**OSHA REPORTING, RECORDING, AND POSTING REQUIREMENTS**

The purpose of this program is to outline the procedures all Piedmont Service Group (PSG) employees will follow in relation to injuries and their reporting, recording and posting requirements.

**KEY RESPONSIBILITIES**

**Safety Manager**

• Shall ensure all job related injuries and illness are recorded properly in accordance with OSHA

requirements.

• Shall ensure all required postings are conducted in accordance with recordkeeping guidelines.

• Shall maintain all required records.

• Shall determine the proper classification of job related injuries or illnesses based on OSHA recordkeeping guidelines.

**Supervisors**

• Shall ensure that all job related injuries and illness are reported promptly to the PSG Safety Manager.

**Employees**

• Shall promptly report any actual or suspected job related injury or illness.

**Injury Reporting**

All employees will report any injury while working for PSG. You will inform your direct Supervisor as soon as possible. Your Supervisor will then inform the Safety Director. The following situations dictate when OSHA needs to be informed of an injury related incident:

* All employers are required to notify OSHA when an employee is killed on the job or suffers a work-related hospitalization, amputation, or loss of an eye.
* A fatality must be reported within 8 hours.
* An in-patient hospitalization, amputation, or eye loss must be reported within 24 hours.

**Recordkeeping**

A comprehensive OSHA 300 log shall be maintained at the main office. This log will include all work related recordable injuries and illnesses incurred by PSG employees as prescribed by 29 CFR 1904. This log shall be available to government representatives, employees and employee representatives upon request.

OSHA's Form 301 (or equivalent) will be used to keep record of all fatalities, injuries and illnesses that:

• Work related

• Is a new case

• Meets one or more of the general recording criteria. (See OSHA's definition below)

The company Safety Director shall prepare OSHA Form 300-A by the 15th day of January, following the recording year. The completed form will be distributed to the respective sites and posted therein from February 1st through April 30th at each branch location and otherwise required. After the required posting period, the form shall be filed with the corresponding OSHA 300 for a period of five (5) years.

Any online reporting required by a federal or state plan will also be followed.

The OSHA 300A summary will be signed by a company official.

All recordable illnesses or injuries must be recorded on the OSHA 300 Log within seven calendar days of receiving information that the injury occurred.

The company Safety Director shall also provide semi-annual and annual reports to upper-management of accident statistics and trends. These reports will be used to evaluate safety performance and to focus on eliminating recurring trends to prevent future accidents.

**How does OSHA define a recordable injury or illness?**

* + Any work-related fatality.
  + Any work-related injury or illness that results in loss of consciousness, days away from work, restricted work, or transfer to another job.
  + Any work-related injury or illness requiring medical treatment beyond first aid.
  + Any work-related diagnosed case of cancer, chronic irreversible diseases, fractured or cracked bones or teeth and punctured eardrums.
  + There are also special recording criteria for work-related cases involving: [needle sticks and sharps injuries](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9639), [medical removal](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9640), [hearing loss](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9641) and [tuberculosis](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9642).

**How does OSHA define first aid? Not OSHA recordable**

* + Using a non-prescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes);
  + Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment); cleaning, flushing or soaking wounds on the surface of the skin;
  + Using wound coverings such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-Strips™ (other wound closing devices such as sutures, staples, etc., are considered medical treatment);
  + Using hot or cold therapy;
  + Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes);
  + Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.). Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;
  + Using eye patches;
  + Removing foreign bodies from the eye using only irrigation or a cotton swab;
  + Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;
  + Using finger guards;
  + Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes); or
  + Drinking fluids for relief of heat stress.

**Jobsite Postings**

PSG shall post a copy of the annual summary (300-A log) in each establishment in a conspicuous place or places where notices to employees are customarily posted. PSG must ensure that the posted annual summary is not altered, defaced or covered by other material.

The annual summary must be posted no later than February 1st of the year following the year covered by the records and the posting kept in place until April 30th.

