



TEAMSTERS

Safety & Health FACTS

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UNION REPRESENTATIVES AND WORKSITE INSPECTIONS

The main purpose of a workplace inspection is to discover health and safety hazards and correct them before injuries or illnesses occur. The education of workers about the hazards they face at work is an additional benefit. Union representatives can take part in OSHA inspections as well as perform their own inspections. No matter who is conducting the inspection, it is essential that all employees are aware that an inspection is taking place and feel free to tell inspectors of any problems they have had or observed.

Talking To Workers:

The primary goal of any effective union health and safety program is to prevent workers from being injured or becoming ill from the hazards they face on the job. To do this, union representatives must be detectives: listening to workers' health and safety complaints, inspecting the workplace, investigating accidents, and using accident and illness records.

Talking to workers is the most important piece of what union representatives should do when trying to solve health and safety problems. No one knows better what problems exist in the workplace and, often, what the best solutions are, than the people who work there every day. Simply talking to workers and listening to their issues is the starting point for successful worksite inspections.

Three Steps For A Worksite Inspection:

There are three distinct segments of any workplace inspection, whether it is an inspection of the worksite by OSHA or by the union as part of a joint labor/management worksite inspection.

1. Opening Conference

The first part of the inspection is the "opening conference." This is simply a meeting between the employer, the union representative and the inspector (or in the case of an inspection by a joint committee, the inspection team) before the actual walk-around inspection begins.

It is possible to have separate opening conferences for labor and management before an official OSHA inspection if workers feel intimidated talking to the OSHA inspector in management's presence.

In the opening conference the parties should review existing safety and health programs and policies, look at injury and illness data which OSHA requires the employer to keep, and generally prepare for the walk-around by becoming familiar with the process on the plant floor.

Examples of the safety and health programs and policies that should be consulted include:

- ♦ the right-to-know or hazard communication program, including training data;
- ♦ a confined space entry program;
- ♦ a lockout/tagout program;
- ♦ a respiratory protection program;
- ♦ an emergency response plan including evacuation routes, emergency phone numbers, etc.;
- ♦ traffic safety and control procedures for highway and public utilities crews; and,
- ♦ any other written health and safety programs or policies.

In addition, the annual Log of Occupational Injuries and Illnesses (OSHA 200 or state equivalent) should be reviewed by the inspector or inspection team at the opening conference. Special attention should be paid to any "cause of injury" trends. The inspector(s) should also review the training records which are required to be kept by OSHA under the Hazard Communication Standard (1910.1200 or state equivalent) and the Respiratory Protection Standard (1910.134), as well as any other safety and health programs maintained by the employer as required by OSHA.

The inspector(s) should consult the written Hazard Communication (Right-to Know) Program, become familiar with the list of chemicals to which employees are exposed and review the Material Safety Data Sheets (MSDS) maintained by the employer.

In addition, inspectors should look at medical, exposure, injury and illness, accident records and any other information which may be used to determine the effectiveness of the health and safety program, and whether the program complies with the applicable OSHA standards.

2. The Walk-Around Survey

All inspections should take place during normal working hours so inspectors can observe and talk with employees while they are performing their normal day-to-day activities. This will help prevent important problems from being missed.

Ideally, inspections (other than OSHA) should be conducted once a month, but the actual frequency may have to be negotiated. Inspections by the local union only may also be performed without management's presence and may be as frequent as the local wishes to make them.

Whatever the frequency of inspections, the worksite should be reinspected whenever there is a change in work methods, processes, or in the chemicals and tools used. This is to make sure that these changes do not adversely affect the health and safety of the members.

Several important points need to be made about conducting the worksite inspections:

- ♦ Be especially alert. Use your senses of sight, smell, and hearing as you inspect. Notice how you feel while working or inspecting.
- ♦ Make a map of the worksite. Draw a diagram or get a copy of the floor plan from the employer. Use it to identify certain processes and areas where you find hazards.
- ♦ Take good notes. Identify the location of any hazard, who is affected by it, and if it is a routine or non-routine operation. These notes can be very helpful later.
- ♦ Take photographs. Polaroids can provide evidence right away, but 35 mm cameras take better pictures. Take both if you can.
- ♦ Write a report. After the inspection, write a report of all the health and safety problems that were identified during the inspection. Cite the OSHA standard violated, if any. Request that corrective measures be taken as soon as possible. If it is a union-only inspection, submit a copy of the report to the Joint Committee or give a copy to management. Be sure to keep several copies for the local union.

A checklist may be very helpful in conducting the worksite inspection. Certain areas of the worksite may be forgotten and not inspected or the inspector may not find certain hazards. The use of checklists will help to avoid this problem.

The following list of sample inspection questions are representative of the kinds of questions that should be mentioned on a checklist. More extensive checklists are available from the IBT Safety and Health Department.

- ♦ Have there been any recent accidents/near misses?
- ♦ Are workers trained to operate the equipment properly?
- ♦ Are fire exits marked properly? Is access to fire exits blocked in any way?
- ♦ Have workers been trained about the chemicals they may be exposed to?
- ♦ Are Material Safety Data Sheets available for all chemicals used in the facility?
- ♦ Does the area seem hot, cold, noisy, or stuffy. Are chemical odors evident?
- ♦ Do workers ever complain of headaches, dizziness, watering eyes or sore throats?
- ♦ Do machines have all the necessary guards around moving parts and drive belts?
- ♦ Are all stairways and walkways clear?
- ♦ Are hardhats, safety shoes, gloves, respirators, and other personal protective equipment provided when necessary?
- ♦ Do people lift, carry, push, or drag heavy loads? If lifting, do they lift properly? Can the job be changed to reduce the heavy lifting workers must do?

3. The Closing Conference

After the inspection has been completed, all violations recorded, and the findings reviewed, the last step in the inspection process is to hold what OSHA calls the "closing conference." Like the opening conference, it is a meeting between the employer, the union representative, and, if present, the OSHA inspector.

At this conference, the findings of the inspection will be reviewed with management and the union. If it is an official OSHA inspection, violations of OSHA standards and possible abatement (correction) dates will be discussed.

If it is a labor-management inspection, violations of OSHA standards and/or employer safety policies will be reported. The written safety and health policies, programs, and plans of the employer should be evaluated and discussed. Correction of unsafe conditions and improvements in safety and health programs should be recommended during this conference, and completion dates set.

A summary of the inspection report as well as the minutes of health and safety committees should be posted on the union bulletin board or distributed to workers in newsletters. If an OSHA inspection results in a citation, the employer is required to post a copy of the citation near the area where the violation occurred.