

A GOOD TIME TO AUDIT YOUR SAFETY PROGRAM

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With winter coming on and business slowing down at this time of year, it is a good time to conduct an audit of your company Safety Program. OSHA is not going to go away and may actually be more aggressive in the future. How would your company fair if OSHA showed up today? Are you ready?

It's important to know what OSHA expects and to ensure those areas are reviewed in detail. The three major areas that need to be reviewed in detail are:

- Physical conditions of the Plant
- Written OSHA Programs
- Employee Safety Training and documentation

OSHA expects every company to provide a place of employment free of recognized safety and health hazards. Begin by conducting a general walk around and check for the following items:

Housekeeping – make sure the plant and garage are in good shape

- Keep aisleways clear
- Ensure there is adequate lighting
- Pick up tools and ensure these are kept stored out of the way when not in use
- Clean-up spills
- Ensure the fire extinguishers are charged and kept clear at all times

Electrical

- Keep extension cords out of the aisleways, inspect the cords to ensure they are in good condition
- Don't use extension cords to power fixed equipment
- Keep electrical boxes clear. A minimum of 36" is required in front of each panel

Machine Guarding

- Ensure the head pulley and tail pulley on conveyors are guarded
- Make sure all drive pulleys on motors and compressors are guarded
- Make sure any other equipment is guarded properly

Fall Protection

- Overhead work platforms and walkways need to have approved guardrails systems. Top rail 42"; midrail 21" and toe board

Confined Space Location

- All Permit Required Confined Spaces need a sign "Permit Required Confined Space – Authorized Personnel Only"

Spill Prevention

- Oil tanks and drains need spill protection

Labeling

- All containers of Hazardous Chemicals need approved Hazard Communication Labels

Personal Protective Equipment

- The areas where acid is used to clean the truck will need to have splash goggles, aprons and gloves
- Safety glasses with side shields used by the mechanics and maintenance

Written Safety Programs should be carefully reviewed and where necessary updated. Areas that OSHA will be reviewing include:

- Lockout/Tagout Program and Written Lockout/Tagout Procedures
- Hazard Communication Program
- Confined Space Entry Procedures including Drum Clean Out Procedures
- Emergency Evacuation Program
- PPE Program and Written Certificates of Hazard Assessments
- Respirator written program and annual fit testing and medical questionnaires filled out
- Forklift Safety Program
- Bloodborne Pathogens Program

Employee Safety Training - OSHA expects each employer to train their employees in:

- General Safety Policies
- Site and Job specific Safety Training
- OSHA Required Training
- Audit the new employee training programs.
- Have all new employees received required training and documentation in place?
- Has annual follow-up training been completed? This includes the following:
 - Fire Extinguisher Operation
 - Emergency Procedures
 - Respirator Training
 - Confined Space refresher

Additional training should also be updated on a regular basis:

- Hazard Communication
- Electrical
- Safe Driving
- Machine Guarding
- Check to ensure all employees required to operate a forklift, front end loader and bobcat are trained and re-trained every three years

A Safety Training Matrix needs to be developed to track your training if you don't have one. This will make it easy to check on training requirements and update your training.

The above review could go a long way in saving your company from OSHA citations and the fines that go along with these. Remember the old saying, "An ounce of prevention is worth a pound of cure."

If you have any safety related questions or need assistance with your Safety Program, please feel free to call me at 1-800-356-1274.