



## Meiners Electric, Company Safety Manual

PAGE: 1 of 2

LAST REVISION:

December 28<sup>th</sup>, 2009

REVIEWED BY:

L. Kirk Berglund, Safety Director

FORM REF No:

SP-OSHAINSP

SUBJ:

**OSHA Inspection Management**

### PURPOSE

This document has been prepared to communicate Meiners' policy on the procedures to be followed when an inspector from the federal or state Occupational Safety and Health Administration (“OSHA”) arrives at one of Meiners Electric's jobsites. This policy applies to all workers, supervisors, forepersons, line managers and other personnel (which we'll refer to collectively as “Employees”).

### POLICY

Employees shall **immediately** notify Meiners Electric's Safety Director when an OSHA inspector or representative is at a jobsite along with the main office. The highest ranking Employee who is available shall meet with the inspector and ask him/her to refrain from beginning the inspection for at least 30 minutes or until the safety representative or another company representative arrives. If no one arrives within 30 minutes, or if the inspector refuses the request, the Employee shall accompany the inspector throughout the inspection in accordance with the following procedures.

### PROCEDURES

All Employees responding to a request by an OSHA inspector to investigate a jobsite shall:

1. **Initial Meeting:** Meet with the inspector before the inspection takes place to determine the scope of the inspection. Employee should ask whether the inspection is random, the result of a complaint or imminent hazard. Employee should try to ensure that the inspector limits the inspection to the purpose he/she states is the purpose of the inspection.
2. **Credentials:** Ask the inspector for his/her credentials before allowing the inspector to gain entrance to the jobsite. No one will be allowed to enter a jobsite without proper credentials, such as an identification badge indicating that the inspector is an OSHA representative.
3. **Warrant:** Ask if the inspector has a warrant.
  1. If the inspector has a warrant, Employee shall inspect the warrant to determine whether the inspection is limited to a particular area of the jobsite.
  2. **[Optional]** If the inspector does not have a warrant, Employee shall demand that the inspector obtain one and return at a later date.
  3. If the inspector has a warrant, Employee shall direct the inspector to the areas listed in the warrant, but not refuse his request to inspect other areas. OSHA inspectors shall be permitted to inspect all aspects of the jobsite, regardless of the areas listed on the warrant. In such an event, Employee shall simply state to the inspector that the area he is inspecting is not listed on the warrant and the search may not be permissible.



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4. **Accompany:** Employee shall accompany the inspector at all times during the inspection.
5. **Interviews:** Employee shall allow the inspector to interview other workers. All workers have the right to be accompanied by an attorney, a company representative must be present at all interviews. Employee shall take notes of all conversations the inspector has with the representative and other workers.
6. **Records:** Employee shall keep a detailed record of all documents turned over to the inspector. Do not give the inspector free access to document storage. Instead, provide only those documents that the inspector requests and make a copy of each document before turning it over.
7. **Courtesy and Cooperation:** Remain as calm and polite as possible. Be courteous and answer questions truthfully, but do not offer information that the inspector hasn't asked for or make guesses when responding to questions. Avoid making any statements that could be construed as an admission of violating any laws or regulations, and don't speculate as to how any accidents occurred.
8. **Correct Hazards:** If possible, immediately correct any hazards that are found during the inspection before the inspection ends.
9. **Closing Conference:** Meet with the inspector for a closing conference. Take notes of any alleged violations and requirements for corrective action. Ask whether there will be a follow-up inspection and if so, when such an inspection is expected to take place.