

Regulatory Agencies' Inspection Policy

(rev 12-2018)

- 25.1 PURPOSE
 - 25.2 GENERAL
 - 25.3 NOTIFICATION
 - 25.4 CONDUCT DURING THE INSPECTION
 - 25.5 SUPERVISOR'S GUIDELINES
-

25.1 PURPOSE

To provide guidelines for use in the event of an inspection by a representative of government safety and health or environmental regulatory agency including OSHA, NCOSH, NAVFAC, EPA and similar.

25.2 GENERAL

It is T.A. Woods Company's policy to voluntarily comply with all aspects of the Occupational Safety and Health Act of 1970 and all other agency codes, ordinances or standards. It is also a policy of the TAW to allow an authorized authority who, upon presentation of proper credentials from a local, state or federal agency, requests entry to conduct an inspection.

T.A. Woods Company will not discharge or discriminate against any employee who has exercised any right under the Act or any other regulatory standard, including the right to make safety and health complaints or request a compliance inspection.

25.3 NOTIFICATION

Any contact by any public official representing a regulatory agency must be reported immediately to the Safety/HR and/or project manager, informing them of the details. This includes inspections for TAW or other contractors on site. Contact to be reported includes site visits, phone calls, and written communication. The original of documents must be immediately provided to Safety.

25.4 CONDUCT DURING THE INSPECTION

The inspecting officer will present identification to the supervisor of the project, state the purpose of the visit, and request an opening conference with a representative of the TAW. Prior to permitting the inspector on site, **a member of management must be present.** Therefore, the Safety/HR or project manager must be contacted prior to the start of the

inspection. The TAW superintendent or foreman should explain a manager is enroute and request the inspection begin at arrival.

In cases of a courtesy visit or visit for another contractor on site, TAW Safety or project manager does not have to be present. However, notice should be provided in advance to TAW Safety for a planned courtesy visit and if a regulatory agency is on site to visit another contractor.

Contract documents are not to be given to any inspectors. Only safety-related documents will be provided during the site visit.

At the conclusion of the inspection, the regulatory agency office will conduct a closing conference to discuss the findings and dates of expected corrections as well as answer any questions. Although a closing conference is not required, T.A. Woods Company representatives will request that the inspector provide one.

25.5 SUPERVISOR'S GUIDELINES

During the course of the inspection, the supervisor of the project as well as the TAW Safety/HR or project manager (if present) should accompany the inspection party and adhere to the following guidelines:

25.5.1 Inspections can be the result of the following:

- General-random selection based on a permit or inspection pool
- Courtesy-normally requested by the GC or CM
- Focus-normally starts as a General or Courtesy but due to violations associated with one of the 4 focus areas, becomes a Focus Inspection for all contractors on sight
- Complaint-results from a complaint made by an employee, another contractor, a citizen or a "drive by" from an inspector. If the inspection is the result of an official complaint, request a copy of the complaint before commencing the inspection.
- Death or serious injury of an employee. The employee does not have to be an employee of TAW.

25.5.2 Keep a chronological written record of the entire inspection. This information should include where the inspecting officer goes, names of employees spoken to, topics of discussion, and length of discussions. Note that inspectors are permitted to speak with employees in private. TAW personnel may be present if an employee request such. If any photographs are taken, the supervisor should take the same photos. If no camera is available, request copies of the photos for our records. If the inspector denies this request, accurately record all areas, employees, and work environments/tasks the inspector photographs.

25.5.3 Only provide access to the area(s) requested. Take the inspector to area(s) via the most direct route. Do not allow unauthorized or unnecessary personnel to follow you to this area.

25.5.4 Do not give ideas or helpful hints on what areas to go to or where to look. Do not allow unnecessary personnel to loiter around you. Do not answer questions regarding other contractors or their personnel. Do not point out safety deficiencies of other contractors. Only provide answers to questions asked. Do not elaborate.

At no time should the supervisor admit responsibility for any alleged violations. If permitted without being considered a violation to correct issues presented by the inspector during the inspection, do so. Ensure records are maintained of this.

The supervisor should answer questions asked with specific information. Additional information or comments should not be provided. The supervisor should understand that all comments are being recorded by the inspector. Crew members should be provided these instructions. Do not make small talk with the inspector.

Do not hesitate to request the inspecting officer to ask the project manager, or Safety for clarification of policies. If you do not have an answer, do not make one up!

25.5.5 At the conclusion of the inspection, all of the events that took place should be entered into the supervisor's Daily Status Field Report, and the original notes must be forwarded to Safety/HR.