

INSPECTION PROCEDURES

P&P C-1A
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AUTHORITY: California Labor Code §§6304.3(d), 6307, 6309, 6314, 6314.1, 6317.5, 6317.7, 6320, 6321, and 6322.

POLICY: It is the policy of the Division of Occupational Safety and Health to conduct inspections of California workplaces in accordance with applicable sections of the California Labor Code, Title 8 Safety Orders and Division Policy and Procedures.

PROCEDURES:

A. PREPARATION FOR INSPECTION

1. Complaint, Accident, Referral, Hazard and Industry Review

Prior to initiating an inspection, compliance personnel shall review the nature of the complaint, accident or referral, the type of hazards found in the industry in which the inspection is to be conducted, and the past citation history of the employer to be inspected.

2. Advance Notice

a. Compliance personnel shall not give the employer advance notice that an inspection is to be conducted by the Division, unless given express permission to do so by the Chief of the Division or the Chief's designee.

b. Advance notice of an inspection is usually given in the following situations:

(1) When an imminent hazard is present so that the employer can abate the hazard as quickly as possible;

(2) When an inspection has to be conducted after regular business hours;

(3) When special arrangements are necessary to conduct the inspection, e.g., when it is necessary for maintenance of security at a correctional facility or for protecting the safety and health of compliance personnel when inspecting a correctional facility.

c. Compliance personnel shall ensure that the time between the opening conference and the initiation and completion of the walkaround portions of the inspection is brief enough so that the perception is not created that the employer had advance notice of the inspection.

d. Prior to initiating a programmed inspection, compliance personnel shall verify that the employer is doing business at the address to be inspected without giving advance notice of the inspection.

3. Materials and Equipment

a. Inspection Forms and Employer Handouts

Prior to initiating an inspection, compliance personnel shall ensure that all applicable inspection forms and employer informational handouts are ready to be taken with them to the inspection site.

b. Sampling Equipment

Prior to initiating an inspection, compliance personnel shall ensure that all appropriate sampling equipment to be taken with them to the inspection site is ready, calibrated and in good working order.

c. Personal Protective Equipment

(1) Prior to initiating an inspection, compliance personnel shall ensure that all necessary personal protective equipment (PPE) to be taken with them to the inspection site is ready and in good working order.

(2) Prior to use, compliance personnel shall be trained in the proper use and limitations of all PPE, such as hard hats, safety glasses or goggles, safety shoes, coveralls (fire-retardant if necessary) and respirators.

NOTE: Compliance personnel shall not be assigned to conduct an inspection which requires them to wear a respirator unless they have undergone the applicable qualitative or quantitative fit tests.

4. Expert Assistance

a. During the performance of inspections involving specialized worksites or complex hazards, the assistance of a technical expert from within the Division, e.g., from other District Offices in the Cal/OSHA Enforcement Unit, from the Elevator, Pressure Vessel, Crane or Medical Units, or from outside the Division, e.g., from the private sector, may be needed to effectively conduct the inspection.

b. Prior to initiating an inspection, compliance personnel shall determine if expert assistance is necessary to conduct the inspection. If such assistance is needed, compliance personnel shall notify the District Manager of the need for assistance. The District Manager shall arrange, through the Regional Manager, for the expert assistance to be provided.

c. During the inspection, Division and outside experts shall coordinate their activities with compliance personnel conducting the inspection.

NOTE: Experts hired by the Division as consultants for the purpose of assisting with the particular inspection shall be accompanied at all times by compliance personnel conducting the inspection.

d. All findings, sampling results, conclusions and recommendations of experts shall be included in the inspection file.

B. INITIAL CONTACT

1. Professionalism

When conducting an inspection, compliance personnel shall conduct themselves as professional safety engineers and industrial hygienists and be cognizant that they represent the State of California at all times.

2. Timing

Inspections shall be conducted during normal business hours unless special circumstances necessitate otherwise.

NOTE: If severe weather conditions are encountered during an inspection and activities at the inspected worksite are shut down, compliance personnel shall postpone the inspection and continue it when weather permits.

3. Presentation of Credentials

Compliance shall identify themselves to the employer by showing their State of California Photo Identification Card and Division of Occupational Safety and Health business card prior to conducting an inspection of the worksite.

