



REDACTED EXCERPT | REPORT ID 62FC03EB

Sample Corrective Action Log

Metals Fabrication · Statesville, NC · June 2026

Pages 7–17 of a real engagement report. Findings, CFR citations, priority ratings, corrective actions, and timelines are accurate to the engagement. Client identifiers withheld.

What's Inside

- ✓ Finding classification method
- ✓ CRITICAL / SERIOUS / DOCUMENTATION labels
- ✓ CFR-cited hazard entries
- ✓ Per-finding corrective action steps
- ✓ Action owner assignments
- ✓ Timeline commitments (30/60/90-day)
- ✓ Consolidated action-log summary
- ✓ Document coverage gap table

Find → Document → Assign → Verify → Close



FINDINGS & CORRECTIVE ACTIONS

CRITICAL Immediate action required — presents imminent hazard or regulatory exposure

SERIOUS Address within 30 days — required element missing or incomplete

DOCUMENTATION Administrative gap — document exists or process in place but needs formalization

DOCUMENTATION Corrective Action Log — Not Yet Created

29 CFR 1910 General Duty Clause

Finding:	No corrective action document currently exists. OSHA expects evidence that identified hazards are tracked, assigned, and resolved. Without a corrective action log, there is no record of follow-through on safety findings — including those identified during this audit.
Action Required:	Create a corrective action log that captures: date identified, hazard description, assigned responsible party, target completion date, and date closed. This can be a simple form or integrated into the ERP system.
Timeline:	Before first production employee starts

DOCUMENTATION Bloodborne Pathogen Exposure Control Plan — Missing

29 CFR 1910.1030

Finding:	Facility plans to train first responders and administer minor first aid on-site. Once any employee performs first aid or is designated as a first responder, a written Bloodborne Pathogen Exposure Control Plan is required. This plan must identify who may be exposed, describe the methods of compliance, and address post-exposure procedures.
Action Required:	Develop a written Bloodborne Pathogen Exposure Control Plan prior to first responder training. Contact Red Cross to schedule first aid/CPR certification for staff — all employees are recommended. The plan does not need to be complex but must be written, site-specific, and available to employees.
Timeline:	Prior to first responder training

DOCUMENTATION Emergency Action Plan — Muster Points and Assembly Areas Missing

29 CFR 1910.38

Finding:	The EAP is signed and in place. However, designated muster points and assembly areas are not yet documented in the written plan. The facility has six clearly marked and lit exit doors. A primary assembly area (front driveway) and severe weather shelter (interior bathroom wall or designated interior wall) were identified during the walkthrough but are not yet written into the plan. Note: facility is currently exempt from written EAP requirement at current headcount of 10 or fewer employees but is maintaining the plan voluntarily — which is commended.
Action Required:	Add the following to the written EAP before move to permanent facility: (1) Primary assembly area — front driveway, (2) Alternate severe weather shelter — interior bathroom wall or nearest interior wall, (3) Facility emergency contact phone numbers including local utilities, (4) Consider a magnetic rally point sign on the dumpster for visible identification.
Timeline:	Before move to permanent facility

DOCUMENTATION Facility Address — Must Be Updated Across All Documents

General — Document Control

Finding:	All current safety documents reflect the temporary facility address. The permanent facility address will differ. Presenting OSHA-required documents with an incorrect facility address during an inspection creates unnecessary questions about document accuracy and currency.
Action Required:	Update the facility address on all safety documents prior to or immediately upon move to the permanent building. This includes: IIPP, EAP, LOTO program, HazCom program, SDS library header, PPE program, and all training forms.
Timeline:	Before or upon move to permanent facility

