

OSHA Handbook for Small Businesses



Safety Management Series

U.S. Department of Labor
Occupational Safety and Health Administration

OSHA 2209
1996 (Revised)



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ABOUT THIS BOOKLET

This booklet is being provided at cost to owners, proprietors, and managers of small businesses by the Occupational Safety and Health Administration (OSHA), an agency of the U.S. Department of Labor. For a copy of this publication, write to the U.S. Government Printing Office, Superintendent of Documents, Washington, DC 20402, or call (202) 512-1800, (202) 512-2250 (fax) for ordering information. Order No. 029-016-00144-1; Cost \$4.00.

The handbook should assist small business employers to meet the legal requirements imposed by, and under, the authority of the *Occupational Safety and Health Act of 1970* (P.L.91-596) and achieve an in-compliance status voluntarily prior to an inspection performed pursuant to the Act.

The materials in this handbook are based upon the federal OSHA standards and other requirements in effect at the time of publication, and upon generally accepted principles and activities within the job safety and health field.

This booklet is not intended to be a legal interpretation of the provisions of the *Occupational Safety and Health Act of 1970* or to place any additional requirements on employers or employees.

The material presented herein will be useful to small business owners or managers and can be adapted easily to individual establishments.

All employers should be aware that there are certain states (and similar jurisdictions) which operate their own programs under agreement with the U.S. Department of Labor, pursuant to section 18 of the Act. The programs in these jurisdictions may differ in some details from the federal program.

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Occupational Safety and Health Administration
Joseph A. Dear, Assistant Secretary

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TO THE SMALL BUSINESS EMPLOYER

Small business employers may have special problems in dealing with workplace safety and health hazards. Frequently, large corporations can afford the full-time services of safety engineers and industrial hygienists, whereas small firms often cannot.

Yet the workplace hazards that cause thousands of injuries and illnesses every year are as prevalent in small businesses as in larger firms. That is why we have prepared this handbook to help small business employers establish their own safety and health programs. This booklet advises employers on how to manage safety and health protection at their own worksites, and tells how to obtain free, on-site consultations by safety and health professionals.

We at OSHA hope that each small business owner will recognize the value of positive, cooperative action—among employers, employees, and government—to provide safe and healthful workplaces throughout the Nation.

Tell us what you think, how the book can be improved, or anything else we can do to help you in this vital effort.

Send your comments and suggestions to Editor,
OSHA, 200 Constitution Avenue, NW, Rm. N3647,
Washington, DC 20210.

Joseph A. Dear
Assistant Secretary for Occupational Safety and Health

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PREFACE

American workers want safe and healthful places to work. They want to go home whole and healthy each day. Determined to make that dream possible, OSHA, for the last 25 years, has been committed to “assuring so far as possible every working man and woman in the nation safe and healthful working conditions.” OSHA believes that providing workers with a safe workplace is central to their ability to enjoy health, security, and the opportunity to achieve the American dream.

OSHA’s had success in this endeavor. For example, brown lung—the dreaded debilitating disease that destroyed the lives of textile workers—has been virtually wiped out. Grain elevator explosions are now rare. Fewer workers die in trenches, fewer get asbestosis, and fewer contract AIDS or hepatitis B on the job.

Also, OSHA inspections can have real, positive results. According to a recent study, in the three years following an OSHA inspection that results in penalties, injuries and illnesses drop on average by 22 percent.¹

Despite OSHA’s efforts, however, every year more than 6,000 Americans die from workplace injuries,² and 6 million people suffer non-fatal injuries at work.³ Injuries alone cost the economy more than \$110 billion a year. Also, in the public’s view, OSHA has been driven too often by numbers and rules, not by smart enforcement and results. Business complains about overzealous enforcement and burdensome rules. Many people see OSHA as an agency so enmeshed in its own red tape that it has lost sight of its own mission. And too often, a “one-size-fits-all” regulatory approach has treated conscientious employers no differently from those who put workers needlessly at risk.

Confronted by these two realities and to keep pace with the workforce and problems of the future, OSHA began in 1993 to set goals to reinvent itself. OSHA is not changing direction but is changing its destination to improve its ability to protect working Americans.

In addition, OSHA in its reinvention efforts is determined to promote small business formation and growth as well as provide quality service to our small business customers.

For example, OSHA is implementing President Clinton’s regulatory reform⁴ initiatives by (1) giving employers a choice—a partnership with OSHA and employees to provide better safety and health or traditional enforcement, (2) common sense in developing and enforcing regulations, and (3) measuring results, not red tape.

Building Partnerships

One of the most successful OSHA strategies began in Maine. In Maine, 200 employers with poor workers’ compensation records received letters from their local OSHA office encouraging them to adopt safety and health programs and find and fix workplace hazards. That was the partnership option. The alternative was traditional enforcement with a guaranteed OSHA inspection.

An overwhelming 198 employers chose partnership. They implemented safety and health programs that worked. In partnership with employees, the companies over the past three years have found more than 184,000 hazards and fixed more than 134,000 of them. They have reaped the expected rewards—65 percent have seen their injury and illness rates decline while the 200 as a whole have experienced a 47-percent drop in workers’ compensation cases. This unique program earned OSHA a prestigious Ford Foundation Innovations in American Government award. Today, OSHA is developing similar programs nationwide.

Common Sense Regulations

A second set of initiatives seeks to cut unnecessary rules and regulations and red tape. OSHA is dropping 1,000 pages of outdated, obtuse rules and regulations, has begun rewriting standards in plain language and is rewriting the old consensus standards adopted without hearings in 1971 and 1972.

One of OSHA’s standards that most concerns employers, particularly the small businesses, is the hazard communication standard. Yet, this regulation is vital because workers must be aware of the dangers they face from toxic substances in the workplace. At OSHA’s request, the National Advisory Committee on

¹ Wayne B. Gray and John T. Scholze, “Does Regulatory Enforcement Work?” *Law & Society Rev* 27 (1): 177-213, 1993.

² Guy Toscano and Janice Windau, “The Changing Character of Fatal Work Injuries,” *Monthly Labor Review* 117 (10):17, October 1994.

³ Bureau of Labor Statistics, *Survey of Occupational Injuries and Illnesses*, 1993.

⁴ Regulatory reform—to make the Federal Government more effective and responsive in the area of regulation—was first proposed by Vice President Gore in his National Performance Review Report, presented to President Clinton in September 1993. OSHA proposed its reinvention initiatives in May 1995.

Occupational Safety and Health has established a work group to identify ways to improve the standard. The agency's goal is to focus on the most serious hazards, simplify the Material Safety Data Sheets⁵ which are often complex, and reduce the amount of paperwork required by the hazard communication standard.

Common Sense Enforcement: Results, Not Red Tape

Equally as important as the content of the rules and regulations OSHA enforces is the way it enforces them—the way that the agency's 800 inspectors and other employees do their business.

OSHA also is speeding abatement of hazards through a program known as Quick Fix. Employers who fix a nonserious hazard while the compliance officer is at the site can receive a penalty reduction of up to 15 percent depending on the nature of the hazard.⁶ To date, this program has been effective in obtaining immediate abatement of hazards. The program will be applied nationwide to encourage employers to increase employee protection immediately, while freeing OSHA employees and employers from monitoring abatement and doing followup paperwork.

Response teams also are finding ways to speed up complaint investigations. For example, when someone calls in a complaint, an OSHA compliance staff member calls the employer, discusses the issue, and follows up with a faxed letter describing the complaint and requests a response to the allegations within five days. Using procedures as simple as phone calls and faxed copies of complaint forms have sharply reduced the time between receipt of a non-formal complaint and abatement of the hazard by at least 50 percent.

Focusing on construction inspections is another approach to reinvention. After evaluating its fatality data, OSHA realized that 90 percent of construction fatalities result from just four types of hazards. Now when compliance officers inspect a construction site with an effective safety and health program, they focus only on the four main killers: falls from heights, electrocution, crushing injuries (e.g., trench cave-ins), and being struck by material or equipment.

To the 67 OSHA area offices that conduct OSHA inspections, reinvention involves—Getting Results and Improving Performance, or GRIP. To do this, OSHA uses a four-step redesign process: (1) developing approaches targeted to the most hazardous worksites, (2) creating a team organizational structure, (3) improving office processes, and (4) measuring results. Twelve of OSHA's area offices have already been redesigned with hopes of adding additional offices each quarter.

OSHA also is establishing a new relationship with its state plan partners—the 25 states and territories that operate their own OSHA-approved safety and health programs. OSHA realizes that encouraging them to experiment with innovative ways to prevent injuries and illnesses ultimately will benefit all workers. For example, Kentucky's Mobile Training Van, developed cooperatively with the Associated General Contractors of Kentucky, provides safety and health training for small business employers and employees at construction sites. Michigan's Ergonomics Award Program encourages employers and employees to design solutions to some of the most persistent workplace injuries and disorders and to share their successes with other companies that may be having similar problems. Also, several states, through workers' compensation reform legislation and other measures, have mandated workplace safety and health programs and joint labor-management safety committees that have resulted in dramatic reductions in injuries and workers' compensation costs.

States that operate their own worker safety and health plans must provide worker protection that is "at least as effective as" the federal program. However, because their standards and other procedures may vary, businesses in these states should check with their state agency. See Appendix E for a list of state plans.

Another program that OSHA is enhancing is its Voluntary Protection Program (VPP), which recognizes companies doing an outstanding job in worker safety and health. Participation in this partnership program has doubled from 104 in 1992 to 245 in 1995. Workers at VPP sites enjoy improved workplace safety and health, but other sites also benefit as VPP participants offer their expertise and assistance through the VPP Participants' Association Mentoring Program and the OSHA Volunteers Program. OSHA's free on-site consultation program, which helps smaller employers improve workplace safety and health is another successful innovation. Expert consultants review operations, identify and help employers abate hazards, and assist them in developing or strengthening workplace safety and health programs.

⁵ Chemical manufacturers and importers must develop a MSDS for each hazardous chemical they produce or import, and must provide the MSDS automatically at the time of the initial shipment of a hazardous chemical to a downstream distributor or user.

⁶ Does not apply to fatalities, high, medium-gravity, serious, willful, repeat, or failure-to-abate hazards. Applies only to individual violations and to permanent and substantial corrective actions.

Training is an essential component in the reinvention process. OSHA's Training Institute, located in the Chicago area, provides training for compliance safety and health officers as well as the public and safety and health staff from other federal agencies. The Institute offers 80 courses and has trained more than 140,000 students since it opened in 1972. OSHA also has 12 programs for other institutions to conduct OSHA courses for the private sector and other federal agencies. The new education centers make safety and health training and education more accessible to those who need it. For more information about OSHA's Training Institute or to obtain a training catalog, write the OSHA Training Institute, 1555 Times Drive, Des Plaines, IL 60018, or call (847) 297-4913.

In addition, the Agency has implemented a number of information dissemination projects and plans to undertake new initiatives to improve the availability of safety and health data to the public through a variety of electronic means. The agency provides extensive offerings on its CD-ROM, introduced in 1992 and sold by the Government Printing Office, as well as on a recently expanded and upgraded World Wide Web page on the Internet (<http://www.osha.gov/>). OSHA also has developed two user-friendly computer programs, available free on the Internet and through trade groups to help employers comply with the agency's cadmium and asbestos standards. Another set of interactive programs on the Internet permits employers to determine their employment category (Standard Industrial Classification Code) and then learn the most frequently cited OSHA standards for that category in 1995.

These efforts—coupled with OSHA's consultation, voluntary protection programs, safety and health program management guidelines,⁷ training and education programs, and state plans—will better serve all American workers and employers, including small businesses, in providing safer and more healthful working conditions. For information on various OSHA programs, see Appendix E at the end of this publication.

⁷ To assist employers and employees in developing effective safety and health programs, OSHA published recommended *Safety and Health Program Management Guidelines* (*Fed Reg* 54 (18): 3908-3916, January 26, 1989). These voluntary guidelines apply to all places of employment covered by OSHA.

I. INTRODUCTION

A Profit and Loss Statement

As a small business owner, you are characteristically a risk taker. You wager your business acumen against larger, perhaps more heavily financed corporate groups and other free-spirited, self-employed individuals like yourself. There is excitement and challenge in such a venture. But to succeed, you need good management information, an ability to be a good manager of people, and the intelligence and inner strength both to make decisions and to make the right decisions.

Thousands of workers die each year, and many, many more suffer injury or illness from conditions at work. But how often does an owner or manager like you actually see or even hear about work-related deaths, serious injuries, or illnesses in the businesses with which you are familiar? How often has your business actually sustained this type of loss?

In most small businesses, the answer is—rarely. For this reason, many owners or managers do not understand why there is controversy about OSHA, job safety and health standards, inspections, citations, etc.

But others have learned why. Unfortunately, they have had to go through the kind of loss we are talking about. And these owner/managers will tell you that it is too late to do anything once a serious accident happens. They now know that **prevention** is the only real way to avoid this loss.

Reducing all losses is a goal that you as an owner or manager clearly share with us in OSHA. Each of us may see this goal in a slightly different light, but it remains our common intent.

We have learned from small employers, like you, that you place a high value on the well-being of your employees. Like many small businesses, you probably employ family members and personal acquaintances. And, if you don't know your employees before they are hired, then chances are that the very size of your workgroup and workplace will promote the closeness and concern for one another that small businesses value.

Assuming that your commitment to safe and healthful work practices is a given, we in OSHA want to work with you to prevent all losses. We believe that, when you make job safety and health a real part of your everyday operations, you cannot lose in the long run.

Successful safety and health activity now will enable you to avoid possible losses in the future.

Developing a Profitable Strategy for Handling Occupational Safety and Health

Many people confuse the idea of “accidents” with the notion of Acts of God. The difference is clear. Floods and tornadoes cannot be prevented by the owner or manager of a small business, but workplace accidents can be prevented, and indeed, floods and tornadoes can be anticipated and prepared for.

Nobody wants accidents to happen in his or her business. A serious fire or the death of an employee or an owner can cause the loss of a great amount of profit or, in some cases, even an entire business. To prevent such losses, you don't have to turn your place upside down. You may not have to spend a lot of money, either. You may only need to use good business sense and to apply recognized prevention principles.

There are reasons why accidents happen. Something goes wrong somewhere. It may take some thought, and maybe the help of friends or other trained people, to figure out what went wrong, but there will be a cause—a reason why. Once you know the cause, it is possible to prevent an accident. You need some basic facts, and perhaps some help from others who know some of the answers already. You also need a plan—a plan for preventing accidents.

Not all danger at your worksite depends on an accident to cause harm, of course. Worker exposure to toxic chemicals or harmful levels of noise or radiation may happen in conjunction with routine work as well as by accident. You may not realize the extent of the exposure on the part of you and/or your employees, or of the harm that may result. The effect may not appear immediately, but it may be fatal in the long run. You need a plan that includes prevention of these “health hazard exposures” as well as accidents. You need a *safety and health protection plan*.

It is not a difficult task to develop such a plan. Basically, you only need to concern yourself with those types of accidents and health hazard exposures which *could* happen in your workplace.

Because each workplace is different, your program may be different from one that your neighbor or your competitor might use. But this is not important. You want it to reflect *your* way of doing business, not theirs.

While the details may vary, there are four basic elements that are always found in workplaces with a good accident prevention program. These are as follows:

1. The manager or management team leads the way, especially by setting policy, assigning and supporting responsibility, setting an example, and involving employees.
2. The worksite is continually analyzed to identify all hazards and potential hazards.
3. Methods for preventing or controlling existing or potential hazards are put in place and maintained.
4. Managers, supervisors, and employees are trained to understand and deal with worksite hazards.

Regardless of the size of your business, you should use each of these elements to prevent workplace accidents and possible injuries and illnesses.

Developing a workplace program following these four points should lead you to do all the things needed to protect you and your workers' safety and health. If you already have a program, reviewing it in relation to these elements should help you improve what you have.

If you follow it, this four-point approach to safety and health protection in your business should also help you to improve efficiency. It may help you reduce insurance claims and other costs. While it does not guarantee compliance with OSHA standards, the approach will help you toward full compliance and beyond. It will certainly give you a way to express and document your good faith.

This approach usually does not involve large costs. Especially in smaller businesses, it generally does not require additional employees. Usually it can be integrated into your other business functions with modest effort on your part.

The key to the success of this plan is to see it as a part of your business operation and to see it reflected in all your work. As you continue doing it, the program becomes easier. It becomes built-in and then you need only check on it periodically to be sure everything's working well.

In Section 2, for example, we give short titles for each of the elements and then give short descriptions and illustrations for each. Since most employers, like you, are pressed for time, these descriptions are capsules of information to assist you in thinking through and getting started on your own approach.

II. A FOUR-POINT WORKPLACE PROGRAM

The Four-Point Workplace Program described here is based upon the *Safety and Health Program Management Guidelines* issued by OSHA on January 26, 1989. (For a free copy of the guidelines, write OSHA Publications, P.O. Box 37535, Washington, DC 20013-7535. Send a self-addressed mail label with your request.) Although voluntary, these guidelines represent OSHA's policy on what every worksite should have in place to protect workers from occupational hazards. The guidelines are based heavily on OSHA's experience with the Voluntary Protection Programs (VPP). These voluntary programs are designed to recognize and promote effective safety and health management as the best means of ensuring a safe and healthful workplace. For more information on the guidelines and VPP, please contact OSHA's Office of Cooperative Programs, U.S. Department of Labor, 200 Constitution Avenue, N.W., Room N3700, Washington, DC 20210, (202) 219-7266.

Using The Four-Point Program

As you review this publication, we encourage you to use the tearout Action Plan Worksheet in Appendix A to jot down the actions that you wish to take to help make your workplace safer and more healthful for your employees. Noting those actions as you go along will make it much easier for you to assemble the total plan you need.

Management Commitment and Employee Involvement

As the owner or manager of a small business, your attitude towards job safety and health will be reflected by your employees. If you are not interested in preventing employee injury and illness, nobody else is likely to be.

At all times, demonstrate your personal concern for employee safety and health and the priority you place on them in your workplace. Your policy must be clearly set. Only you can show its importance through your own actions.

Demonstrate to your employees the depth of your commitment by involving them in planning and carrying out your efforts. If you seriously involve your employees in identifying and resolving safety and health problems, they will commit their unique insights and energy to helping achieve the goal and objectives of your program.

Consider forming a joint employee-management safety committee. This can assist you in starting a program and will help maintain interest in the program once it is operating. Committees can be an excellent way of communicating safety and health information. If you have few employees, consider rotating them so that all can have an active part in the safety and health programming. The men and women who work for you are among the most valuable assets you have. Their safety, health, and goodwill are essential to the success of your business. Having them cooperate with you in protecting their safety and health not only helps to keep them healthy—it makes your job easier.