PSG must save the OSHA 300 Log, the privacy case list (if one exists), the annual summary and the OSHA 301 Incident Report forms for five (5) years following the end of the calendar year that these records cover.

**OSHA Inspections**

Under the Occupational Safety and Health Act of 1970, the Occupational Safety and Health Administration is authorized to conduct workplace inspections to determine whether employers are complying with standards issued by the agency for safe and healthful workplaces. Inspections are usually conducted without advance notice.

Your behavior during the inspection is very important. The following outline will provide you, the Project Superintendent or Technician, with the steps that should be taken during an OSHA inspection.

**First, call the Safety Director immediately anytime OSHA is on site** or news of a future OSHA inspection. Second, relax and note the following procedures:

**Introduction:**

During the opening conference, the compliance officer should introduce himself/herself and show his/her official credentials. The Superintendent should take a business card or make a copy of the credentials for future use.

**Attendees:**

This conference should be attended by any subcontractor’s superintendent, any labor union representative, any employee or any foreman that the compliance officer requests, if applicable.

**Purpose:**

The purpose of this conference is:

• To allow OSHA to explain the reasons for the inspection.

• To generally lay out the inspection steps.

• To obtain the consent of the employer to conduct the inspection.

• To clarify other general questions about the inspection.

**Type of Inspection:**

You may ask questions about the nature of the inspection. An inspection may result from:

• An imminent danger condition.

• An accident on the job site that resulted in a fatality or a worker being hospitalized.

• A complaint. The Superintendent has the right to obtain a copy of the complaint but does not have the right to ask who made the complaint.

• A random inspection.

• A follow-up to a previous inspection.

**Questions:**

You should take this opportunity to provide the compliance officer with useful information, such as what PPE they must utilize on the project. Begin preparing company safety and health programs and policies along with required records.

**Consent:**

For the inspection to proceed beyond the office or conference room in which the opening conference was held, OSHA must have the consent of the employer. It is PSG's policy that consent is given to the compliance officer; however, if faced with a complaint inspection, politely but firmly inform the compliance officer that consent is given only for the inspection of the items under complaint and that no consent is being given for the inspection of any other area beyond that complaint.

**Walk Around Inspection**

**Escort:**

The Superintendent, Project Manager or Safety Director must escort the compliance officer at all times. If the inspection is based on a complaint, you should escort the compliance officer to the area of the complaint. Choose the best route.

**Notes:**

Detailed notes of the compliance officer’s findings and comments should be taken.

**Pictures:**

Pictures taken by the OSHA compliance officer should also be taken by the escort. The picture should be in the same direction and view as the picture taken by the compliance officer.

**Measurements:**

Measurements taken by the compliance officer should also be taken by the escort and documented.

**Interviews:**

The compliance officer has the right to consult with employees in private. You have the right to be represented during the interview.

**Abatement:**

Immediately abate any violations that are noted and have the compliance officer mark them as abated on his/her notes.

**Documentation:**

OSHA may also verify training, recordkeeping and postings. Listed below is an example of what is commonly review during an inspection:

• OSHA Form 300, Log of Injuries and Illnesses

• The written Hazard Communication Program

• The Safety Program

• Training Records

• Accident Reports

• Emergency Action Plans

# • Weekly Toolbox Talks

# **Closing Conference**

**Violations Noted:**

The compliance officer should discuss all unsafe or unhealthful conditions observed during the inspection and indicate all apparent violations for which he/she may issue or recommend a citation and a proposed penalty.

**Questions:**

Employers have the right to ask further questions in regard to the inspection and to provide further documentation in regard to violations that were noted.

**Informal Conference**

You have the right to request an informal conference within 15 working days of the citation. The citation(s)

can be discussed at this conference. This is a recommended option. You have nothing to lose and at

minimum, experience to gain.

**Citation Postings**

You need to immediately, upon receipt of the citation, post it where it will be readily observable by all

affected employees. The citation must remain posted until the violation has been abated or for 3 working

days.