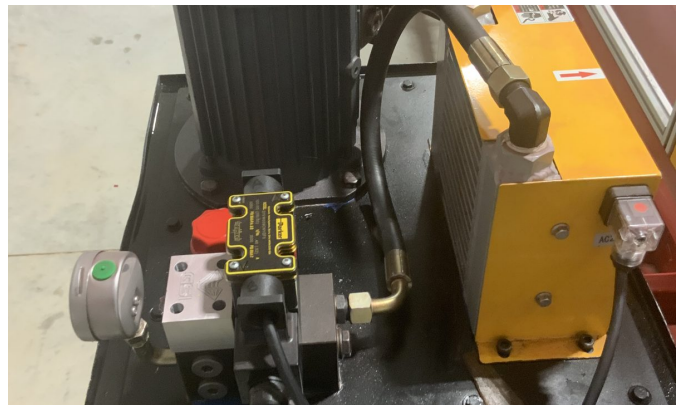
DOCUMENTATION SDS Library — Star Fire AW46 Hydraulic Oil Missing

29 CFR 1910.1200(g)

Finding:	The SDS library is comprehensive and well-organized. One gap identified: Star Fire AW46 Hydraulic Oil used in the D-coiler hydraulic power unit does not have an SDS on file. Two 5-gallon pails (10 gallons total) are on site. The product was identified during the facility walkthrough.
Action Required:	Obtain the GHS-compliant SDS for Star Fire AW46 Hydraulic Oil and add it to the digital SDS library and physical binder. SDS is available from the manufacturer or distributor. Verify the SDS is in 16-section GHS format.
Timeline:	Immediately — chemical is already on site



Star Fire AW46 Hydraulic Oil — two 5-gallon pails confirmed on site; SDS not in library



Hydraulic power unit — Parker valve block and electric motor; source of AW46 hydraulic fluid

SERIOUS Compressed Gas Cylinder — Unsecured and Improperly Stored

29 CFR 1910.101(b) / 29 CFR 1910.110

Finding:	A propane cylinder was observed stored upright but unsecured, immediately adjacent to the flammable liquids storage cabinet. OSHA requires compressed gas cylinders to be secured upright at all times to prevent tipping. Additionally, compressed gas cylinders should be stored separately from flammable liquids — the proximity to the flammable cabinet creates a compounded ignition risk in the event of a leak or cabinet breach.
Action Required:	Secure the propane cylinder with a chain, bracket, or cylinder stand that prevents tipping. Relocate the cylinder away from the flammable storage cabinet — minimum separation of 20 feet or a fire-resistant barrier rated at least 30 minutes. If propane is used for a specific operation, store it outside when not in immediate use. Add compressed gas cylinder storage procedures to the safety program.
Timeline:	Immediately



Propane cylinder stored unsecured immediately adjacent to flammable storage cabinet — 29 CFR 1910.101(b)

DOCUMENTATION Secondary Container Labeling — Simple Green Spray Bottle

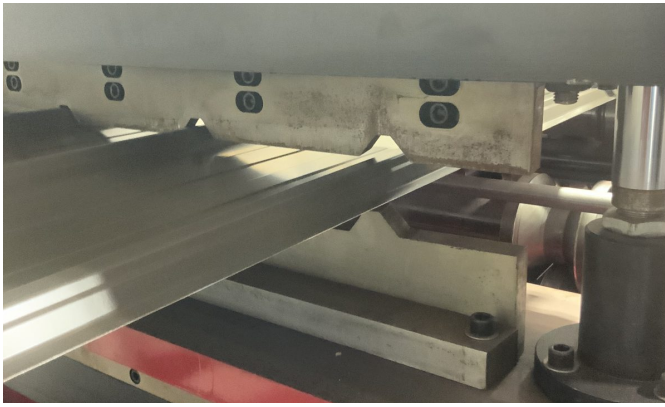
29 CFR 1910.1200(f)(7)

Finding:	One unlabeled secondary container identified — a Simple Green spray bottle. All containers transferred from original packaging that are kept beyond one shift must be labeled with the product identifier and applicable hazard information.
Action Required:	Label the Simple Green spray bottle with: product name (Simple Green), signal word (Caution), and primary hazard (skin/eye irritant). GHS-format label preferred. Exception applies only to portable containers for immediate use by one employee in one shift — not applicable here.
Timeline:	Immediately

