



**ISRI**

# SAFETY GUIDANCE MATERIAL

## SAFETY MANAGEMENT GUIDANCE

*This safety resource was written for the scrap industry by the scrap industry and was developed to assist you in making your scrap operation a safe place for employees, customers, and visitors. The best safety programs are custom-tailored to individual operations. These resources offer sample wording of policies and procedures.*

### SAFETY INSPECTIONS

**APPLICABLE STANDARD:** N/A (Check for state-specific standards)

**EMPLOYEES AFFECTED:** All employees

#### **WHAT IS IT?**

A safety inspection is a structured walk-through of your facility to identify hazards, verify compliance with standards, and evaluate safety performance.

#### **WHY IS IT IMPORTANT?**

Just as inspections of the manufacturing process are important for quality control, safety inspections are vital for loss control. Also, promptly correcting substandard or hazardous conditions discovered during an inspection communicates that management is serious about preventing accidents.

#### **WHAT IS REQUIRED?**

- Establish a process for inspections.
- Develop an inspection checklist as an aid.
- Be committed to timely correction of nonconformance found during the inspection process.

#### **HOW DO YOU DO IT?**

##### **Set up the inspection process**

Determine what needs to be inspected, what aspects of each item need to be examined, and the frequency of inspections. You can begin by answering the following five questions:

1. *Are there required inspections?* Determine which inspections of operations, procedures, or pieces of equipment are mandated by OSHA regulations or by manufacturer recommendations. Example of inspections required on a regular basis by OSHA include, but are not limited to:

- 1910.68 (Powered Platforms, Manlifts, and Vehicle-Mounted Work Platforms): periodic inspection of not more than 30 days.
- 1910.147 (The Control of Hazardous Energy): audit of program yearly
- 1910.157 (Portable Fire Extinguishers): visual inspection monthly, maintenance inspection yearly

2. *What is the loss severity potential of the problem?* A damaged or removed machine guard has the potential to cause much greater loss to employees, equipment, etc., than does a defective handle on a shovel. Therefore you may want to inspect machine guards more frequently than shovels.

3. *What is the potential for injury to the employees?* If an item or piece of equipment were to fail, how many employees would be endangered? How frequently is the danger posed?



4. *How quickly can an item or part become hazardous?* Usually, equipment and tools that get heavy use become damaged or defective or just wear out faster than those that are rarely used.

5. *What do previous records show?* Production and maintenance records and/or incident investigation reports can provide information on failures and injuries due to equipment or processes.

### **Decide who will do the inspection**

Depending on the size and structure of your organization, an inspection team might include the department supervisor, a supervisor from another department, or even a group of supervisors. You might decide to have the inspections performed by members of the safety committee.

### **Develop an inspection checklist and perform the inspection**

Once you have examined all facets (equipment, critical parts and components, infrastructure) of the operation, you should develop a checklist to use while conducting the inspection. Remember that the checklist is strictly an aid to the inspection process, serving as a reminder of what to look for and a means to document what has already been covered. The completion of the inspection process is the actual correction of nonconformances found during the inspection.

Make your checklist simple to follow and easy to understand. The items that need correcting should be easy to spot. Some examples of checklists appear in Appendix A.

Your checklist can vary in length from a few items to hundreds. Longer checklists generally are keyed to OSHA standards. When developing your checklist, you might want to break it down into the following general categories:

- Machinery and equipment: This should include but not be limited to general and point-of-operation safeguards and proper use of tools.
- Material handling and storage: For example, inspect the condition of equipment, storage areas, and cylinder transportation.
- Hand and portable tools: Be sure that the proper tools are being used, and check the condition and care of tools being used.
- Fire protection: Check location and accessibility along with records of inspections.
- Electrical: Include extension cords, outlet box covers, GFI circuits etc.
- Housekeeping/maintenance: Inspect restrooms. Look for obstructions, tripping hazards, maintenance schedules and records, etc.
- Personal protective equipment: Check not only whether equipment is being used properly, but also whether it is being cared for properly.
- Administrative: This includes training records, emergency preparedness, accident reports, OSHA postings, etc.

