Audits & Inspections Best Practices

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EHS Risk Management

KPA’s online, on-site, and on-call solutions help organizations control risk, protect assets, and effectively manage people through a combination of intuitive software, interactive training, and on-site consulting.
Questions

• Submit questions in the “Questions” panel
  – Questions will be answered at the end
  – If your question does not get answered, we will reach out to you following the webinar

• You will receive the recording and presentation deck by email about 1 hour after the webinar

*This webinar is for educational purposes only.*
Meet Your Speaker

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12 years with KPA
15+ year field consultant
What You’ll Learn Today

1. Audits vs. Inspections
2. Safety Audit Best Practices
3. Types of Safety Audits
4. Safety Committee Considerations
5. Frequency & ROI of Audits & Inspections
6. DIY vs. Third-Party
Audits vs. Inspections
Inspections

- Inspections focus on physical facilities, hazards, and controls
- Questions/checklist may include:
  - Are all chemical containers labeled?
  - Are there any boxes blocking exit routes?
  - Is machinery well-maintained and properly guarded?
  - Are workers wearing all necessary personal protective equipment?
  - Has emergency equipment been inspected?
- Conducted by managers, supervisors, foremen, and other on-site personnel
- OSHA will require inspections for some equipment onsite
Audits

- Safety audits are more in-depth than safety inspections
- Audits move beyond immediate hazards to examine behind-the-scenes workplace safety systems and additional human factors:
  - What do the organization’s safe workplace policies look like?
  - Are people adhering to policies?
  - What kind of training is provided to employees? Is the training comprehensive and up-to-date?
  - What data points are being collected?
  - Are there any short-or long-term legal risks the organization should be aware of?
  - Is the organization investing enough money in safety and using the budget effectively?
  - Are there employee accidents onsite? If so, what are the trends?
  - How could the safety program become more efficient?
- Frequently conducted by external, third-party professionals
- OSHA does allow self-audits
Safety Audit Best Practices
Types of Safety Audits: Regulatory

**OSHA**
- Evaluate required training
- OSHA written programs
- Hazard Assessment
- Employee PPE needs
- Respiratory Protection Review
- Behavioral safety
- Safety suggestions
- Chemical inventory
- SDS Access
- Compliance issue follow up
- Safety committee meetings
- LOTO
- Fall Protection Equipment

**EPA**
- Waste paperwork/e-manifests
- 6H paperwork
- EPA ID#s
- Air permits (if required)
- Onsite chemical storage
- Storage tank permits (if required)
- Spill Prevention Control and Countermeasure Plan needs
- Stormwater plan needs
- Tier II
- AC Recovery Equipment and Employee Training

**DOT**
- Required training
- DOT signage posted
- Accurate shipping papers/labels

**NFPA**
- Onsite chemical storage
- Fire alarm/equipment inspections
- Sprinkler safety
- Hazardous Materials Inventory
Types of Safety Audits: Facility

Know what to look for!

- Facility - Emergency equipment, fire extinguishers, eyewash stations, etc.
Types of Safety Audits: Accident Investigation

Assign responsibility for accident investigations
Create an accident investigation kit
Root Cause Analysis
  • The fishbone investigation
  • The Five Whys
How can this be prevented in the future?
Communicate investigation outcome
Evaluate any process changes

Are there any patterns or trends to facility accidents?
Injuries, vehicle accidents, and property damage should be investigated
Safety Committee

What should be covered?

- Define mission, goals, and expectations
- Appoint one owner of the team
- Consider assigning people to key accountability positions
- Review recent audit results
- Debrief on recent accidents/incidents
- Corrective and preventative action planning
- Take and distribute meeting minutes
- Who should be included?
  - Sr. Management, HR, department managers
  - Consider having employees join for a new perspective
Frequency of Inspections and Audits

- Certain equipment requires frequent inspection schedules:
  - Annually: Automotive lifts, elevator permits, overhead cranes, fire doors, fire extinguishers
  - Monthly: Emergency equipment, fire extinguishers, SPCC visual inspection, first aid kits
  - Weekly: Test showers and eyewash stations, hazardous waste storage areas
  - Daily: Forklifts, ladders, PPE

- Frequency of EHS audits not necessarily mandated by regulations
  - Facilities must show an encompassing safety program that can be adapted

- In some states, however, safety committee meeting frequency is prescribed by law
  - Facilities must have a safety committee
  - State OSHA plans supersede Federal OSHA requirements
  - California: required by Cal OSHA IIPP
  - Montana: More than five employees

Safety committee regulations by state

Sixteen states require employers to have safety and health committees - 15 under varying circumstances. Below is a list of those states and their provisions.

- **Alabama**: If requested by employees
- **Connecticut**: More than 25 employees or a high incident rate
- **Hawaii**: Employers with 25 or more workers must have a committee or “a person designated and trained by the employer for the facility’s safety and health program.”
- **Louisiana**: An employer’s safety plan has requirements for “designation of employees responsible for safety” and regular safety meetings.
- **Minnesota**: More than 25 employees or a high incident rate
- **Montana**: More than five employees
- **Nebraska**: Required of all employers
- **Nevada**: More than 25 employees
- **New Hampshire**: More than 15 employees
- **New York**: Group dividend plan (Employer enrollment in safety and loss prevention incentive program)
- **North Carolina**: High incident rate or more than 10 employees
- **Oregon**: More than 10 employees (Meetings required for employers with 10 or fewer employees.)
- **Tennessee**: High incident rate
- **Vermont**: High incident rate
- **Washington**: More than 10 employees
- **West Virginia**: High incident rate
ROI of Audits and Inspections

Reduced Experience Modification Rate (EMR)
- Lower your insurance premiums
- Reduce the costs of your losses, both frequency and severity

Fine avoidance
- Prevent regulatory fines because your facility is already compliant
- A safety program provides a great first impression to regulators

Productivity and Profitability
- Direct and indirect costs of injuries
- By preventing injuries you can improve profitability
DIY Audits vs. Consultant Audits

• DIY Audits:
  – Must have knowledge of compliance regulations
  – Requires dedication and accountability
  – Must conduct ongoing research into new and changing regulations
  – Audits can be subjective
  – Must be an effective communicator

• Consultant (third party) Audits:
  – Experienced (No learning curve required)
  – Current on changing regulations
  – Objective
  – Can share industry experience, recommendations, and affordable solutions
Best of Both Worlds

Best practice: A combination of in-house and third party consultants

• **In-house**
  - Customize inspection checklists
  - Conduct periodic self-inspections
  - Reporting
  - Onsite resource for immediate safety concerns

• **Consultants**
  - Overall program audit
  - Accident investigation coaching
  - Can provide employee training
  - Compliance deadline reminders
  - Shows employees that you are investing in their safety
Corrective and Preventive Actions

- An audit by itself does nothing to improve safety
- A safety program must incorporate a process for correcting identified hazards promptly and documenting corrective actions
- Items should be fixed in a timely matter
- OSHA does not penalize facilities for employer audits, alternatively they want to see a good faith effort by employers to provide a safe workplace
- Examples include:
  - Employee Training
  - Container Labeling
  - Inspection Documentation
Questions
Getting Started

• Introduction to software, so you can start using it immediately for
  – SDS Management
  – Online Training

• Initial Site Visit
  – Meet team members
  – Facility tour
  – Safety Committee Meeting
  – Advice on closing existing issues
  – Fire evacuation map
  – Document location of fire extinguisher, emergency exist, oil storage, etc…
Summary