

IV. OSHA FOCUSED INSPECTIONS

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PURPOSE/SCOPE/REQUIREMENTS

Since October 1994, OSHA has been conducting focused inspections during their programmed inspections on those project sites that meet the following requirements.

At all programmed inspections an opening conference will be held consistent with current agency guidelines and then proceed as follows:

AT THE OPENING CONFERENCE, ALWAYS ASK THE COMPLIANCE OFFICER IF THIS WILL BE A FOCUSED INSPECTION.

4A. During all programmed inspections, the compliance officer will determine whether or not the prime, general or site controlling contractor has an effective safety program that meets the guidelines as follows:

1. The comprehensiveness of the program.
2. The degree to which it has been implemented.
3. The presence of a Competent Person.
4. The means by which the program is enforced.
5. Includes management policies and involvement.
6. Has effective employee involvement
7. Has adequate employee training.

If the above contractor meets these requirements, then a focused inspection will be conducted which will include all sub contractors working at the site. If the contractor does not meet these requirements, then a comprehensive inspection will be conducted.

4B. During all safety referral, compliance and fatality inspections, the compliance officer will inspect the site with regards to the complaint and then proceed with the focused inspection.

Focused inspections will concentrate primarily on the four (4) groups of hazards which account for the most fatalities and serious injuries in the construction industry.

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|-----------------------------------|-----------------------|
| 1.) Falls | 2.) Struck |
| by (material handling equipment) | |
| 3.) Caught in/between (trenching) | 4.) Electrical shock. |

However, during the course of the focused inspection, violations for other hazards (other than serious hazards), in plain view is abated immediately and abatement observed by the compliance officer will be noted in the case file, but not cited.

If during the walk around, the compliance officer determines that the number of serious and non-serious hazards found on the project indicates that the safety program is ineffective, the inspection may be expanded beyond the focused areas.

OSHA Comprehensive Project Site Inspections

Under previous agency policy, all construction site inspections were the comprehensive type, addressing all areas of the workplace and classes of hazards. This guidance caused compliance officers to spend too much time and effort on a few sites looking for violations and thus, too little time overall on many sites inspecting for hazards which were most likely to cause fatalities and serious injuries to workers.

Under the comprehensive system, a contractor is likely to be cited for hazards that are unrelated to the four (4) hazard areas most likely to cause fatalities and serious injuries.

Falls from elevations (33%)
Struck by material handling equipment (27%)
Caught in/between trenching (18%)
Electrical shock (19%)

Although these other conditions are important, the time and resources spent on a few sites can be better spent pursuing conditions on many sites related to the four hazard areas most likely to cause fatalities or serious injuries.

OSHA will continue to do comprehensive inspections of all project contractors that fail to demonstrate that they have no apparent commitment to safety and health programs or a competent person on site.