The Elements of an OSHA Inspection

- The Knock at the Door
- The Opening Conference
- The Walk Around
- Interviews
- The Closing Conference

Knock, Knock: It’s OSHA!

- OSHA Compliance officers will usually check in with the college receptionist. All employees are to direct OSHA compliance officers to the college receptionist if approached.
  - Receptionist will contact NCTC representatives immediately!
    - Julie Fenning, Safety Officer
      - 218-683-8633
      - 218-684-2166
    - Bob Gooden, Director of Facilities, EGF Campus
      - 218-793-2450
      - 218-779-3691
    - Clinton Castle, Director of Facilities, TRF/Aerospace
      - 218-683-8600
      - 218-684-5564
    - Becky Lindseth, Executive Director of Administrative Services
      - 218-793-2476
      - 218-686-7533
    - Colleen Kukowski, Administrative Services Coordinator
      - 218-793-2407
- NCTC representative will ask to see credentials of compliance officers.
- NCTC representative will ask officers to explain the purpose of the inspection (this limits the scope of inspection)
  - “Programmed” inspection
  - Response to fatality or catastrophic event
  - Response to employee complaint
- NCTC representative (Colleen Kukowski) will send WENS notification to all Employees
  - OSHA is on the ______ campus. Reminder to review the Safety Inspection Guide located on NCTC Safety home page. Thank you!
- NCTC representative (Colleen Kukowski) will reserve a designated area to conduct opening conference and interviews (all day) and order refreshments.
  - Conference Room 461B (TRF)
- Conference Room 301 (EGF)
- Conference Room AC13B (Aerospace)

**OPENING CONFERENCE**

Compliance officers will first conduct an opening conference.

- The compliance officer will:
  - Describe the purpose of the inspection
  - May request that a union employee representative participate
  - Outline in general terms the scope of the inspection, including the need for private employee interviews, physical inspection of the workplace and records, etc.
  - Review personal protective equipment (PPE) hazard assessment
    - Awareness of hazards and appropriate PPE
  - Review OSHA 300 Logs and 300A summary forms
  - Review written programs

**THE WALK AROUND**

The scope will depend upon the nature and purpose of the inspection. OSHA may have authority to perform a comprehensive inspection, which may involve a full facility walk around, along with hygiene sampling, or may focus on one area specifically.

- NCTC representatives will accompany the compliance officer during the inspection.
- The compliance officer is permitted to take photographs or videotapes whenever he/she determines that it is necessary to do so. Any photographs or videotapes taken by the compliance officer should be replicated by the NCTC representatives. (Colleen Kukowski)
- The AFSCME contract requires that an AFSCME employee representative be invited to accompany the compliance officer in the physical inspection of the plant. (Article 11 Section 2) NCTC representative (Colleen Kukowski) will email respective union steward an invitation to participate.
- **NCTC representatives must require that the compliance officers abide by all College safety rules. (Required PPE, etc.)**

**IMPORTANT!!! EMPLOYEE INTERVIEWS**

The compliance officer may wish to interview management representatives and other employees.

