

OSHA *continued*

rare variances are hard to get; expense or hardship will not be enough. The employer must show that it is nearly impossible to comply.

RECORD KEEPING

In the words of the act, "Each employer shall make, keep, and preserve, and make available to the Secretary (of Labor), or the Secretary of HEW, such records regarding his activities relating to this Act as the Secretary, in cooperation with the Secretary of HEW, may prescribe by regulation as necessary or appropriate for the enforcement of this Act or for developing information regarding the cause and prevention of occupational accidents and illnesses. In order to carry out the provisions of this paragraph such regulations may include provisions requiring employers to conduct inspection."

Records of all work-related deaths, injuries and illnesses must be maintained. Minor injuries requiring only first-aid treatment need not be recorded, but a record must be made if the injuries involved medical treatment, loss of consciousness, restriction of work or motion or transfer to another job.

"First aid" is described as one-time treatment and any follow-up examination of minor scratches,

cuts or burns. "Medical treatment" includes treatment by a physician or registered professional person.

Employers can also be required to maintain accurate records of employee exposure to potentially toxic materials or harmful physical agents. Golf course superintendents, club managers or kitchen supervisors and swimming pool directors should take careful note of this requirement. The records required of employers include: 1) a diary or log of all reportable injuries and illnesses; 2) an annual review of all reportable deaths, injuries and illnesses, and 3) a statistical report to the Secretary of Labor of all work injuries and illnesses required to be kept.

Required records should be kept at the location from which employees are paid or at their base of operations.

A special report must also be sent to the nearest OSHA office if any illness or injury results in the death of one or more employees or the hospitalization of five or more employees.

Records must be kept for five years. Entries in diaries or logs must be initialed by the manager or employee who is responsible for the information.

INSPECTIONS

In enforcing the standards, Labor

Department safety inspectors may enter any premise "without delay" and, generally, with no advance notice. Their inspections normally will be made during regular working hours. They will inspect the premises and all pertinent conditions, structures, machines, apparatus, devices, equipment and materials during their actual use. They will also question privately any employer, owner, operator, agent or employee.

The act permits the employer and a representative authorized by his employees to accompany the inspector during the physical inspection of any work place for the purposes of aiding the inspection.

Sites will be selected for inspection on the following priorities: 1) catastrophe and/or fatality; 2) complaints; 3) target industries (longshoring, wood products, roofing and sheet metal, meat processing and mobile homes and transportation equipment), and 4) general inspection.

Although the inspections are primarily to aid the enforcement of standards issued under the act, the inspector himself does not enforce these rules; he simply observes and reports on the employer's failure to do so and recommends citations and proposes penalties.

When the inspector first comes on the premises he will verify that the

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OSHA REGIONAL OFFICES

REGION I: Boston (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont); John F. Kennedy Federal Building, Government Center, Room E 308, Boston, Mass. 02203; (617) 233-6712.

REGION II: New York (New Jersey, New York); Room 3445, 1515 Broadway, New York, N.Y. 10036; (212) 971-5941.

REGION III: Philadelphia (Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia); Penn Square Building, Room 623, Juniper and Filbert Sts., Philadelphia, Pa. 19107; (215) 597-4102.

REGION IV: Atlanta (Ala-

bama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee); Suite 587, 1375 Peachtree St. N.E., Atlanta, Ga. 30309; (404) 526-3573.

REGION V: Chicago (Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin); Room 1201, 300 W. Wacker Dr., Chicago, Ill. 60606; (312) 353-4716.

REGION VI: Dallas (Arkansas, Louisiana, New Mexico, Oklahoma, Texas); Texaco Building, 1512 Commerce St., Dallas, Tex. 75201; (214) 749-2477.

REGION VII: Kansas City (Iowa, Kansas, Missouri, Nebraska); Waltower Building,

Room 300, 823 Walnut St., Kansas City, Mo. 64106; (816) 374-5249.

REGION VIII: Denver (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming); Denver Federal Center, Federal Building, Room 15010, 1961 Stout St., Denver, Colo. 80202; (303) 837-3883.

REGION IX: San Francisco (Arizona, California, Hawaii, Nevada); 10353 Federal Building, 450 Golden Gate Ave., San Francisco, Calif. 94102; (415) 556-0584.

REGION X: Seattle (Alaska, Idaho, Oregon, Washington); 1808 Smith Tower Building, 506 Second Ave., Seattle, Wash. 98104; (206) 442-5930.