As a small business employer, you have inherent advantages, such as close contact with your employees, a specific acquaintance with the problems of the whole business, and usually a low worker turnover. Probably you have already developed a personal relationship of loyalty and cooperation that can be built upon very easily. These advantages may not only increase your concern for your employees but also may make it easier to get their help.

Here are some actions to take:

- Post your own policy on the importance of worker safety and health next to the OSHA workplace poster where all employees can see it. (See sample policy statements in Appendix B.)
- Hold a meeting with all your employees to communicate that policy to them and to discuss your objectives for safety and health for the rest of the year. (These objectives will result from the decisions you make about changes you think are needed after you finish reading this publication.)
- Make sure that support from the top is visible by taking an active part, personally, in the activities that are part of your safety and health program. For example, personally review all inspection and accident reports to ensure followup when needed.
- Ensure that you, your managers, and supervisors follow all safety requirements that employees must follow, even if you are only in their area briefly. If, for instance, you require a hard hat, safety glasses and/or safety shoes in an area, wear them yourself when you are in that area.

- Use your employees' special knowledge and help them buy into the program by having them make inspections, put on safety training, or help investigate accidents.
- Make clear assignments of responsibility for every part of the program that you develop. Make certain everyone understands them. The more people involved the better. A good rule of thumb is to assign safety and health responsibilities in the same way you assign production responsibilities. Make it a special part of everyone's job to operate safely. That way, as you grow and delegate production responsibilities more widely, you will commit safety and health responsibilities with them.
- Give those with responsibility enough people, on-the-clock time, training, money and authority to get the job done.
- Don't forget about it after you make assignments; make sure personally that they get the job done. Recognize and reward those who do well, and correct those who don't.
- Take time, at least annually, to review what you have accomplished against what you set as your objectives and decide if you need new objectives or program revisions to get where you want to be.
- Set up a way to get expert help when you make changes, to be sure that the changes are not introducing new hazards into your workplace. Also, find ways to keep current on newly recognized hazards in your industry.
- Make an assignment, maybe to teams that include employees, to look carefully at each job from time to time, taking it apart step-by-step to see if there are any hidden hazards in the equipment or procedures. Some training may be necessary at the start.
- Set up a system of checking to make sure that your hazard controls have not failed and that new hazards have not appeared. This is usually done by routine self-inspections. You can use the checklist in Section IV of this book as a starting point. Add items to it that better fit your situation. Subtract from it those items that do not fit your situation. Your state consultant can probably assist you to establish an effective system.
- Provide a way for your employees to let you or another member of management know when they see things that look harmful to them and encourage them to use it.
- Learn how to do a thorough investigation when things go wrong and someone gets sick or hurt. This will help you find ways to prevent recurrences.
- Initially, take the time to look back over several years of injury or illness experience to identify patterns that can lead to further prevention. Thereafter, periodically look back over several months of experience to determine if any new patterns are developing.

Worksite Analysis

It is your responsibility to know what you have in your workplace that could hurt your workers. Worksite analysis is a group of processes that helps you make sure that you know what you need to keep your workers safe. You may need help in getting started with these processes. You can call on your state Consultation Program, listed in Appendix E, for this help. Also, OSHA published a booklet entitled *Job Hazard Analysis*. (See **Related Publications** in Section V for ordering information.) Once you get everything set up, you or your employees can do many of them.

Here are some actions to take:

- Request a consultation visit from your state Consultation Program covering both safety and health to get a full survey of the hazards which exist in your workplace and those which could develop. You can also contract for such services from expert private consultants if you prefer.

Hazard Prevention and Control

Once you know what your hazards and potential hazards are, you are ready to put in place the systems that prevent or control those hazards. Your state consultant can help you do this. Whenever possible, you will want to eliminate those hazards. Sometimes that can be done through substitution of a less toxic material or through engineering controls that can be built in. When you cannot eliminate hazards, systems should be set up to control them.

Here are some actions to take:

- Set up safe work procedures, based on the analysis of the hazards in your employees' jobs (discussed above), and make sure that the employees doing each job understand the procedures and follow them. This may be easier if employees are involved in the analysis that results in those procedures. (See Appendix C - Codes of Safe Practices.)
- Be ready, if necessary, to enforce the rules for safe work procedures by asking your employees to help you set up a disciplinary system that will be fair and understood by everyone.
- Where necessary to protect your employees, provide personal protective equipment (PPE) and be sure your employees know why they need it, how to use it and how to maintain it.
- Provide for regular equipment maintenance to prevent breakdowns that can create hazards.
- Ensure that preventive and regular maintenance are tracked to completion.
- Plan for emergencies, including fire and natural disasters, and drill everyone frequently enough so that if the real thing happens, everyone will know what to do even under stressful conditions.
- Ask your state consultant to help you develop a medical program that fits your worksite and involves nearby doctors and emergency facilities. Invite these medical personnel to visit the plant before emergencies occur and help you plan the best way to avoid injuries and illness during emergency situations.
- You must ensure the ready availability of medical personnel for advice and consultation on matters of employee health. **This does not mean that you must provide health care.** But, if health problems develop in your workplace, you are expected to get medical help to treat them and their causes.

To fulfill the above requirements, consider the following:

- You should have an emergency medical procedure for handling injuries, transporting ill or injured workers and notifying medical facilities with a minimum of confusion. Posting emergency numbers is a good idea.

- Survey the medical facilities near your place of business and make arrangements for them to handle routine and emergency cases. Cooperative agreements could possibly be made with nearby larger plants that have medical personnel and/or facilities onsite.
- You should have a procedure for reporting injuries and illnesses that is understood by all employees.
- Consider performing routine walkthroughs of the worksite to identify hazards and track identified hazards until they are corrected.
- If your business is remote from medical facilities, you are **required** to ensure that a person or persons be adequately trained and available to render first-aid. Adequate first-aid supplies must be readily available for emergency use. Arrangements for this training can be made through your local Red Cross Chapter, your insurance carrier, your local safety council and others.
- You should check battery charging stations, maintenance operations, laboratories, heating and ventilating operations and any corrosive materials areas to make sure you have the **required** eye wash facilities and showers.
- Consider retaining a local doctor or an occupational health nurse on a part-time or as-used basis to advise you in your medical and first-aid planning.

Training for Employees, Supervisors and Managers

An effective accident prevention program requires proper job performance from everyone in the workplace.

As an owner or manager, you must ensure that all employees know about the materials and equipment they work with, what known hazards are in the operation, and how you are controlling the hazards.

Each employee needs to know the following:

- No employee is expected to undertake a job until he or she has received job instructions on how to do it properly and has been authorized to perform that job.
- No employee should undertake a job that appears unsafe.

You may be able to combine safety and health training with other training that you do, depending upon the kinds of potential and existing hazards that you have. With training, the “proof is in the pudding” in that the result that you want is everyone knowing what they need to know to keep themselves and their fellow workers safe and healthy.

Here are some actions to take:

- Ask your state consultant to recommend training for your worksite. The consultant may be able to do some of the training while he or she is there.
- Make sure you have trained your employees on every potential hazard that they could be exposed to and how to protect themselves. Then verify that they really understand what you taught them.
- Pay particular attention to your new employees and to old employees who are moving to new jobs. Because they are learning new operations, they are more likely to get hurt.
- Make sure that you train your supervisors to know all the hazards that face the people they supervise and how to reinforce training with quick reminders and refreshers, and with disciplinary action if necessary. Verify that they know what is expected of them.
- Make sure that you and your top management staff understand all of your responsibilities and how to hold subordinate supervisory employees accountable for theirs.

Documenting Your Activities

Document your activities in all elements of the Four-Point Workplace Program. Essential records, including those legally required for workers’ compensation, insurance audits and government inspections **must** be maintained as long as the actual need exists. Keeping records of your activities, such as policy statements, training sessions for management and employees safety and health meetings held, information distributed to employees, and medical arrangements made, is greatly encouraged. Maintaining essential records also will aid:

- (1) the demonstration of sound business management as supporting proof for credit applications, for showing “good faith” in reducing any proposed penalties from OSHA inspections, for insurance audits and others; and

- (2) the efficient review of your current safety and health activities for better control of your operations and to plan improvements.

Safety and Health Recordkeeping

Records of sales, costs, profits and losses are essential to all successful businesses. They enable the owner or manager to learn from experience and to make corrections for future operations. Records of accidents, related injuries, illnesses and property losses can serve the same purpose, if they are used the same way. The sole purpose of OSHA recordkeeping is to store factual information about certain accidents that have happened. When the facts have been determined, causes can often be identified, and control procedures can be instituted to prevent a similar occurrence from happening.

Injury/Illness Records

There are injury/illness recordkeeping requirements under OSHA that require a minimum of paperwork. These records will provide you with one measure for evaluating the success of your safety and health activities. Success would generally mean a lack of, or a reduced number of, employee injuries or illnesses during a calendar year.

There are five important steps required by the OSHA recordkeeping system:

1. Obtain a report on every injury requiring medical treatment (other than first aid).
2. Record each injury on the *OSHA Form No. 200* according to the instructions provided.
3. Prepare a supplementary record of occupational injuries and illnesses for recordable cases either on *OSHA Form No. 101* or on workers’ compensation reports giving the same information.
4. Every year, prepare the annual summary (*OSHA Form No. 200*); post it no later than February 1, and keep it posted until March 1. (Next to the OSHA workplace poster is a good place to post it.)
5. Retain these records for at least 5 years.

During the year, periodically review the records to see where injuries are occurring. Look for any patterns or repeat situations. These records can help you to identify those high risk areas to which you should direct your immediate attention.

Since the basic OSHA records include only injuries and illnesses, you might consider expanding your own system to include all incidents, including those where no injury or illness resulted, if you think such information would assist you in pinpointing unsafe conditions and/or procedures. Safety councils, insurance carriers and others can assist you in instituting such a system.

Injury/illness recordkeeping makes sense, and we recommend this practice to all employers. There are some limited exemptions for small business employers who employ 10 or fewer employees as well as for businesses that have certain SIC codes. Refer to *Title 29 Code of Federal Regulations (CFR) 1904* for the specific exceptions. The employer is required to report, to OSHA, all work-related fatalities and multiple hospitalization accidents with 8 hours of notification of the accident.

Regardless of the number of employees you have or the SIC classification, you may be selected by the Federal Bureau of Labor Statistics (BLS) or a related state agency for inclusion in an annual sample survey. You will receive a letter directly from the agency with instructions, if you are selected.

Exposure Records and Others

The injury/illness records may not be the only records you will need to maintain. Certain OSHA standards that deal with toxic substances and hazardous exposures require records on the exposure of employees, physical examination reports, employment records, etc.

As you work on identifying hazards, you will be able to determine whether these requirements apply to your situation on a case-by-case basis. We mention it here so that you will be aware of these records and that, if required, they should be used with your control procedures and with your self-inspection activity. They should not be considered merely as bookkeeping.

III. STARTING YOUR VOLUNTARY ACTIVITY

You can use this basic action plan to get started on your program.

To avoid confusion, we need to explain that this action plan is not organized solely in the order of the four points we described in Section II. Rather, it provides the most direct route to getting yourself organized to complete your Four-Point Program.

When you have completed your action plan, your activity should be organized around the four points described in Section II.

Decide to Start Now

The time to start your safety and health program is **now**. You have a better picture of what constitutes a good safety and health program. Now you can address the practical concerns of putting these elements together and coming up with a program to suit *your* workplace.

Presumably you have been taking notes for your action plan as you went through the preceding description of the Four-Point Program. You should be ready now to decide exactly what you want to accomplish, and to determine what steps are necessary to achieve your goals. Then you will plan out how and when each step will be done, and who will do it.

Your plan should consider your company's immediate needs, and provide for ongoing, "long-lasting" worker protection. Once your plan is designed, it is important to follow through and use it in the workplace. You will then have a program to anticipate, identify and eliminate conditions or practices which could result in injuries and illnesses.

If you have difficulty in deciding where to begin, a phone call to your state consultation program will get you the assistance you need. A state consultant will survey your workplace for existing or potential hazards. Then, if you request it, he or she will determine what you need to make your safety and health program effective. The consultant will work with you to develop a plan for making these improvements, and to establish procedures for making sure that your program stays effective.

Whether you choose to work with a consultant or to develop your program yourself, there are other publications similar to this (available from a state consultation

program or from OSHA) which spell out in greater detail the steps you can take to create an effective safety and health program for your workplace. The rewards for your efforts will be a workplace with a high level of efficiency and productivity, and a low level of loss and injury.

Designating Responsibility

You **must** decide who in your company is the most appropriate person to manage your safety and health program. Who can be sure that the program will become an integral part of the business? In many cases it will be you, the owner. Sometimes it will be the plant manager or a key supervisor. It could even be an engineer, personnel specialists or other staff member.

Whoever you choose should be as committed to workplace safety and health as you are, who has the time to devote to developing and managing the program, and who is willing to take on the responsibility and accountability that goes with operating an effective program. The success of your program hinges on the success of the individual you choose, and he or she cannot succeed without your full cooperation and support. Remember, though, that even when you appoint someone as your safety manager and delegate the authority to manage the program, the ultimate responsibility for safety and health in *your* workplace rests on *you*.

Having made your selection of a safety and health manager, you or your designee and any others you choose will need to take (or be sure you have already taken) the following actions.

Get Some Help on the Details

First, you may need to catch up with all the changes made since the Act became law in December 1970. For example, the federal law contains provisions for allowing a state to develop and operate its own occupational safety and health program in place of the federal OSHA program. It is possible that the regulatory aspect of the law (setting of mandatory minimum standards and conducting inspections of workplaces) is now being operated by your state government.

You need to know which level of government has current jurisdiction over your establishment. If you are not sure of this, telephone the nearest OSHA Area Office to find out. (See Appendix E.)

Second, you will need certain federal OSHA publications (or comparable state publications) for use in your safety and health activities:

1. OSHA workplace poster (*Job Safety and Health Protection* - OSHA 2203) - You must have the federal or state OSHA poster displayed in your workplace.
2. Standards that apply to your operations - You need these standards for reference material in your business. (See Appendix D.) These are the regulations OSHA uses when inspecting for compliance with the Act. These standards are the baseline for your own inspections and are useful in determining what specific changes need to be made when hazards are identified. Most businesses come under OSHA's General Industry Standards, but if you are involved with construction or maritime operations you will need the standards that apply to these classifications. (In states with OSHA programs, use the appropriate state standards.)
3. Recordkeeping requirements and the necessary forms - You need these if you have 11 or more employees. These forms are not too different from other information forms you have been keeping for workers' compensation and other records.
4. *Occupational Safety and Health Act* - You may want this for your own information and reference in the future.

Clean Up Your Place of Business

Poor housekeeping is a major contributor to low morale and sloppy work in general, even if it is not usually the cause of major accidents. Most safety action programs start with an intensive clean-up campaign in all areas of business.

Get rid of rubbish that has collected; make sure proper containers are provided; see that flammables are properly stored; make sure that exits are not blocked; if necessary, mark aisles and passageways; provide adequate lighting, etc.

Get everyone involved and impress upon them exactly what it is you want to do to make your workplace safer, more healthful and more efficient.

Start Gathering Specific Facts About Your Situation

Before you make any changes in your safety and health operations, you will want to gather as much information as possible about the current conditions at your

workplace and about business practices that are already part of your safety and health program. This information can help you identify any workplace problems and see what's involved in solving them.

The assessment of your workplace should be conducted by the person responsible for the safety and health program and/or a professional safety and health consultant. It consists of two major activities.

The first is a comprehensive safety and health survey of your entire facility, designed to identify any existing or potential safety and health hazards. This initial survey should focus on evaluating workplace conditions with respect to safety and health regulations and generally recognized safe and healthful work practices. It should include checking on the use of any hazardous materials, observing employee work habits and practices, and discussing safety and health problems with employees. See **Section IV, Self-Inspection Check Lists**, to help you get a good start on creating this initial survey.

The second major activity is an assessment of your existing safety and health program to identify areas that may be working well and those that may need improvement. You will want to gather together as much information as you can that relates to the safety and health management of your workplace. You should include the following in this review:

- **Safety and health activities** — Examine current ongoing activities as well as those tried previously, company policy statements, rules (both work and safety), guidelines for proper work practices and procedures and records of training programs.
- **Equipment** — Make a list of your major equipment, principal operations and the locations of each. Special attention should be given to inspection schedules, maintenance activities and plant and office layouts.
- **Employees' capabilities** — Make an alphabetical list of all employees, showing the date they were hired, what their jobs are and what experience and training they have had. Special attention should be given to new employees and to employees with handicaps.
- **Accident and injury/illness history** — Take a look at your first-aid cases, workers' compensation insurance payments, and workers' compensation awards, if any. Review any losses. Determine how your insurance rate compares with others in your group. Special attention should be given to recurring accidents, types of injuries, etc.

With whatever facts you have been able to assemble, take a quick look to see if any major problem areas can be identified. You would be looking for such things as interruptions in your normal operations, too many employees taking too much time off, or too many damaged products. General assistance in this kind of problem identification can often be obtained from compensation carriers, local safety councils, state agencies, your major suppliers and even, perhaps, a competitor.

If there is a major problem, see what can be done to solve it. Once a problem is identified, you can work on the corrective action or a plan for controlling the problem. Take immediate action at this point and make a record of what you have done. Don't become overly involved in looking for major problem areas during this fact-finding stage. Remember that no one hazardous situation causes all of your safety and health problems, and therefore, it is likely that no single action will greatly improve your safety and health program.

If you have found no major problem at this point, don't stop here. Now it is time to develop a comprehensive safety and health program that meets your needs and those of your employees. This will make it more difficult for major problems to crop up in the future.

Establish Your Four-Point Safety and Health Program

The success of any workplace safety and health program depends on careful planning. This means that you have taken time to think through what you want to accomplish, and you may even have a general idea of what it will take to accomplish your goals. Based on that, you can design a step by step process that will take you from the idea stage to having a fully effective operation.

The most effective way to create the safest possible workplace for you and your employees is to institute the Four-Point Program discussed in Section II of this handbook. Use the guidance presented in Section II to help you develop your program.

Establish your **management commitment** and **involve your employees**. No safety and health program will work, especially in the long term, without this commitment and involvement. You should have already taken the first step by designating the person who will be responsible for your program.

Be certain that your employees are as widely involved in the program as possible from the beginning. They are the people most in contact with the potential and actual safety and health hazards at your worksite. They will have constructive input into the development of your safety and health program. Its ultimate success will depend upon their support—support that will be more forthcoming for a program in which they have had a meaningful input.

Make sure your program assigns responsibility and accountability to all employees in your organization. A good safety and health program makes it clear that each and every employee from you through the supervisory levels to the line worker is responsible for his or her part of the program. You will make their safety and health duties clear and each of them will be held accountable for his or her safety and health related duties.

Refer to the recommended actions to take in Section II - Worksite Analysis. These will help start your program off on the right track. You will be building the foundation for a successful safety and health program.