### **Follow through after inspections**

After an inspection is completed, a written report should follow. The report should list the department, time and date, a recap of corrective actions taken from the last report, and any nonconformances found during the current inspection, along with recommended corrective actions and timetables for completing them.

Communicate the inspection findings (good and bad) to all employees in the department.

Display the inspection report where it can be visible—for example, near the supervisor's office and/or the safety manager's office—in order to constantly monitor progress on corrective actions.

## APPENDIX A: Sample Inspection Checklists

### Example 1: Basic checklist

Housekeeping	Check if action required	Comments / Action required
Work aisles maintained and in orderly condition		
Floors, aisles, work areas free of slip, trip, and fall hazards		
Bathrooms clean and maintained		
Tools, equipment stored properly		

Source: National Safety Council.

### Example 2: Detailed checklist

Housekeeping—Aisles _____			
Yes	No	N/A	
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Are aisle widths maintained? <u>29 CFR 1910.22(b)(1)</u>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Are aisles and passageways properly illuminated?
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Are aisles in good condition? <u>29 CFR 1910.22(b)(1)</u>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Are aisles kept clean and free of obstructions? <u>29 CFR 1910.22(b)(1)</u>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Are aisles marked? <u>29 CFR 1910.22(b)(2)</u>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Are fire aisles, access to stairways, and fire equipment kept clear? <u>29 CFR 1910.178(m)(14)</u>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Is there safe clearance for equipment through aisles and doorways? <u>29 CFR 1910.176(a)</u>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Are aisles marked and maintained in good condition? <u>29 CFR 1910.176(a)</u>

Source: J. J. Keller.

## APPENDIX B: Comprehensive Checklist

### Sample Self Inspection / OSHA Audit Checklist

		<b>OSHA Hazard Communication Program</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.1200
		Is there a written program?	1910.1200(e)(1)
		Does a MSDS exist for each hazardous substance in the workplace and are they accessible to all employees on all shifts?	1910.1200(g)(1)
		Is there a chemical inventory list of hazardous chemicals used and is it current?	1910.1200e(1)(i)
		Is there a system for maintaining chemical inventory lists for 30 years?	1910.1020
		Has a labeling system been identified?	1910.1200(f)(5)
		Has every employee who has the potential for exposure to hazardous chemicals has been trained upon their initial employment?	1910.1200(h)
		Is training documented?	Management

		<b>OSHA 300 Log</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1904.
		Is there a current OSHA 300 log?	1904.2
		Are OSHA 300 logs for the past five years available for review?	1904.6
		Are OSHA 301, employer's first report of injury or illness, available for review for each OSHA recordable injury or illness?	1904.4
		Has an analysis of the OSHA 300 log been performed to determine patterns of injuries or illness and develop corrective action?	Management

		<b>OSHA Poster</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1903.
		OSHA Poster posted (not covered by other posted material) where employees usually gather?	1903.2

		<b>OSHA Lockout/Tagout/Energy Control</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.147
		Is there a written program?	1910.147(c)(1)
		Are the written procedures specific to equipment?	1910.147(c)(4)
		Have authorized and affected employees received initial training?	1910.147(c)(7)
		Is training documented?	Management
		Are annual reviews/inspections of programs available, current and documented?	1910.147(c)(6)
		Are Lockout/Tagout locks and tags used only for controlling energy and for no other purpose?	1910.147(c)(5)

		<b>OSHA Guarding</b>	<b>Regulatory Reference</b>
	No	Narrative	1910.211-.219
		Are the following guarded when within 7 feet of floor or work platform?	
		(a) blades	1910.212(a)(5)
		(b) horizontal shafts	1910.219(c)(2)
		(c) flywheels	1910.219(b)(1)
		(d) pulleys	1910.219(d)(1)
		(e) horizontal belts and ropes	1910.219(e)(1) (2)
		(f) vertical belts	1910.219(e)(3) (4)
		(g) gears, sprockets, chains	1910.219(f)(1)
		On abrasive wheel grinders, are work rests adjusted for a maximum 1/8" opening to prevent work from becoming jammed?	1910.215(a)(4)
		On abrasive wheel grinders, is the tongue a maximum distance of 1/4" clearance?	1910.215(b)(9)
		The angular exposure of the grinding wheel on bench and floor stands should not exceed 90 or one-fourth of the periphery.	1910.215(b)(3)