4. Consent

a. Compliance personnel shall obtain the employer's permission to enter the worksite, unless the worksite is one which is open to the public, and shall obtain the employer's permission to conduct an inspection of the worksite prior to beginning an inspection.

b. Compliance personnel shall obtain permission to conduct an inspection from a management level representative of the employer, or if none is present, from the employer representative who appears to have authority to grant permission to conduct an inspection.

NOTE: For inspections of California employers working at a worksite controlled by the federal government, e.g., military installations, national parks and federal buildings, compliance personnel shall identify themselves to the highest ranking management official at the site and obtain their permission to conduct an inspection.

c. When a management level or other acceptable employer representative is not present at the worksite, compliance personnel shall contact the employer by telephone and request permission to conduct the inspection.

(1) If the employer consents to the inspection over the telephone, but does not plan to come to the worksite to participate in the inspection, compliance personnel shall request that the employer designate an individual to accompany compliance personnel on the walkaround.

(2) If the employer does consent over the telephone to the inspection, but requests that compliance personnel wait for the employer's arrival, compliance personnel shall await the arrival of the employer, or a representative of the employer, but shall do so for no more time than is reasonable, i.e., one hour. If the employer does not appear at the worksite within one hour, compliance personnel shall initiate the inspection.

(3) If compliance personnel cannot reach the employer after making a good faith effort to do so, compliance personnel shall initiate the inspection and shall document the effort made to obtain the employer's consent to conduct the inspection on the Cal/OSHA 1A.

(4) If the employer refuses permission to conduct the inspection, compliance personnel shall consider the employer's response as a refusal of entry.

5. Refusal of Entry

Compliance personnel shall notify the District Manager of every refusal of entry. The District Manager shall notify the Legal Unit, through the Regional Manager, of the refusal of entry, and the Legal Unit shall provide assistance in obtaining a warrant or in taking other appropriate action. See P&P C-25.

6. Labor Disputes

a. If a labor dispute, including work stoppages, strikes or picketing, is encountered at a worksite subject to an unprogrammed or programmed inspection between the employer and his or her employees, or between two different labor unions competing for the right to represent the employer's employees, compliance personnel shall notify the District Manager before attempting to enter the worksite.

b. Programmed inspections may be deferred during a labor dispute and unprogrammed inspections shall be conducted with appropriate caution.

NOTE: Any complaint received by the District from a worksite in which a labor dispute is occurring shall be thoroughly evaluated to determine if it is a valid complaint. See P&P C-7.

C. OPENING CONFERENCE

1. Management Representation

An opening conference shall be conducted with the employer, or the highest ranking representative of the employer available at the inspected worksite.

EXCEPTION: If an inspection is being conducted because of an imminent hazard, compliance personnel shall, after identifying themselves to the nearest available representative of the employer, ask to be taken to the imminent hazard immediately. After employees have been removed from exposure to the imminent hazard, compliance personnel shall conduct an opening conference.

2. Joint Employer-Employee Opening Conference

Compliance personnel shall hold a joint opening conference with the employer, or his or her representative, and bargaining unit representative of the employees. When is not possible to hold a joint opening conference, compliance personnel shall hold separate opening conferences when appropriate.

3. Multi-Employer Worksites

a. Construction Worksites

(1) After entering the worksite, compliance personnel shall make contact with the highest ranking representative of the general contractor present at the worksite and ask about the presence of subcontractors currently working at the worksite on the day of the inspection.

(2) Compliance personnel shall notify any subcontractor working at the worksite, who is also to be inspected, of the opening conference, and allow a reasonable amount of time, but not more than 30 minutes to one hour, to provide a representative to attend the opening conference.

(3) Compliance shall document the names, addresses and activities of each employer involved at the multi-employer worksite. If any violative condition(s) are present at the multi-employer worksite, compliance personnel shall determine if any of the employers involved at the multi-employer worksite have exposed their employees to the violative condition(s) (Exposing Employer), created the violative condition(s) (Creating Employer), failed to correct the violative condition(s) (Correcting Employer), and any employer who, by contract or practice, controls the multi-employer worksite (Controlling Employer). See P&P C-1C.

b. Other Multi-Employer Worksites

At non-construction multi-employer worksites, compliance personnel shall notify each of the employers who are present at the worksite, and who will also be inspected, of the opening conference and allow a reasonable amount of time, but not more than 30 minutes to one hour, to provide a representative to attend the opening conference.

