

# OSHA'S TOP 10 LIST:

## DOCUMENTS TO HAVE ON HAND

By Amanda Mayer

**W**hen people think of Top 10 lists these days, comedy is the first thing that comes to mind. But if an Occupational Safety and Health Administration (OSHA) inspector arrives on the jobsite, good jokes won't go very far. Contractors need to prove that their company and employees are serious about safety. One of the best ways to do that is to have all safety documentation and reports up to date and handy when the OSHA inspector asks for them. Below are the 10 documents and reports they ask for most often when visiting construction sites.

### 1. The OSHA 300 Log

OSHA Form 300 is the document used to track injury and illness records if a company has at least 10 employees. It's one that OSHA nearly always requests, so it's important to keep it up to date. The supervisor or other team member responsible for keeping the log needs to have a thorough understanding of what constitutes recordable injuries or illnesses, so that the company is not recording any that don't belong there.

### 2. Hazard Communications Program

The inspector will probably check to see that the company has a written Hazard Communications Program, and verify that it covers all of the required elements. This plan should address workplace hazards, where employees can access Material Safety Data Sheets (MSDS), and how hazards are going to be labeled on the jobsite, as well as how the company's training program will address these issues.

### 3. Training Records

While there isn't an easy standard for these records, rest assured that OSHA is going to want to see proof that the company is providing the training that's appropriate for the work it is doing



and the hazards that workers may encounter. For example, if there will be excavation on the site, OSHA will expect evidence that workers have participated in excavation safety training.

### 4. Emergency Action Plan

What are workers supposed to do if a fire breaks out or a funnel cloud bears down on the work site? The company's Emergency Action Plan is supposed to spell out the actions workers should take when confronted by situations like those. Generally speaking, the contractor that is in control of the site is required to develop the plan, so if a company is one of the subcontractors or another party, it will need to demonstrate that its team is familiar with the plan.

### 5. Lockout and Tagout Program

If crews are going to work around electrical or mechanical

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systems that could create a hazard when activated, the company will need to provide details of how it will provide protection. Simply stating that it will use a lockout and tagout program isn't enough; it is necessary to spell out how it works and show evidence that it has been explained to the affected workers.

#### 6. Excavation and Trenching Oversight

If a company's crews will be involved in excavation or trenching, or if they'll work in areas affected by another contractor's excavation or trenching activities, OSHA will expect to see written documentation of safety procedures. In addition, depending on the nature of the work, the company may need to provide written logs to verify that proper inspection procedures are being followed.

#### 7. Fall Protection

Here again, if the situations workers will experience require the use of fall protection, OSHA will want to see a written program that explains the nature of the protective gear and its use. They may also ask to see records of specific training for fall protection equipment.

#### 8. Confined Space

As with excavation and fall protection, if anyone under the company's supervision will be working in a confined-space situation, OSHA will expect to see a written safety program. That program should spell out the training for entry teams,

what types of permits are required for specific work, and who will oversee safety during those activities.

#### 9. Material Safety Data Sheets

This was mentioned under the Hazard Communications Program, but it bears repeating. Companies need to be sure that they have an MSDS for every chemical on-site or available quickly from the home office. If there is an incident involving a specific material, the company can expect OSHA to request the MSDS. In other inspections, they'll probably focus on how the sheets are being maintained and whether they are accessible to employees.

#### 10. Hazard Assessment

A formal hazard assessment identifies jobsite hazards that require the use of personal protective equipment, and OSHA's expectations for documentation will depend largely on the nature of the site and the activities. In some cases, they'll simply want to see that the company has a program in place. In others, they'll expect written documentation that hazards are identified, and proper equipment and training are provided each day.

#### ONE EXTRA POINT

While it is important to have the right information on hand, and to be responsive when the OSHA inspector asks for more detail or clarification, never feel compelled to volunteer information that the inspector has not requested. ♦

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