		<b>OSHA</b>	<b>Regulatory Reference</b>
		<b>Emergency Eye Wash and Shower Stations</b>	
Yes	No	Narrative	
		Are eyes or body exposed to injurious corrosive materials?	1910.151©

		<b>OSHA</b>	<b>Regulatory Reference</b>
		<b>Medical Services and First Aid</b>	
Yes	No	Narrative	1910.151
		Has an assessment been completed to determine if professional medical assistance can reach the facility within five minutes?	Management
		If more than five minutes are needed, has at least one employee per work shift been designated as an emergency first aid/CPR provider?	1910.151(b)
		Do all designated first aid/CPR providers have a current certificate for providing emergency first aid?	1910.151(b)
		Is a first aid kit available and stocked according to ANSI?	1910.151(b)
		Comments and Recommendations: Does the facility dispense pills, capsules or any other medication to employees?	Management

		<b>OSHA</b>	<b>Regulatory Reference</b>
		<b>Personal Protective Equipment</b>	
Yes	No	Narrative	1910.132-.137
		Has a hazard assessment for each job been completed to determine what personal protective equipment (PPE) is to be worn?	.132(d)(1)
		Has each hazard assessment been certified and documented?	.132(d)(2)
		Has training been completed?	.132(f)
		Has the training been documented?	.132(f)
		Is PPE being worn?	Management
		Is PPE available and in good shape - gloves with no holes?	Management

		<b>OSHA Means of Egress</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.36/.37
		Are exits or routes to reach exits clearly visible?	1910.36(a)(5)
		Are exit doors marked with exit signs that have letters not less than 6" high?	1910.37(q)(8)
		Are exit signs internally illuminated or do they have an external light source?	1910.37(q)(6)

		<b>OSHA Power Industrial Trucks (Forklifts, Loaders)</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.178
		Are maintenance records kept for 12 months or is there a routine maintenance service agreement with vendor?	Management
		Are daily checks performed before operating powered industrial trucks?	1910.178(n)(11)
		Are operators trained to operate powered industrial trucks?	1910.178(n)(11)
		Is training documented?	Management
		Are engines shut off while refueling?	1910.178(p)(2)
		Are brakes set on trucks and wheel chocks under rear wheels when being loaded? Are wheel stops or other devices used when loading rail cars?	1910.178(k)(1) (2)

		<b>OSHA Power Industrial Trucks (Forklifts, Loaders)</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	178
		Are dock boards strong enough to carry load?	178(n) (11)
		Are dock boards secured in position to prevent slipping?	178(n) (11)
		Are handholds provided to permit safe handling?	Management



		<b>OSHA Overhead and Gantry Cranes</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.179
		Are rated loads plainly marked on each side of crane?	(b)(5)
		Are daily visual inspections performed before using crane (all operating mechanisms, hooks, hoist chains)?	(j)(2)
		Are there monthly inspections with a certification record that includes: (a) date of inspection (b) signature of person who performed inspection (c) the serial number (d) identifier of what was inspected performed on hooks, hoist chains, running ropes?	(j)(2)(iii) & (iv)  (m)(2)
		Are annual, periodic inspections performed?	(j)(3)
		Are annual, periodic inspections documented?	Management

		<b>OSHA Slings</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.184
		Are slings inspected each day prior to use?	(d)
		Are inspection records available at least every 12 months for alloy steel slings?	(e)(3)



		<b>OSHA Other Portable Tools and Equipment</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.244
		Are jacks legibly marked with their capacity rating?	(a)(1)(ii)
		Are jacks inspected at least every 6 months?	(a)(2)(vi)(a)
		Are inspections documented?	Management
		Are defective jacks tagged out-of-service?	(a)(2)(viii)