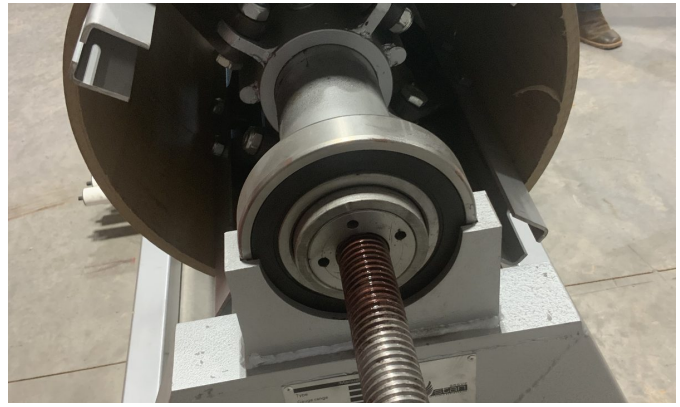
SERIOUS Machine Guarding Training — Not in New Hire Orientation

29 CFR 1910.212

Finding:	A Machine Guarding Program is in place. However, machine guarding training is not yet incorporated into the new hire orientation checklist. The employee handbook (parent company version) has not yet been modified to include manufacturing-specific policies such as guard bypassing and forklift incident reporting requirements.
Action Required:	Add machine guarding training to the new hire orientation sign-off sheet covering: identification of machine hazards, purpose and function of guards, prohibited practices (bypassing/removing guards), and reporting of missing or damaged guards. Update the employee handbook to include: (1) guard bypassing as grounds for termination, and (2) forklift incidents not reported as grounds for termination.
Timeline:	Before first production employee is hired



Shear blade — open point of operation at cut zone; guarding training must be in new hire orientation

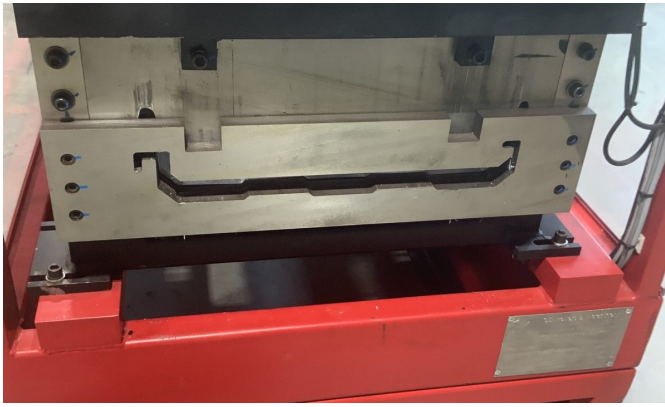


D-coiler drive end — rotating components and threaded screw; machine hazard awareness required

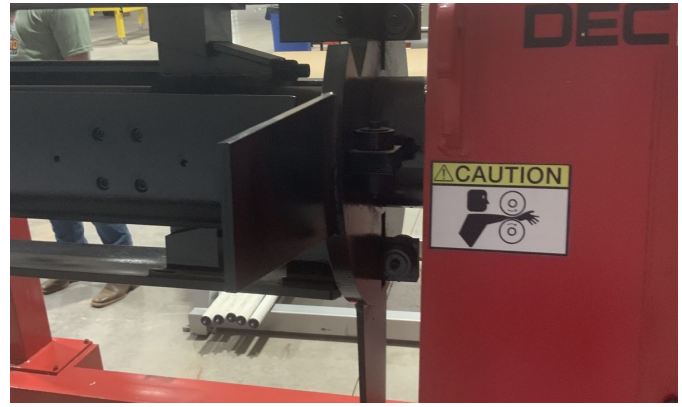
SERIOUS Machine-Specific LOTO Procedures — YBR Machine and Full Inventory Not Yet Complete