Establish and regularly conduct your **worksite analysis**. You cannot have a successful Safety and Health Program if it has not identified all the hazards and potential hazards present in your workplace. This is an ongoing process that includes routine self-inspections if you are to know where probable hazards exist and whether or not they are under control.

Create the systems and procedures necessary to **prevent and control the hazards** that have been identified through your worksite analysis. These control procedures will be your basic means for preventing accidents. The OSHA standards that have been promulgated can be of great assistance to you since they address controls in order of effectiveness and preference. The hierarchy of controls is as follows: engineering, administrative, work practice and personal protective equipment. Whenever feasible, engineering, administrative, or work practice controls should be instituted even though they may not eliminate the hazard or reduce exposure to or below the permissible exposure limit. They must, however, be used in conjunction with personal protective equipment to reduce the hazard or exposure to the lowest practical level. Where no standard exists, creative problem solving and consultant resources should help you create effective controls. The basic formula OSHA follows is, in order of preference:

1. **Eliminating the hazard** from the machine, the method, the material or the plant structure.
2. **Abating the hazard** by limiting exposure or controlling it at its source.
3. **Training personnel** to be aware of the hazard and to follow safe work procedures to avoid it.
4. **Prescribing personal protective equipment** for protecting employees against the hazard.

Be sure to establish and provide ongoing **training for employees, supervisors and managers**. This should ensure that everyone at your worksite will know about the hazards that exist and how to control them.

Each of these points is crucial if you want to establish a safe and healthful workplace for you and your employees. Together, these elements reinforce your program, thereby making it more difficult for accidents to occur and for work-related health problems to develop.

Develop and Implement Your Action Plan

Develop an action plan to help you build your safety and health program around the four points discussed above. It can serve as a “road map” to get your program from where it is now to where you want it to be. It tells you what has to be done, the logical order in which to do it, who is responsible, and perhaps most important, where you want to be when you finish. It is a specific description of problems and solutions, but it is not ironclad—it can and should be changed to correspond with changes in the workplace.

A good action plan has two parts:

1. An overall list of the major changes or improvements that are needed to make your safety and health program effective. Assign each item a priority and a target date for completion, and identify the person who will monitor or direct each action.
2. A specific plan on how to implement each major change or improvement. Here, you would write out what you wanted to accomplish, the steps required, who would be assigned to do what, and when you plan to be finished. This part of the action plan will help you keep track of program improvements so that details do not slip through the cracks. When several improvements are being made at once, it is easy to overlook something that may be an important prerequisite for your next action.

A worksheet that may help you design an overall action plan and describe specific action steps appears in Appendix A.

Once the plan has been established, put it into action, beginning with the item that has been assigned the highest priority. Check to make sure it is realistic and manageable, then address the steps you have written out for that item. This detailed description of the steps required will help you keep track of the development that is taking place. Keep in mind that you can, of course, work on more than one item at a time, and that the priorities may change as other needs are identified or as your company’s resources change.

Open communication with your employees is crucial to the success of your efforts. Their cooperation depends on understanding what the safety and health program is all about, why it is important to them, and how it affects their work. The more you do to involve them in the changes you are making, the smoother your transition will be.

By putting your action plan into operation at your workplace, you will have taken a major step toward having an effective safety and health program. **Remember, a safety and health program is a plan put into practice.** You can keep your program on track by periodically checking its progress and by calling on a state consultant when you need assistance.

Any good management system requires a periodic review to make sure that the system is operating as intended. Every so often (quarterly, semi-annually, or annually) you should take a careful look at each critical component in your safety and health program to determine what is working well and what changes are needed. Your consultant can assist you in this area as well. When you identify improvements that should be made, you have the basis for new safety and health objectives for the coming year. Developing new action plans for those improvements will help you to continue to progress toward an effective safety and health program. That, in turn, will reduce your safety and health risks and increase efficiency and profit.

Remember, however, that it is also important to document your activities. The only way you can evaluate the success of your safety and health program is to have the documentation available to tell you what you have done, to assess how it has worked and to provide you with guidance on how you can make it work even better.

Technical assistance may be available to you as a small business owner or manager through your insurance carrier, your fellow business-people, suppliers of your durable equipment and raw materials, the local safety council and many local, state and federal agencies, including the state consultation programs and OSHA Area Offices. You may even find help in the yellow pages of your telephone directory which will give you the names of many companies that specialize in items and services relating to safety, health and fire prevention.

Establishing a quality Safety and Health Program at your place of business will take some time and involve some resources, but you should be pleasantly surprised with the results. Employees will be reassured because of your commitment to their safety and health on the job. You will probably save money through increased productivity and reduced workers' compensation insurance costs. You will find increased respect in your community. The rewards you receive will surely exceed the cost of your investment in safety and health protection.

IV. SELF-INSPECTION

The most widely accepted way to identify hazards is to conduct safety and health inspections. The only way you can be certain of the actual situation is for you to look at it from time to time.

Begin a program of self-inspection in your own workplace. Self-inspection is a must if you are to know where probable hazards exist and whether they are under control.

Later in this Section, you will find checklists designed to assist you in this fact-finding. They will give you some indication of where you should begin action to make your business safer and more healthful for all of your employees.

These checklists are by no means all-inclusive. You may wish to add to them or delete portions that do not apply to your business. Consider carefully each item as you come to it and then make your decision.

Don't spend time with items that obviously have no application to your business. Make sure each item is seen by you or your designee, and leave nothing to memory or chance. Write down what you see, or don't see, and what you think you should do about it.

When you have completed the checklists, add this material to your injury information, your employee information, and your process and equipment information. You will now possess many facts that will help you determine what problems exist. Then, if you use the OSHA standards in your problem-solving process, it will be much easier for you to determine the action needed to solve these problems.

Once the hazards have been identified, you can institute the control procedures described in Section III and establish your four-point safety and health program.

Technical assistance in self-inspection may be available to you as a small business owner or manager through your insurance carrier, the local safety council and many local, state, and federal agencies, including the state consultation programs and OSHA Area Offices. Additional checklists are available from the National Safety Council, trade associations, insurance companies and other similar service organizations. (Refer to Section V.)

Self-Inspection Scope

The scope of your self-inspections should include the following:

- **Processing, Receiving, Shipping and Storage**—equipment, job planning, layout, heights, floor loads, projection of materials, materials-handling and storage methods, and training for material handling equipment.
- **Building and Grounds Conditions**—floors, walls, ceilings, exits, stairs, walkways, ramps, platforms, driveways, and aisles.
- **Housekeeping Program**—waste disposal, tools, objects, materials, leakage and spillage, cleaning methods, schedules, work areas, remote areas, and storage areas.
- **Electricity**—equipment, switches, breakers, fuses, switch-boxes, junctions, special fixtures, circuits, insulation, extensions, tools, motors, grounding, and national electric code compliance.
- **Lighting**—type, intensity, controls, conditions, diffusion, location, and glare and shadow control.
- **Heating and Ventilation**—type, effectiveness, temperature, humidity, controls, and natural and artificial ventilation and exhaust.
- **Machinery**—points of operation, flywheels, gears, shafts, pulleys, key ways, belts, couplings, sprockets, chains, frames, controls, lighting for tools and equipment, brakes, exhausting, feeding, oiling, adjusting, maintenance, lockout/tagout, grounding, work space, location, and purchasing standards.
- **Personnel**—experience training, including hazard identification training; methods of checking machines before use; type of clothing; personal protective equipment; use of guards; tool storage; work practices; and methods of cleaning, oiling, or adjusting machinery.
- **Hand and Power Tools**—purchasing standards, inspection, storage, repair, types, maintenance, grounding, use, and handling.

- **Chemicals**—storage, handling, transportation, spills, disposals, amounts used, labeling, toxicity or other harmful effects, warning signs, supervision, training, protective clothing and equipment, and hazard communication requirements.
- **Fire Prevention**—extinguishers, alarms, sprinklers, smoking rules, exits, personnel assigned, separation of flammable materials and dangerous operations, explosive-proof fixtures in hazardous locations, and waste disposal.
- **Maintenance, including tracking and abatement of preventive and regular maintenance**—regularity, effectiveness, training of personnel, materials and equipment used, records maintained, method of locking out machinery, and general methods.
- **Personal Protective Equipment**—type, size, maintenance, repair, storage, assignment of responsibility, purchasing methods, standards observed, training in care and use, rules of use, and method of assignment.
- **Transportation**—motor vehicle safety, seat belts, vehicle maintenance, and safe driver programs.
- **Review**—evacuation routes, equipment, and personal protective equipment.

SELF-INSPECTION CHECK LISTS

These check lists are by no means all-inclusive. You should add to them or delete portions or items that do not apply to your operations; however, carefully consider each item as you come to it and then make your decision. You also will need to refer to OSHA standards for complete and specific standards that may apply to your work situation. (**NOTE:** These check lists are typical for general industry but not for construction or maritime.)

EMPLOYER POSTING

- Is the required OSHA workplace poster displayed in a prominent location where all employees are likely to see it?
- Are emergency telephone numbers posted where they can be readily found in case of emergency?
- Where employees may be exposed to any toxic substances or harmful physical agents, has appropriate information concerning employee access to medical and exposure records and "Material Safety Data Sheets" been posted or otherwise made readily available to affected employees?
- Are signs concerning "Exiting from buildings," room capacities, floor loading, biohazards, exposures to x-ray, microwave, or other harmful radiation or substances posted where appropriate?
- Is the Summary of Occupational Illnesses and Injuries (OSHA Form 200) posted in the month of February?

RECORDKEEPING

- Are all occupational injury or illnesses, except minor injuries requiring only first aid, being recorded as required on the OSHA 200 log?
- Are employee medical records and records of employee exposure to hazardous substances or harmful physical agents up-to-date and in compliance with current OSHA standards?
- Are employee training records kept and accessible for review by employees, when required by OSHA standards?

- Have arrangements been made to maintain required records for the legal period of time for each specific type record? (Some records must be maintained for at least 40 years.)
- Are operating permits and records up-to-date for such items as elevators, air pressure tanks, and liquefied petroleum gas tanks?

SAFETY AND HEALTH PROGRAM

- Do you have an active safety and health program in operation that deals with general safety and health program elements as well as the management of hazards specific to your worksite?
- Is one person clearly responsible for the overall activities of the safety and health program?
- Do you have a safety committee or group made up of management and labor representatives that meets regularly and report in writing on its activities?
- Do you have a working procedure for handling in-house employee complaints regarding safety and health?
- Are you keeping your employees advised of the successful effort and accomplishments you and/or your safety committee have made in assuring they will have a workplace that is safe and healthful?
- Have you considered incentives for employees or workgroups who have excelled in reducing workplace injury/illnesses?

MEDICAL SERVICES AND FIRST AID

- Is there a hospital, clinic, or infirmary for medical care in proximity of your workplace?
- If medical and first-aid facilities are not in proximity of your workplace, is at least one employee on each shift currently qualified to render first aid?

- Have all employees who are expected to respond to medical emergencies as part of their work*

(1) received first-aid training; (2) had hepatitis B vaccination made available to them; (3) had appropriate training on procedures to protect them from bloodborne pathogens, including universal precautions; and (4) have available and understand how to use appropriate personal protective equipment to protect against exposure to bloodborne diseases?

- Where employees have had an exposure incident involving bloodborne pathogens, did you provide an immediate post-exposure medical evaluation and followup?
- Are medical personnel readily available for advice and consultation on matters of employees' health?
- Are emergency phone numbers posted?
- Are first-aid kits easily accessible to each work area, with necessary supplies available, periodically inspected and replenished as needed?
- Have first-aid kit supplies been approved by a physician, indicating that they are adequate for a particular area or operation?
- Are means provided for quick drenching or flushing of the eyes and body in areas where corrosive liquids or materials are handled?

FIRE PROTECTION

- Is your local fire department well acquainted with your facilities, its location and specific hazards?
- If you have a fire alarm system, is it certified as required?

*Pursuant to an OSHA memorandum of July 1, 1992, employees who render first aid only as a collateral duty do not have to be offered pre-exposure hepatitis B vaccine only if the employer puts the following requirements into his/her exposure control plan and implements them: (1) the employer must record all first-aid incidents involving the presence of blood or other potentially infectious materials before the end of the work shift during which the first-aid incident occurred; (2) the employer must comply with post-exposure evaluation, prophylaxis, and followup requirements of the standard with respect to "exposure incidents," as defined by the standard; (3) the employer must train designated first-aid providers about the reporting procedure; and (4) the employer must offer to initiate the hepatitis B vaccination series within 24 hours to all unvaccinated first-aid providers who have rendered assistance in any situation involving the presence of blood or other potentially infectious materials.

- If you have a fire alarm system, is it tested at least annually?
- If you have interior stand pipes and valves, are they inspected regularly?
- If you have outside private fire hydrants, are they flushed at least once a year and on a routine preventive maintenance schedule?
- Are fire doors and shutters in good operating condition?
- Are fire doors and shutters unobstructed and protected against obstructions, including their counterweights?
- Are fire door and shutter fusible links in place?
- Are automatic sprinkler system water control valves, air and water pressure checked weekly/periodically as required?
- Is the maintenance of automatic sprinkler systems assigned to responsible persons or to a sprinkler contractor?
- Are sprinkler heads protected by metal guards, when exposed to physical damage?
- Is proper clearance maintained below sprinkler heads?
- Are portable fire extinguishers provided in adequate number and type?
- Are fire extinguishers mounted in readily accessible locations?
- Are fire extinguishers recharged regularly and noted on the inspection tag?
- Are employees periodically instructed in the use of extinguishers and fire protection procedures?

PERSONAL PROTECTIVE EQUIPMENT AND CLOTHING

- Are employers assessing the workplace to determine if hazards that require the use of personal protective equipment (e.g. head, eye, face, hand, or foot protection) are present or are likely to be present?

- If hazards or the likelihood of hazards are found, are employers selecting and having affected employees use properly fitted personal protective equipment suitable for protection from these hazards?
- Has the employer been trained on ppe procedures, i.e. what ppe is necessary for a job tasks, when they need it, and how to properly adjust it?
- Are protective goggles or face shields provided and worn where there is any danger of flying particles or corrosive materials?
- Are approved safety glasses required to be worn at all times in areas where there is a risk of eye injuries such as punctures, abrasions, contusions or burns?
- Are employees who need corrective lenses (glasses or contacts) in working environments having harmful exposures, required to wear *only* approved safety glasses, protective goggles, or use other medically approved precautionary procedures?
- Are protective gloves, aprons, shields, or other means provided and required where employees could be cut or where there is reasonably anticipated exposure to corrosive liquids, chemicals, blood, or other potentially infectious materials? See 29 CFR 1910.1030(b) for the definition of "other potentially infectious materials."
- Are hard hats provided and worn where danger of falling objects exists?
- Are hard hats inspected periodically for damage to the shell and suspension system?
- Is appropriate foot protection required where there is the risk of foot injuries from hot, corrosive, poisonous substances, falling objects, crushing or penetrating actions?
- Are approved respirators provided for regular or emergency use where needed?
- Is all protective equipment maintained in a sanitary condition and ready for use?
- Do you have eye wash facilities and a quick Drench Shower within the work area where employees are exposed to injurious corrosive materials?
- Where special equipment is needed for electrical workers, is it available?
- Where food or beverages are consumed on the premises, are they consumed in areas where there is no exposure to toxic material, blood, or other potentially infectious materials?
- Is protection against the effects of occupational noise exposure provided when sound levels exceed those of the OSHA noise standard?
- Are adequate work procedures, protective clothing and equipment provided and used when cleaning up spilled toxic or otherwise hazardous materials or liquids?
- Are there appropriate procedures in place for disposing of or decontaminating personal protective equipment contaminated with, or reasonably anticipated to be contaminated with, blood or other potentially infectious materials?

GENERAL WORK ENVIRONMENT

- Are all worksites clean, sanitary, and orderly?
- Are work surfaces kept dry or appropriate means taken to assure the surfaces are slip-resistant?
- Are all spilled hazardous materials or liquids, including blood and other potentially infectious materials, cleaned up immediately and according to proper procedures?
- Is combustible scrap, debris and waste stored safely and removed from the worksite promptly?
- Is all regulated waste, as defined in the OSHA bloodborne pathogens standard (29 CFR 1910.1030), discarded according to federal, state, and local regulations?
- Are accumulations of combustible dust routinely removed from elevated surfaces including the overhead structure of buildings, etc.?
- Is combustible dust cleaned up with a vacuum system to prevent the dust going into suspension?
- Is metallic or conductive dust prevented from entering or accumulating on or around electrical enclosures or equipment?
- Are covered metal waste cans used for oily and paintsoaked waste?

- Are all oil and gas fired devices equipped with flame failure controls that will prevent flow of fuel if pilots or main burners are not working?
- Are paint spray booths, dip tanks, etc., cleaned regularly?
- Are the minimum number of toilets and washing facilities provided?
- Are all toilets and washing facilities clean and sanitary?
- Are all work areas adequately illuminated?
- Are pits and floor openings covered or otherwise guarded?
- Have all confined spaces been evaluated for compliance with 29 CFR 1910.146?

WALKWAYS

- Are aisles and passageways kept clear?
- Are aisles and walkways marked as appropriate?
- Are wet surfaces covered with non-slip materials?
- Are holes in the floor, sidewalk or other walking surface repaired properly, covered or otherwise made safe?
- Is there safe clearance for walking in aisles where motorized or mechanical handling equipment is operating?
- Are materials or equipment stored in such a way that sharp projectives will not interfere with the walkway?
- Are spilled materials cleaned up immediately?
- Are changes of direction or elevations readily identifiable?
- Are aisles or walkways that pass near moving or operating machinery, welding operations or similar operations arranged so employees will not be subjected to potential hazards?
- Is adequate headroom provided for the entire length of any aisle or walkway?

- Are standard guardrails provided wherever aisle or walkway surfaces are elevated more than 30 inches (76.20 centimeters) above any adjacent floor or the ground?
- Are bridges provided over conveyors and similar hazards?

FLOOR AND WALL OPENINGS

- Are floor openings guarded by a cover, a guardrail, or equivalent on all sides (except at entrance to stairways or ladders)?
- Are toeboards installed around the edges of permanent floor opening (where persons may pass below the opening)?
- Are skylight screens of such construction and mounting that they will withstand a load of at least 200 pounds (90 kilograms)?
- Is the glass in the windows, doors, glass walls, etc., which are subject to human impact, of sufficient thickness and type for the condition of use?
- Are grates or similar type covers over floor openings such as floor drains of such design that foot traffic or rolling equipment will not be affected by the grate spacing?
- Are unused portions of service pits and pits not actually in use either covered or protected by guardrails or equivalent?
- Are manhole covers, trench covers and similar covers, plus their supports designed to carry a truck rear axle load of at least 20,000 pounds (9000 kilograms) when located in roadways and subject to vehicle traffic?
- Are floor or wall openings in fire resistive construction provided with doors or covers compatible with the fire rating of the structure and provided with a self-closing feature when appropriate?