		<b>OSHA Electrical</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.303-.335
		Is each service, feeder, and branch circuit legibly marked to indicate its purpose unless it is so arranged that its purpose is evident?	.303(f)
		Is working space clearance for access to live parts operating at 600 volts or less according to Table S-1: 30" wide, 36" clear space front	.303(g)(1)(i)(ii) (iv)
		Are flexible cords being used as permanent wiring?	.305(g)(1)(h)(iii)
		Do all portable electrical equipment have a ground plug or are double insulated?	.304(f)(5)(iv)
		Are all unused openings in electrical cabinets, boxes, and fittings effectively closed? (conductor openings)	.305(b)(1)
		Are conductors entering boxes, cabinets, or fittings protected from abrasion?	.305(b)(1)
		Are live parts operating at 50 volts or more guarded against accidental contact by approved cabinets, or other forms of approved enclosures?	.303(g)(2)
		Are all pull boxes, and junction boxes covered with appropriate face plates and free of holes? (covers, canopies)	.334(a)(3)(ii) .305(b)(2)

		<b>OSHA Fire Extinguisher Maintenance</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.157
		Are fire extinguishers mounted, easily identified, and accessible?	(c)(1)
		Are fire extinguishers visually inspected monthly?	(e)(2)
		Have annual maintenance checks been performed and documented?	(e)(3)

		<b>OSHA Flammable, Combustible Liquids, Fuel Island</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.106
		Emergency shut off valve clearly marked / accessible?	(g)(3)(iii)
		Refuel point: "NO SMOKING" signs posted?	(g)(8)
		Refuel point: Fire extinguisher within 75 feet?	(g)(9)
		Dispensing units for Class I liquids (i.e., gasoline) shall be mounted on concrete island or protected from collision damage?	(g)(3)(iv)(d)

		<b>OSHA Automatic Sprinkler Systems</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.159
		Maintenance - Flow Tests: Main drain flow test performed annually and inspection test valves opened every two years?	(c)(2)

		<b>Employee Emergency Action Plan</b>	<b>Reference</b>
Yes	No	Narrative	
		Written Employee Emergency Action Plan in place?	Management
		Employees who are designated to use fire extinguishers are trained?	1910.157(g)(1)

		<b>Management Findings Emergency Action Plan - Minimum</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.38
		<p>Emergency Action Plan:</p> <ul style="list-style-type: none"> <li>(1) written</li> <li>(2) map with exits and rally points indicated</li> <li>(3) emergency reporting procedures</li> <li>(4) job titles of emergency coordinators</li> </ul> <p>This plan must include a map showing escape routes and emergency exits. The plan shall indicate the rally point outside of the facility and shall include the method for reporting fires and other emergencies, and the job titles of the persons who are to assist in the safe and orderly evacuation of employees. This can be accomplished by a map and posting emergency telephone numbers at the facility, and designating who is the emergency coordinator.</p>	Management
		Have employees been trained on the Emergency Action Plan?	Management
		Is the Emergency Action Plan training documented?	Management

		<b>OSHA Material Storage</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.176
		Is material stored in tiers stacked, blocked, interlocked and limited to prevent sliding, tipping, leaning or falling?	(b)

		<b>Management Findings Confined Space</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.146
		Is there a written confined space program?	(c)(1)
		Has a list of "Confined Spaces Evaluated" been completed?	(c)(1)
		Has a "Permit Required Confined Space Determination Worksheet" been completed for each space?	(c)(1)
		Have "Permit Required Confined Spaces" been labeled?	(c)(2)
		Is training documented?	(g)
		If contractors enter "Permit Required Confined Spaces", has their program been reviewed?	(c)(8)

		<b>OSHA Housekeeping</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.22(a)(1)
		Is facility kept clean, orderly and in sanitary condition?	.22(a)(1)

		<b>OSHA Walkways/Working Surface</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.22(b)(2)
		Are permanent aisles or passageways marked for employee walking areas?	.22(b)(2)
		Are walking areas kept clear?	(b)(1)

		<b>OSHA Platforms</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.23(c)(1)
		Are open sided floors or platforms 4 feet or more above the ground guarded by standard railings (42" high with a mid rail) and a 4" toeboard?	.23(c)(1)

