GENERAL OSHA COMPLIANCE CHECKLIST

OSHA is the agency responsible for establishing and enforcing standards that will make the workplace safe and healthful for the employees.

**Step 1: OSHA Requirements that Apply to Most General Industry Employers**

1. **Hazard Communication Standard.**
   Employers with employees who may be exposed to hazardous chemicals in the workplace must prepare and implement a written Hazard Communication Program and comply with other requirements of the standard. This standard is designed to ensure that employers and employees know about hazardous chemicals in the workplace and how to protect themselves.

   The main steps to an effective Hazard Communication Program include:
   - Learn the standard and identify responsible staff
   - Prepare and implement a written hazard communication program
   - Ensure containers are labeled
   - Maintain safety data sheets
   - Inform and train employees
   - Evaluate and reassess your program
   - An organizational structure
   - A comprehensive work plan
   - Site-specific safety and health plan
   - Medical surveillance program
   - Standard Operating Procedure for safety and health
   - Any necessary interface between general program and site specific activities
   - Procedure for labels and other forms of warning
   - Procedure for Material Safety Data Sheets
   - Procedure for Employee information and training
   - A list of hazardous chemicals known to be present
   - Methods to be used to inform employees of the hazards of non-routine tasks

   Hazard Communication Plan Last Reviewed: _______________

2. **Emergency Action Plan Standard.**
   An Emergency Action Plan describes the actions employees should take to ensure their safety in a fire or other emergency situation. OSHA recommends that all employers have an Emergency Action Plan. A plan is mandatory when required by an OSHA standard.
Putting together a comprehensive emergency action plan that deals with those issues specific to your worksite is not difficult. It involves taking what was learned from your workplace evaluation and describing how employees will respond to different types of emergencies, taking into account your specific worksite layout, structural features, and emergency systems. Most organizations find it beneficial to include a diverse group of representatives (management and employees) in this planning process and to meet frequently to review progress and allocate development tasks. The commitment and support of all employees is critical to the plan's success in the event of an emergency; ask for their help in establishing and implementing your emergency action plan. For smaller organizations, the plan does not need to be written and may be communicated orally if there are 10 or fewer employees.

At a minimum, the plan must include but is not limited to the following elements:

☐ Emergency escape procedures and emergency escape route assignments
☐ Procedure to be followed by employees who remain to operate critical operations
☐ Procedure to account for all employees
☐ Rescue and medical duties identified for those assigned
☐ Preferred means of reporting fires and other emergencies
☐ Names or job titles of persons who can provide further information

Although they are not specifically required by OSHA, you may find it helpful to include the following in your plan:

☐ A description of the alarm system to be used to notify employees (including disabled employees) to evacuate and/or take other actions. The alarms used for different actions should be distinctive and might include horn blasts, sirens, or even public address systems.
☐ The site of an alternative communications center to be used in the event of a fire or explosion.
☐ A secure on- or offsite location to store originals or duplicate copies of accounting records, legal documents, your employees' emergency contact lists, and other essential records.

Emergency Action Plan Last Reviewed: ________________

3. **Fire Safety.**

OSHA recommends that all employers have a Fire Prevention Plan. A plan is mandatory when required by an OSHA standard. A fire prevention plan must be in writing, be kept in the workplace, and be made available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees.

An employer must inform employees upon initial assignment to a job of the fire hazards to which they are exposed. An employer must also review with each employee those parts of the fire prevention plan necessary for self-protection.

At a minimum, your fire prevention plan must include:

☐ A list of the major workplace fire hazards
☐ Names or titles of persons responsible for fire prevention maintenance
☐ Names or titles of persons responsible for control of fuel source hazards
☐ Housekeeping procedure for the control of fire hazard accumulation
☐ Maintenance procedures for heat producing equipment

Fire Prevention Plan Last Reviewed: ________________

4. Exit Routes.
All employers must comply with OSHA's requirements for exit routes in the workplace.

Exit Route Plan Last Reviewed: ________________

5. Walking & Working Surfaces.
Floors, aisles, platforms, ladders, stairways, and other walking/working surfaces are present, to some extent, in all general industry workplaces. Slips, trips, and falls from these surfaces constitute the majority of general industry accidents. The OSHA standards for walking and working surfaces apply to all permanent places of employment, except where only domestic, mining, or agricultural work is performed.

Walk and Working Surfaces Last Reviewed: ________________

6. Medical & First Aid.
OSHA requires employers to provide medical and first-aid personnel and supplies commensurate with the hazards of the workplace. The details of a workplace medical and first-aid program are dependent on the circumstances of each workplace and employer.