STAIRS AND STAIRWAYS

- Are standard stair rails or handrails on all stairways having four or more risers?
- Are all stairways at least 22 inches (55.88 centimeters) wide?

- Do stairs have landing platforms not less than 30 inches (76.20 centimeters) in the direction of travel and extend 22 inches (55.88 centimeters) in width at every 12 feet (3.6576 meters) or less of vertical rise?
- Do stairs angle no more than 50 and no less than 30 degrees?
- Are stairs of hollow-pan type treads and landings filled to the top edge of the pan with solid material?
- Are step risers on stairs uniform from top to bottom?
- Are steps on stairs and stairways designed or provided with a surface that renders them slip resistant?
- Are stairway handrails located between 30 (76.20 centimeters) and 34 inches (86.36 centimeters) above the leading edge of stair treads?
- Do stairway handrails have at least 3 inches (7.62 centimeters) of clearance between the handrails and the wall or surface they are mounted on?
- Where doors or gates open directly on a stairway, is there a platform provided so the swing of the door does not reduce the width of the platform to less than 21 inches (53.34 centimeters)?
- Are stairway handrails capable of withstanding a load of 200 pounds (90 kilograms), applied within 2 inches (5.08 centimeters) of the top edge, in any downward or outward direction?
- Where stairs or stairways exit directly into any area where vehicles may be operated, are adequate barriers and warnings provided to prevent employees stepping into the path of traffic?
- Do stairway landings have a dimension measured in the direction of travel, at least equal to the width of the stairway?
- Is the vertical distance between stairway landings limited to 12 feet (3.6576 centimeters) or less?
- Are surfaces elevated more than 30 inches (76.20 centimeters) above the floor or ground provided with standard guardrails?
- Are all elevated surfaces (beneath which people or machinery could be exposed to falling objects) provided with standard 4-inch (10.16 centimeters) toeboards?
- Is a permanent means of access and egress provided to elevated storage and work surfaces?
- Is required headroom provided where necessary?
- Is material on elevated surfaces piled, stacked or racked in a manner to prevent it from tipping, falling, collapsing, rolling or spreading?
- Are dock boards or bridge plates used when transferring materials between docks and trucks or rail cars?

EXITING OR EGRESS

- Are all exits marked with an exit sign and illuminated by a reliable light source?
- Are the directions to exits, when not immediately apparent, marked with visible signs?
- Are doors, passageways or stairways, that are neither exits nor access to exits, and which could be mistaken for exits, appropriately marked "NOT AN EXIT," "TO BASEMENT," "STOREROOM," etc.?
- Are exit signs provided with the word "EXIT" in lettering at least 5 inches (12.70 centimeters) high and the stroke of the lettering at least 1/2-inch (1.2700 centimeters) wide?
- Are exit doors side-hinged?
- Are all exits kept free of obstructions?
- Are at least two means of egress provided from elevated platforms, pits or rooms where the absence of a second exit would increase the risk of injury from hot, poisonous, corrosive, suffocating, flammable, or explosive substances?
- Are there sufficient exits to permit prompt escape in case of emergency?
- Are special precautions taken to protect employees during construction and repair operations?

ELEVATED SURFACES

- Are signs posted, when appropriate, showing the elevated surface load capacity?

- Is the number of exits from each floor of a building and the number of exits from the building itself, appropriate for the building occupancy load?
- Are exit stairways that are required to be separated from other parts of a building enclosed by at least 2-hour fire-resistive construction in buildings more than four stories in height, and not less than 1-hour fire-resistive constructive elsewhere?
- Where ramps are used as part of required exiting from a building, is the ramp slope limited to 1 foot (0.3048 meters) vertical and 12 feet (3.6576 meters) horizontal?
- Where exiting will be through frameless glass doors, glass exit doors, or storm doors are the doors fully tempered and meet the safety requirements for human impact?

EXIT DOORS

- Are doors that are required to serve as exits designed and constructed so that the way of exit travel is obvious and direct?
- Are windows that could be mistaken for exit doors, made inaccessible by means of barriers or railings?
- Are exit doors openable from the direction of exit travel without the use of a key or any special knowledge or effort when the building is occupied?
- Is a revolving, sliding or overhead door prohibited from serving as a required exit door?
- Where panic hardware is installed on a required exit door, will it allow the door to open by applying a force of 15 pounds (6.75 kilograms) or less in the direction of the exit traffic?
- Are doors on cold storage rooms provided with an inside release mechanism which will release the latch and open the door even if it's padlocked or otherwise locked on the outside?
- Where exit doors open directly onto any street, alley or other area where vehicles may be operated, are adequate barriers and warnings provided to prevent employees from stepping into the path of traffic?
- Are doors that swing in both directions and are located between rooms where there is frequent traffic, provided with viewing panels in each door?

PORTABLE LADDERS

- Are all ladders maintained in good condition, joints between steps and side rails tight, all hardware and fittings securely attached and moveable parts operating freely without binding or undue play?
- Are non-slip safety feet provided on each ladder?
- Are non-slip safety feet provided on each metal or rung ladder?
- Are ladder rungs and steps free of grease and oil?
- Is it prohibited to place a ladder in front of doors opening toward the ladder except when the door is blocked open, locked or guarded?
- Is it prohibited to place ladders on boxes, barrels, or other unstable bases to obtain additional height?
- Are employees instructed to face the ladder when ascending or descending?
- Are employees prohibited from using ladders that are broken, missing steps, rungs, or cleats, broken side rails or other faulty equipment?
- Are employees instructed not to use the top step of ordinary stepladders as a step?
- When portable rung ladders are used to gain access to elevated platforms, roofs, etc., does the ladder always extend at least 3 feet (0.9144 meters) above the elevated surface?
- Is it required that when portable rung or cleat type ladders are used, the base is so placed that slipping will not occur, or it is lashed or otherwise held in place?
- Are portable metal ladders legibly marked with signs reading "CAUTION" - Do Not Use Around Electrical Equipment" or equivalent wording?
- Are employees prohibited from using ladders as guys, braces, skids, gin poles, or for other than their intended purposes?
- Are employees instructed to only adjust extension ladders while standing at a base (not while standing on the ladder or from a position above the ladder)?
- Are metal ladders inspected for damage?

- Are the rungs of ladders uniformly spaced at 12 inches, (30.48 centimeters) center to center?

HAND TOOLS AND EQUIPMENT

- Are all tools and equipment (both company and employee owned) used by employees at their workplace in good condition?
- Are hand tools such as chisels and punches, which develop mushroomed heads during use, reconditioned or replaced as necessary?
- Are broken or fractured handles on hammers, axes and similar equipment replaced promptly?
- Are worn or bent wrenches replaced regularly?
- Are appropriate handles used on files and similar tools?
- Are employees made aware of the hazards caused by faulty or improperly used hand tools?
- Are appropriate safety glasses, face shields, etc. used while using hand tools or equipment which might produce flying materials or be subject to breakage?
- Are jacks checked periodically to ensure they are in good operating condition?
- Are tool handles wedged tightly in the head of all tools?
- Are tool cutting edges kept sharp so the tool will move smoothly without binding or skipping?
- Are tools stored in dry, secure location where they won't be tampered with?
- Is eye and face protection used when driving hardened or tempered spuds or nails?

PORTABLE (POWER OPERATED) TOOLS AND EQUIPMENT

- Are circular saw guards checked to assure they are not wedged up, thus leaving the lower portion of the blade unguarded?
- Are rotating or moving parts of equipment guarded to prevent physical contact?
- Are all cord-connected, electrically operated tools and equipment effectively grounded or of the approved double insulated type?
- Are effective guards in place over belts, pulleys, chains, sprockets, on equipment such as concrete mixers, and air compressors?
- Are portable fans provided with full guards or screens having openings 1/2 inch (1.2700 centimeters) or less?
- Is hoisting equipment available and used for lifting heavy objects, and are hoist ratings and characteristics appropriate for the task?
- Are ground-fault circuit interrupters provided on all temporary electrical 15 and 20 ampere circuits, used during periods of construction?
- Are pneumatic and hydraulic hoses on power-operated tools checked regularly for deterioration or damage?

ABRASIVE WHEEL EQUIPMENT GRINDERS

- Is the work rest used and kept adjusted to within 1/8 inch (0.3175 centimeters) of the wheel?
- Is the adjustable tongue on the top side of the grinder used and kept adjusted to within 1/4 inch (0.6350 centimeters) of the wheel?
- Do side guards cover the spindle, nut, and flange and 75 percent of the wheel diameter?
- Are bench and pedestal grinders permanently mounted?
- Are goggles or face shields always worn when grinding?
- Is the maximum RPM rating of each abrasive wheel compatible with the RPM rating of the grinder motor?
- Are fixed or permanently mounted grinders connected to their electrical supply system with metallic conduit or other permanent wiring method?

- Does each grinder have an individual on and off control switch?
- Is each electrically operated grinder effectively grounded?
- Before new abrasive wheels are mounted, are they visually inspected and ring tested?
- Are dust collectors and powered exhausts provided on grinders used in operations that produce large amounts of dust?
- Are splash guards mounted on grinders that use coolant to prevent the coolant reaching employees?
- Is cleanliness maintained around grinders?

POWDER-ACTUATED TOOLS

- Are employees who operate powder-actuated tools trained in their use and carry a valid operators card?
- Is each powder-actuated tool stored in its own locked container when not being used?
- Is a sign at least 7 inches (17.78 centimeters) by 10 inches (25.40 centimeters) with bold face type reading "POWDER-ACTUATED TOOL IN USE" conspicuously posted when the tool is being used?
- Are powder-actuated tools left unloaded until they are actually ready to be used?
- Are powder-actuated tools inspected for obstructions or defects each day before use?
- Do powder-actuated tool operators have and use appropriate personal protective equipment such as hard hats, safety goggles, safety shoes and ear protectors?

MACHINE GUARDING

- Is there a training program to instruct employees on safe methods of machine operation?
- Is there adequate supervision to ensure that employees are following safe machine operating procedures?
- Is there a regular program of safety inspection of machinery and equipment?

- Is all machinery and equipment kept clean and properly maintained?
- Is sufficient clearance provided around and between machines to allow for safe operations, set up and servicing, material handling and waste removal?
- Is equipment and machinery securely placed and anchored, when necessary to prevent tipping or other movement that could result in personal injury?
- Is there a power shut-off switch within reach of the operator's position at each machine?
- Can electric power to each machine be locked out for maintenance, repair, or security?
- Are the noncurrent-carrying metal parts of electrically operated machines bonded and grounded?
- Are foot-operated switches guarded or arranged to prevent accidental actuation by personnel or falling objects?
- Are manually operated valves and switches controlling the operation of equipment and machines clearly identified and readily accessible?
- Are all emergency stop buttons colored red?
- Are all pulleys and belts that are within 7 feet (2.1336 meters) of the floor or working level properly guarded?
- Are all moving chains and gears properly guarded?
- Are splash guards mounted on machines that use coolant to prevent the coolant from reaching employees?
- Are methods provided to protect the operator and other employees in the machine area from hazards created at the point of operation, ingoing nip points, rotating parts, flying chips, and sparks?
- Are machinery guards secure and so arranged that they do not offer a hazard in their use?
- If special handtools are used for placing and removing material, do they protect the operator's hands?

- Are revolving drums, barrels, and containers required to be guarded by an enclosure that is interlocked with the drive mechanism, so that revolution cannot occur unless the guard enclosure is in place, so guarded?
- Do arbors and mandrels have firm and secure bearings and are they free from play?
- Are provisions made to prevent machines from automatically starting when power is restored after a power failure or shutdown?
- Are machines constructed so as to be free from excessive vibration when the largest size tool is mounted and run at full speed?
- If machinery is cleaned with compressed air, is air pressure controlled and personal protective equipment or other safeguards utilized to protect operators and other workers from eye and body injury?
- Are fan blades protected with a guard having openings no larger than 1/2 inch (1.2700 centimeters), when operating within 7 feet (2.1336 meters) of the floor?
- Are saws used for ripping, equipped with anti-kick back devices and spreaders?
- Are radial arm saws so arranged that the cutting head will gently return to the back of the table when released?
- Are all equipment control valve handles provided with a means for locking-out?
- Does the lock-out procedure require that stored energy (mechanical, hydraulic, air, etc.) be released or blocked before equipment is locked-out for repairs?
- Are appropriate employees provided with individually keyed personal safety locks?
- Are employees required to keep personal control of their key(s) while they have safety locks in use?
- Is it required that only the employee exposed to the hazard, place or remove the safety lock?
- Is it required that employees check the safety of the lock-out by attempting a startup after making sure no one is exposed?
- Are employees instructed to always push the control circuit stop button immediately after checking the safety of the lock-out?
- Is there a means provided to identify any or all employees who are working on locked-out equipment by their locks or accompanying tags?
- Are a sufficient number of accident preventive signs or tags and safety padlocks provided for any reasonably foreseeable repair emergency?
- When machine operations, configuration or size requires the operator to leave his or her control station to install tools or perform other operations, and that part of the machine could move if accidentally activated, is such element required to be separately locked or blocked out?
- In the event that equipment or lines cannot be shut down, locked-out and tagged, is a safe job procedure established and rigidly followed?

LOCKOUT/TAGOUT PROCEDURES

- Is all machinery or equipment capable of movement, required to be de-energized or disengaged and locked-out during cleaning, servicing, adjusting or setting up operations, whenever required?
- Where the power disconnecting means for equipment does not also disconnect the electrical control circuit:
 - Are the appropriate electrical enclosures identified?
 - Is means provided to assure the control circuit can also be disconnected and locked-out?
- Is the locking-out of control circuits in lieu of locking-out main power disconnects prohibited?

WELDING, CUTTING AND BRAZING

- Are only authorized and trained personnel permitted to use welding, cutting or brazing equipment?
- Does each operator have a copy of the appropriate operating instructions and are they directed to follow them?
- Are compressed gas cylinders regularly examined for obvious signs of defects, deep rusting, or leakage?

- Is care used in handling and storing cylinders, safety valves, and relief valves to prevent damage?
- Are precautions taken to prevent the mixture of air or oxygen with flammable gases, except at a burner or in a standard torch?
- Are only approved apparatus (torches, regulators, pressure reducing valves, acetylene generators, manifolds) used?
- Are cylinders kept away from sources of heat?
- Are the cylinders kept away from elevators, stairs, or gangways?
- Is it prohibited to use cylinders as rollers or supports?
- Are empty cylinders appropriately marked and their valves closed?
- Are signs reading: DANGER—NO SMOKING, MATCHES, OR OPENLIGHTS, or the equivalent, posted?
- Are cylinders, cylinder valves, couplings, regulators, hoses, and apparatus kept free of oily or greasy substances?
- Is care taken not to drop or strike cylinders?
- Unless secured on special trucks, are regulators removed and valve-protection caps put in place before moving cylinders?
- Do cylinders without fixed hand wheels have keys, handles, or non-adjustable wrenches on stem valves when in service?
- Are liquefied gases stored and shipped valve-end up with valve covers in place?
- Are provisions made to never crack a fuel gas cylinder valve near sources of ignition?
- Before a regulator is removed, is the valve closed and gas released from the regulator?
- Is red used to identify the acetylene (and other fuel-gas) hose, green for oxygen hose, and black for inert gas and air hose?
- Are pressure-reducing regulators used only for the gas and pressures for which they are intended?
- Is open circuit (No Load) voltage of arc welding and cutting machines as low as possible and not in excess of the recommended limits?
- Under wet conditions, are automatic controls for reducing no load voltage used?
- Is grounding of the machine frame and safety ground connections of portable machines checked periodically?
- Are electrodes removed from the holders when not in use?
- Is it required that electric power to the welder be shut off when no one is in attendance?
- Is suitable fire extinguishing equipment available for immediate use?
- Is the welder forbidden to coil or loop welding electrode cable around his body?
- Are wet machines thoroughly dried and tested before being used?
- Are work and electrode lead cables frequently inspected for wear and damage, and replaced when needed?
- Do means for connecting cable lengths have adequate insulation?
- When the object to be welded cannot be moved and fire hazards cannot be removed, are shields used to confine heat, sparks, and slag?
- Are fire watchers assigned when welding or cutting is performed in locations where a serious fire might develop?
- Are combustible floors kept wet, covered by damp sand, or protected by fire-resistant shields?
- When floors are wet down, are personnel protected from possible electrical shock?
- When welding is done on metal walls, are precautions taken to protect combustibles on the other side?
- Before hot work is begun, are used drums, barrels, tanks, and other containers so thoroughly cleaned that no substances remain that could explode, ignite, or produce toxic vapors?

- Is it required that eye protection helmets, hand shields and goggles meet appropriate standards?
- Are employees exposed to the hazards created by welding, cutting, or brazing operations protected with personal protective equipment and clothing?
- Is a check made for adequate ventilation in and where welding or cutting is performed?
- When working in confined places, are environmental monitoring tests taken and means provided for quick removal of welders in case of an emergency?

COMPRESSORS AND COMPRESSED AIR

- Are compressors equipped with pressure relief valves, and pressure gauges?
- Are compressor air intakes installed and equipped so as to ensure that only clean uncontaminated air enters the compressor?
- Are air filters installed on the compressor intake?
- Are compressors operated and lubricated in accordance with the manufacturer's recommendations?
- Are safety devices on compressed air systems checked frequently?
- Before any repair work is done on the pressure system of a compressor, is the pressure bled off and the system locked-out?
- Are signs posted to warn of the automatic starting feature of the compressors?
- Is the belt drive system totally enclosed to provide protection for the front, back, top, and sides?
- Is it strictly prohibited to direct compressed air towards a person?
- Are employees prohibited from using highly compressed air for cleaning purposes?
- If compressed air is used for cleaning off clothing, is the pressure reduced to less than 10 psi?
- When using compressed air for cleaning, do employees wear protective chip guarding and personal protective equipment?

- Are safety chains or other suitable locking devices used at couplings of high pressure hose lines where a connection failure would create a hazard?
- Before compressed air is used to empty containers of liquid, is the safe working pressure of the container checked?
- When compressed air is used with abrasive blast cleaning equipment, is the operating valve a type that must be held open manually?
- When compressed air is used to inflate auto ties, is a clip-on chuck and an inline regulator preset to 40 psi required?
- Is it prohibited to use compressed air to clean up or move combustible dust if such action could cause the dust to be suspended in the air and cause a fire or explosion hazard?

