

Safety Strategies Make for Happy Workers

Davis Woodruff
Management Methods

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MODERATOR: Robert Hust
Frost Brown Todd LLC

OSHA REGIONAL NOTICE

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: CPL 1408 (CPL 02-03)	EFFECTIVE DATE: January 15, 2014
SUBJECT: Regional Emphasis Program for Safety Hazards in Auto Parts Industry – NAICS 3363XX (Motor Vehicle Parts Manufacturing)	
REGIONAL IDENTIFIER: Atlanta Regional Notice CPL 2	

ABSTRACT

Purpose: The purpose of this instruction is to establish a Regional Emphasis Program to reduce workplace exposures to safety hazards associated in the Auto Parts Supplier Industry.

Scope: This Notice applies to Atlanta East, Atlanta West, Birmingham, Jackson, and Mobile Area Offices.

References: OSHA Notice CPL 02-09-150, Field Operations Manual
OSHA Instruction CPL 02-00-025, Scheduling Systems for Programmed Inspections
OSHA Instruction CPL 04-00-001, Procedures for Approval of Local Emphasis Programs (LEPs) and Experimental Programs
OSHA Instruction CPL 02-00-051, Enforcement: Exceptions and Limitations under the Appropriations Act

Cancellations: None

State Impact: None

Action Offices: Atlanta East, Atlanta West, Birmingham, Jackson, and Mobile Area Offices

Originating Office: Atlanta Regional Office

Contact: Assistant Regional Administrator for Enforcement Programs
USDOL-OSHA Atlanta Regional Office
(678) 237-0400

By and Under the Authority of

TERESA A. HARRISON
Acting Regional Administrator

1. Fall protection
2. Hazard communication
3. Scaffolding
4. Respiratory protection
5. Electrical Wiring
6. Powered industrial trucks
7. Ladders
8. Lockout/Tag out (LOTO)
9. Electrical: systems design
10. Machine guarding



Source: U.S. Dept. of Labor website



279



79



66



13



\$23,000

\$207,100

\$109,000

◆ Fines

◆ Legal Fees

◆ Hassle Costs

◆ And could be worse!

\$121,000

\$135,900

\$6,000

\$36,900

\$99,000

\$80,000



PANEL DISCUSSION

Handling a Wall-To-Wall OSHA Inspection

- Preparation
- Opening Conference
- Actual Inspection
- Employee Interviews
- Closing Conference

Preparation

- Proper Safety Programs in Place; Training Conducted; OSHA Logs and Training Documentation Up-to-Date
- Have a written plan for the actual inspection
 - Designated contact person (safety director, HR Director, Outside safety expert)
 - Have a designated back-up in case contact person is unavailable

Opening Conference

- Investigator should be accompanied at all times
- Direct inspector to an office to meet the contact person
- Advise area/department managers that OSHA inspection is beginning and do a quick review of the site; must meet with inspector in a “reasonable time”
- Ask for the inspector’s I.D.
- Confirm purpose of inspection (scheduled inspection, complaint or response to incident)
- Right to warrant; not recommended under normal circumstances.

Actual Inspection

- Inspector will review the written safety programs and OSHA logs.
- Inspector will conduct walk-around survey.
 - At least one and preferably two management representatives should always accompany the inspector.
 - If a union shop, then one union representative can serve as the employee representative.
 - Take notes of all remarks and questions asked by the inspector.
 - Take photographs of anything the inspector photographs.
 - Have available the appropriate equipment to measure the same things the inspector will measure (example – air quality, noise, etc.)
 - Management representative should not volunteer any information.
 - Do not conduct any demonstrations for the inspector.
 - Do not try to talk the inspector out of a violation.

Employee Interviews

- Employer must make employees available but need not do so during production (often better to allow to be done during work hours).

Closing Conference

- Inspector will hold a closing conference
- Inspector typically will identify violations and may discuss abatement time and costs.
- Use the conference to get additional information from inspector – do not be argumentative.

QUESTIONS