A workplace first-aid program is part of a comprehensive safety and health management system that includes the following four essential elements:
☐ Management Leadership and Employee Involvement
☐ Worksite Analysis
☐ Hazard Prevention and Control
☐ Safety and Health Training

Medical and First Aid Program Last Reviewed: ________________

STEP 2: OSHA REQUIREMENTS THAT MAY APPLY TO YOUR WORKPLACE

1. If you have employees who operate machinery (e.g., saws, slicers, shears, slitters, power presses, etc.), you may be subject to OSHA's Machine Guarding requirements.
2. If your employees service or maintain machines or equipment that could start up unexpectedly or release hazardous energy, you may be subject to OSHA's Lockout/Tagout requirements.
3. Electrical hazards, such as wiring deficiencies, are one of the hazards most frequently cited by OSHA. OSHA's electrical standards include design requirements for electrical systems and safety-related work practices.

4. Employers must perform an assessment of each operation in their workplace to determine if their employees are required to wear personal protective equipment (PPE). Note that engineering controls and work practices are the preferred methods for protecting employees — OSHA generally considers PPE to be the least desirable means of controlling employee exposure.

5. If necessary to protect the health of your employees, you must provide appropriate respirators. You must establish a Respiratory Protection program that meets the requirements of OSHA's Respiratory Protection standard.

6. Employers whose employees are exposed to excessive noise (e.g., conditions that make normal conversation difficult) may be required to implement a Hearing Conservation program.

7. Employers should evaluate their workplaces for the presence of confined spaces.

8. If employees may be exposed to blood or bodily fluids as part of their assigned duties, you may be subject to OSHA's Bloodborne Pathogens standard.

9. If your employees operate Powered Industrial Trucks (e.g., forklifts), you may be subject to OSHA's Powered Industrial Trucks standard.

This list is not comprehensive – additional OSHA standards may apply to your workplace. Be sure to review OSHA's general industry standards (29 CFR 1910) for other requirements. In addition, section 5(a)(1) of the Occupational Safety and Health Act, known as the General Duty Clause, requires employers to provide their employees with a workplace that is free of recognized hazards likely to cause death or serious physical harm.

- Ladders
  - Ladders shall be inspected frequently for serviceability

- Confined Spaces
  - Permit spaces shall be posted with danger signs (or equally effective means)

- Portable Fire Extinguishers
  - Employer shall assure that portable fire extinguishers are maintained in a fully charged and operable condition and kept in their designated places
  - Employer shall be responsible for the inspection, maintenance, and testing of all portable fire extinguishers; annual maintenance check

- Fixed Extinguishing systems
  - Employer shall assure that inspection and maintenance dates are recorded on the container, container tag, or in a central location
  - Inspected annually by a person knowledgeable

- Employee Alarm System
  - Employer shall post emergency telephone numbers near telephones, or employee notice boards, and other conspicuous locations when telephones serve as a means of reporting emergencies

- Slings
• Each day before being used, the sling and all fastenings and attachments shall be inspected for damage or defects by a designated competent person

☐ Blood-borne Pathogens
  • Warning labels shall be affixed to containers of regulated waste, refrigerators, and freezers containing blood or other potentially infectious material; and other containers used to store, transport or ship blood or other potentially infectious material
  • Sign shall be posted at the entrance to work areas of HIV and HBV Research Laboratory and Production Facilities

☐ Hazard Communication
  • Each container, containing hazardous chemical(s) shall be labeled, tagged, or marked

**Workplace Hazard Assessment for PPE Last Reviewed: ______________**
☐ Workplace evaluated identified
☐ Person certifying that the evaluation has been performed
☐ Date(s) of the hazard assessment
☐ Document identified as a certification of hazard assessment

**Respiratory Protection Last Reviewed: ______________**
☐ Standard Operating Procedure for respirator selection
☐ Medical questionnaire for employee use
☐ Maintenance of respirators
☐ Inspection of respirators
☐ Work area surveillance

**Permit Required Confined Space Last Reviewed: ______________**
☐ Identify and evaluate the hazards of permit spaces before employee entry
☐ Develop and implement the means, procedures, and practices necessary for safe entry
☐ Provide equipment
☐ Evaluate permit space condition
☐ Provide at least one attendant outside
☐ Designate the persons who are to have active roles
☐ Develop and implement procedures for summoning rescue and emergency services
☐ Develop a system for the preparation, issuance, use and cancellation of entry permits

**Control of Hazardous Energy Plan Last Reviewed: ______________**
☐ Procedures for energy control
☐ Employee training
☐ Periodic inspections (at least annually)

