

OSHA FIELD PROTOCOL: Construction Site Guide

In construction, OSHA inspections are often "focused" on the **Fatal Four** (Falls, Struck-By, Caught-In/Between, and Electrocution). Use this guide to manage the site during an unannounced visit.

I. ARRIVAL AT THE JOBSITE

- **Verify Credentials:** Ask for the inspector's photo ID and serial number.
- **Notify the Superintendent:** Immediately alert the Site Superintendent, Safety Manager, and the General Contractor (if you are a subcontractor).
- **Waiting Area:** Escort the inspector to the site trailer or a designated safe area. **Do not** allow them to walk the site unescorted.

II. THE OPENING CONFERENCE

- **Identify the Trigger:** Determine if the visit is a "Programmed" (random) inspection or a "Focused" inspection targeting specific hazards like fall protection.
- **Multi-Employer Scope:** Clarify which contractors are being inspected. Under the **Multi-Employer Worksite Policy**, you can be cited for hazards created by others if your employees are exposed.
- **Request Complaints:** If the visit is due to a complaint, request a redacted copy.

III. THE WALK-AROUND (Rules of the Yard)

- **PPE Compliance:** Ensure the inspector wears all site-required PPE (hard hat, high-vis vest, safety glasses, steel toes). They **must** follow your site safety rules.
- **The "Direct Path":** Escort the inspector using the most direct, safe route to the area of concern. Avoid walking them through unrelated high-risk zones.
- **Shadow Photo/Video:** If the inspector takes a photo of a trench, ladder, or scaffold, take the **exact same photo** from the same angle.
- **Immediate Abatement:** If a minor hazard is identified (e.g., a missing mid-rail or an ungrounded tool), fix it immediately. This demonstrates "Good Faith".

IV. RECORDS & INTERVIEWS

- **Construction Records:** Have these ready in the trailer:

- **OSHA 300 Logs** (must be produced within 4 hours).
- **Site-Specific Safety Plan** and **HAZCOM/SDS**.
- **Training Records** (Fall Protection, Scaffolding, Trenching, etc.).
- **Competent Person:** Identify the "Competent Person" for specific tasks (e.g., excavation or scaffolding) if the inspector asks.
- **Interviews:** Hourly workers may be interviewed privately. Supervisors/Management have the right to have a company representative present.

V. THE CLOSING CONFERENCE

- **Preliminary Findings:** Listen to all alleged violations. Take detailed notes but **do not admit guilt** or agree to specific fines on-site.
- **Corrective Actions:** Discuss how you plan to fix identified hazards to show proactive safety management.
- **The 15-Day Rule:** You have **15 working days** from receiving a formal citation to pay or file a "Notice of Contest".

PRO TIP: In construction, "Plain View" is everything. If an inspector sees a worker without a harness while walking to the trailer, they can—and will—expand the inspection scope.