4. Opening Conference Format

a. The following format contains the essential items compliance personnel need to include in an opening conference. The order in which the items are covered, or the addition of other items, is the responsibility of the inspector. See Item 11 (Opening Conference) on the Cal/OSHA 1A.

NOTE: An Opening Conference may be conducted at the employer's worksite with the employer physically present or may be conducted at the worksite with the employer telephonically present.

b. During the opening conference, compliance personnel shall:

(1) Show their State of California Identification and exchange business cards with the employer;

(2) Explain the purpose and scope of the inspection;

NOTE: When communicating the purpose and scope of the inspection, compliance personnel shall take care not to reveal to the employer the identity of the complainant(s) or any of the complaint item(s) because disclosure of the complaint items may identify the complainant to the employer.

(3) Explain to the employer the elements of the Cal/OSHA program in general terms, and present to the employer any informational materials about the Cal/OSHA program;

(4) Inform the employer about the rights that the employer's employees, or their labor union representative, have to make a complaint to the Division about workplace safety and health hazards, to be allowed by the employer to participate in the walkaround part of the inspection, to be interviewed by compliance personnel out of the presence of the employer, to be free from being disciplined by the employer for participating in the inspection, to observe any monitoring or measurement of employee exposure conducted pursuant to a Title 8 Safety Order, to be notified of toxic substance exposure and to be informed of any corrective action taken.

(5) Inform the employer about the inspection walkaround procedures, that employee interviews will be conducted during the walkaround, that photographs of the worksite may be taken during the walkaround, and, if hazards which are violations of Title 8 Safety Orders are observed during the walkaround, that citations classified as regulatory, general, serious, willful, repeat or failure-to-abate shall be issued and monetary penalties proposed even if the employer is a public sector entity;

NOTE: Arrange for an employer and employee bargaining unit representative to accompany you during the walkaround. If employees at the worksite are represented by more than one labor union, arrange, if possible, for an individual from one labor union to represent the other(s) during the walkaround.

(6) Review the employer's Injury and Illness Prevention (IIP) Program and explain how an effective IIP Program can benefit the employer in the event that citations are issued, see Item 15 (IIP Program Review) on the Cal/OSHA 1A;

NOTE: Compliance personnel shall request a copy of the employer's IIP Program to review at a later date.

(7) Discuss the requirement that every employer post the Cal/OSHA poster "upon receipt";

NOTE: If the employer does not have a Cal/OSHA Poster posted after compliance personnel determine that the employer had received one, compliance personnel shall cite the employer for a regulatory violation (Failure to Post the Cal/OSHA Poster, 8 CCR §340) and provide the employer with a Cal/OSHA Poster.

(8) Discuss the requirement that every employer must have workers' compensation insurance for their employees;

NOTE ONE: Compliance personnel shall ask the employer for the name of their workers' compensation insurer.

NOTE TWO: Compliance personnel shall ask the employer for documentation from their insurer of their experience modification rate if the employer is experience-rated by their insurer (most small employers are not experience-rated). If the employer is qualified for small employer relief (fewer than 20 employees and low hazard) from IIP Program requirements, see P&P C-45A and 45B.

(9) Explain the Title 8 injury and illness recordkeeping requirements and verify that the employer maintains the Log (OSHA Form 300), if required to do so by regulation, and has a file of employer reports of employee injuries or illnesses (Form 5020 or equivalent);

NOTE: Compliance personnel shall request a copy of the employer's Log and relevant employer reports of employee injuries and illnesses to review at a later date. Set a timeframe for the employer to provide the documents and use the Cal/OSHA 1AY to request documentation from the employer.

(10) Examine any of the employer's permits or registrations and ask if the employer has obtained any variances from Title 8 Safety Orders;

(11) Ask the employer if any specialized PPE equipment is needed by compliance personnel to conduct the inspection; and

(12) Ask the employer for consent to proceed with the walkaround part of the inspection.

NOTE: If the employer refuses compliance personnel entry into the worksite, see Section B.4.

D. WALKAROUND

1. Scope

a. Comprehensive -- See P&P C-1, Section C.1.

b. Partial -- See P&P C-1, Section C.2.

c. Expanding Scope from Partial to Comprehensive

After the opening conference and while conducting the walkaround, compliance personnel may expand the scope of an inspection from partial to comprehensive if workplace conditions or employee comments suggest the need for a comprehensive inspection.