**Blood-borne Pathogens Plan Last Reviewed: ______________**
☐ Exposure determination
☐ Schedule and method of implementation of:
• Methods of compliance
• HIV and HBV Research Laboratories and Procedure
• Hepatitis B Vaccination and Post-Exposure Evaluation and Follow-up
• Communication of hazards to employees
• Recordkeeping

☐ Procedure for the evaluation of circumstances surrounding exposure incidents

**Occupational Exposure to Hazardous Chemicals in Laboratories Plan Last Reviewed:**

☐ Chemical Hygiene Plan
☐ Standard Operating Procedures relevant to safety and health
☐ Criteria used to determine and implement control measures
☐ Provisions for employee information and training
☐ Pre-activity procedure
☐ Provisions for medical consultation and medical examination, if needed
☐ Personnel responsible for implementation of the Chemical Hygiene Plan

**Ergonomics (General Duty Clause) Last Reviewed:**

☐ Full ergonomic program consisting of
☐ Management, leadership and employee participation
☐ Hazard information and reporting
☐ Job hazard analysis and control
☐ Training
☐ MSD management
☐ Program evaluation

**Occupational Exposure to Tuberculosis (General Duty Clause) Last Reviewed:**

☐ Respiratory protection program consisting of:
☐ Procedure for employee screening (skin test/x-ray)
☐ Procedure for worker removal, in the event of contracted TB
☐ Procedure for employee information and training
☐ Isolation procedure for TB patients
☐ Procedure for TB patient transfer
☐ Medical questionnaire
☐ Summary record

**STEP 3: SURVEY YOUR WORKPLACE FOR ADDITIONAL HAZARDS**

Survey your workplace for additional hazards and OSHA requirements by:

• Using a checklist. See the Self-Inspection Checklists in OSHA’s Small Business Handbook.
• Using an online tool like the OSHA eTool: OSHA Hazard Awareness Advisor. This tool can help you identify and understand common safety and health hazards in your workplace. It will ask you about activities, practices, material, equipment, and policies at your workplace. The Hazard
Awareness Advisor uses your answers to determine the hazards that are likely to be present. It then prepares a customized report that briefly describes the likely hazards and the OSHA standards that address those hazards.

- Reviewing OSHA’s Safety and Health Information Bulletins

**STEP 4: DEVELOP A COMPREHENSIVE JOBSITE SAFETY & HEALTH PROGRAM**

While OSHA does not require employers to develop comprehensive safety and health programs, development and implementation of these programs is an effective way to comply with OSHA standards and prevent workplace injuries and illnesses. The information you've obtained from the steps above is a good start for developing a comprehensive safety and health program.

**STEP 5: TRAIN YOUR EMPLOYEES**

Many of the OSHA standards have an employee training requirement. Every employee does not need all training.

- **Emergency Action Plan**
  - Review the plan with each employee covered by the plan (initial hire, whenever employee responsibilities change, and whenever the plan is changed)
  - Parts of the plan employee must know to protect the employee in the event of an emergency

- **Fire Prevention Plan**
  - Apprise employees of the fire hazards of the materials and processes to which they are exposed
  - Parts of the plan employee must know to protect the employee in the event of an emergency

- **Compressed Gas Cylinders**
  - Each employee who may have contact with compressed gas cylinders, shall be trained in their safe handling and storage

- **Hazardous Waste Operations**
  - Training shall be based on the duties and function to be performed by each responder of an emergency response organization

- **Personal Protective Equipment**
  - When PPE is necessary
  - What PPE is necessary
  - How to properly don, doff, adjust, and wear PPE
  - Limitations of PPE
  - Proper care, maintenance, useful life, and disposal of PPE

- **Respiratory Protection**
  - Why respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator
  - What the limitations and capabilities of the respirator are
  - How to use the respirator effectively
  - How to inspect, put on and remove, use, and check the seals of the respirator
  - What procedures are for maintenance and storage of the respirator
  - How to recognize medical signs and symptoms that may limit effective use of respirator
  - General requirements of the respiratory protection standard
Entry Permit Confined Space
- The employer shall provide training so that all employees whose work is regulated by this section acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned

Control of Hazardous Energy
- Employer shall provide training to ensure that the purpose and function of the energy control program are understood and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees
- Authorized recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control affected
- Purpose and use of the energy control procedure

Portable Fire Extinguishers
- Familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage fire fighting

Employee Alarm Systems
- Employer shall explain preferred means of reporting emergencies

Powered Industrial Trucks (patient lifts)
- Employer shall ensure that each operator is competent

Laundry Machinery and Operations
- Employees shall be properly instructed as to the hazards of their work and be instructed in safe practices, by bulletins, printed rules, and verbal instructions

