GROWERTALKS

Features

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What Happens When OSHA Shows Up?

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What to expect during an OSHA inspection and proactive steps that can help you be ready long before it begins.

The knock on the door can come at any time and more often than many growers realize.

When the Occupational Safety & Health Administration (OSHA) arrives, how the inspection unfolds matters—not just for compliance, but for the outcomes that flow from it. What inspectors ask for, what they observe on the walk-around and how employers respond in the moment can influence whether issues turn into citations, how severe those citations are and even whether small oversights balloon into major findings.

Why OSHA shows up and what triggers a visit

In most cases, OSHA inspections occur with little or no advance warning. In horticulture, common triggers include:

- Injury reporting: Federal rule requires employers to report workplace fatalities within eight hours and inpatient hospitalizations, amputations or loss of an eye within 24 hours of knowing about them.
- Employee complaints: These often involve issues like heat exposure, inadequate training or unsafe equipment use. OSHA frequently prioritizes these reports.
- Referral or follow-ups: This may be from first responders, another agency or repeat conditions noted in injury logs.

What OSHA asks for first and why documentation matters

Most inspections start with a review of documentation. OSHA will ask to see records that provide insight into workplace safety practices, injury trends and compliance efforts.

OSHA 300 Logs and injury reporting: Inspectors almost always ask for OSHA 300/300A logs and 301 incident reports (if required to be maintained), especially when conducting routine or programed inspections. These help shape the focus of the walk-around. For example, if logs show frequent strains from material handling or repeated slips/trips/falls, an inspector may prioritize observing those areas in action.

Training records and written programs: OSHA requires more than just completed training—it must be documented, evaluated and delivered in a format that employees can understand. For multilingual crews, this means training in their primary language, not just checking boxes in English. Areas of focus include:

- Heat illness prevention training
- Forklift and other mobile equipment training
- Hazard communication training
- Machine operation and guarding training
- Fall protection awareness

Written safety programs are equally critical. In addition to training logs, inspectors will ask for documentation that reflects real operational practices—such as heat illness plans, forklift certification processes and hazard communication protocols.

What OSHA sees on the walk-around

After reviewing records, OSHA inspectors typically conduct a physical walkthrough to assess worksite conditions.
Heat illness controls in practice: Even without a finalized federal heat standard, heat illness and heat illness prevention is high on OSHA's radar, especially in greenhouses and outdoor fields where temperatures can soar. Inspectors look for:

- Evidence that workers are taking appropriate water/rest breaks
- Shade or cooling areas being used when heat thresholds are met
- Supervisors and employees are aware of heat illness symptoms and intervention steps

If none of this exists, inspectors may rely on the General Duty Clause—a broad safety statement—which can lead to citations later.
Ladders and roof access: Inspectors will check access points to elevated surfaces:

- Are ladders in good condition, inspected regularly and appropriate for the task?
- Are damaged ladders kept in service or "temporarily fixed" with boards, wiring, tape or makeshift repairs?
- Is there a tie-off plan or other fall protection method for work on top of greenhouses?

Fall hazards related to greenhouse maintenance frequently draw OSHA attention. If a worker routinely accesses a roof without documented procedures and fall protection, that's a violation waiting to happen.
Machine guarding and moving parts: Any moving parts or powered equipment will draw attention. Potting machines, conveyors, transplanters and PTO shafts on tractors are frequent issues of concern. Common issues include:

- Guards removed during maintenance and not replaced
- Inadequate guarding on newly installed machines
- Lack of protection on older equipment or attachments

Equipment operation practices: Inspectors review powered equipment usage and related training. While Powered Industrial Trucks (forklifts) have very specific training regulations, companies must also provide proper training for other mobile equipment like scissor lifts and tractors. Inspectors may ask to see classroom and hands-on evaluation records—not only that training was offered, but that operators were evaluated and found competent.

Your responses matter

Not all findings lead to violations, but how you engage during the inspection process can shape results. Consider

these best practices:

1. Be courteous, professional and verify credentials. A polite, professional approach demonstrates good faith and supports good communication, while verifying credentials ensures the inspection is legitimate.
2. Provide only what's requested. When OSHA requests documents, supply exactly what's been asked for—no more, no less. Unsolicited materials may expand the scope of the inspection unnecessarily.
3. Accompany the inspector. Never allow a walk-through to proceed unaccompanied. Escorting inspectors allows you to provide context, manage the route and observe their documentation. Be sure to take your own documentation—notes and photos—to support any after-inspection conversations.
4. Address minor issues immediately. If an easily correctable condition is identified—such as a missing outlet cover—resolving it on the spot demonstrates a proactive safety culture.
5. Understand the process takes time. OSHA has up to six months to issue citations. Verbal observations made during the inspection may not translate into violations—but they should still inform your safety review.

Internal practices that make a difference

The best way to be ready for an OSHA inspection is to make safety a priority every day—not just when an inspector arrives.

- Conduct routine inspections and safety audits: A regular safety audit will help uncover many of the same things OSHA would find. Horticulture businesses that perform regular safety audits and implement risk-mitigation measures in response to findings tend to experience fewer injuries/claims, which can help to lower insurance costs.
- Assign an OSHA contact: Designate one person (and a No. 2 in case the primary person isn't available) when OSHA arrives who knows where records are stored and how to navigate interaction with compliance officers.
- Track and fix hazards: Encourage workers to report hazards. Use a reporting process that identifies who gets the report, who fixes it and when it's done.
- Know what applies to you: Before an inspection, take time to confirm which OSHA standards apply to your operation. Understanding what's relevant helps you prepare documentation and training that aligns with those standards.

Inspection readiness starts long before OSHA arrives

In horticulture, inspections may begin with a single concern, but can quickly expand if broader risks are present. A well-prepared operation is positioned to navigate the process confidently and efficiently. Identifying and addressing hazards as part of your regular safety practices not only supports compliance—it also protects the well-being of the people who keep your business running. **GT**

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