



**COMPANY
HEALTH & SAFETY
PROGRAM**

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1.0 PURPOSE

The purpose of this section is to communicate to PPP project supervisors, and others, company policy and procedures regarding government conducted safety and health inspections.

2.0 SCOPE

This section provides guidelines for PPP job-site supervisors to follow in the event of a government safety or health compliance inspection.

3.0 INDEX TO SECTION

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- 6.0 Procedures and Responsibilities

4.0 OVERVIEW

The procedures provided in this section apply to all PPP jobsites, both, in states where occupational safety and health are regulated and enforced by the Federal Occupational Safety & Health Administration (OSHA) and in states with their own programs authorized by Federal OSHA. PPP's headquarters state of Michigan has its own administration, MIOSHA, under the Department of Energy, Labor and Economic Growth.

Inspections are performed by safety and health compliance officers (inspectors). It is PPP's intent to be prepared for inspections not only by being in compliance with safety and health regulations, but also by having employees prepared to represent PPP to inspectors in the most professional manner possible.



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5.0 INSPECTION PRIORITIES

OSHA has established a system of inspection priorities as follows:

1. ***Imminent danger***, where there is reasonable certainty that a danger exists that can be expected to cause death or serious physical harm immediately or before the danger can be eliminated through normal enforcement procedures.
2. ***Catastrophes and fatal accidents***; where there is an incident causing a fatality or the hospitalization of three or more employees.
3. ***Employee complaints***; where employees make a formal complaint of alleged violations of standards or of unsafe or unhealthful working conditions.
4. ***Programmed high hazard inspections***; aimed at specific high hazard industries, occupations or health substances.
5. ***Follow-up inspections***; conducted to determine if previously cited violations have been corrected.

6.0 PROCEDURES AND RESPONSIBILITIES

This section may not cover every possible contingency of an OSHA inspection. The following is a common chronological sequence of inspection procedures and responsibilities:

1. The PPP safety director shall be notified immediately of incidents where:
 - a. A fatality or the hospitalization of three or more employees occur, where-upon the governing OSHA body must be notified in person or by telephone within 8 hours;
 - b. Advance notice of an OSHA inspection occurs, where-upon employee representatives must be notified; or
 - c. An inspector arrives on site to conduct an inspection.



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2. When an inspector arrives at a site to conduct an inspection, it is his/her responsibility to locate the owner representative, supervisor or agent in charge and present credentials. Anyone that attempts to collect a penalty or promote the sale of a product or service is not an official inspector, and should be reported to law enforcement officials immediately.
3. When the PPP project supervisor is the responsible representative, it is expected that he/she do the following:
 - a. Verify the inspector's credentials.
 - b. Inform the PPP safety director, where-upon the safety director would attempt to be present for the inspection if he could be there in a reasonable amount of time, and the inspector agreed to wait. A reasonable amount of time is generally considered to be not more than 1 hour.
 - c. Review this section and consult with the PPP safety director in the event that the safety director cannot be present.
 - d. An authorized employee representative must be given the opportunity to attend the proceedings. Under no circumstances can the employee representative be selected by the employer or the employer's representative.
4. The inspector will conduct an opening conference where the following should occur:
 - a. The inspector explains how the site was selected and determines whether it will be subject to a comprehensive safety inspection or eligible for a focused inspection.

Note: *One of the reasons it is so important to have the PPP Health & Safety Program on site and in use is, with that criteria met, the inspector may conduct an abbreviated "focused inspection" concentrating on a set number of issues that may be agency or industry priorities at the time.*

- b. The inspector will give the employer representative a copy of any employee complaint that may be involved. The complaint may be anonymous if so requested by the complainant.



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- c. The PPP representative shall provide the inspector with the PPP Health & Safety Program and any site-specific safety plans or procedures that may be in use.
5. After the opening conference, the inspector and accompanying representatives proceed through the job-site to inspect for safety or health hazards, as per the following:
 - a. The route and duration of the inspection is determined by the inspector.
 - b. The inspector may confer with employees about safety and health conditions and practices, making an effort to minimize any work interruptions. Each employee is protected under the law, from discrimination for exercising his or her safety and health rights.
 - c. An inspection tour may cover part or all of a jobsite, even if the inspection resulted from a specific complaint, fatality or catastrophe.
 - d. The inspector will inspect postings and records including: safety and health records that are required to be kept; training records; OSHA Forms 300 and 300A; required workplace posters; emergency phone numbers; etc.

Note: *OSHA places special importance on posting and record keeping.*

- e. The PPP representative shall show the inspector every courtesy and do everything possible to immediately abate hazards/violations that are observed.



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6. At some point in time after the inspection, a closing conference is conducted by the inspector with the various representatives involved, and consists of the following:

Note: *When appropriate, more than one closing conference may be held (e.g., when health hazards are being evaluated or laboratory reports are required).*

- a. The inspector will answer questions and discuss participant's problems and needs.
 - b. The inspector will distribute an employer rights and responsibilities publication.
 - c. The inspector will discuss all unsafe or unhealthful conditions observed during the inspection and indicate all apparent violations for which a citation and a proposed penalty may be issued or recommended. The inspector will not indicate any specific proposed penalties. Only the division director has that authority and then only after having received a full report.
7. The inspector will conduct a closing discussion with employees, or their representative, if requested, to discuss matters of direct interest to them.

REVISION HISTORY

Revision number	Description of change	Written by	Checked by	Effective date
	Review of Program	George Newton		10/20/2014