



SUPPORTING OSHA DURING SITE INSPECTIONS

By Dennis Pivin CSP, CHST, CIT, NASSCO Director of Health, Safety and Environmental

While my fellow colleagues are working diligently to keep everyone safe in the workplace, there is always room to go one step further, and one of those ways is to embrace and support representatives from the Occupational Safety and Health Administration (OSHA) during site inspections. They are there to help, not hinder, and it is important to view OSHA representatives as part of your team in keeping your most valued assets - your workers - safe.

Tip #1: Make them feel welcome. I am often asked "Since OSHA is the government, should we just let them do what they need to do and hope for the best?" The answer is no. I have heard from some OSHA officers that they feel abandoned after announcing their presence and starting their inspection. While there are a lot of suggestions on how to best manage an OSHA site visit, here are a few ways to make them feel welcome:

1. Ask the OSHA officer for their badge and make sure you log the information. In my interactions with OSHA officers, they expect you to ask for their badge and are probably disappointed if you do not. It is always a good idea to verify who is on your job site, regardless of who they are.
2. Identify yourself to the OSHA officer as well. Providing a business card or electronic card helps them understand your role in the organization.
3. Ask if you can escort them on their visit. While you cannot tell them where to go and what to do, ideally you should be present to answer any questions the officer may have regarding your work process. Also, there

may be situations where they want to speak with employees one on one. In those cases, be prepared to comply and step away if requested.

4. If the OSHA officer asks to take pictures it would be a good idea to take a picture with your phone as well, taking the picture from the same angle and position the officer took their picture. This way you will have a record of items that may be brought forward by OSHA at a later date.
5. Be sure to attend a closing meeting with OSHA before they leave the site. This is an opportunity for the employer to have a dialogue with the OSHA officer before they leave, and they may be able to share some details about any possible concerns.

Tip #2: Always comply. I am aware of instances when OSHA officers were asked to show a warrant with the hope that they wouldn't return. This is not a good idea. It is my understanding that OSHA does an excellent job of choosing inspection sites. Sometimes this results from OSHA having a focus program (like trenching) which may require an inspector to stop at a job site if they see work going on, as well as from OSHA initiative programs that may include your industry. Keep in mind that OSHA can seek support from a Federal judge to access a site, if necessary, and OSHA can easily show merit to the judge for the inspection and in most cases the judge will authorize a search warrant. Best practices should always be followed, compliance granted, and the opportunity to improve safety should be your number one priority.

Tip #3: Expect complaints. Sometimes OSHA will arrive on a job site because of an employee complaint. Do not assume the complaint is frivolous and understand that it is the role and responsibility of OSHA to examine all complaints. Also, rest assured that OSHA has the tools and experience to sift through complaints to easily identify those that are legitimate from those that may have been filed fraudulently by a disgruntled employee. Regardless of the reason, complaints will happen, and it is always in your best interest to respond appropriately.

These tips are based on my responses to questions I hear over and over again from companies involved with OSHA site inspections, and just scratch the surface of best practices. In addition to these tips, you should have a corporate policy in place to determine how to respond to OSHA site visits, and guidelines should be shared with your management team so they are fully prepared to respond appropriately to a site visit by OSHA.

THE BEST SOURCE FOR SUPPORT AND INFORMATION, OF COURSE, IS TO CONTACT OSHA DIRECTLY FOR ADVICE AND GUIDANCE ON ALL QUESTIONS PERTAINING TO THE HEALTH AND SAFETY OF YOUR WORKERS. FOR MORE INFORMATION, PLEASE VISIT [OSHA.GOV](https://www.osha.gov).

TECH TIPS IS A BI-MONTHLY ARTICLE ON TRENDS, BEST PRACTICES AND INDUSTRY ADVICE FROM NASSCO'S TRENCHLESS TECHNOLOGY MEMBERSHIP PROFESSIONALS



Follow us on social media or visit [NASSCO.org](https://nassco.org)

"... IT IS IMPORTANT TO VIEW OSHA REPRESENTATIVES AS PART OF YOUR TEAM IN KEEPING YOUR MOST VALUED ASSETS —YOUR WORKERS— SAFE."



NASSCO