Access to Employee Exposure and Medical Records
- Existence, location, and availability of any records (person responsible for maintaining)
- Employee rights of access to these records

Blood-borne Pathogens
- Accessible copy of the regulatory text of this standard and an explanation of its contents
- General explanation of the epidemiology and symptoms of blood-borne diseases
- Explanation of the modes of transmission of blood-borne pathogens
- Explanation of exposure control plan and how to obtain a copy of the written plan
- Explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials

Hazard Communication
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area
- Physical and health hazards of the chemicals in the work area
- Measures employees can take to protect themselves from these hazards
- Details of the company’s hazard communication program

Occupational Exposure to Hazardous Chemicals in Laboratories
- Contents of this standard and its appendices
- Location and availability of the employers Chemical Hygiene Plan
- Permissible exposure limits for OSHA regulated substances
• Signs & symptoms associated with exposures in the laboratory
• Location and availability of known reference material on the hazardous chemicals
• Training requirements of hazard communication standard

☐ Ergonomics (General Duty Clause)
• Muscular-Skeletal Disorder signs and symptoms associated with problem job tasking
• Muscular-Skeletal Disorder reporting system and management procedure

☐ Tuberculosis (General Duty Clause)
• Information about the disease
• Signs and symptoms of tuberculosis
• Skin test procedure and frequency
• Preventative precautions
• Employee responsibility

STEP 6: RECORDKEEPING, REPORTING, & POSTING

1. Recordkeeping.
OSHA requires certain employers to keep records of workplace injuries and illnesses.
• First determine if you are exempt from the routine recordkeeping requirements. You are not required to keep OSHA injury and illness records (unless asked to do so in writing by OSHA or the Bureau of Labor Statistics) if:
  o you had 10 or fewer employees during all of the last calendar year; or
  o you are in certain low-hazard industries
• If you do not qualify for these exemptions, you must comply with OSHA’s recordkeeping requirements.

   Log of Work-Related Injuries and Illnesses (OSHA form 300)
   ☐ OSHA Form 300 maintained by calendar year
   ☐ Entries made within 7 calendar days
   ☐ OSHA Form 300 retained for 5 years

   Summary of Work-Related Injuries and Illnesses (OSHA form 300A)
   ☐ Closed out and signed by a Company executive at the end of the calendar year
   ☐ Posted in a conspicuous place for all employees from February 1st through April 30th

   Injury and Illness Incident Report (OSHA Form 301 or equivalent)
   ☐ Supplementary record constructed within 7 calendar days of recordable case

2. Reporting.
All employers, regardless of size or industry, must report to OSHA all work-related fatalities within 8 hours. All employers must also report to OSHA all work-related inpatient hospitalizations, all amputations, and all loses of an eye within 24 hours. Read about OSHA’s reporting requirements.

3. OSHA Poster.
All employers must post the OSHA Form 2203 Job Safety and Health Poster or state equivalent.
4. **Access to Employee Exposure and Medical Records.**
An OSHA standard requires employers to provide employees, their designated representatives, and OSHA with access to employee exposure and medical records. Employers generally must maintain employee exposure records for 30 years and medical records for the duration of the employee's employment plus 30 years. **NOTE:** If your workplace is in a state operating an OSHA-approved state program, state plan recordkeeping regulations, although substantially identical to federal ones, may have some more stringent or supplemental requirements, such as for reporting of fatalities and catastrophes. Contact your state program directly for additional information.

**STEP 7: EVALUATE AND REEVALUATE YOUR SAFETY PROGRAM**
☐ **Employee Work Practices**
  • Use of accident prevention measures (such as gait belt)
  • PPE with cleaning products
  • PPE with patients
  • Workers observing accident prevention signs and tags
  • Usage of biohazard containers
  • Using lifting devices

☐ **Physical Structure**
  • Compliance with Life Safety Code
  • Slip, trip, and fall hazards
  • Access to firefighting equipment and monthly inspections
  • Access to medical emergency equipment and eye wash
  • General housekeeping - accumulation of combustible material, etc.
  • Service ability of tools and equipment, primarily maintenance and ground
  • Marking of physical hazards color code
  • Confined spaces identified

☐ **Administrative Practices**
  • Posting of notices. Job Safety and Health
  • Records of inspections
  • Availability of MSDS and chemical inventory list

☐ **Employees**
  • Ask them questions (e.g., “How would you report and unsafe condition?”)
  • Role in emergency action plan
  • Familiarization on how to use portable fire extinguisher
  • Availability of MSDS and how to locate information on it
  • Procedure for blood saturated clothing
For additional information, it is recommended that employers visit [www.osha.gov](http://www.osha.gov) or call 1-800-321-OSHA (6742).