

# COMPLIANCE CONNECTION

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A bimonthly newsletter designed to help you navigate the ins and outs of compliance and the safe practice of industrial refrigeration.

## HAZCOM –It's still in the Top 10 OSHA Citations!

Can you believe it? The Hazard Communication regulation (1910.1200) which has been a standard since 1983 is still a problem citation for the food manufacturing industry.

In order to aid industry, OSHA has created a new HAZCOM manual, "Hazard Communication – Small Entity Compliance Guide for Employers That Use Hazardous Chemicals" (Pub: 3695). Although it was written for employers that have a smaller number of employees, this manual does a good job of describing the standard and its recent modifications. It would be useful to all facilities.

The manual also includes steps to create a HAZCOM program, and even a sample written program. If you already have a training program or have not yet organized one, it also describes the necessary steps for training and factors that need to be considered.

Take a minute and review this manual, it may save you a citation!

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## OSHA Inspections

By Debbie Bennett, Ph.D.

Companies have the right to require OSHA to get a warrant before allowing a Safety and Health inspection, but once OSHA has a warrant, continuing to prevent an inspection can be costly.

One company found this lesson out the hard way, and by the time they paid OSHA's attorney fees and fines the total cost to them was over \$700,000.

According to OSHA, inspections are always conducted without advance notice. There are, however, special circumstances under which OSHA may give notice to the employer, but such a notice will normally be less than 24 hours. These circumstances include the following:

- Imminent danger situations that require correction as soon as possible;
- Accident investigations;
- Inspections that must take place after regular business hours;
- Cases where notice is required to ensure that the employer and employee representative or other personnel will be present;
- Cases where an inspection must be delayed for more than 5 working days;
- Situations in which the OSHA Area Director determines that advance notice would produce a more thorough or effective inspection.

Most attorneys who represent companies in legal disputes with OSHA advise employees to be ready for OSHA inspections and not refuse an inspector to enter. Reason: Why start off on a bad foot with an agency that has the ability to fine you up to \$70,000 for each violation?

## Mark Your Calendar!

Please make note of the following . . . we want to see you there!

**March 18-21, 2018**

**IIAR Annual Conference**

Colorado Springs, CO

Come visit us at booth #612

**April 23-24, 2018**

**Refrigeration Review Course**

**for RETA Certification Prep**

Ft. Smith, AR

If you are planning to become RETA certified soon, this review course is for you. Register at [www.ammonia.com](http://www.ammonia.com).

Note: Registration includes attendance of the 2018 DFW/Ft. Smith, AR RETA Regional Conference.

**April 24-25, 2018**

**2018 DFW/Ft. Smith, AR**

**RETA Regional Conference**

Ft. Smith, AR

**April 24-27, 2018**

**SOPs, PMs & MOPs Workshop**

Chicago, IL

**Oct. 23-25, 2018**

**Valve Workshop**

Chicago, IL



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