29 CFR 1910.147(c)(4)

Finding:	The permanent facility contains at minimum four machines requiring individual LOTO procedures: (1) DEC Roller, (2) YBR machine with hydraulic die set, (3) MU 1260V, and (4) GSI Rollers MR-18 Hybrid 2025. The YBR machine was observed with a production job spec sheet posted on it, indicating it is or will be in active use. LOTO procedures must be specific to each machine — naming energy sources, isolation points, and stored energy release steps. The GSI MR-18 factory enclosure addresses guarding but does not eliminate the LOTO requirement.
Action Required:	Develop machine-specific LOTO procedures for all four machines at the permanent facility. Each procedure must include: energy source types, specific isolation device locations, stored energy release steps, and verification method. Photograph each disconnect and label them (DC1, DC2, etc.) as planned. Post laminated or QR-coded procedures at each machine.
Timeline:	Before production employees operate any equipment



YBR machine — production job spec sheet posted; die set open; machine-specific LOTO procedure required



DEC Roller — CAUTION nip point and AUTOMATIC ROTATION warning labels; LOTO procedure required

DOCUMENTATION Heat Stress Prevention Plan — Not Yet Developed

29 CFR 1910 General Duty Clause / NC OSHA Heat Stress Guidance

Finding:	The permanent facility is a manufacturing environment with planned 4×10 shifts. Metal roll forming generates heat, and summer production will expose employees to combined ambient and process heat. OSHA's proposed heat stress rule and NC OSHA General Duty enforcement both expect employers to have documented controls for heat exposure before employees are placed in hot work conditions. No written heat stress plan currently exists.
Action Required:	Develop a written Heat Stress Prevention Plan before summer production begins. The plan should include: heat exposure risk assessment by work area, mandatory water provision (approximately one quart per employee per hour in warm conditions), designated cool-down rest area accessible to all employees, acclimatization schedule for new hires (gradual exposure over 7-14 days), supervisor training to recognize heat illness symptoms, and emergency response procedures for heat-related illness.
Timeline:	Before summer production begins

SERIOUS First Aid Kits — Insufficient Coverage

29 CFR 1910.151(b)

Finding:	Facility currently has one first aid kit. For a manufacturing facility with multiple work zones, OSHA requires first aid supplies to be readily accessible. The facility footprint and planned workforce require additional coverage. One kit in the office area is not adequate for the production floor.
Action Required:	Procure and mount a minimum of two additional first aid kits: one on the production floor near the machines and one near the forklift/material handling area. Eyewash station (Hawa station) is already in place — commended. Restock kits regularly and include ibuprofen for first responder use.
Timeline:	Before production employees start — priority before move to permanent facility

SERIOUS AED — Not Yet Acquired

OSHA Best Practice / NC General Statutes

Finding:	No Automated External Defibrillator (AED) is currently on site. With a planned workforce of 15+ employees performing physical manufacturing work, the absence of an AED represents a meaningful gap in emergency response capability. First responders cannot effectively respond to cardiac events without an AED. Sudden cardiac arrest survival rates drop approximately 10% for every minute without defibrillation.
Action Required:	Acquire an AED and mount it in a visible, accessible location on the production floor. Ensure the battery maintenance schedule is added to the safety compliance calendar. Train at least one employee per shift on AED use — Red Cross certification recommended. Note: Red Cross first aid/CPR classes typically include AED training.
Timeline:	Before production employees start — priority item

SERIOUS Safety Issue Reporting Mechanism — Informal Only

29 CFR 1910 General Duty Clause / Anti-Retaliation — 29 CFR 1904.35

Finding:	Currently, safety issue reporting is verbal and informal. OSHA's General Duty Clause requires employers to provide a workplace free from recognized hazards — which includes having a system for employees to report hazards without fear of retaliation. With a growing workforce and temp agency employees, a formal reporting mechanism is needed before production begins.
Action Required:	Add a formal safety issue reporting mechanism. Options discussed: (1) a button or form within the ERP system (recommended — already planned), or (2) a physical safety concern form posted near the safety bulletin board. Include a written non-retaliation statement in the IIPP and employee handbook.
Timeline:	Before first production employee starts