COMPRESSORS AIR RECEIVERS

- Is every receiver equipped with a pressure gauge and with one or more automatic, spring-loaded safety valves?
- Is the total relieving capacity of the safety valve capable of preventing pressure in the receiver from exceeding the maximum allowable working pressure of the receiver by more than 10 percent?
- Is every air receiver provided with a drain pipe and valve at the lowest point for the removal of accumulated oil and water?
- Are compressed air receivers periodically drained of moisture and oil?
- Are all safety valves tested frequently and at regular intervals to determine whether they are in good operating condition?
- Is there a current operating permit used by the Division of Occupational Safety and Health?
- Is the inlet of air receivers and piping systems kept free of accumulated oil and carbonaceous materials?

COMPRESSED GAS CYLINDERS

- Are cylinders with a water weight capacity over 30 pounds (13.5 kilograms), equipped with means for connecting a valve protector device, or with a collar or recess to protect the valve?

- Are cylinders legibly marked to clearly identify the gas contained?
- Are compressed gas cylinders stored in areas which are protected from external heat sources such as flame impingement, intense radiant heat, electric arcs, or high temperature lines?
- Are cylinders located or stored in areas where they will not be damaged by passing or falling objects or subject to tampering by unauthorized persons?
- Are cylinders stored or transported in a manner to prevent them from creating a hazard by tipping, falling or rolling?
- Are cylinders containing liquefied fuel gas, stored or transported in a position so that the safety relief device is always in direct contact with the vapor space in the cylinder?
- Are valve protectors always placed on cylinders when the cylinders are not in use or connected for use?
- Are all valves closed off before a cylinder is moved, when the cylinder is empty, and at the completion of each job?
- Are low pressure fuel-gas cylinders checked periodically for corrosion, general distortion, cracks, or any other defect that might indicate a weakness or render it unfit for service?
- Does the periodic check of low pressure fuel-gas cylinders include a close inspection of the cylinders' bottom?

HOIST AND AUXILLARY EQUIPMENT

- Is each overhead electric hoist equipped with a limit device to stop the hook travel at its highest and lowest point of safe travel?
- Will each hoist automatically stop and hold any load up to 125 percent of its rated load if its actuating force is removed?
- Is the rated load of each hoist legibly marked and visible to the operator?
- Are stops provided at the safe limits of travel for trolley hoist?
- Are the controls of hoist plainly marked to indicate the direction of travel or motion?

- Is each cage-controlled hoist equipped with an effective warning device?
- Are close-fitting guards or other suitable devices installed on hoist to assure hoist ropes will be maintained in the sheave groves?
- Are all hoist chains or ropes of sufficient length to handle the full range of movement of the application while still maintaining two full wraps on the drum at all times?
- Are nip points or contact points between hoist ropes and sheaves which are permanently located within 7 feet (2.1336 meters) of the floor, ground or working platform, guarded?
- Is it prohibited to use chains or rope slings that are kinked or twisted?
- Is it prohibited to use the hoist rope or chain wrapped around the load as a substitute, for a sling?
- Is the operator instructed to avoid carrying loads over people?

INDUSTRIAL TRUCKS—FORKLIFTS

- Are only employees who have been trained in the proper use of hoists allowed to operate them?
- Are only trained personnel allowed to operate industrial trucks?
- Is substantial overhead protective equipment provided on high lift rider equipment?
- Are the required lift truck operating rules posted and enforced?
- Is directional lighting provided on each industrial truck that operates in an area with less than 2 foot-candles per square foot of general lighting?
- Does each industrial truck have a warning horn, whistle, gong, or other device which can be clearly heard above the normal noise in the areas where operated?
- Are the brakes on each industrial truck capable of bringing the vehicle to a complete and safe stop when fully loaded?
- Will the industrial trucks' parking brake effectively prevent the vehicle from moving when unattended?

- Are industrial trucks operating in areas where flammable gases or vapors, or combustible dust or ignitable fibers may be present in the atmosphere, approved for such locations?
- Are motorized hand and hand/rider trucks so designed that the brakes are applied, and power to the drive motor shuts off when the operator releases his or her grip on the device that controls the travel?
- Are industrial trucks with internal combustion engine, operated in buildings or enclosed areas, carefully checked to ensure such operations do not cause harmful concentration of dangerous gases or fumes?
- Are powered industrial trucks being safely operated?

SPRAYING OPERATIONS

- Is adequate ventilation assured before spray operations are started?
- Is mechanical ventilation provided when spraying operations are done in enclosed areas?
- When mechanical ventilation is provided during spraying operations, is it so arranged that it will not circulate the contaminated air?
- Is the spray area free of hot surfaces?
- Is the spray area at least 20 feet (6.096 meters) from flames, sparks, operating electrical motors and other ignition sources?
- Are portable lamps used to illuminate spray areas suitable for use in a hazardous location?
- Is approved respiratory equipment provided and used when appropriate during spraying operations?
- Do solvents used for cleaning have a flash point to 100°F or more?
- Are fire control sprinkler heads kept clean?
- Are “NO SMOKING” signs posted in spray areas, paint rooms, paint booths, and paint storage areas?
- Is the spray area kept clean of combustible residue?
- Are spray booths constructed of metal, masonry, or other substantial noncombustible material?

- Are spray booth floors and baffles noncombustible and easily cleaned?
- Is infrared drying apparatus kept out of the spray area during spraying operations?
- Is the spray booth completely ventilated before using the drying apparatus?
- Is the electric drying apparatus properly grounded?
- Are lighting fixtures for spray booths located outside of the booth and the interior lighted through sealed clear panels?
- Are the electric motors for exhaust fans placed outside booths or ducts?
- Are belts and pulleys inside the booth fully enclosed?
- Do ducts have access doors to allow cleaning?
- Do all drying spaces have adequate ventilation?

ENTERING CONFINED SPACES

- Are confined spaces thoroughly emptied of any corrosive or hazardous substances, such as acids or caustics, before entry?
- Are all lines to a confined space, containing inert, toxic, flammable, or corrosive materials valved off and blanked or disconnected and separated before entry?
- Are all impellers, agitators, or other moving parts and equipment inside confined spaces locked-out if they present a hazard?
- Is either natural or mechanical ventilation provided prior to confined space entry?
- Are appropriate atmospheric tests performed to check for oxygen deficiency, toxic substances and explosive concentrations in the confined space before entry?
- Is adequate illumination provided for the work to be performed in the confined space?
- Is the atmosphere inside the confined space frequently tested or continuously monitored during conduct of work?

- Is there an assigned safety standby employee outside of the confined space, when required, whose sole responsibility is to watch the work in progress, sound an alarm if necessary, and render assistance?
- Is the standby employee appropriately trained and equipped to handle an emergency?
- Is the standby employee or other employees prohibited from entering the confined space without lifelines and respiratory equipment if there is any question as to the cause of an emergency?
- Is approved respiratory equipment required if the atmosphere inside the confined space cannot be made acceptable?
- Is all portable electrical equipment used inside confined spaces either grounded and insulated, or equipped with ground fault protection?
- Before gas welding or burning is started in a confined space, are hoses checked for leaks, compressed gas bottles forbidden inside of the confined space, torches lighted only outside of the confined area and the confined area tested for an explosive atmosphere each time before a lighted torch is to be taken into the confined space?
- If employees will be using oxygen-consuming equipment—such as salamanders, torches, and furnaces, in a confined space—is sufficient air provided to assure combustion without reducing the oxygen concentration of the atmosphere below 19.5 percent by volume?
- Whenever combustion-type equipment is used in a confined space, are provisions made to ensure the exhaust gases are vented outside of the enclosure?
- Is each confined space checked for decaying vegetation or animal matter which may produce methane?
- Is the confined space checked for possible industrial waste which could contain toxic properties?
- If the confined space is below the ground and near areas where motor vehicles will be operating, is it possible for vehicle exhaust or carbon monoxide to enter the space?
- Are employees instructed in proper first-aid and other emergency procedures?
- Are hazardous substances, blood, and other potentially infectious materials identified, which may cause harm by inhalation, ingestion, or skin absorption or contact?
- Are employees aware of the hazards involved with the various chemicals they may be exposed to in their work environment, such as ammonia, chlorine, epoxies, caustics, etc.?
- Is employee exposure to chemicals in the workplace kept within acceptable levels?
- Can a less harmful method or process be used?
- Is the work area's ventilation system appropriate for the work being performed?
- Are spray painting operations done in spray rooms or booths equipped with an appropriate exhaust system?
- Is employee exposure to welding fumes controlled by ventilation, use of respirators, exposure time, or other means?
- Are welders and other workers nearby provided with flash shields during welding operations?
- If forklifts and other vehicles are used in buildings or other enclosed areas, are the carbon monoxide levels kept below maximum acceptable concentration?
- Has there been a determination that noise levels in the facilities are within acceptable levels?
- Are steps being taken to use engineering controls to reduce excessive noise levels?
- Are proper precautions being taken when handling asbestos and other fibrous materials?
- Are caution labels and signs used to warn of hazardous substances (e.g., asbestos) and biohazards (e.g., bloodborne pathogens)?
- Are wet methods used, when practicable, to prevent the emission of airborne asbestos fibers, silica dust and similar hazardous materials?
- Are engineering controls examined and maintained or replaced on a scheduled basis?

ENVIRONMENTAL CONTROLS

- Are all work areas properly illuminated?

- Is vacuuming with appropriate equipment used whenever possible rather than blowing or sweeping dust?
- Are grinders, saws, and other machines that produce respirable dusts vented to an industrial collector or central exhaust system?
- Are all local exhaust ventilation systems designed and operating properly such as air flow and volume necessary for the application, ducts not plugged or belts slipping?
- Is personal protective equipment provided, used and maintained wherever required?
- Are there written standard operating procedures for the selection and use of respirators where needed?
- Are restrooms and washrooms kept clean and sanitary?
- Is all water provided for drinking, washing, and cooking potable?
- Are all outlets for water not suitable for drinking clearly identified?
- Are employees' physical capacities assessed before being assigned to jobs requiring heavy work?
- Are employees instructed in the proper manner of lifting heavy objects?
- Where heat is a problem, have all fixed work areas been provided with spot cooling or air conditioning?
- Are employees screened before assignment to areas of high heat to determine if their health condition might make them more susceptible to having an adverse reaction?
- Are employees working on streets and roadways where they are exposed to the hazards of traffic, required to wear bright colored (traffic orange) warning vests?
- Are exhaust stacks and air intakes so located that contaminated air will not be recirculated within a building or other enclosed area?
- Is equipment producing ultraviolet radiation properly shielded?

- Are universal precautions observed where occupational exposure to blood or other potentially infectious materials can occur and in all instances where differentiation of types of body fluids or potentially infectious materials is difficult or impossible?

FLAMMABLE AND COMBUSTIBLE MATERIALS

- Are combustible scrap, debris, and waste materials (oily rags, etc.) stored in covered metal receptacles and removed from the worksite promptly?
- Is proper storage practiced to minimize the risk of fire including spontaneous combustion?
- Are approved containers and tanks used for the storage and handling of flammable and combustible liquids?
- Are all connections on drums and combustible liquid piping, vapor and liquid tight?
- Are all flammable liquids kept in closed containers when not in use (e.g., parts cleaning tanks, pans, etc.)?
- Are bulk drums of flammable liquids grounded and bonded to containers during dispensing?
- Do storage rooms for flammable and combustible liquids have explosion-proof lights?
- Do storage rooms for flammable and combustible liquids have mechanical or gravity ventilation?
- Is liquefied petroleum gas stored, handled, and used in accordance with safe practices and standards?
- Are "NO SMOKING" signs posted on liquefied petroleum gas tanks?
- Are liquefied petroleum storage tanks guarded to prevent damage from vehicles?
- Are all solvent wastes, and flammable liquids kept in fire-resistant, covered containers until they are removed from the worksite?
- Is vacuuming used whenever possible rather than blowing or sweeping combustible dust?

- Are firm separators placed between containers of combustibles or flammables, when stacked one upon another, to assure their support and stability?
- Are fuel gas cylinders and oxygen cylinders separated by distance, and fire-resistant barriers, while in storage?
- Are fire extinguishers selected and provided for the types of materials in areas where they are to be used?

Class A Ordinary combustible material fires.

Class B Flammable liquid, gas or grease fires.

Class C Energized-electrical equipment fires.

- Are appropriate fire extinguishers mounted within 75 feet (2286 meters) of outside areas containing flammable liquids, and within 10 feet (3.048 meters) of any inside storage area for such materials?
- Are extinguishers free from obstructions or blockage?
- Are all extinguishers serviced, maintained and tagged at intervals not to exceed 1 year?
- Are all extinguishers fully charged and in their designated places?
- Where sprinkler systems are permanently installed, are the nozzle heads so directed or arranged that water will not be sprayed into operating electrical switch boards and equipment?
- Are “NO SMOKING” signs posted where appropriate in areas where flammable or combustible materials are used or stored?
- Are safety cans used for dispensing flammable or combustible liquids at a point of use?
- Are all spills of flammable or combustible liquids cleaned up promptly?
- Are storage tanks adequately vented to prevent the development of excessive vacuum or pressure as a result of filling, emptying, or atmosphere temperature changes?
- Are storage tanks equipped with emergency venting that will relieve excessive internal pressure caused by fire exposure?

- Are “NO SMOKING” rules enforced in areas involving storage and use of hazardous materials?

HAZARDOUS CHEMICAL EXPOSURE

- Are employees trained in the safe handling practices of hazardous chemicals such as acids, caustics, etc.?
- Are employees aware of the potential hazards involving various chemicals stored or used in the workplace such as acids, bases, caustics, epoxies, and phenols?
- Is employee exposure to chemicals kept within acceptable levels?
- Are eye wash fountains and safety showers provided in areas where corrosive chemicals are handled?
- Are all containers, such as vats, and storage tanks labeled as to their contents, e.g., “CAUSTICS”?
- Are all employees required to use personal protective clothing and equipment when handling chemicals (gloves, eye protection, and respirators)?
- Are flammable or toxic chemicals kept in closed containers when not in use?
- Are chemical piping systems clearly marked as to their content?
- Where corrosive liquids are frequently handled in open containers or drawn from storage vessels or pipe lines, are adequate means readily available for neutralizing or disposing of spills or overflows and performed properly and safely?
- Have standard operating procedures been established, and are they being followed when cleaning up chemical spills?
- Where needed for emergency use, are respirators stored in a convenient, clean, and sanitary location?
- Are respirators intended for emergency use adequate for the various uses for which they may be needed?
- Are employees prohibited from eating in areas where hazardous chemicals are present?
- Is personal protective equipment provided, used and maintained whenever necessary?

- Are there written standard operating procedures for the selection and use of respirators where needed?
- If you have a respirator protection program, are your employees instructed on the correct usage and limitations of the respirators? Are the respirators NIOSH-approved for this particular application? Are they regularly inspected and cleaned, sanitized and maintained?
- If hazardous substances are used in your processes, do you have a medical or biological monitoring system in operation?
- Are you familiar with the Threshold Limit Values or Permissible Exposure Limits of airborne contaminants and physical agents used in your workplace?
- Have control procedures been instituted for hazardous materials, where appropriate, such as respirators, ventilation systems, and handling practices?
- Whenever possible, are hazardous substances handled in properly designed and exhausted booths or similar locations?
- Do you use general dilution or local exhaust ventilation systems to control dusts, vapors, gases, fumes, smoke, solvents or mists which may be generated in your workplace?
- Is ventilation equipment provided for removal of contaminants from such operations as production grinding, buffing, spray painting, and/or vapor degreasing, and is it operating properly?
- Do employees complain about dizziness, headaches, nausea, irritation, or other factors of discomfort when they use solvents or other chemicals?
- Is there a dermatitis problem? Do employees complain about dryness, irritation, or sensitization of the skin?
- Have you considered the use of an industrial hygienist or environmental health specialist to evaluate your operation?
- If internal combustion engines are used, is carbon monoxide kept within acceptable levels?
- Is vacuuming used, rather than blowing or sweeping dusts whenever possible for clean-up?

- Are materials which give off toxic asphyxiant, suffocating or anesthetic fumes, stored in remote or isolated locations when not in use?

HAZARDOUS SUBSTANCES COMMUNICATION

- Is there a list of hazardous substances used in your workplace?
- Is there a current written exposure control plan for occupational exposure to bloodborne pathogens and other potentially infectious materials, where applicable?
- Is there a written hazard communication program dealing with Material Safety Data Sheets (MSDS), labeling, and employee training?
- Is each container for a hazardous substance (i.e., vats, bottles, storage tanks, etc.) labeled with product identity and a hazard warning (communication of the specific health hazards and physical hazards)?
- Is there a Material Safety Data Sheet readily available for each hazardous substance used?
- Is there an employee training program for hazardous substances?

Does this program include:

- An explanation of what an MSDS is and how to use and obtain one?
- MSDS contents for each hazardous substance or class of substances?
- Explanation of "Right to Know?"
- Identification of where an employee can see the employers written hazard communication program and where hazardous substances are present in their work areas?
- The physical and health hazards of substances in the work area, and specific protective measures to be used?
- Details of the hazard communication program, including how to use the labeling system and MSDS's?

- Does the employee training program on the bloodborne pathogens standard contain the following elements:

(1) an accessible copy of the standard and an explanation of its contents; (2) a general explanation of the epidemiology and symptoms of bloodborne diseases; (3) an explanation of the modes of transmission of bloodborne pathogens; (4) an explanation of the employer's exposure control plan and the means by which employees can obtain a copy of the written plan; (5) an explanation of the appropriate methods for recognizing tasks and the other activities that may involve exposure to blood and other potentially infectious materials; (6) an explanation of the use and limitations of methods that will prevent or reduce exposure including appropriate engineering controls, work practices, and personal protective equipment; (7) information on the types, proper use, location, removal, handling, decontamination, and disposal of personal protective equipment; (8) an explanation of the basis for selection of personal protective equipment; (9) information on the hepatitis B vaccine; (10) information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials; (11) an explanation of the procedure to follow if an exposure incident occurs, including the methods of reporting the incident and the medical followup that will be made available; (12) information on postexposure evaluations and followup; and (13) an explanation of signs, labels, and color coding?

- Are employees trained in the following:
 - How to recognize tasks that might result in occupational exposure?
 - How to use work practice and engineering controls and personal protective equipment and to know their limitations?
 - How to obtain information on the types, selection, proper use, location, removal, handling, decontamination, and disposal of personal protective equipment?
 - Who to contact and what to do in an emergency?

