

Health & Safety Compliance Auditing: Regularly Overlooked Issues

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Objective

Identify Health and Safety deficiencies commonly identified during compliance audits.

Background

- ◆ Common deficiencies identified in over 100+ third party compliance audits
- ◆ Audit findings that are not typically recognized by facility personnel

Recordkeeping Findings

- ◆ OSHA Recordable
 - Cases recorded that were first aid only
 - Cases not recorded when prescriptions issued

Walking-Working Surface Findings

- ◆ Unguarded platforms
 - Loading Docks
 - Pits
 - Use of chains for guarding
- ◆ No posted load ratings
 - Mezzanines
 - Upper Floors
- ◆ Fixed ladders
 - Not present to equipment needing routine attention
 - Non-compliant design

Means of Egress

- ◆ Exits not adequately illuminated or routes not identified
- ◆ Exits through “lockable” doors
- ◆ In swing doors
- ◆ Egress to an area of higher hazard
 - Storage of flammables


Ventilation

- ◆ Spray operations
 - Cross-drafts, e.g. pedestal fan usage
 - Testing not performed or manometer readings not taken
- ◆ Dip Tanks
 - Quarterly inspections and testing not performed

Hearing Conservation

- ◆ Standard not posted in the workplace
- ◆ Noise reduction not calculated for hearing protectors
- ◆ Attenuation not implemented

PPE Programs

- ◆ PPE assessments not certified
 - ◆ Use of wrong hand protection, e.g. non-compatibility with chemicals
 - ◆ Modified PPE use
 - ◆ Non-compliant "safety glasses"
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Hazardous Material Usage and Storage

- ◆ Excess storage of flammable and combustibles
- ◆ Excess number of flammable cabinets per fire area
- ◆ Maintaining minimum clearances in front and to the sides of spray booths
- ◆ Open spraying of flammables without regard to Class and Division
- ◆ Use of flammables liquids in sonic cleaners

Sanitation

- ◆ Non-potable and potable water systems not labeled
- ◆ No backflow prevention to prevent siphoning from processes
- ◆ Use of non-potable water for hand washing

Confined Spaces and LOTO

- ◆ HVAC components and machining equipment not assessed as PRCS
- ◆ Annual LOTO inspections and verifications not performed

Machine Guarding

- ◆ Pressure vessel relief valves not frequently and regularly tested
- ◆ Point of operation guarding – openings not evaluated for proper size
- ◆ Machinery not anchored
- ◆ Anti-restart devices not installed on saws, etc.
- ◆ Dogs missing from radial arm saws

Material Handling

- ◆ Shelving not anchored nor labeled with capacities
- ◆ Use of non-approved attachments on fork trucks
- ◆ Battery charging stations unprotected and no spill kits available
- ◆ Cranes and hoists not labeled properly and daily checks not performed
- ◆ Lifting fixtures not rated for load capacities

Employee Exposures

- ◆ Eyewash and drench showers are not tested and compliant with ANSI Z358.1 where corrosives are present
- ◆ First aid training and appropriate kits available in areas of highly hazardous chemicals, e.g. HCN, HF

Employee Exposures

- ◆ By-products of reactions not identified nor evaluated
 - Metallic salts and acids
 - Phosgene, ozone and fluorides from welding operations
 - VOC's off-gassing from processes
- ◆ Dermal exposures and irritations
 - Metals
 - Aldehydes

Radiation

◆ Ionizing

- Periodic evaluation by Geiger-Mueller Instrument
- Employees do not understand results of dosimetry

◆ Non-ionizing

- No Laser Safety Program
- No evaluation of NHZ
- Employees not aware of different laser classes

Haz Com

- ◆ No inventory of chemicals
- ◆ MSDS' not available or out-of-date
- ◆ Employees have not received chemical specific training

Q&A

Thank you!