CONSULTANT FOLLOW-UP ITEMS

Hydraulic Fluid Containment — RESPONSE

[CLIENT CONTACT] asked about minimum containment requirements for the Star Fire AW46 Hydraulic Oil on site (approximately 10 gallons / two 5-gallon pails). FINDINGS: At 10 gallons total, this facility is well below the EPA SPCC threshold of 1,320 gallons of above-ground oil storage — no engineered containment system is federally required at this volume. OSHA does not set a specific numeric secondary containment threshold for small quantities of hydraulic fluid in portable containers. RECOMMENDATION: Best practice at this volume is to store the pails on a shallow spill tray or in a cabinet with built-in containment, keep absorbent spill materials nearby, and ensure containers cannot drain to a floor drain or soil. No large berms or concrete containment is required. If storage volume later expands to multiple drums or bulk tanks, GigLine will reassess against the 1,320-gallon EPA SPCC trigger and any applicable local fire code requirements.

Break Room / Rest Area Requirements — RESPONSE

[CLIENT CONTACT] asked whether a formal break room is legally required under North Carolina law for a manufacturing facility running 4×10 shifts. FINDINGS: Federal OSHA (enforced by NC OSHA) does NOT require a labeled break room as a named room in all workplaces. What IS required: (1) Clean sanitary restrooms in reasonable proximity — minimum one toilet for 1-15 employees, (2) Unrestricted access to restrooms without employer delay, (3) Potable drinking water that is safe, correctly dispensed, and clearly marked, (4) For hot manufacturing environments, a designated cool-down/rest area where employees can sit, hydrate, and recover from heat exposure. RECOMMENDATION: With 4×10 shifts in a manufacturing environment, designate and maintain a rest area that is cooler than the production floor, large enough to seat workers on break, and accessible for both scheduled and as-needed cool-down breaks. Provide cool potable water continuously near work areas — approximately one quart per employee per hour in warm conditions. GigLine recommends developing a written Heat Stress Prevention Plan before summer production begins, including break frequency, acclimatization guidance for new hires, and supervisor responsibilities. NC OSHA is aligning with federal proposed heat-stress rule language and can cite under the General Duty Clause if employees are at risk of heat illness without reasonable controls.

CORRECTIVE ACTION SUMMARY

#	ACTION	PRIORITY	TIMELINE
1	Secure propane cylinder and relocate away from flammable storage cabinet	SERIOUS	Immediately
2	Add Star Fire AW46 Hydraulic Oil SDS to library	DOCUMENTATION	Immediately
3	Label Simple Green spray bottle	DOCUMENTATION	Immediately
4	Acquire AED and mount on production floor	SERIOUS	Before employees start
5	Procure 2 additional first aid kits	SERIOUS	Before employees start
6	Add machine guarding training to new hire orientation	SERIOUS	Before first hire
7	Add safety issue reporting mechanism to ERP	SERIOUS	Before first hire
8	Create corrective action log	DOCUMENTATION	Before first hire
9	Develop Bloodborne Pathogen Exposure Control Plan	DOCUMENTATION	Before first responder training
10	Develop written Heat Stress Prevention Plan	DOCUMENTATION	Before summer production
11	Schedule Red Cross first aid/CPR certification for staff	DOCUMENTATION	Before production start
12	Build machine-specific LOTO procedures for YBR machine and all permanent facility equipment	SERIOUS	Before production start
13	Add muster points and assembly areas to EAP	DOCUMENTATION	Before move to permanent facility
14	Update facility address on all documents	DOCUMENTATION	Before or upon move to permanent facility
15	Conduct noise exposure survey at permanent facility	PENDING	After production begins
16	Determine Hearing Conservation Program requirement based on noise survey	PENDING	After noise survey
17	Hydraulic fluid containment — CLOSED. No engineered system required at current volume. Spill tray recommended.	CLOSED	Complete
18	Break room requirement — CLOSED. Designated cool-down area required; formal break room not mandated.	CLOSED	Complete