NOTE: Compliance personnel shall document the reasons for expanding the scope from a partial inspection to a comprehensive one in Item 23 on the Cal/OSHA 1A.

2. Employee Participation in the Walkaround

- a. An authorized employee representative shall be offered the opportunity by the employer to accompany compliance personnel during the walkaround.
- b. Where there is no authorized employee bargaining unit representative at the inspected worksite, compliance personnel shall consult with a representative number of the employer's employees concerning matters of workplace safety and health.
- c. If a translator is needed to effectively communicate with employees, compliance personnel shall secure a reliable translator.

NOTE: Compliance personnel shall not use the employer, or a representative of the employer, as employee translators. However, other employees may be used as translators.

- d. Compliance personnel shall inform any employee who participates in the walkaround that it is the employer's duty to compensate employees for time spent during the walkaround or during an interview. Inform employees that if the employer denies employees such compensation, a complaint may be filed within six months after the occurrence of the denial with the nearest office of the Division of Labor Standards Enforcement (DLSE).

3. Walkaround Format

- a. The following format contains the minimum items compliance personnel need to include in a walkaround. Every worksite is different and it is the responsibility of compliance personnel to perform a complete and effective walkaround consistent with the scope of the inspection.
- b. During the walkaround, compliance personnel shall, at a minimum:
 - (1) Check if any of the following items are posted at the worksite:
 - (a) Cal/OSHA poster;
 - (b) Previously issued citations;
 - (c) Injury and Illness Summary (during February only);
 - (d) Material Safety Data Sheets;
 - (e) List of Hazardous Substances;
 - (f) Employee exposure records notification;
 - (g) Permits;

- (h) Forklift Operating Rules (if applicable);
- (i) Workers' Compensation Insurer;
- (j) Industrial Welfare Commission Poster; and
- (k) Any other required postings.

NOTE: If an employer cannot show proof of workers' compensation insurance or has not posted the applicable Industrial Welfare Commission posters, compliance personnel shall make a referral to the nearest office of the Division of Labor Standards Enforcement (DLSE).

(2) Observe, and document on the Cal/OSHA 1B or the Field Documentation Worksheet, work processes, work conditions and equipment to determine if violations of Title 8 Safety Orders exist at the worksite;

NOTE: A preliminary walkaround of the worksite shall be completed before compliance personnel make a determination to request (safety engineer) or to perform (industrial hygienist) comprehensive industrial hygiene sampling.

(3) Evaluate, and document on a copy of the Cal/OSHA 7, each complaint item to determine if the item exists and if it constitutes a violation of a Title 8 Safety Order;

NOTE: Compliance personnel shall not document any observation of a complaint item on the Cal/OSHA 1A in order to safeguard the confidentiality of the complainant.

(4) Interview a representative number of employees and record their names, job title, addresses, telephone numbers and labor union affiliation in Item 23 on the Cal/OSHA 1A;

(5) Take any pertinent photographs of the worksite, including photographs of any materials, processes or equipment;

NOTE ONE: Compliance personnel shall not photograph materials, process or equipment which are subject to trade secret protection or which are proprietary unless absolutely necessary and only after permission to do so has been granted by the employer. If such photographs are deemed necessary, compliance personnel shall safeguard the photographs by keeping them in a secure place.

NOTE TWO: Compliance personnel shall not enter security areas of the worksite unless absolutely necessary and only after permission to do so has been granted by the employer.

(6) Collect pertinent documentary and physical evidence;

NOTE ONE: If during the investigation of an accident or occupational illness it is necessary to ensure that the worksite, or physical evidence located at the worksite, are preserved until the inspection can be completed, compliance personnel shall issue an Order to Preserve. See P&P C-25A.

NOTE TWO: If it is necessary to collect physical evidence during a non-accident or occupational illness inspection, compliance personnel shall utilize the Cal/OSHA 1AZ (Chain of Custody) for the collection of evidence.

NOTE THREE: If compliance personnel observe any potential asbestos-related violations, then they shall document the presence of asbestos by bulk sampling, if possible. Employee exposure to asbestos shall be documented by personal sampling representative of "worst-case," full-shift employee exposure, if possible. Exposure to, or the presence of, other contaminants shall be documented through sampling, as appropriate.

