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### **Purpose**

The purpose of this program is to have effective procedures conducting safety audits and correcting unsafe conditions and acts.

# Responsibilities

## **Site Supervision**

Daily, project management and or its subcontractors will inspect the project prior to the beginning of work.

Weekly, the company shall inspect the work site using a checklist form.

Where imminent danger or serious exposures exist, steps shall be taken to correct these conditions immediately, before any paperwork is initiated. All corrective action must be indicated or attached to the inspection report.

Subcontractors must also maintain an ongoing program to identify and correct jobsite safety hazards. Subcontractor inspections shall be conducted on a regular basis and copies of these inspections, with the corrective action taken, will be given to the company'spost-incident phase.

# **OSHA Inspections**

This procedure outlines the responsibilities of the company's management in controlling an OSHA inspection and guidelines in fulfilling those responsibilities. As soon as the OSHA compliance officer arrives at the jobsite, the Project Manager and the company's office must be notified. A reasonable effort will be made to get the compliance officer and his equipment on site without undue delay.

### **Opening Conference**

The Project Manager and/or the Project Superintendent, and another member of the company's management should attend the opening conference, if possible. The Project Manager will be the sole spokesman during the conference. Another member of management will take notes. MSC Safety Solutions should be contacted to assist if possible (303-477-1044).

The OSHA compliance officers' credentials should be requested and carefully reviewed.

The type and scope of inspection should be determined. If a warrant exists, a copy of the warrant and any supporting affidavits should be obtained.

# **Jobsite Inspection**

The companies' most senior position on site will be assigned "spokesman" duties during the walk-around inspection, and a second the company staff member will be assigned as the note taker. Courteous treatment of the compliance officer is expected at all times and the following principles must be followed:

Do not agree that any violations exist

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Do not point out any possible or potential problem areas.

Do not indicate that you have been aware of any alleged violations.

Do not argue with the compliance officer.

Do not volunteer any information or make any admissions.

#### Records

Notes must be made of all records furnished, not furnished and any comments made by the compliance officer relating to records. During this part of the inspection the company Project Manager will furnish all requested safety records and another staff member will take notes.

#### **Tests**

Every test made by the compliance officer during the inspecting must be documented with:

Purpose of the test

Time the test began

Test equipment used

Area where the test was taken

Name and craft of employee(s) involved in the test and one for photographs as indicated in the following pages.

Location of testing equipment and distance from the closest employee.

Time the test ended

The test results, if available

Use the attached form to document each test.

## **Photographs**

Every photograph taken by the compliance officer must be documented and duplicated. If photographs cannot be taken during the inspection, they must be taken immediately after. The compliance officer shall be required to mark "CONFIDENTIAL-TRADE SECRET AREA" on any instant-print photograph taken in a trade secret area. Complete the attached form for each photograph. Notes about the photographs shall be:

Time the photograph was taken

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Type of camera used

Area in which the photo was taken

Location of the camera in the area when the photo was taken

Distance of the camera from the subject

## **Employee Interviews**

If the compliance officer requests private interviews with employees, such interviews would be scheduled to minimize interference with production. Employees should be advised of their rights.

# **Closing Conference**

The following information must be obtained from the compliance officer:

- Exact nature of an alleged violation, including specific location.
- Exact standard or general duty clause allegedly violated.
- o Copies of all standards allegedly violated.
- Exactly how the compliance officer believes compliance can be affected.

The note taker will prepare a report with the assistance of the Project Manager and a complete copy of this report will go to the company's main office.