

# ABC Manufacturing Corp. Health & Safety Audit

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**OSHA 300 Logs & Poster**  
**(29 CFR 1904.29 Subpart C)**  
**(29 CFR 1903.2)**

Compliant	Noncompliant	Best Practice
X		

1. You are maintaining the 300 Log accident and illness record in accordance with OSHA requirements. Also you have posted the 300-A Summary Log where employees can see it from February 1st through April 30th of each year. You have substituted your Worker's Comp. Injury report for the OSHA 301 form which is OK. (8) incidents in 2007, (5) related to lifting, sprains & strains = 37 DART, You may want to consider having someone conduct a periodic "Toolbox Talk" on proper lifting & ergonomic awareness.
2. You have the required OSHA poster properly displayed in accordance with the law.

**Hazard Communication Program**  
**(29 CFR 1910.1200 Subpart Z)**  
**(see computer dic for sample)**

Compliant	Noncompliant	Best Practice
	X	

1. The Employee Right-To-Know Act of 1983 known as the OSHA Hazard Communication Standard, 29 CFR 1910.1200, requires not only the maintenance and availability of Material Safety Data Sheets (MSDS), but also requires a written program explaining the law, your container labeling program, a list of chemicals found in your facility and an employee training program. Although you do have an excellent notebook of MSDS documents, **there is no evidence of a compliant Hazard Communication Program. This is a serious gap in your legal obligation under the law.** I have provided a computer disc where you will find a SAMPLE HazCom Program for your use in developing your own program.
2. Your list of chemicals should be inventoried and updated annually. This updated list might be provided to the local Fire Dept. along with the location of flammables, gases and caustics. In the event of a fire, these emergency responders will appreciate knowing where any hazardous chemicals are located.
3. Employees must have access to your (MSDS) Material Safety Data Sheets. You must keep all (MSDS) documents forever, however, you may archive the ones for chemicals that you no longer use.

**Safety Program**

(see computer disc for sample)

1. Your current Safety Program is incorporated into your Employee Handbook pages 4-8 which is OK, however, there are several written programs that are missing:

- Emergency Action Plan
- Lockout/Tagout Program
- Bloodborne Pathogen Policy

As these are written, I would recommend putting all of the programs into one three ring binder with topic dividers and an index. This becomes basis for employee training.

Compliant	Noncompliant	Best Practice
	X	

**Walking-Working Surfaces - General Requirements**

(29 CFR 1910.22 Subpart D)

1. In general, you have a very neat, organized and safe work environment for your employees. Housekeeping is adequate but could use some attention in a few corners and areas. Aisles and passageways are fairly well identified and reasonably clear of clutter. The only real issue may be the roof access ladder at the loading dock. I did not measure the distance but it appears to be in excess of 20 feet which would require a cage or some kind of ladder safety device such as a belt and friction device.

Compliant	Noncompliant	Best Practice
	X	

## Safety Committee

PA DOL Bureau of PennSafe Certified

Compliant	Noncompliant	Best Practice
Recommended but not required		

1. Safety committees comprised of both employee and employer representatives are a proven tool to reduce incidents in the work place.
2. Although your Accident Record and Lost Work Day Incident Rate are OK, the workplace environment and behaviors require constant vigilance to maintain at the highest standard.
3. I would welcome the opportunity to talk with you about the Pennsylvania PENNSAFE safety committee program which offers a 5% discount on your workers Comp Insurance Premium

## Safety Audit

(see attached floor plan and photo guide to potential problem issues)

In general, the facility offers a safe and healthy work environment. This indicates an active and ongoing interest and participation by both management and employees. The following are a few minor issues I noted during my walking safety audit of the facility.

1. Extension cords (purchased or shop made) may not be used in lieu of permanent wiring. **29 CFR 1910.305 (a)(2) & (g)**
2. Be careful not to block access to electrical boxes and panels. **29 CFR 1910.303 (g)(1)(i)**
3. All containers must be properly labeled and hazard labels are nice. **29 CFR 1910.1200 (f)(5)(i) & (ii) Note (7) portable containers for immediate use**
4. Cages must be provided for fixed ladders greater than 20 feet. **29 CFR 1910.27 (d)(1)(ii)**