



For school districts or any company, one of the most stressful times can be an OSHA inspector's unannounced arrival at their facility. Whether the inspector is there to respond to a fatality, to conduct a routine inspection, or to investigate an employee complaint, the stress level is heightened. Employees need to know several items to make the OSHA inspection run as smooth as possible. It is OSHA's job to regulate safety in the workplace. Failing to meet their standards can result in citations and hefty fines. But an unannounced visit from OSHA doesn't have to bring on feelings of anxiety and fear for school transportation directors or mechanics/technicians. If employers and employees take the necessary steps towards compliance, they can rest easy when OSHA comes knocking.

At any transportation facility, one of the first places to review is the maintenance facility/shop. This is the area that the majority of the work is completed and it is also the area that can have several OSHA violations. Many times issues are simply overlooked due to time restraints or because it is the way it's always been done. So why change?

Here's why! A Compliance Safety and Health Officer (CSHO) may arrive unannounced at your facility at any time, without notification. While the employer has the right to make the CSHO obtain a search warrant, this is generally not a good practice as it delays the inspection and increases the officer's suspicion about the working conditions. OSHA will be able to obtain a search warrant within approximately 24 hours, which is generally not enough time to correct any large problem or to correct unsafe working conditions. OSHA does not have to demonstrate probable cause for the inspection, but must follow administrative standards for conducting the inspection. The CSHO will present their credentials to the staff member on duty. The OSHA Act allows an employer and employee representative to accompany the CSHO during the inspection. They will hold an opening conference to be attended by the employee representative and the establishment's safety personnel, or manager.

However, before the CSHO arrives in your district, it's a good idea to perform your own Hazard Control Assessment. Doing it on your own is not necessarily the best way to begin. It is recommended that you contact your local insurance agent, as most insurance companies will perform the Hazard Control Assessment at no cost to the district. A good place to start your own Hazard Control Assessment is to:

- Take a look at how and where accidents are occurring, looking for frequency or a pattern. Knowing how workers are hurt can go a long way toward keeping them safe and improving the safety in every area in the school district.
- Review and update as needed the districts Material Safety Standard Sheets, under the new HazCom guidelines it is now called Safety Data Sheets, and this is an important feature to know because it gives the CSHO an idea on whether or not employers have done the updated training required by the code. These books when maintained correctly provide workers access to Safety Data Sheets (SDS) so they can understand the technical details of chemicals used district wide.
- Employee training or right to understand. OSHA maintains that it is the employer's obligation to make sure workers know and understand hazard communications. Employees need to take this training seriously because OSHA inspectors may quiz workers to see if they can explain what different pictograms mean or if they are able to find important safety information on products labels and understand employee required safety procedures.
- Employee "right to know" means Hazard Communication (HazCom) which deals with chemicals, meaning employees have a "right to know" about chemicals they are exposed to in their job. Employee training is required for various hazards, such as HazCom, Electrical, Asbestos, Lockout/Tagout, Confined Spaces, etc. Don't confuse "right to know" training with employee training because they are not the same thing.
- Review the district's hazard labeling for electrical and chemicals. (Signage - electrical/gas shutoff locations, etc.)



Looking at the OSHA Top 10 most cited violations, the list can be overwhelming. Using your research you can start to slice and dice the data, there are more important lists within the Top 10. And you will begin to see the actions and areas that lead to worse accidents, the highest fines and, most importantly, how to prevent them.



OSHA’s Top (10) Most Cited Violation Areas:

1. Fall Protection Walking and working surfaces clear of trip and slipping hazards (Fluids Cords, Hoses etc.) (1926.501)
2. Hazard Communication (1910.1200)
3. Scaffolding (1926.451)
4. Respiratory Protection (1910.134)
5. Control of Hazardous Energy - Lockout/Tagout (1910.147)
6. Ladders (1926.1053)
7. Powered Industrial Trucks (1910.178)
8. Fall Protection - Training Requirements (1926.503)
9. Machine Guarding - General Requirement (1910.212)
10. Personal Protective and Lifesaving Equipment - Eye and Face Protection (1926.102)

Seven (7) Additional Areas of Concern:

1. Electrical – Wiring Methods
2. Confined Spaces (1910.146)
3. Electrical Cabinets (1910.305)
4. Chemical Storage Cabinets.
5. Chemical Labeling
6. Hazard Labeling (Signage)
7. Employee Training



How to use the Top 10 list to improve your organization: A good place to start is to understand how they come up with the top 10, and then begin evaluating how it speaks to you and your facility. Take the list and use it to make your organization better. Apply the lessons learned by other organizations and avoid these same costly mistakes that can lead to injuries, illness and reputation risk. In a short period of time you will begin to see your facility’s true risks by performing a thorough site assessment. An individual site assessment will break down the hazards you may not see that can contribute to your incident rate.



For some organizations, safety has become a matter of routine. They hang the appropriate safety signage, have monthly safety meetings and require or encourage compliance. Numerous companies are OSHA-compliant on the surface. However, while performing the Hazard Control Assessment you may find out that your organization can do better. There are many ways of building a strong Safety Culture with a true commitment from management, and a hands-on approach that includes the involvement of employees.

It’s not always easy to make the decision to invest in compliance training programs. But the cost of not doing so can be extremely high. With fines for not improving your safety knowledge can have an adverse effect on your school district’s bottom line.

Engaging employees improves morale, and trust, which improves productivity, and that that generally leads to helping keep costs down. Safety is everyone’s job, and the people most likely to spot problems are those closest to the work.

The organizations that introduce a tough, caring, safety program, and involve their employees in the development and reinforcement of that program generally have a better safety record. Don’t put it off because it seems complicated. You’re not going to improve safety with that kind of a plan.

Don’t sacrifice safety for budgetary reasons, it’s not necessary. Finding the correct safety program improvements that fit your organization is where you start. Where it goes from there depends on you.

Ultimately, a third-party assessment may help you close the gaps, and bring your program into compliance more quickly and efficiently. Make the contact with your local insurance agent and begin the process soon, before OSHA arrives in your district for an unannounced and unexpected visit.