ELECTRICAL

- Do you specify compliance with OSHA for all contract electrical work?
- Are all employees required to report as soon as practicable any obvious hazard to life or property observed in connection with electrical equipment or lines?
- Are employees instructed to make preliminary inspections and/or appropriate tests to determine what conditions exist before starting work on electrical equipment or lines?
- When electrical equipment or lines are to be serviced, maintained or adjusted, are necessary switches opened, locked-out and tagged whenever possible?
- Are portable electrical tools and equipment grounded or of the double insulated type?
- Are electrical appliances such as vacuum cleaners, polishers, and vending machines grounded?
- Do extension cords being used have a grounding conductor?
- Are multiple plug adaptors prohibited?
- Are ground-fault circuit interrupters installed on each temporary 15 or 20 ampere, 120 volt AC circuit at locations where construction, demolition, modifications, alterations or excavations are being performed?
- Are all temporary circuits protected by suitable disconnecting switches or plug connectors at the junction with permanent wiring?
- Do you have electrical installations in hazardous dust or vapor areas? If so, do they meet the National Electrical Code (NEC) for hazardous locations?
- Is exposed wiring and cords with frayed or deteriorated insulation repaired or replaced promptly?
- Are flexible cords and cables free of splices or taps?
- Are clamps or other securing means provided on flexible cords or cables at plugs, receptacles, tools, equipment, etc., and is the cord jacket securely held in place?

- Are all cord, cable and raceway connections intact and secure?
- In wet or damp locations, are electrical tools and equipment appropriate for the use or location or otherwise protected?
- Is the location of electrical power lines and cables (overhead, underground, underfloor, other side of walls) determined before digging, drilling or similar work is begun?
- Are metal measuring tapes, ropes, handlines or similar devices with metallic thread woven into the fabric prohibited where they could come in contact with energized parts of equipment or circuit conductors?
- Is the use of metal ladders prohibited in areas where the ladder or the person using the ladder could come in contact with energized parts of equipment, fixtures or circuit conductors?
- Are all disconnecting switches and circuit breakers labeled to indicate their use or equipment served?
- Are disconnecting means always opened before fuses are replaced?
- Do all interior wiring systems include provisions for grounding metal parts of electrical raceways, equipment and enclosures?
- Are all electrical raceways and enclosures securely fastened in place?
- Are all energized parts of electrical circuits and equipment guarded against accidental contact by approved cabinets or enclosures?
- Is sufficient access and working space provided and maintained about all electrical equipment to permit ready and safe operations and maintenance?
- Are all unused openings (including conduit knock-outs) in electrical enclosures and fittings closed with appropriate covers, plugs or plates?
- Are electrical enclosures such as switches, receptacles, and junction boxes, provided with tight-fitting covers or plates?
- Are disconnecting switches for electrical motors in excess of two horsepower, capable of opening the circuit when the motor is in a stalled condition, without exploding? (Switches must be horsepower rated equal to or in excess of the motor hp rating.)
- Is low voltage protection provided in the control device of motors driving machines or equipment which could cause probable injury from inadvertent starting?
- Is each motor disconnecting switch or circuit breaker located within sight of the motor control device?
- Is each motor located within sight of its controller or the controller disconnecting means capable of being locked in the open position or is a separate disconnecting means installed in the circuit within sight of the motor?
- Is the controller for each motor in excess of two horsepower, rated in horsepower equal to or in excess of the rating of the motor it serves?
- Are employees who regularly work on or around energized electrical equipment or lines instructed in the cardiopulmonary resuscitation (CPR) methods?
- Are employees prohibited from working alone on energized lines or equipment over 600 volts?

NOISE

- Are there areas in the workplace where continuous noise levels exceed 85dBA?
- Is there an ongoing preventive health program to educate employees in: safe levels of noise, exposures; effects of noise on their health; and the use of personal protection?
- Have work areas where noise levels make voice communication between employees difficult been identified and posted?
- Are noise levels being measured using a sound level meter or an octave band analyzer and are records being kept?
- Have engineering controls been used to reduce excessive noise levels? Where engineering controls are determined not feasible, are administrative controls (i.e., worker rotation) being used to minimize individual employee exposure to noise?
- Is approved hearing protective equipment (noise attenuating devices) available to every employee working in noisy areas?
- Have you tried isolating noisy machinery from the rest of your operation?

- If you use ear protectors, are employees properly fitted and instructed in their use?
- Are employees in high noise areas given periodic audiometric testing to ensure that you have an effective hearing protection system?

FUELING

- Is it prohibited to fuel an internal combustion engine with a flammable liquid while the engine is running?
- Are fueling operations done in such a manner that likelihood of spillage will be minimal?
- When spillage occurs during fueling operations, is the spilled fuel washed away completely, evaporated, or other measures taken to control vapors before restarting the engine?
- Are fuel tank caps replaced and secured before starting the engine?
- In fueling operations, is there always metal contact between the container and the fuel tank?
- Are fueling hoses of a type designed to handle the specific type of fuel?
- Is it prohibited to handle or transfer gasoline in open containers?
- Are open lights, open flames, sparking, or arcing equipment prohibited near fueling or transfer of fuel operations?
- Is smoking prohibited in the vicinity of fueling operations?
- Are fueling operators prohibited in buildings or other enclosed areas that are not specifically ventilated for this purpose?
- Where fueling or transfer of fuel is done through a gravity flow system, are the nozzles of the self-closing type?

IDENTIFICATION OF PIPING SYSTEMS

- When nonpotable water is piped through a facility, are outlets or taps posted to alert employees that it is unsafe and not to be used for drinking, washing or other personal use?

- When hazardous substances are transported through above ground piping, is each pipeline identified at points where confusion could introduce hazards to employees?
- When pipelines are identified by color painting, are all visible parts of the line so identified?
- When pipelines are identified by color painted bands or tapes, are the bands or tapes located at reasonable intervals and at each outlet, valve or connection?
- When pipelines are identified by color, is the color code posted at all locations where confusion could introduce hazards to employees?
- When the contents of pipelines are identified by name or name abbreviation, is the information readily visible on the pipe near each valve or outlet?
- When pipelines carrying hazardous substances are identified by tags, are the tags constructed of durable materials, the message carried clearly and permanently distinguishable and are tags installed at each valve or outlet?
- When pipelines are heated by electricity, steam or other external source, are suitable warning signs or tags placed at unions, valves, or other serviceable parts of the system?

MATERIAL HANDLING

- Is there safe clearance for equipment through aisles and doorways?
- Are aisleways designated, permanently marked, and kept clear to allow unhindered passage?
- Are motorized vehicles and mechanized equipment inspected daily or prior to use?
- Are vehicles shut off and brakes set prior to loading or unloading?
- Are containers of combustibles or flammables, when stacked while being moved, always separated by dunnage sufficient to provide stability?
- Are dock boards (bridge plates) used when loading or unloading operations are taking place between vehicles and docks?

- Are trucks and trailers secured from movement during loading and unloading operations?
- Are dock plates and loading ramps constructed and maintained with sufficient strength to support imposed loading?
- Are hand trucks maintained in safe operating condition?
- Are chutes equipped with sideboards of sufficient height to prevent the materials being handled from falling off?
- Are chutes and gravity roller sections firmly placed or secured to prevent displacement?
- At the delivery end of the rollers or chutes, are provisions made to brake the movement of the handled materials?
- Are pallets usually inspected before being loaded or moved?
- Are hooks with safety latches or other arrangements used when hoisting materials so that slings or load attachments won't accidentally slip off the hoist hooks?
- Are securing chains, ropes, chockers or slings adequate for the job to be performed?
- When hoisting material or equipment, are provisions made to assure no one will be passing under the suspended loads?
- Are material safety data sheets available to employees handling hazardous substances?

TRANSPORTING EMPLOYEES AND MATERIALS

- Do employees who operate vehicles on public thoroughfares have valid operator's licenses?
- When seven or more employees are regularly transported in a van, bus or truck, is the operator's license appropriate for the class of vehicle being driven?
- Is each van, bus or truck used regularly to transport employees equipped with an adequate number of seats?

- When employees are transported by truck, are provisions provided to prevent their falling from the vehicle?
- Are vehicles used to transport employees equipped with lamps, brakes, horns, mirrors, windshields and turn signals and are they in good repair?
- Are transport vehicles provided with handrails, steps, stirrups or similar devices, so placed and arranged that employees can safely mount or dismount?
- Are employee transport vehicles equipped at all times with at least two reflective type flares?
- Is a full charged fire extinguisher, in good condition, with at least 4 B:C rating maintained in each employee transport vehicle?
- When cutting tools or tools with sharp edges are carried in passenger compartments of employee transport vehicles, are they placed in closed boxes or containers which are secured in place?
- Are employees prohibited from riding on top of any load which can shift, topple, or otherwise become unstable?

CONTROL OF HARMFUL SUBSTANCES BY VENTILATION

- Is the volume and velocity of air in each exhaust system sufficient to gather the dusts, fumes, mists, vapors or gases to be controlled, and to convey them to a suitable point of disposal?
- Are exhaust inlets, ducts and plenums designed, constructed, and supported to prevent collapse or failure of any part of the system?
- Are clean-out ports or doors provided at intervals not to exceed 12 feet (3.6576 meters) in all horizontal runs of exhaust ducts?
- Where two or more different type of operations are being controlled through the same exhaust system, will the combination of substances being controlled, constitute a fire, explosion or chemical reaction hazard in the duct?
- Is adequate makeup air provided to areas where exhaust systems are operating?

- Is the source point for makeup air located so that only clean, fresh air, which is free of contaminants, will enter the work environment?
- Where two or more ventilation systems are serving a work area, is their operation such that one will not offset the functions of the other?

SANITIZING EQUIPMENT AND CLOTHING

- Is personal protective clothing or equipment that employees are required to wear or use, of a type capable of being cleaned easily and disinfected?
- Are employees prohibited from interchanging personal protective clothing or equipment, unless it has been properly cleaned?
- Are machines and equipment, which process, handle or apply materials that could be injurious to employees, cleaned and/or decontaminated before being overhauled or placed in storage?
- Are employees prohibited from smoking or eating in any area where contaminants that could be injurious if ingested are present?
- When employees are required to change from street clothing into protective clothing, is a clean change room with separate storage facility for street and protective clothing provided?
- Are employees required to shower and wash their hair as soon as possible after a known contact has occurred with a carcinogen?
- When equipment, materials, or other items are taken into or removed from a carcinogen regulated area, is it done in a manner that will contaminate non-regulated areas or the external environment?

TIRE INFLATION

- Where tires are mounted and/or inflated on drop center wheels, is a safe practice procedure posted and enforced?
- Where tires are mounted and/or inflated on wheels with split rims and/or retainer rings, is a safe practice procedure posted and enforced?
- Does each tire inflation hose have a clip-on chuck with at least 24 inches (6.9 centimeters) of hose between the chuck and an in-line hand valve and gauge?
- Does the tire inflation control valve automatically shutoff the air flow when the valve is released?
- Is a tire restraining device such as a cage, rack or other effective means used while inflating tires mounted on split rims, or rims using retainer rings?
- Are employees strictly forbidden from taking a position directly over or in front of a tire while it's being inflated?

V. ASSISTANCE IN SAFETY AND HEALTH

OSHA Assistance

Free Onsite Consultation

Using a free consultation service largely funded by the U.S. Occupational Safety and Health Administration (OSHA), employers can find out about potential hazards at their worksites, improve their occupational safety and health management systems, and even qualify for a 1-year exemption from routine OSHA inspections.

The service is delivered by state governments using well-trained professional staff. Most consultations take place onsite, though limited services away from the worksite are available.

Primarily targeted for smaller businesses, this safety and health consultation program is completely separate from the OSHA inspection effort. In addition, no citations are issued or penalties proposed.

It's confidential, too. Your name, your firm's name, and any information you provide about your workplace, plus any unsafe or unhealthful working conditions that the consultant uncovers, will not be reported routinely to the OSHA inspection staff.

Your only obligation will be to commit yourself to correcting serious job safety and health hazards—a commitment which you are expected to make prior to the actual visit and carried out in a timely manner.

Getting Started: Since consultation is a voluntary activity, you must request it. Your telephone call or letter sets the consulting machinery in motion. The consultant will discuss your specific needs with you and set up a visit date based on the priority assigned to your request, your work schedule, and the time needed for the consultant to prepare adequately to serve you. OSHA encourages a complete review of your firm's safety and health situation; however, if you wish you may limit the visit to one or more specific problems.

Opening Conference: When the consultant arrives at your worksite for the scheduled visit, he or she will first meet with you in an opening conference to briefly review the consultant's role and the obligation you incur as an employer.

Walkthrough: Together, you and the consultant will examine conditions in your workplace. OSHA strongly encourages maximum employee participation in the walkthrough. Better informed and more alert employees can more easily work with you to identify and correct potential injury and illness hazards in your workplace. Talking with employees during the walkthrough helps the consultant identify and judge the nature and extent of specific hazards.

The consultant will study your entire workplace or the specific operations you designate and discuss the applicable OSHA standards. Consultants also will point out other safety or health risks which might not be cited under OSHA standards, but which nevertheless may pose safety or health risks to your employees. They may suggest and even provide other measures such as self-inspection and safety and health training you and your employees can apply to prevent future hazardous situations.

A comprehensive consultation also includes: (1) appraisal of all mechanical and environmental hazards and physical work practices, (2) appraisal of the present job safety and health program or the establishment of one, (3) a conference with management on findings, (4) a written report of recommendations and agreements and (5) training and assistance with implementing recommendations.

Closing Conference: The consultant will then review detailed findings with you in a closing conference. You will learn not what you need to improve, but what you are doing right, as well. At that time you can discuss problems, possible solutions and abatement periods to eliminate or control any serious hazards identified during the walkthrough.

In rare instances, the consultant may find a "imminent danger" situation during the walkthrough. If so, you must take immediate action to protect all employees. In certain other situations—those which would be judged a "serious violation" under OSHA criteria—you and the consultant are required to develop and agree to a reasonable plan and schedule to eliminate or control that hazard. The consultants will offer general approaches and options to you. They may also suggest other sources for technical help.

Abatement and Followthrough: Following the closing conference, the consultant will send you a detailed written report explaining the findings and confirming any abatement periods agreed upon. Consultants may also contact you from time to time to check your progress. You, of course, may always contact them for assistance.

Ultimately, OSHA does require hazard abatement so that each consultation visit achieves its objective—effective employee protection. If you fail to eliminate or control identified serious hazards (or an imminent danger) according to the plan and within the limits agreed upon or an agreed upon extension, the situation must be referred from consultation to an OSHA enforcement office for appropriate action. This, however, has occurred only rarely in the past.

Benefits: Knowledge of your workplace hazards and ways to eliminate them can only improve your own operations—and the management of your firm. You will get professional advice and assistance on the correction of workplace hazards and benefit from onsite training and assistance provided by the consultant to you and your employees. The consultant can help you establish or strengthen an employee safety and health program, making safety and health activities routine considerations rather than crisis-oriented responses.

In many states, employers may participate in OSHA’s “Safety and Health Achievement Recognition Program”—SHARP. This program is designed to provide incentives and support to smaller, high-hazard employers to develop, implement and continuously improve effective safety and health programs at their worksite(s). SHARP provides for recognition of employers who have demonstrated exemplary achievements in workplace safety and health by receiving a comprehensive safety and health consultation visit, correcting all workplace safety and health hazards, adopting and implementing effective safety and health management systems, and agreeing to request further consultative visits if major changes in working conditions or processes occur which may introduce new hazards. Employers who meet these specific SHARP requirements may be removed from OSHA’s programmed inspection list for a period of 1 year.

The Onsite Consultants **WILL:**

- Help you recognize hazards in your workplace,
- Suggest general approaches or options for solving a safety or health problem,

Identify kinds of help available if you need further assistance,

Provide you with a written report summarizing findings,

Assist you to develop or maintain an effective safety and health program,

Provide training and education for you and your employees, and

Recommend you for a 1-year exclusion from OSHA programmed inspections, once program criteria are met.

The Onsite Consultants **WILL NOT:**

Issue citations or propose penalties for violations of OSHA standards,

Report possible violations to OSHA enforcement staff, or

Guarantee that your workplace will “pass” an OSHA inspection.

For more information concerning consultation assistance, see the list of consultation projects in Appendix E.

Voluntary Protection Programs (VPP)

OSHA’s Voluntary Protection Programs (VPP) provide an opportunity for labor, management, and government to work together cooperatively to further the goal of providing effective safety and health protection in the workplace. The VPP grant recognition to worksites that provide or are committed to providing effective protection for their employees through implementation of systematically managed safety and health programs. The Star Program is for worksites that have at least 1 year’s experience with an effectively implemented safety and health program. The Merit Program is for worksites working toward an effectively implemented program. The Demonstration Program is for worksites with programs at Star quality but have some aspect of their program that requires further study by OSHA. All participants work in partnership with OSHA and provide models for OSHA and for their industries. For further information, either contact your OSHA regional office listed in Appendix E, or OSHA’s Division of Voluntary Programs (202-219-7266) at U.S. Department of Labor, Occupational Safety and Health Administration, 200 Constitution Avenue, NW, Room N3700, Washington, DC 20210.

Voluntary Protection Programs Participants Association (VPPPA)

The VPPPA has members in most states where the federal OSHA program operates and in many states where state plans are in force. The VPPPA is willing to provide information, outreach, and mentoring to help worksites improve their safety and health programs. Chapters of the National Association have been formed in most OSHA regions. Members of these chapters also are willing to provide the kind of assistance provided by the national organization. In order to contact your regional chapter of the Association, please call or write your OSHA Regional Office listed in the back of this publication. They will be able to provide you with the address and telephone number of the chapter in your region. To contact the VPPPA national organization, please call (703) 761-1146 or write to the following address:

Voluntary Protection Programs Participants
Association
7600 East Leesburg Pike
Suite 440
Falls Church, VA 22043

States with Approved Plans

The federal Occupational Safety and Health Act encourages each state to assume the fullest responsibility for the administration and enforcement of occupational safety and health programs.

For example, federal law permits any state to assert jurisdiction, under state law, over any occupational safety or health standard not covered by a federal standard.

In addition, any state may assume responsibility for the development and enforcement of its own occupational safety and health standards for those areas now covered by federal standards. However, the state must first submit a plan for approval by the Labor Department's Occupational Safety and Health Administration. Many states have done so.

Certain states are now operating under approved state plans. These states may have adopted the existing federal standards or may have developed their own standards. Some states also have changed the required poster. You need to know whether you are covered by a state plan operation, or are subject to the federal program, in order to determine which set of standards and regulations (federal or state) apply to you. The easiest way to determine this is to call the nearest OSHA area office.

If you are subject to state enforcement, the OSHA area office will explain this, explain whether the state is using the federal standards, and provide you with information on the poster and on the OSHA recordkeeping requirements. The OSHA area office will also refer you to the appropriate state government office for further assistance.

This assistance also may include the free onsite consultation visits described earlier. If you are subject to state enforcement, you should also take advantage of this service.

See list of OSHA-approved state plans in Appendix E.

Emergencies

For life-threatening situations, call (800) 321-OSHA. Complaints will go immediately to the nearest OSHA area or state office for help.

For further information on any OSHA program, contact your nearest OSHA area or regional office listed in this publication.

