

Frequency of Inspections

Most employers have plenty of safety related items at their facility that need regular inspections. The common question we hear is, "Are there requirements for inspecting this item at a set interval or is it just a recommendation?" Ultimately, it is important to know if some regulatory group requires or recommends inspections at a certain interval, but there are still various safety products that the manufacturer suggest be inspected at preset intervals. For others, it might be a judgment call by the facility. This might be based on frequency of use for that item or the seriousness of that item not working when it is needed most!

Beyond the obvious reason of helping to keep employees safe, regular documented inspections will ultimately help with liability concerns in the event of an accident or incident. We live in a litigious society, so minimizing the risks to the company is important for management to consider. Performing a risk assessment of the safety assets that should be inspected will help you determine an appropriate frequency, provided there are no hard regulations or manufacturer requirements that are already identified. We are working with a large customer on the east coast that asked us to identify both REQUIRED and RECOMMENDED frequencies for specific items in their facility, so we thought the following list could be shared with you. Granted, every customer inspection list will be different, based on their facility layout and risk concerns:

Fire Extinguishers: According to OSHA [29 CFR 1910.157(e)(2), employers must perform a visual inspection on portable fire extinguishers at least **once per month** (generally put on a tag). This is also a good benchmark for homeowners to follow. Visually inspecting your fire extinguishers helps ensure several important points:

- The extinguisher is still present in its designated location
- No damage has occurred to the equipment
- No obstructions are blocking the equipment from view or from easy access
- The extinguisher is fully charged and operational

Spill Kits: No regulation stipulates an inspection frequency for spill kits, but it's a good idea to set up a regular schedule for kit inspections. **We suggest monthly.**

<u>Eye Wash/Shower – Plumbed and Non-Plumbed:</u> OSHA's medical services and first aid standard (1910.151) does not address testing. The American National Standards Institute's (ANSI) emergency eyewash and equipment standard does. ANSI says you should:

- Test showers and eyewash stations at least weekly
- Inspect showers and eyewash stations annually for compliance with ANSI product specifications

OSHA references the ANSI standard, but doesn't require compliance with it. With that said, weekly is "recommended," but if your team does this at LEAST monthly, that is better than many other companies do. Please remember that "plumbed" eyewash and showers need to be activated with water run through them, as rust and debris can potentially be sitting stagnant in the line (that is why weekly activation is suggested). With the eyewash stations that either have fluid cartridges or water with a preservative in a tank, you are verifying that the date of the preservative is still good and that there is still indeed water in the reservoir (sometimes these are accidentally activated and management does not realize this, as some units contain their own fluid and do not dump water on the floor).

FA Kits/Trauma Kits/AEDs: Depending on their location, the frequency of first aid kit inspections will vary (there is no specific OSHA standard on this). In the workplace where there may be a higher frequency of use, kits should be inspected monthly or as needed depending on use. We recommend monthly (not only looking for missing items but checking expiration dates on certain items). This would also apply to trauma kits. While many AEDs do a "self-evaluation" and

some can alert you to a problem (start beeping if battery is getting bad), it is a good idea to check these units monthly (at a minimum). Part of this process is to verify the expiration dates of both the "pads" and the batteries. We would want to check your make and model to verify this meets the suggested inspection frequency by that manufacturer.

Emergency Lights/Exit Signs: NFPA 101 (Life Safety Codes) requires a monthly inspection of all emergency and exit lighting systems. Standard Fire Prevention Code 1999 807.1.4 Exit Illumination and Signs states a functional test shall be conducted on every required emergency lighting system at 30-day intervals for a minimum of 30-seconds. In essence, you are tricking the emergency light/sign into thinking there is a power outage (by pushing the "test" button) and it will turn on in about 3 seconds after holding it. You are testing the "rechargeable battery" that is housed in the unit, making sure it will do its job when called upon.

Ladders: OSHA 1910.23(b)(9) indicates that *ladders are inspected before initial* use in each work shift, and more frequently as necessary, to identify any visible defects that could cause employee injury. There is a concern that you still should have a competent person periodically inspecting and documenting the integrity of a given ladder (keep on a checklist or spreadsheet). A competent person is going to take extra time to check the label (those with missing or illegible labels need to be removed from service until a replacement label it applied) and check the ladder thoroughly for any dents, deterioration (of fiberglass and wood ladders), missing feet, and potential cracked rungs. I suggest this be done either monthly or quarterly. Regardless, the frequency of inspection for ladders is open to interpretation and should be decided by a risk assessment. As an example, it is hard to justify inspecting ladders monthly in an office environment where they are used twice per year (as an example). There is an incredible amount of liability in ladder usage, as injuries from them can be quite severe and implications from potential lawsuits are commonly severe (especially if we don't have good documentation on the inspections and training for their proper use). Again, check with the manufacturer for their process and suggestions.