		<b>OSHA Respiratory Protection</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.134
		Are respirators provided to employees who are potentially exposed to excessive concentrations of airborne contaminants (e.g., asbestos, silica dust, solvent vapors) and oxygen deficient atmospheres?	(a)(2)
		Are respirators worn by employees for comfort (voluntary use) where concentrations of airborne contaminants do not exceed permissible exposure limits?	(c)(2)(i)
		Are employees who voluntarily use dust masks (filtering face pieces), where conditions do not require the use of a respirator, trained, fit tested and provided with, review and understand the Non-Mandatory Respirator Use Statement of OSHA before being issued a dust mask?	(c)(2)(i)
		Is there a documented copy of Appendix D signed by the employee?	Management

		<b>OSHA Hearing Conservation</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.95
		Have noise surveys been conducted?	(d)
		Is there a written program?	Ⓢ
		Are areas, where hearing protection required, labeled?	
		Are employees able to choose from a selection of hearing protectors (3 or more)?	(l)
		Are annual audiograms conducted for employees exposed to 85 dBA or greater?	(g)(6)
		Is annual training conducted and documented?	(k)

		<b>OSHA Bloodborne Pathogens</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.1030
		Has the facility developed a written Exposure Control Plan (ECP)?	(c)(1)
		Have employees who have been assigned as designated first aid providers been identified?	(c)(2)
		Have required employees been offered the opportunity to receive within 10 days of initial assignment the Hepatitis B vaccine?	(f)(1)(2)
		Have required employees who have refused to receive the vaccine signed a declination form?	(f)(2)(iv)
		Is annual training for required employees conducted and documented?	(g)(2)

		<b>OSHA Welding Operations</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.252 & 253
		Are welders suitably trained in the safe operation of their equipment and emergency procedures in the event of a fire?	.252(a)
		Is adequate ventilation provided when airborne contamination could exceed current health standards or an oxygen deficient atmosphere could develop?	.252(b)(4)
		Are oxygen cylinders in storage separated from fuel-gas cylinders by a minimum of twenty feet or by a five-foot high noncombustible barrier of at least one-half hour fire resistance?	
		Has flashback protection been installed on all fuel-gas systems to prevent the backflow of oxygen into the fuel-gas supply system and the passage of a flash back into the fuel-gas supply system?	
		Are welding curtains or shields positioned so that passers by and employees in the immediate area cannot see the welding-arc?	.252(b)(2)(iii)
		Is proper personal protective equipment provided to and worn by welders and welder helpers?	.252(b)(2)(iii)
		Is a Hot Work Permit system in place?	
		Are welding cables that must be laid on the floor or ground protected so that they will not interfere with safe passage?	.252(1)(ii)
		Are welding cables with splices within 10 feet of the holder, with damaged insulation or exposed bare conductors routinely identified and replaced?	



		<b>OSHA Sanitation</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.141
		Are facilities kept in an orderly manner?	(a)(3)
		Is potable water available for consumption and use?	(b)
		Are toilet and washing facilities maintained in a sanitary condition?	©

		<b>OSHA Multi-piece and Single-rim Tire Servicing</b>	<b>Regulatory Reference</b>
Yes	No	Narrative	1910.177
		Does employer have a program to train all employees who service rim wheels in the hazards involved in servicing those rim wheels and the safety procedures to be followed?	1910.177(c)(1)
		Has employer evaluated each employee's ability to perform these tasks and to service rim wheels safely? Has employer provided additional training as necessary to assure that each employee maintains his or her proficiency? Is each employee tested according to their proficiency in tire servicing equipment maintenance activities?	1910.177(c)(3)
		Does employer furnish a restraining device for inflating tires on multi-piece wheels?	1910.177(d)(1)
		Does employer provide a restraining device or barrier for inflating tires on single piece wheels unless the rim wheel will be bolted onto a vehicle during inflation? Does employer provide a clip-on chuck?	1910.177(d)(2)
		Does employer provide an in-line valve with a pressure gauge or a presettable regulator?	1910.177(d)(4)(ii)
		Does employer provide a sufficient length of hose between the clip-on chuck and the in-line valve (if one is used) to allow the employee to stand outside the trajectory?	1910.177(d)(4)(iii)

<b>Management Findings Material Handlers</b>			<b>Regulatory Reference</b>
Yes	No	Narrative	
		Has employer conducted training for all material handling equipment operators?	
		Are observations being conducted of material handling operations?	
		Are employees disciplined/counseled regarding following the safe operations procedures?	