



Company Background

- Primarily a label and tagging manufacturer
- OSHA Violation for hearing conservation
- Approximately 25 employees
- Manufactures primarily for the horticulture labelling
- Thermal Printing Operation

Example Products

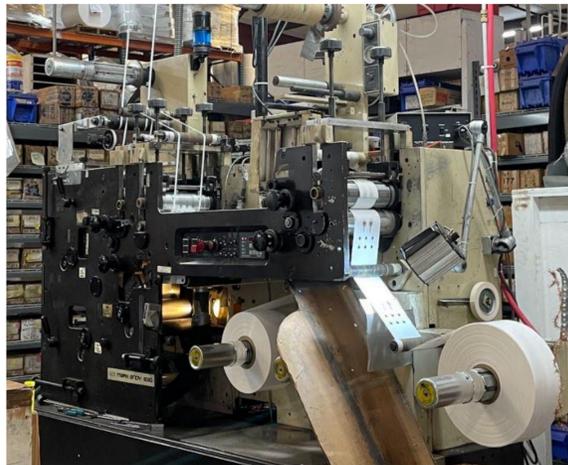
- RFID Labels
- Thermal Signs
- Color Laser Signs
- Pot Stakes
- Slip-On Tags



Manufacturing Processes



- Maintenance Operations
- Forklifts
- Laser Printing
- Thermal Printing
- Stacking and Stocking



Purpose and Methods

- Primary Goal: Learn the process of conducting an inspection and convey the findings in a final report
- Secondary Goal: Provide useful health & safety recommendations to the host company
- Methods: Researched similar industries and determine common violations. Created a tailored inspection checklist. Performed a walk-through inspection and interview management staff. Provide recommendations and findings.

Advantages & Limitations

- + Management commitment to operational Safety
- + Management seemed motivated to improve safety/quality
- + Taking pictures was allowed

- Poor documentation
- Training Records, Safety Policies/Programs, Hazardous Waste Records, Accident Reports/Logs
- No Standardized training
- High Employee turnover

Potential Violations

- Lock-Out / Tag-Out
- Hazard Communication
- Hearing Conservation
- Materials stacking
- Fire exits
- Machine Guarding



Sample Visual Observations



SMS Evaluation

- The inspection team noticed a general lack of SMS usage at the manufacturing facility.
- Management involvement was present but was lacking in terms of the four components of SMS.
- Management must continue to commit to safe policies, risk evaluations & controls, and safety training for workers.
- OSHA SMS elements should be followed to achieve an effective safety system. Training can be accessed by management using OSHA resources.



Recommendations to Company

- Begin to document the new hire training program and ensure all members of management review the written program. Ensure all employees have access to this document.
- Create a functioning lockout-tagout program to ensure safety during frequent maintenance. Follow OSHA training guidelines.
- Identify areas of intersection between the powered vehicles and workers. Clearly mark these areas to reduce risk of accident.
- Keep emergency exits clear by marking the evacuation pathway with bright tape on the floor. Follow OSHA exit route standards.
- Follow OSHA hearing conservation program steps and provide training regarding the importance of hearing protection.



Top OSHA Standards Violated Oct. 2020 – Sept. 2021

Standard	Citations	Inspections	Penalty	Description
19100036	2	1	\$12,288	Design and construction requirements for exit routes.
19100178	2	2	\$9,382	Powered industrial trucks.
19100212	2	2	\$9,255	General requirements for machines.
19100037	1	1	\$0	Maintenance, safeguards, and operations features for exit routes.
19100038	1	1	\$0	Emergency action plans.
19100095	1	1	\$4,828	Occupational noise exposure.
19101200	1	1	\$0	Hazard Communication.
Total	10	7	\$35,753	All Standards Cited for Other Miscellaneous Durable Goods Merchant Wholesalers

Conclusions

- The manufacturing company required serious upgrades in terms of policies, training programs, and site organization.
- The recommendations provided by the inspection team should be thoroughly analyzed before implementation can occur.
- Management is highly active in the work environment and holds safety in high regard but lacks the systems to support and promote safe operations.
- SMS should be implemented over time with commitment to OSHA recommendations, hazard analyses, and continuous evaluation.
- Include the workers in all aspects of the SMS to increase worker participation and loyalty to the program.