Something to Think About (Disclaimer)

WARNING: The warnings, precautions, and instructions discussed herein cannot cover all possible conditions and situations that may occur. Common Sense and Caution are not built into any situation—they must be supplied by the participant.

Regulatory Compliance—Consider These Points!

When a representative from a government agency makes a visit to one of our locations, what do they look for? Do you ever consider that YOU can have a positive or negative influence on what happens?

The number one influence on the regulators perception of IMI is their first glimpse of the facilities. And housekeeping and visual appearance are the main ingredients of that first glimpse. The visual appearance has already been taken in by the time the visitor introduces themselves. So keep the general appearance of your work site in mind and consider how you can assist in improving that appearance. If everyone contributes a little to the job of maintaining a good looking work place, it is not a major job for any one individual.

For anyone who makes contact with an inspector, a friendly attitude will go a long way in their perception of IMI. Particularly for the site manager, it is important to be friendly, but business like. Knowing where to locate documentation that would be requested is important as well. Usually an OSHA inspector will start by reviewing required paperwork. Our experience with MSHA shows that the paperwork review is toward the end of the inspection.

When the physical inspection of the premises begins, always make sure someone accompanies the inspector. It is very important to take note of what occurs during the inspection. Make note of questions that are asked and comments that are made.

Be careful what information you offer to the inspector. It is important to be friendly and business like, but do not incriminate yourself or the Company. Above all do not lie to any government regulator. It is acceptable to say, “I would rather not answer that question” or “I don’t know.” The consequences for lying are much more severe than the cost of correcting a violation that is discovered.

Most inspectors now carry cameras to record what they see. It is important that we take pictures of the same things that the inspector takes and from the same location.

Again, housekeeping will be the first thing that an inspector will see, so maintaining the housekeeping of the entire facility is very important. Some other safety deficiencies that are frequently identified during inspections:

- Blocked fire extinguishers, power boxes, or emergency exits.
- Electrical problems such as unlabeled disconnects, ground wire missing from extension cords or tools, electrical wires not secured in boxes, damaged insulation on cords, and no ground fault circuit interrupters in areas that are wet.
- Guarding of nip and pinch points.
- Handrails and weight limits for overhead storage areas and safe access to overhead areas.
- Violations of the hazard communication standard—unlabeled containers or no MSDS.
- No lockout/tagout program and equipment not being locked out while maintenance is performed or not having locks available to perform proper lockout.
- No eye wash stations in proximity to where chemical exposures occur.

If it doesn’t look, feel, or seem right—Save the Day—Back Away!!!

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Why do incidents occur in multiples?
You may not realize it, but it seems to me that vehicle and equipment damage incidents occur in multiples. A single location may not see that this is occurring, but when the incident reports are all sent to a central location, it is obvious that they do occur in multiples. Earlier this year there was a rash of incidents that occurred within a two week span and again just recently we have had two trucks backing into each other, a truck backing into a pick-up truck, a truck backing over a telephone box, and a truck running into the upright of a conveyor. These were all at locations far removed from each other so likely you haven’t heard about them.

I am not superstitious and don’t follow the signs of the moon, so can’t offer a good explanation of this apparent phenomenon. I do believe in God, but there is no explanation there either, that I can figure out.

How about this:
We all need to pay close attention to the task at hand. I know from experience that when I have had a close call or have suffered some injury, that it was usually a result of my not paying close attention to the task at hand. So I understand the difficulty in staying focused and that there are a whole host of outside influences that can vie for our attention.

Please take a moment each and every day to consider the tasks that you are asked to perform. Then STOP, LOOK, ANALYZE, and MANAGE (SLAM) every task. Get your co-workers involved in the process for added success.

Have a Safe September!