(7) Document on the Cal/OSHA 1B, Field Documentation Worksheet or Note taking Sheet each violation observed, its classification and the location of the violation within the worksite;

(8) Document information obtained during the inspection to support a determination about the employer's good faith, size, and history as follows:

(a) Good Faith

The employer's "Good Faith" in Item 20 of the Cal/OSHA 1A can be demonstrated by the following factors:

- i. Overall evaluation of safety and health program (Item 19 on the Cal/OSHA 1A);
- ii. Degree of cooperation with compliance personnel during the inspection;
- iii. Genuine effort to comply with Title 8 Safety Orders, including IIP Program requirements;
- iv. Effectiveness of communication with employees about workplace safety and health matters; and
- v. Resolve to correct any hazards which were identified during the walkaround.

NOTE: Any employer who receives a poor rating for any sub-item in Item 19 shall not be given a "good" rating for Good Faith in Item 20 on the Cal/OSHA 1A.

(b) Size

Size is based on the total number of employees controlled by the employer at all of their locations throughout the United States at the time of the inspection as follows:

- i. One to ten -- 40%
- ii. Eleven to twenty-five -- 30%
- iii. Twenty-six to sixty -- 20%
- iv. Sixty-one to one hundred -- 10%
- v. More than one hundred -- 0%

(c) History

The employer's history is based on an examination and evaluation of the employer's previous citation(s) within the last three (3) years as follows:

- i. Good -- No serious, repeat or willful violations and less than one general or regulatory violation per 100 employees at the establishment -- 10%;
- ii. Fair -- No serious, repeat or willful violations and less than twenty (20) general or regulatory violations per 100 employees at the establishment -- 5%;
- iii. Poor -- A serious, repeat or willful violation or more than twenty (20) general or regulatory violations per 100 employees at the establishment -- 0%;

NOTE: For a fixed establishment, the evaluation of the employer's history is based upon the history of the establishment at that location. For a non-fixed establishment, the evaluation of the employer's history is based upon that employer's regional citation history, except for field sanitation violations. See P&P C-46.

(9) After completing the walkaround, compliance personnel shall conduct either an Exit Conference (See Section E.) or a Closing Conference (See Section F.) with the employer before leaving the worksite.

E. EXIT CONFERENCE

1. No Violations Observed

If compliance personnel are certain that no violations were observed during the walkaround and that no Citations or Notices will be issued, compliance personnel shall inform the employer that no violations were observed, and that, after approval by the District Manager, a Cal/OSHA 1AX (Notice of No Violation After Inspection) shall be issued to the employer. See Forms Completion, Section I.

NOTE: If no violations are observed and no enforcement document will be issued, or a Information Memorandum will be issued, compliance personnel may conduct an abbreviated Closing Conference consisting of the Items found in Section F.2.a. and b., F.3.a, b. and j..

2. Violations Observed

a. Field-Issued

If violations are observed during the walkaround and citation(s) are issued in the "field" without District Manager review and approval, a Closing Conference with the employer or the employer's representative shall be conducted. See Section F.b. below.

b. Office-Issued

(1) If violations are observed during the walkaround, and citations are going to be issued at a Closing Conference to be scheduled at a date following the walkaround, compliance personnel shall conduct an Exit Conference with the employer prior to leaving the worksite.

(2) During the exit conference, compliance personnel shall provide the employer, or the employer's representative with:

(a) A preliminary report about any violations observed during the walkaround;

(b) An anticipated date when a closing conference will be held and citations will be issued; and

(c) Information about any recommended interim corrective action(s).

F. CLOSING CONFERENCE

1. The following format contains the essential items compliance personnel need to include in a Closing Conference when a Citation, Notice, Special Order or Order to Take Special Action will be issued. The order in which the items are covered, or the inclusion of additional items, is the responsibility of compliance personnel. See Item 13 (Closing Conference) on the Cal/OSHA 1A.

NOTE ONE: A Closing Conference can be conducted at the employer's worksite or may be conducted with the employer over the telephone.

NOTE TWO: When no enforcement document will be issued, or a Information Memorandum will be issued, the Closing Conference consists only of the Items found in Section F.2.a. and b., F.3.a., b., e. and j..