Other Sources of Help

Workers' Compensation Carriers and Other Insurance Companies

Many workers' compensation carriers as well as many liability and fire insurance companies conduct periodic inspections and visits to evaluate safety and health hazards. Managers of small and medium-sized businesses need to know what services are available from these sources. Contact your carrier and see what it has to offer.

Trade Associations and Employer Groups

Because of the increase in job safety and health awareness resulting from OSHA activities, many trade associations and employer groups have put a new emphasis on safety and health matters to better serve their members. If you are a member of such a group, find out how it is assisting its members. If you are not a member, find out if these groups are circulating their materials to nonmembers, as many do.

Trade Unions and Employee Groups

If your employees are organized, set up some communications, as you do in normal labor relations, to get coordinated action on hazards in your business. Safety and health is one area where advance planning will produce action on common goals. Many trade unions have safety and health expertise that they are willing to share.

The National Safety Council and Local Chapters

The National Safety Council has a broad range of information services available. If you have a local chapter of the NSC, you can call or visit to see how you can use materials pertaining to your business. If there is no chapter nearby, you can write:

National Safety Council
1121 Spring Lake Drive
Itasca, IL 60143-3201

Professional Associations

The following Professional Associations are an additional resource that may be able to provide assistance to you:

American Society of Safety Engineers
1800 East Oakton Street
Des Plaines, IL 60018-2187

American Industrial Hygiene Association
2700 Prosperity Avenue
Suite 250
Fairfax, VA 22031-4319

American Conference of Governmental Industrial Hygienists
1330 Kemper Meadow Drive
Cincinnati, Ohio 45240

For Specific Medical Consultation

Talk to your local doctors or clinics and see if one of them will advise you on workplace medical matters on a consulting basis.

You can contact your local Red Cross Chapter for assistance in first-aid training. If you cannot locate a local chapter, write:

American National Red Cross
National Headquarters
Safety Programs
2025 18th and E Streets, N.W.
Washington, D.C. 20006

Your Local Library

Many local or university libraries contain information on specific safety and health subjects pertaining to your business.

These materials are usually in reference rooms or technical subject areas. Ask your librarian what is available. The library may be able to obtain material for you, through inter-library loan, purchase, etc.

Two basic publications of the National Safety Council will give you many sources of technical information. The Accident Prevention Manual for Industrial Operations is a basic reference book for all safety and health work. The second, Fundamentals of Industrial Hygiene, contains excellent information on toxic materials and recommended health and hygiene practices. Both of these references have other sources listed at the end of each chapter that may help you in solving specific problems.

Financing Workplace Improvement

The Small Business Administration (SBA) is authorized to make loans to assist small businesses to meet OSHA standards. Because SBA's definition of a "small" business varies from industry to industry, it is advisable to contact your local SBA field office and ask whether you qualify.

If you have not been inspected by OSHA, now is the time to seek consultation to learn whether your workplace will require any improvements—and how much the improvements are going to cost. This can be done by calling your OSHA Regional Office. Staff there can assist you in assessing what improvements are needed and which standards relate to the condition(s) to be corrected.

A helpful hint, if you decide to apply for an SBA loan: experience indicates that most delays in processing SBA/OSHA loans are due to applications which either do not (1) adequately describe each workplace condition to be corrected and identify one or more OSHA standard(s) applicable to the condition to be corrected, or (2) provide a reasonable estimate of the cost to correct each condition.

In most cases, safety hazards can be corrected without financial assistance. Health hazards may be more costly to correct. The age and condition of the building and equipment are major factors to be considered.

Interest rate information on SBA loans may be obtained from any SBA office. They fluctuate but are generally lower than you can obtain elsewhere.

In addition, you may wish to consult your own bank. It pays to shop around for loans.

And don't forget to check with your accountant at income tax time, since safety and health improvements generally can be expended or depreciated.

Small Business Development Centers (SBDC's)

Small Business Development Centers (SBDC) provide up-to-date counseling, training, and technical assistance in all aspects of small business management. In addition to making special efforts to reach socially and economically disadvantaged groups, veterans, women, and the disabled, other services include, but are not limited to, assisting small business with financial, marketing, production, organization, engineering and technical problems, and feasibility studies. There are now 57 SBDC's—one in every state (Texas has four), the District of Columbia, Puerto Rico, the U.S. Virgin Islands, and Guam. Listed below are the lead organizations that sponsor the SBDC and manage the program.

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**APPENDIX A
OVERALL ACTION PLAN WORKSHEET**

Major Action Steps to be Taken	Priority (Assign Each Step a Number)	Projected Completion Date	Actual Completion Date
1. _____ _____ _____	_____	_____	_____
2. _____ _____ _____	_____	_____	_____
3. _____ _____ _____	_____	_____	_____
4. _____ _____ _____	_____	_____	_____
5. _____ _____ _____	_____	_____	_____
6. _____ _____ _____	_____	_____	_____
7. _____ _____ _____	_____	_____	_____
8. _____ _____ _____	_____	_____	_____
9. _____ _____ _____	_____	_____	_____
10. _____ _____ _____	_____	_____	_____

ACTION STEP

Description of Action to be Taken: _____

Specific Steps Required	Persons Assigned	Projected Completion Date	Problems/ Delays Encountered	Actual Completion Date
--------------------------------	-------------------------	----------------------------------	-------------------------------------	-------------------------------

1. _____

2. _____

3. _____

4. _____

APPENDIX B: MODEL POLICY STATEMENTS

The following statements serve merely as examples of what might be used or modified by employers to help prevent employee injury and illness.

“The Occupational Safety and Health Act of 1970 clearly states our common goal of safe and healthful working conditions. The safety and health of our employees continues to be the first consideration in the operation of this business.”

“Safety and health in our business must be a part of every operation. Without question it is every employee’s responsibility at all levels.”

“It is the intent of this company to comply with all laws. To do this we must constantly be aware of conditions in all work areas that can produce injuries. No employee is required to work at a job he or she knows is not safe or healthful. Your cooperation in detecting hazards and, in turn, controlling them is a condition of your employment. Inform your supervisor immediately of any situation beyond your ability or authority to correct.”

“The personal safety and health of each employee of this company is of primary importance. The prevention of occupationally-induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity whenever necessary. To the greatest degree possible, management will provide all mechanical and physical facilities required for personal safety and health in keeping with the highest standards.”

“We will maintain a safety and health program conforming to the best practices of organizations of this type. To be successful, such a program must embody the proper attitudes toward injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and his or her co-workers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved.”

“Our objective is a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with, but surpassing, the best experience of operations similar to ours. Our goal is zero accidents and injuries.”

“Our safety and health program will include:

- Providing mechanical and physical safeguards to the maximum extent possible.
- Conducting a program of safety and health inspections to find and eliminate unsafe working conditions or practices, to control health hazards, and to comply fully with the safety and health standards for every job.
- Training all employees in good safety and health practices.
- Providing necessary personal protective equipment and instructions for its use and care.
- Developing and enforcing safety and health rules and requiring that employees cooperate with these rules as a condition of employment.
- Investigating, promptly and thoroughly, every accident to find out what caused it and to correct the problem so that it won’t happen again.
- Setting up a system of recognition and awards for outstanding safety service or performance.”

“We recognize that the responsibilities for safety and health are shared:

- The employer accepts the responsibility for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions.
- Supervisors are responsible for developing the proper attitudes toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves.
- Employees are responsible for wholehearted, genuine operation with all aspects of the safety and health program including compliance with all rules and regulations—and for continuously practicing safety while performing their duties.”

APPENDIX C: CODES OF SAFE PRACTICES

This is a suggested code. It is general in nature and inclusive of many types of small business activities. It is intended only as a model which you can redraft to describe your own particular work environment.

General Policy

1. All employees of this firm shall follow these safe practice rules, render every possible aid to safe operations, and report all unsafe conditions or practices to the supervisor/employer.
2. Supervisors shall insist that employees observe and obey every rule, regulation and order necessary to the safe conduct of the work, and shall take such action necessary to obtain compliance.
3. All employees shall be given frequent accident prevention instructions. Instructions, practice drills and articles concerning workplace safety and health shall be given at least once every ____ working days.
4. Anyone known to be under the influence of alcohol and/or drugs shall not be allowed on the job while in that condition. Persons with symptoms of alcohol and/or drug abuse are encouraged to discuss personal or work-related problems with the supervisor/employer.
5. No one shall knowingly be permitted or required to work while his or her ability or alertness is impaired by fatigue, illness or other causes that might expose the individual or others to injury.
6. Employees should be alert to see that all guards and other protective devices are in proper places and adjusted, and shall report deficiencies. Approved protective equipment shall be worn in specified work areas.
7. Horseplay, scuffling and other acts which tend to endanger the safety or well-being of employees are prohibited.

8. Work shall be well-planned and supervised to prevent injuries when working with equipment and handling heavy materials. When lifting heavy objects, employees should bend their knees and use the large muscles of the leg instead of the smaller muscles of the back. Back injuries are the most frequent and often the most persistent and painful type of workplace injury.
9. Workers shall not handle or tamper with any electrical equipment, machinery or air or water lines in a manner not within the scope of their duties, unless they have received instructions from their supervisor/employer.
10. All injuries shall be reported promptly to the supervisor/employer so that arrangements can be made for medical and/or first-aid treatment. First-aid materials are located in _____, emergency, fire, ambulance, rescue squad, and doctor's telephone numbers are located on _____, and fire extinguishers are located at _____.

Suggested Safety Rules

- Do not throw material, tools or other objects from heights (whether structures or buildings) until proper precautions are taken to protect others from the falling object hazard.
- Wash thoroughly after handling injurious or poisonous substances.
- Gasoline shall not be used for cleaning purposes.
- Arrange work so that you are able to face ladder and use both hands while climbing.

Use of Tools and Equipment

- Keep faces of hammers in good condition to avoid flying nails and bruised fingers.
- Files shall be equipped with handles; never use a file as a punch or pry.
- Do not use a screwdriver as a chisel.
- Do not lift or lower portable electric tools by the power cords; use a rope.
- Do not leave the cords of these tools where cars or trucks will run over them.

Machinery and Vehicles

- Do not attempt to operate machinery or equipment without special permission, unless it is one of your regular duties.
- Loose or frayed clothing, dangling ties, finger rings, and similar items must not be worn around moving machinery or other places where they can get caught.
- Machinery shall not be repaired or adjusted while in operation.

APPENDIX D: OSHA JOB SAFETY AND HEALTH STANDARDS, REGULATIONS, AND REQUIREMENTS

OSHA has four separate sets of standards: General Industry (*29 Code of Federal Regulations* [CFR] 1910), Construction (29 CFR 1926), Maritime Employment (29 CFR 1915-1919), and Agriculture (29 CFR 1928). OSHA has regulations on posting and other administrative matters in 29 CFR 1903 and on recording and reporting of injuries and illnesses in 29 CFR 1904.

The OSH Act also has a general duty clause, section 5(a)(1), 29 U.S.C. 654(b)(1), which provides that

- (a) Each employer. . .
 - (1) shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees.

A recognized hazard is a danger recognized by the employer's industry or industry in general, by the employer, or by common sense. The general duty clause does not apply if there is an OSHA standard dealing with the hazard, unless the employer knows that the standard does not adequately address the hazard.

To order a copy of OSHA regulations, use the order form at the end of this handbook.

After you have obtained a copy of the current standards, those that apply to your business can be identified easily by a process of elimination. Read the introduction to the subpart heading, then analyze the possible hazards mentioned, but only in terms of **your** workplace, **your** equipment, **your** materials and **your** employees.

For example, if you are engaged in retail trade or service and you do not have compressed gases, flammables or explosives on your premises, you can eliminate Hazardous Materials (Subpart H) as not applying to your business.

If you have any questions determining whether a standard is applicable to your workplace, you may contact the nearest OSHA Area Office for assistance. Staff there should be able to answer any questions you may have about standards, as well as give you general guidelines on methods of implementing them in your workplace.

Small businesses are especially encouraged to participate in the development of standards.

APPENDIX E: OSHA OFFICES

Directory of OSHA-Funded Consultation Programs

Alabama

7(c)(1) Onsite Consultation Program
425 Martha Parham West
P.O. Box 870388
Tuscaloosa, AL 35487
(205) 348-3033

Alaska

Division of Consultation and Training
ADOL/OSHA
3301 Eagle Street
P.O. Box 107022
Anchorage, AK 99150
(907) 269-4954

Arizona

Consultation and Training
Division of Occupational Safety and Health
Industrial Commission of Arizona
800 West Washington
Phoenix, AZ 85007-9070
(602) 542-5795

Arkansas

OSHA Consultation
Arkansas Department of Labor
10421 West Markham
Little Rock, AK 72205
(501) 682-4522

California

CAL/OSHA Consultation Service
Department of Industrial Relations
Suite 1260
45 Fremont Street
San Francisco, CA 94105
(415) 972-8515

Colorado

Occupational Safety and Health Section
Colorado State University
110 Veterinary Science Building
Fort Collins, CO 80523
(970) 491-6151

Connecticut

Division of Occupational Safety and Health
Connecticut Department of Labor
200 Folly Brook Boulevard
Wethersfield, CT 06109
(860)566-4550

Delaware

Occupational Safety and Health
Division of Industrial Affairs
Delaware Department of Labor
820 North French Street, 6th Floor
Wilmington, DE 19801
(302) 577-3908

District of Columbia

Office of Occupational Safety and Health
District of Columbia
Department of Employment Services
950 Upshur Street, N.W.
Washington, DC 20011
(202) 576-6339

Florida

7(c) (1) Onsite Consultation Program
Division of Safety
Florida Department of Labor and Employment Security
2002 St. Augustine Road
Building E, Suite 45
Tallahassee, FL 32399-0663
(904) 488-3044

Georgia

7(c)(1) Onsite Consultation Program
Georgia Institute of Technology
O'Keefe Building - Room 23
Atlanta, GA 30332
(404) 894-2643

Guam

OSHA Onsite Consultation
Department of Labor, Government of Guam
P.O. Box 9970
Tamuning, GU 96931
(671) 475-0136

Hawaii

Consultation and Training Branch
Dept of Labor and Industrial Relations
830 Punchbowl Street
Honolulu, HI 96813
(808) 586-9100

Idaho

Safety and Health Consultation Program
Boise State University
Department of Health Studies
1910 University Drive, ET-338A
Boise, ID 83725
(208) 385-3283

Illinois

Illinois Onsite Consultation
Industrial Services Division
Department of Commerce and Community Affairs
State of Illinois Center
100 West Randolph St.
Suite 3400
Chicago, IL 60601
(312) 814-2337

Indiana

Division of Labor
Bureau of Safety, Education and Training
402 West Washington
Room W195
Indianapolis, IN 46204-2287
(317) 232-2688

Iowa

7(c)(1) Consultation Program
Iowa Bureau of Labor
1000 East Grand Avenue
Des Moines, IA 50319
(515) 281-5352

Kansas

Kansas 7(c) (1) Consultation Program
Kansas Department of Human Resources
512 South West 6th Street
Topeka, KS 66603-3150
(913) 296-7476

Kentucky

Division of Education and Training
Kentucky Labor Cabinet
1047 U.S. Highway 127, South
Frankfort, KY 40601
(502) 564-6896

Louisiana

7(c)(1) Consultation Program
Louisiana Department of Labor
Post Office Box 94094
Baton Rouge, LA 70804-9094
(504) 342-9601

Maine

Maine Bureau of Labor Stds.
Division of Industrial Safety
State House Station 82
Augusta, ME 04333
(207) 624-6460

Maryland

Division of Labor and Industry
501 Saint Paul Place, 3rd Floor
Baltimore, MD 21202
(410) 333-4210

Massachusetts

The Commonwealth of Massachusetts
Department of Labor and Industries
1001 Watertown Street
West Newton, MA 02165
(617) 727-3982

Michigan

Michigan Department of Public Health
Division of Occupational Health
3423 N. Logan Street
P.O. Box 30195
Lansing, MI 48909
(517) 335-8250

Michigan Department of Labor
Bureau of Safety and Regulation
7150 Harris Drive
Lansing, MI 48909
(517)322-1809

Minnesota

Department of Labor and Industry
Consultation Division
443 Lafayette Road
St. Paul, MN 55155
(612) 297-5433

Mississippi

Mississippi State University
Center for Safety and Health
2906 North State Street
Suite 201
Jackson, MS 39216
(601) 987-3981

Missouri

Onsite Consultation Program
Division of Labor Standards
Department of Labor
and Industrial Relations
3315 West Truman Boulevard
Post Office Box 449
Jefferson City, MO 65109
(314)751-3403

Montana

Department of Labor and Industry
Safety Bureau
Post Office Box 1728
Helena, MT 59624-1728
(406)444-6418

Nebraska

Division of Safety, Labor and Safety Standards
Nebraska Department of Labor
State Office Building
301 Centennial Mall, South
Lincoln, NE 68509-5024
(402) 471-4717

Nevada

Division of Preventive Safety
Department of Industrial Relations
Suite 106
2500 W. Washington
Las Vegas, NV 89106
(702) 486-5016

New Hampshire

New Hampshire Department of Labor
Division of Public Health Services
6 Hazen Drive
Concord, NH 03301-6527
(603) 271-2024

New Jersey

Division of Workplace Standards
New Jersey Department of Labor
STATION PLAZA 4, CN953
22 South Clinton Avenue
Trenton, NJ 08625-0953
(609) 292-3923

New Mexico

New Mexico Environment Dept.
Occupational Health and Safety
Post Office Box 26110
1190 St. Francis Drive
Santa Fe, NM 87502
(505) 827-2877

New York

Division of Safety and Health
State Office Campus
Building 12, Room 457
Albany, NY 12240
(518) 457-2481

North Carolina

Bureau of Consultative Services
North Carolina Department of Labor
Suite 105
319 Chapanoke Road
Raleigh, NC 27603-3432
(919) 662-4644

North Dakota

Division of Environmental Engineering
1200 Missouri Avenue, Room 304
Bismarck, ND 58506-5520
(701) 328-5188

Ohio

OSHA Onsite Consultation
Bureau of Employment Services
145 S. Front Street
Columbus, OH 43216
(614) 644-2246

Oklahoma

OSHA Division
Oklahoma Department of Labor
4001 North Lincoln Boulevard
Oklahoma City, OK 73105-5212
(405) 528-1500

Oregon

Department of Insurance and Finance/APD
Occupational Safety and Health Division
Labor & Industries Bldg., Room 430
350 Winter Street, N.E.
Salem, OR 97310
(503) 378-3272

Pennsylvania

Indiana University of Pennsylvania
Safety Sciences Department
205 Uhler Hall
Indiana, PA 15705
(412) 357-2561

Puerto Rico

Occupational Safety and Health Office
Puerto Rico Department of Labor
and Human Resources
505 Munoz Rivera Avenue,
Hato Rey, PR 00918
(809) 754-2188

Rhode Island

Division of Occupational Health
Rhode Island Department of Health
3 Capital Hill
Providence, RI 02908
(401) 277-2438

