

Ben Lavery IV talks about OSHA 300 Log changes and upcoming deadlines in early 2019

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Ben Lavery IV from California Safety Training Corporation (CSTC) talks about the recent changes to OSHA 300 Log reporting, and the upcoming deadlines, including fines, and how to use your OSHA 300 logs to help your business.

Transcript

What should companies be aware of with OSHA 300 changes and deadlines?

So your OSHA 300 log need to be posted. It's commonly done at the notice boards from February 1st to April 30th. Also, as a change as of last year, they need, you need to be electronically reporting those OSHA 300 logs. So as of February 1st, you'll need to report your OSHA 300 logs for 2018 and that's a change because in the past you would just post it on a board you didn't have to do that electronic reporting. And they changed that policy last year. Caught us by surprise because California was saying they're not going to do it and then they changed that up and asked us to do it. Now they haven't, that we've seen, taken enforcement action for not doing that electronic reporting for the year 2017. That should have been done in the I think it was the summer of 2018, but we believe that they will take enforcement action if you do not report your OSHA 300 logs for 2018, in this spring coming. And that's for anyone who has 25 or more employees and they're working in regulated industries. Most of the industries that CSTC works with are regulated industries. So those would be agricultural, agriculture, construction, general industry, manufacturing, transportation are all regulated industries. Those that are not would be the normal, less hazardous industries, such as your service industry that don't go and do hands-on work typically.

What types of fines can be expected if you are not compliant with OSHA 300 Log regulations?

The fines for not reporting or not posting your OSHA 300 logs, are getting more expensive but they're administrative penalties so they tend to not be more than \$5,000 and more typically would be under \$1,000. But it is, it's kind of like getting that ticket for not registering your car on time. You have to register your car and now you're paying a twenty five dollar penalty on top of your normal registration fee. So everyone has to report OSHA 300 Logs and if you don't, and they come in and give you this again I say it's a \$750 fine for not reporting them. Well not only do you still after report you've now pay 750 bucks for the privilege of reporting.

Would you like to talk about anything else regarding OSHA 300 Logs?

I would talk a little bit about OSHA 300 logs and I think it's an area for CSTC to work with our clients to improve on really looking at those OSHA 300 logs. To make sure that we're designing programs that address what we would call a lagging indicator. In other words, we don't always want to be looking backwards to predict what we're supposed to do this year, but it's a mistake not to look at the past to make sure that we're addressing what the past issues or problems are. So I think it's one of those areas specifically in OSHA 300, that there's a big debate about what's a recordable injury and what's a first-aid. And so I think, documenting your first aids and recordables as a good indicator of what your potential future problems are is really wise move and I don't know that we really do a great job of reaching out to our clients and saying hey, what are, show us your OSHA 300 log, how can we help to make sure that doesn't happen and then get at least address that lagging indicator and get into predictions too and really look at future indicators, which I think the PASI program, the Program Audit and Safety Inspection is one of the best tools for a predictor or for being proactive in predicting where your issues are. So in our mind those are two of the ways that we really address lagging and leading indicators. And that OSHA 300 log is definitely your lagging indicator, it's documented reported to the government right.

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California Safety Training Corporation

Address

2130 Brundage Lane
Bakersfield, CA 93304

Map Address (<https://maps.google.com/maps?q=2130%20Brundage%20Lane%2C%20Bakersfield%2C%20CA%2093304>)

Phone: 661-377-8300

Fax: 661-377-8313

Email: info@cstcsafety.com (<mailto:info@cstcsafety.com>)

Hours: Mon-Fri: 8:00am-5:00pm

More Information

www.i2p2.co (<http://www.i2p2.co>)

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