2. Prior to conducting a closing conference, compliance shall:

- a. Notify the employer, or the employer's representative, of the date and time of the Closing Conference; and

NOTE: At multi-employer worksites, each employer who was inspected shall be notified of the closing conference and given a reasonable amount of time to attend the conference.

- b. Include employee representatives at the Closing Conference, unless the employer objects to their presence.

NOTE: If the employer objects to the presence of employees at the Closing Conference, but employee representatives want to be present, compliance personnel shall conduct a separate Closing Conference with employee representatives.

3. During a closing conference, compliance personnel shall:

- a. Discuss all conditions affecting occupational safety and health which were noted during the initial walkaround, and during any subsequent visits to the worksite, and describe in detail those workplace conditions which the Division believes represent violations of Title 8 Safety Orders and explain why the Division believes that they are violations;

NOTE: Compliance personnel shall discuss their evaluation of the effectiveness of the employer's Injury and Illness Prevention (IIP) Program even if no IIP Program violations were observed.

- b. Issue, and explain, any Citations, Notices, Special Orders, Orders to Take Special Action, or Information Memoranda to the employer, and inform the employer if additional enforcement documents may be forthcoming;

NOTE: If a Special Order, Order to Take Special Action or an Information Memorandum is issued, compliance personnel shall also complete a Cal/OSHA 1AX (Notice of No Violations), obtain District Manager approval for issuance, and issue the Cal/OSHA 1AX to the employer during the Closing Conference.

- c. Discuss the methods to abate the alleged violative conditions referenced in the Citation, Notice, Special Order or Order to Take Special Action, establish dates by when abatement must be completed and explain that, when abatement is complete, the employer must send Cal/OSHA 160 and/or 161 to the issuing District Office verifying that the violative condition has been abated, see P&P C-2;

NOTE: Explain to the employer that assistance is available from the Consultation Service to identify and correct workplace safety and health hazards for those violations the employer does not intend to appeal.

d. Explain the proposed penalties for each Citation Item, how the penalties were calculated, the adjustment factors which affect calculation of the proposed penalties, the revocation of the 50% abatement credit (or doubling of the penalty) if abatement is not completed by the agreed upon abatement date, the penalty for failure to abate the violative condition, and the penalty for a repeated violation in the future;

e. Explain the requirement that the employer must post a copy of the Citation, Notice, Special Order or Order to Take Special Action at the required location in the worksite and the penalties for failure to post;

f. Inform the employer that he or she may request an informal conference with the District Manager to discuss the inspection and the enforcement action within ten (10) working days of issuance of the enforcement document;

NOTE: The employer can request an Informal Conference with the District Manager anytime up to, and including, the day of the appeals hearing, if the employer has filed an appeal with the Occupational Safety and Health Appeals Board. See P&P C-20;

g. Explain to the employer that he or she has the right to contest the enforcement action by filing an appeal with the Occupational Safety and Health Appeals Board in Sacramento within 15 (fifteen) working days of the issuance of the Citation, Special Order or Order to Take Special Action;

h. Inform the employer that a follow-up inspection of their worksite may be conducted in the future if the Cal/OSHA 160 and/or 161 are not returned to the issuing District Office and for other reasons;

i. Inform the employer that he or she may seek a temporary variance from the Division of Occupational Safety and Health or a permanent variance from the Occupational Safety and Health Standards Board and explain the variance process;

NOTE: If a temporary variance is granted, it cannot be used as a defense to the enforcement action.

j. Remind the employer that he or she is prohibited from discriminating against an employee for making a complaint, or having their labor union representative make a complaint, to the Division about workplace safety and health hazards, for participating in the walkaround part of the inspection, for being interviewed by compliance personnel during the inspection, for participating in the closing conference or for exercising any other right given to employees by the California Labor Code.

G. OFFICE PROCEDURES

Compliance personnel shall submit the completed Cal/OSHA 1AX, together with the inspection file, to the District Manager for approval prior to issuance.

H. FORMS DISTRIBUTION

The original Cal/OSHA 1A, and a copy of the Cal/OSHA 1AX, shall be retained in the District Employer Case File along with other inspection documentation.

FORMS COMPLETION FOR THE Cal/OSHA 1A, 1AX, 1AY & 1AZ

Cal/OSHA 1A

Cal/OSHA 1AX

Cal/OSHA 1AY

Cal/OSHA 1AZ