South Carolina

South Carolina Department of Labor, Licensing
& Regulation
3600 Forest Drive
P.O. Box 11329
Columbia, SC 29211
(803) 734-9599

South Dakota

Engineering Extension
Onsite Technical Division
South Dakota State University
Box 510, 210 Pugsley Circle
Brookings, SD 57007
(605) 688-4101

Tennessee

OSHA Consultative Services
Tennessee Department of Labor
3rd Floor
710 James Robertson Parkway
Nashville, TN 37243-0659
(615) 741 -7036

Texas

Workers' Compensation Commission
Workers' Safety Division
Southfield Building
4000 South I H 35
Austin, TX 78704
(512) 440-3834

Utah

Utah Industrial Commission
Consultation Service
160 East 300 South
Salt Lake City, UT 84114-6650
(801) 530-6868

Vermont

Division of Occupational Safety and Health
Vermont Department of Labor and Industry
National Life Building,
Drawer #20
Montpelier, VT 05602
(802) 828-2765

Virginia

Virginia Department of Labor and Industry
Occupational Safety and Health
Training and Consultation
13 S. 13th Street
Richmond, VA 23219
(804) 786-6613

Virgin Islands

Division of Occupational Safety and Health
Virgin Islands Department of Labor
3012 Golden Rock
Christiansted
St. Croix, Virgin Island 00820
(809) 772-1315

Washington

Washington Department of Labor and Industries
Division of Industrial Safety and Health
Post Office Box 44643
Olympia, WA 98504
(360) 902-5443

West Virginia

West Virginia Department of Labor
Capitol Complex Building 3, Room 319
1800 E. Washington Street
Charleston, WV 25305
(304) 558-7890

Wisconsin

Section of Occupational Health
Wisconsin Department of Health and Human Services
1414 E. Washington Avenue Room 112
Madison, WI 53703
(608) 266-8579

Wisconsin Department of Industry Labor and Human
Relations

Bureau of Safety Inspection
401 Pilot Court, Suite C
Waukesha, WI 53188
(414) 521-5188

Wyoming

Wyoming Department of Employment
Workers' Safety and Compensation Division
Herschler Building, 2 East
122 West 25th Street
Cheyenne, WY 82002
(307) 777-7786

States with Approved Plans

Commissioner

Alaska Department of Labor
1111 West 8th Street
Room 306
Juneau, AK 99801
(907) 465-2700

Director

Industrial Commission of Arizona
800 W. Washington
Phoenix, AZ 85007
(602) 542-5795

Director

California Department of Industrial Relations
45 Fremont Street
San Francisco, CA 94105
(415) 972-8835

Commissioner

Connecticut Department of Labor
200 Folly Brook Boulevard
Wethersfield, CT 06109
(203) 566-5123

Director

Hawaii Department of Labor and Industrial Relations
830 Punchbowl Street
Honolulu, HI 96813
(808) 586-8844

Commissioner

Indiana Department of Labor
State Office Building
402 West Washington Street
Room W195
Indianapolis, IN 46204
(317) 232-2378

Commissioner

Iowa Division of Labor Services
1000 E. Grand Avenue
Des Moines, IA 50319
(515) 281-3447

Secretary

Kentucky Labor Cabinet
1049 U.S. Highway, 127 South
Frankfort, KY 40601
(502) 564-3070

Commissioner

Maryland Division of Labor and Industry
Department of Labor Licensing and Regulation
501 St. Paul Place, 2nd Floor
Baltimore, MD 21202-2272
(410) 333-4179

Director

Michigan Department of Labor
Victor Office Center
201 N. Washington Square
P.O. Box 30015
Lansing, MI 48933
(517) 373-9600

Director

Michigan Department of Public Health
3423 North Logan Street
Box 30195
Lansing, MI 48909
(517) 335-8022

Commissioner

Minnesota Department of Labor and Industry
443 Lafayette Road
St. Paul, MN 55155
(612) 296-2342

Director

Nevada Division of Industrial Relations
400 West King Street
Carson City, NV 97502
(702) 687-3032

Secretary

New Mexico Environment Department
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, NM 87502
(505) 827-2850

Commissioner

New York Department of Labor
W. Averell Harriman State Office Building - 12,
Room 500
Albany, NY 12240
(518) 457-2741

Commissioner

North Carolina Department of Labor
319 Chapanoke Road
Raleigh, NC 27603
(919) 662-4585

Administrator

Department of Consumer & Business Services
Occupational Safety and Health Division (OR-OSHA)
Labor and Industries Bldg., Room 430
Salem, OR 97310
(503) 378-3272

Secretary

Puerto Rico Department of Labor and Human Resources
Prudencio Rivera Martinez Building
505 Munoz Rivera Avenue
Hato Rey, PR 00918
(809) 754-2119

Commissioner

South Carolina Department of Labor
Licensing and Regulation
3600 Forest Drive
P.O. Box 11329
Columbia, SC 29211-1329
(803) 734-9594

Commissioner

Tennessee Department of Labor
Attention: Robert Taylor
710 James Robertson Parkway
Nashville, TN 37243-0659
(615) 741-2582

Commissioner

Industrial Commission of Utah
160 East 300 South, 3rd Floor
P.O. Box 146600
Salt Lake City, UT 84114-6600
(801) 530-6898

Commissioner

Vermont Department of Labor and Industry
National Life Building - Drawer 20
120 State Street
Montpelier, VT 05620
(802) 828-2288

Commissioner

Virginia Department of Labor and Industry
Powers-Taylor Building
13 South 13th Street
Richmond, VA 23219
(804) 786-2377

Commissioner

Virgin Islands Department of Labor
2131 Hospital Street, Box 890
Christiansted
St. Croix, VI 00820-4666
(809) 773-1994

Director

Washington Department of Labor and Industries
General Administrative Building
P.O. Box 44000
Olympia, WA 98504-4000
(360) 902-4200

Administrator

Worker's Safety and Compensation Division (WSC)
Wyoming Department of Employment
Herschler Building, 2nd Floor East
122 West 25th Street
Cheyenne, WY 82002
(307) 777-7786

Connecticut and New York have programs which cover only state and local government operations.

Contacting OSHA Regional and Area Offices

The following is a list of addresses and telephone numbers of OSHA regional and area offices. These offices are sources of information, publications, and assistance in understanding the requirements of the standards.

They can furnish you the basic publications you need:

1. Job Safety and Health Protection (the OSHA workplace poster).
2. The OSHA recordkeeping requirements.
3. A copy of the appropriate set of standards.
4. A large selection of publications concerned with safe work practices, control of hazardous substances, employer and employee rights and responsibilities and other subjects.

Feel free to contact these offices by phone, by mail or in person, without fear of triggering an inspection. However, if you request OSHA compliance personnel to visit your place of business, they are required to issue citations if a violation of an OSHA standard is observed. (We suggest you request a consultation visit instead.)

Regional Offices

If you are unable to contact your local OSHA Area Office, you may contact the appropriate OSHA Regional Office for information and/or assistance.

Region I
(CT,* MA, ME, NH, RI, VT*)
133 Portland Street
1st Floor
Boston, MA 02114
Telephone: (617) 565-7164

Region II
(NJ, NY,* PR,* VI*)
201 Varick Street
Room 670
New York, NY 10014
Telephone: (212) 337-2378

Region III
(DC, DE, MD,* PA, VA,* WV)
Gateway Building, Suite 2100
3535 Market Street
Philadelphia, PA 19104
Telephone: (215) 596-1201

Region IV
(AL, FL, GA, KY,* MS, NC, SC,* TN*)
1375 Peachtree Street, N.E.
Suite 587
Atlanta, GA 30367
Telephone: (404) 347-3573

Region V
(IL, IN,* MI,* MN,* OH, WI)
230 South Dearborn Street
Room 3244
Chicago, IL 60604
Telephone: (312) 353-2220

Region VI
(AR, LA, NM,* OK, TX)
525 Griffin Street
Room 602
Dallas, TX 75202
Telephone: (214) 767-4731

Region VII
(IA,* KS, MO, NE)
City Center Square
1100 Main Street, Suite 800
Kansas City, MO 64105
Telephone: (816) 426-5861

Region VIII
(CO, MT, ND, SD, UT,* WY*)
Suite 1690
1999 Broadway
Denver, CO 80202-5716
Telephone: (303) 844-1600

Region IX
(American Samoa, AZ,* CA,* Guam, HI,* NV,*
Trust Territories of the Pacific)
71 Stevenson Street
Room 420
San Francisco, CA 94105
Telephone: (415) 975-4310

Region X
(AK,* ID, OR,* WA*)
1111 Third Avenue
Suite 715
Seattle, WA 98101-3212
Telephone: (206) 553-5930

*These states and territories operate their own OSHA-approved job safety and health programs (Connecticut and New York plans cover public employees only). States with approved programs must have a standard that is identical to, or at least as effective as, the federal standard.

Area Offices

Alabama

Birmingham, AL 35216

2047 Canyon Road - Todd Mall
Telephone: (205) 731-1500

Mobile, AL 36693

3737 Government Blvd.
Suite 100
Telephone: (334) 441-6131

Alaska

Anchorage, AK 99503

301 W. Northern Lights Blvd.
Suite 407
Telephone: (907) 271-5152

Arizona

Phoenix, AZ 85016

3221 North 16th Street
Suite 100
Telephone: (602) 640-2007

Arkansas

Little Rock, AR 72201

425 West Capitol
Suite 450
Telephone: (501) 324-6291

California

San Francisco, CA 94105

71 Stevenson Street
Suite 415
Telephone: (415) 744-7120

Colorado

Denver, CO 80204

1391 North Speer Blvd.
Suite 210
Telephone: (303) 844-5285

Englewood, CO 80111-2714

7935 E. Prentice Ave.
Suite 209
Telephone: (303) 843-4500

Connecticut

Bridgeport, CT 06604

One Lafayette Square
Suite 202
Telephone: (203) 579-5581

Hartford, CT 06103

Federal Office Building
450 Main Street, Room 508
Telephone: (203) 240-3152

Florida

Fort Lauderdale, FL 33324

Jacaranda Executive Court
8040 Peters Road
Building H-100
Telephone: (305) 424-0242

Jacksonville, FL 32207

Ribault Building
1851 Executive Center Drive
Suite 227
Telephone: (904) 232-2895

Tampa, FL 33610

5807 Breckenridge Pkwy.
Suite A
Telephone: (813) 626-1177

Georgia

Savannah, GA 31406

450 Mall Blvd., Suite J
Telephone: (912) 652-4393

Smyrna, GA 30080

2400 Herodian Way
Suite 250
Telephone: (404) 984-8700

Tucker, GA 30084

Bldg. 7, Suite 110
La Vista Perimeter Office Park
Telephone: (404) 493-6644

Hawaii

Honolulu, HI 96850

300 Ala Moana Blvd.
Suite 5122
Telephone: (808) 541-2685

Idaho

Boise, ID 83703

3050 N. Lakeharbor Lane
Suite 134
Telephone: (208) 334-1867

Illinois

Calumet City, IL 60409

1600 167th Street, Suite 12
Telephone: (708) 891-3800

Des Plaines, IL 60018

2360 E. Devon Avenue
Suite 1010
Telephone: (847) 803-4800

North Aurora, IL 60542

344 Smoke Tree Business Park
Telephone: (630) 896-8700

Peoria, IL 61614

2918 West Willow Knolls Road
Telephone: (309) 671-7033

Indiana

Indianapolis, IN 46204

46 East Ohio Street, Room 423
Telephone: (317) 226-7290

Iowa

Des Moines, IA 50309

210 Walnut Street, Room 815
Telephone: (515) 284-4794

Kansas

Wichita, KS 67202

300 Epic Center
301 N. Main
Telephone: (316) 269-6644

Kentucky

Frankfort, KY 40601

John C. Watts Fed. Bldg., Room
108
330 W. Broadway
Telephone: (502) 227-7024

Louisiana

Baton Rouge, LA 70806
2156 Wooddale Blvd.
Hoover Annex, Suite 200
Telephone: (504) 389-0474

Maine

Bangor, ME 04401
U.S. Federal Building
202 Harlow Street, Room 211
Telephone: (207) 941-8177

Maryland

Baltimore, MD 21201
300 West Pratt Street
Suite 280
Telephone: (410) 962-2840

Massachusetts

Braintree, MA 02184
639 Granite Street, 4th Floor
Telephone: (617) 565-6924

Methuen, MA 01844
Valley Office Park
13 Branch Street
Telephone: (617) 565-8110

Springfield, MA 01103-1493
1145 Main Street, Room 108
Telephone: (413) 785-0123

Michigan

Lansing, MI 48917-4200
801 South Waverly Rd.
Suite 306
Telephone: (517) 377-1892

Minnesota

Minneapolis, MN 55401
Federal Courts Bldg.
110 South 4th Street, Room 116
Telephone: (612) 348-1994

Mississippi

Jackson, MS 39211
3780 I-55 North
Suite 210
Telephone: (601) 965-4606

Missouri

Kansas City, MO 64120
6200 Connecticut Avenue
Suite 100
Telephone: (816) 483-9531

St. Louis, MO 631011
911 Washington Avenue
Room 420
Telephone: (314) 425-4249

Montana

Billings, MT 59101
US Department of Labor - OSHA
19 N. 25th Street
Telephone: (406) 657-6649

Nebraska

Omaha, NE 68106
Overland Wolf Bldg.
Room 100
6910 Pacific Street
Telephone: (402) 221-3182

Nevada

Carson City, NV 89701
1050 East Williams
Suite 435
Telephone: (702) 885-6963

New Hampshire

Concord, NH 03301
279 Pleasant Street
Suite 201
Telephone: (603) 225-1629

New Jersey

Avenel, NJ 07001
1030 Saint Georges Ave.
Plaza 35, Suite 205
Telephone: (908) 750-3270

Hasbrouck Heights, NJ 07604

500 Route 17 South
2nd Floor
Telephone: (201) 288-1700

Marlton, NJ 08053

Marlton Executive Park
701 Route 73 South Bldg. 2
Suite 120
Telephone: (609) 757-5181

Parsippany, NJ 07054

299 Cherry Hill Road
Suite 304
Telephone: (201) 263-1003

New Mexico**Albuquerque, NM 87102-2160**

505 Marquette Avenue, NW
Suite 820
Telephone: (505) 248-5302

New York**Albany, New York 12205-3809**

401 New Karner Road
Suite 300
Telephone: (518) 464-6742

Bayside, NY 11361

42-40 Bell Blvd. 5th Floor
Telephone: (718) 279-9060

Bowmansville, NY 14026

5360 Genesee Street
Telephone: (716) 684-3891

New York, NY 10007

90 Church Street, Room 1407
Telephone: (212) 264-9840

Syracuse, NY 13212

3300 Vikery Road, North New
Telephone: (315) 451-0808

Tarrytown, NY 10591-5107

660 White Plains Road
4th Floor
Telephone: (914) 524-7510

Westbury, NY 11590

990 Westbury Road
Telephone: (516) 334-3344

North Carolina

Raleigh, NC 27601

Century Station, Room 438
300 Fayetteville Street Mall
Telephone: (919) 856-4770

North Dakota

Bismarck, ND 58501

220 E. Rosser, Room 348
P.O. Box 2439
Telephone: (701) 250-4521

Ohio

Cincinnati, OH 45246

36 Triangle Park Drive
Telephone: (513) 841-4132

Cleveland, OH 44199

Federal Office Building
Room 899
1240 East Ninth Street
Telephone: (216) 522-3818

Columbus, OH 43215

Federal Office Bldg.
Room 620
200 N. High Street
Telephone: (614) 469-5582

Toledo, OH 43604

Federal Office Bldg.
Room 734
234 North Summit Street
Telephone: (419) 259-7542

Oklahoma

Oklahoma City, OK 73102

420 West Main Place
Suite 300
Telephone: (405) 231-5351

Oregon

Portland, OR 97294

1220 S.W. Third Avenue
Room 640
Telephone: (503) 326-2251

Pennsylvania

Allentown, PA 18102

850 N. 5th Street
Telephone: (610) 776-0592

Erie, PA 16506-1857

3939 West Ridge Road
Suite B-12
Telephone: (814) 833-5758

Harrisburg, PA 17109

Progress Plaza
49 N. Progress Street
Telephone: (717) 782-3902

Philadelphia, PA 19106

U.S. Custom House, Room 242
Second and Chestnut Street
Telephone: (215) 597-4955

Pittsburgh, PA 15222

Federal Building, Room 1428
1000 Liberty Avenue
Telephone: (412) 644-2903

Wilkes-Barre, PA 18701

Penn Place, Room 2005
20 North Pennsylvania Avenue
Telephone: (717) 826-6538

Puerto Rico

Guaynabo, PR 00968

BBV Plaza Building
1510 F. D. Roosevelt Avenue
Suite 5B
Telephone: (787) 277-1560

Rhode Island

Providence, RI 02903

380 Westminster Mall
Room 243
Telephone: (401) 528-4669

South Carolina

Columbia, SC 29201

1835 Assembly Street, Room 1468
Telephone: (803) 765-5904

Tennessee

Nashville, TN 37215

2002 Richard Jones Road
Suite C-205
Telephone: (615) 781-5423

Texas

Austin, TX 78701

903 San Jacinto Blvd.
Suite 319
Telephone: (512) 482-5783

Corpus Christi, TX 78476

Wilson Plaza
606 N. Carancahua, Suite 700
Telephone: (512) 888-3420

Dallas, TX 75228

8344 East R.L. Thornton Freeway
Suite 420
Telephone: (214) 320-2400

Fort Worth, TX 76180-7604

North Star 2 Building
Suite 430
8713 Airport Freeway
Telephone: (817) 885-7025

Houston, TX 77058

17625 El Camino Real
Suite 400
Telephone: (713) 286-0583

Houston, TX 77058

350 North San Houston Parkway
Suite 120
Telephone: (713) 591-2438

Lubbock, TX 79401

Federal Building, Room 422
1205 Texas Avenue
Telephone: (806) 743-7681

Utah

Salt Lake City, UT 84165-0200

1781 South 300 West
Telephone: (801) 524-5080

Virginia

Norfolk, VA 23510

AFOB, Room 835
200 Granby Mall
Telephone: (804) 441-3820

Washington

Bellevue, WA 98004

505 16th Avenue, N.E.
Telephone: (206) 553-7520

West Virginia

Charleston, WV 25301

550 Eagan Street, Room 206
Telephone: (304) 347-5937

Wisconsin

Appleton, WI 59415

2618 North Ballard Road
Telephone: (414) 734-4521

Madison, WI 53716

4802 East Broadway
Telephone: (608) 264-5388

Milwaukee, WI 53203

Henry S. Reuss Bldg.
Suite 1180
310 West Wisconsin Ave.
Telephone: (414) 297-3315