- NCTC representatives will direct interviews to take place in the designated room.
- NCTC representatives will sit in on all interviews of personnel and take notes of the interviews.
- The compliance officer has the right to interview employees in private.
- Employees may request management sit in on interviews.
- Employees have the right to decline an interview or end an interview at any time.
- Under any circumstance, employees must answer the inspector’s questions truthfully.
- NCTC will not retaliate, in any way, against any employee for participating in an OSHA interview or for telling an OSHA inspector the truth.
- **Possible questions compliance officers may ask.**
  - Where are the OSHA 300A logs posted?
    - 300A logs are posted February 1 – April 30
    - 300 and 300A Logs are prepared for all four locations:
      - Thief River Falls Main Campus – HR Bulletin Board (600E)
      - Thief River Falls Aerospace Site – Employee Lounge Bulletin Board
      - Roseau Satellite site – Employee Bulleting Board
      - East Grand Forks Campus – Reprographics Room Bulletin Board
  - Where do you report injuries?
    - Kristi Lane, Assistant HR Director, 218-683-8631
    - First Report of Injury forms and checklists are located on Employee Central.
  - Where are your written safety programs?
    - Northland contracts with MacNeil Environmental to develop and maintain all required written safety programs.
    - MacNeil Environmental reviews each program each year and makes changes and updates. Affected employees review programs annually and submit edits via email.
    - Programs are maintained and stored in compliance binders provided by MacNeil. Final programs are posted on Northland’s safety web page. [www.northlandcollege.edu/safety](http://www.northlandcollege.edu/safety)
  - Where are your Safety Data Sheets (SDS)?
    - All SDS are managed in the online SDS program subscribed to by the MnSCU system office.
    - The SDS icon has been created on all employee computers.
    - Employees are responsible for maintaining their chemical inventory and ensuring that SDS are on file for each chemical.
    - Employees are to upload new SDS using the GroupLink Ticket system.
    - The online system is managed by the Safety Officer.
    - The Safety Officer uploads the SDS into the online system.
    - Northland contracts with MacNeil every five years for a complete chemical inventory.
- **Have you been trained on the hazards in your workplace?**
  - All mandatory safety training is provided on-line. Employees are directed to contact the Safety Officer with any additional questions regarding the hazards to which they are exposed.
  - Training is housed in Desire2Learn (D2L). D2L can be accessed from Northland's home page, click on Employees, and D2L.
  - Safety training requirements were determined for each employee by the employee, employee’s supervisor, and the college safety officer based on the safety training matrix provided by the safety and compliance staff at the MnSCU system office.
  - Safety training courses are required annually and periodically (every three years) depending on the hazard and OSHA requirement.
  - New employees are required to complete safety training prior to exposure to hazards.
  - Training deadlines follow the fiscal calendar – July 1st – June 30th.

- **Does NCTC conduct workplace inspections?**
  - Routine workplace inspections are conducted of all Northland facilities.
  - All hazards identified are input into the GroupLink ticket system and progress is tracked.
  - The facilities departments are responsible for facilities-related items, and faculty and their supervisors are responsible for academic program-related safety items.
  - MnSCU Inspections – Periodically, staff from the MnSCU system office conduct safety inspections of Northland facilities.
  - COPE – Every four years, representatives from the State of MN Risk Management, MnSCU Risk Management, MnSCU Compliance, and other safety consultants, conduct a comprehensive safety and loss inspection of Northland’s facilities. The first inspection was completed in 2013.
  - MacNeil Environmental – as part of the contract with MacNeil Environmental, the safety consultant conducts a building safety inspection of each location annually.
  - Safety Committee – Representatives of the Safety Committee periodically conduct safety inspections as necessary.

- **How do you report safety hazards?**
  - Northland encourages employees to report any and all safety hazards.
  - The GroupLink Ticket system has been implemented to report and track all safety hazards.
  - The GroupLink icon has been created on all employee computers. Employees can log in and create a ticket for any identified hazard.
  - Hazards are managed by the safety officer and the directors of facilities.

**How To Create a Safety Hazard GroupLink Ticket**
1. Double click on the GroupLink icon on the desktop.
2. Login using your StarID login.
3. Create New Ticket
   a. Facilities
      i. Safety/Security
         a. Safety Hazard

**CLOSING CONFERENCE**

- Upon completion of the inspection, the compliance officer will conduct a closing conference. Typically, the compliance officer will **not** indicate how the proposed violations will be characterized (serious, other than serious, etc.) or the proposed penalty amounts.
- At the closing conference, NCTC representatives should:
  - Bring to the compliance officer’s attention any information regarding conditions in the plant that will present the company in a favorable light and, in particular, any information that has not previously been brought to the compliance officer’s attention.
  - Take detailed notes.
  - Ask the compliance officer what the characterization of the citations will be and the proposed penalty amounts.
  - Discuss with the compliance officer how much time the company will need to make any necessary corrections or repairs of violations that the inspection turned up.