering and accumulating within the enclosures. In wet locations the enclosures shall be weatherproof. http://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=1910_0151&src_anchor_name=1910.151(c)**1910.151(c)** Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.
	**Condition noted:** Flexible cords improperly used. **1910.305(g)(1)(iii)** Unless specifically permitted in paragraph (g)(1)(i) of this section, flexible cords and cables may not be used: **1910.305(g)(1)(iii)(A)** As a substitute for the fixed wiring of a structure; **1910.305(g)(1)(iii)(B)** Where run through holes in walls, ceilings, or floors; **1910.305(g)(1)(iii)(C)** Where run through doorways, windows, or similar openings; **1910.305(g)(1)(iii)(D)** Where attached to building surfaces; or **1910.305(g)(1)(iii)(E)** Where concealed behind building walls, ceilings, or floors.

	**Condition noted:** Several pallets of inventory where positioned in a manner that prevented any access to the emergency exit in the warehouse. **1910.37(a)(3)** Exit routes must be free and unobstructed. No materials or equipment may be placed, either permanently or temporarily, within the exit route. The exit access must not go through a room that can be locked, such as a bathroom, to reach an exit or exit discharge, nor may it lead into a dead-end corridor. Stairs or a ramp must be provided where the exit route is not substantially level.
 	**Condition noted:** Temporary wiring used for permanent installation. **1910.305(a)(2)(i)** Uses permitted, 600 volts, nominal, or less. Temporary electrical power and lighting installations 600 volts, nominal, or less may be used only: **1910.305(a)(2)(i)(A)** During and for remodeling, maintenance, repair, or demolition of buildings, structures, or equipment, and similar activities; **1910.305(a)(2)(i)(B)** For experimental or development work, and **1910.305(a)(2)(i)(C)** For a period not to exceed 90 days for Christmas decorative lighting, carnivals, and similar purposes.

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1910.305(a)(2)(i)(C)
For a period not to exceed 90 days for Christmas decorative lighting, carnivals, and similar purposes.

 	**Condition noted:** Improper storage and care of PPE. Various sections of the PPE standard may apply. **1910.132(f)(1)** The employer shall provide training to each employee who is required by this section to use PPE. Each such employee shall be trained to know at least the following: **1910.132(f)(1)(v)** The proper care, maintenance, useful life and disposal of the PPE. **1910.132(f)(3)** When the employer has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by paragraph (f)(2) of this section, the employer shall retrain each such employee. Circumstances where retraining is required include, but are not limited to, situations where: **1910.132(f)(3)(iii)** Inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill.
	**Condition noted:** Lack of fall protection systems at milk loading bays. http://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=1910_0023&src_anchor_name=1910.23(c)(1)**1910.23(c)(1)** Every open-sided floor or platform 4 feet or more above adjacent floor or ground level shall be guarded by a standard railing (or the equivalent as specified in paragraph (e)(3) of this section) on all open sides except where there is entrance to a ramp, stairway, or fixed ladder. The railing shall be provided with a toeboard wherever, beneath the open sides
	**Condition noted:** Large accumulation of wood pallets. Creating a large fire load. NFPA recommends that pallets stored indoors should not exceed 8 feet in height, with no more than four stacks in a cube, separated from walls and other stacks by 8 feet. **1910.176(c)** Housekeeping. Storage areas shall be kept free from accumulation of materials that constitute hazards from tripping, fire, explosion, or pest harborage. Vegetation control will be exercised when necessary.

	**Condition Noted:** Chemical storage area floor is uneven as a result of chemical reactions, creating a slip and fall hazard. **1910.22(a)(2)** The floor of every workroom shall be maintained in a clean and, so far as possible, a dry condition. Where wet processes are used, drainage shall be maintained, and false floors, platforms, mats, or other dry standing places should be provided where practicable. **1910.22(a)(3)** To facilitate cleaning, every floor, working place, and passageway shall be kept free from protruding nails, splinters, holes, or loose boards.
 	**Condition Noted:** It appears that this eyewash station is not adequately maintained to meet the performance requirements of the standard. http://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=1910_0151&src_anchor_name=1910.151(c)**1910.151(c)** Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use. Most recent letter of interpretation. Click Here.
	**Condition noted:** Bench grinder with more than 1/8 inch from wheel to tool rest and more than 1/4 inch from wheel to tongue guard. **1910.215(a)(4)** Work rests. On offhand grinding machines, work rests shall be used to support the work. They shall be of rigid construction and designed to be adjustable to compensate for wheel wear. Work rests shall be kept adjusted closely to the wheel with a maximum opening of one-eighth inch to prevent the work from being jammed between the wheel and the rest, which may cause wheel breakage. The work rest shall be securely clamped after each adjustment. The adjustment shall

	not be made with the wheel in motion. **1910.215(b)(9)** Exposure adjustment. Safety guards of the types described in Subparagraphs (3) and (4) of this paragraph, where the operator stands in front of the opening, shall be constructed so that the peripheral protecting member can be adjusted to the constantly decreasing diameter of the wheel. The maximum angular exposure above the horizontal plane of the wheel spindle as specified in paragraphs (b)(3) and (4) of this section shall never be exceeded, and the distance between the wheel periphery and the adjustable tongue or the end of the peripheral member at the top shall never exceed one-fourth inch. (See Figures O-18, O-19, O-20, O-21, O-22, and O-23.)