Health & Safety

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Conducting Safety Audits

Most people dread a safety and health compliance audit in the same way as an IRS audit. The words "review," "evaluation," or "assessment" may be used to escape the negative connotations of "audit." No matter how you say it, the process is still a verification of the way things have been. This review process provides an opportunity to identify strengths in safety programs, so that those strengths can be maintained and reinforced. It also provides a chance to recognize areas that need improvement.

Scope

The problem with auditing is defining the scope and purpose of the audit. Audits can be conducted to evaluate the physical environment in a plant. An example of this is the work area safety inspection. This evaluation might address proper inspection and use of fire extinguishers, machine guarding, personal protective equipment and housekeeping. Another type of audit might be conducted less frequently, and used to followup on the action items from the area inspections. A general audit, or "program compliance audit," is useful in preparing a plant for possible OSHA inspection, as well as identifying areas for improvement in safety programs.

During an OSHA compliance inspection, the following items are usually reviewed. These items can be a starting point for conducting a self-audit:

- OSHA-200 logs for the past five years
- Hazard Communication Program
- Lockout/Tagout Program
- Safety Training Program
- Personal Protective Equipment
- Respirator Program
- Hearing Conservation Program
- Confined Space Entry Program
- Crane/hoist/forklift/industrial truck inspection records
- Fire extinguisher training records
- Competent person appointment
- Employee action plan, in case of emergency
- Bloodborne Pathogens Program

The accompanying table shows OSHA's "top 25" list of most frequently cited standards during inspection of fabricated metal products companies. This is a good reference for assigning priority to program development or enhancement. Some of these may not apply in all shops.

When conducting a safety audit, it is also a good idea to review the latest OSHA regulatory updates for new or revised regulations. New or updated standards may leave openings for a shop to falter in compliance. An example is OSHA's latest update of the Personal Protective Equipment (PPE) standard (29 CFR 1910.132). It's no longer enough to provide PPE for employees. The revised standard requires an employer to conduct hazard assessments to determine that the selected PPE is appropriate for the hazard. After the hazard assessment, training must be provided, and employees must demonstrate that they understand when and how to use the equipment properly.

Documentation

Written documentation is very important to OSHA, and must receive

OSHA's Top 25

CFR 1903.2 A	OSHA Poster
CFR 1904.2 A	Employee Injury
CFR 1910.106 E	Flammable & Combustible Liquids
CFR 1910.107 B	Spray Finishing Using Flammable & Combustibles
CFR 1910.1200 E	Written Hazard Communication Program
CFR 1910.1200 F	Labels & Other Forms of Warning
CFR 1910.1200 G	Material Safety Data Sheets
CFR 1910.1200 H	Employee Information & Training
CFR 1910.134 B	Respiratory Protection
CFR 1910.147 C	Lockout/Tagout of Hazardous Energy
CFR 1910.20 G	Access to Employee Medical Records
CFR 1910.212 A	Machine Guarding
CFR 1910.215 A	Abrasive Wheel Machinery (general guarding)
CFR 1910.215 B	Abrasive Wheel Machinery (cup wheels)
CFR 1910.217 B	Mechanical Power Presses (guarding & construction)
CFR 1910.217 C	Mechanical Power Presses (point of operation)
CFR 1910.219 D	Mechanical Power-Transmission Apparatus (pulleys)
CFR 1910.219 E	Mechanical Power-Transmission Apparatus (belt, rope & chain drives)
CFR 1910.23 C	Guarding Floor & Wall Openings
CFR 1910.253 B	Oxygen Fuel Gas Welding & Cutting
CFR 1910.303 G	Electrical General Requirements
CFR 1910.304 F	Wiring, Design and Protection
CFR 1910.305 B	Wiring Methods, Components & Equipment for General Industry (cabinets, boxes & fittings)
CFR 1910.305 G	Wiring Methods, Components & Equipment for General Industry (flexible cords & cables)
CFR 1910.94 D	Ventilation/Personal Protection

the same attention from in-plant auditors. Pay careful attention to what is in writing. Do your written programs truly represent the activity in the shop? If the answer is "no," OSHA may consider these activities as "willful" violations when contemplating citations, which can carry the maximum fine of $70,000 per violation.

Another important aspect of documenting audits is a list of action items. A good list should include action items to be corrected, proposed action, the person responsible, and a time for completion. A list alone, however, is not enough. Follow-up on the list to ensure that corrective action is taken. Be aware that a list of action items can be evidence for willful citations, if the action plan is not followed.

Seek Help

Use the experience available in the shop. Invite the environmental health and safety manager, facility manager, maintenance personnel, engineers, and equipment operators to participate in the audit. By having these participants, new eyes see the work environment from a compliance point of view. Having more people participate in the audit also increases plant safety awareness.

If you're not sure of what you are doing when it comes to auditing, consider retaining an experienced consultant. If it becomes apparent during the audit that deficiencies in programs or work environment cannot be addressed effectively or in a timely manner, it may be best to curtail the audit and seek legal counsel. Your lawyer *may* be able to protect your working documents under "attorney-client privilege." He or she may also be able to give advice on enforcement considerations and procedures.

Audits should be considered a chance to take a serious look at "where you are" vs. "where you should be" regarding compliance issues. It should not be used as an opportunity for a witch hunt, police action, inquisitions, or a chance to say "gotcha" to colleagues. Safety audits should be the opportunity to learn, think, share and improve plant safety. o

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About the Columnist

Vicki P. Sherwood is a product stewardship coordinator for DuPont Company in Research Triangle Park, NC. She has more than eight years' experience in safety, health and environmental affairs with such topics as chemical safety, hazard communication, respiratory protection and hearing conservation. She also has significant background in safety auditing and accident investigation. She is an ABIA-certified occupational health and safety technologist, and is a member of the AESF OSHA Committee.