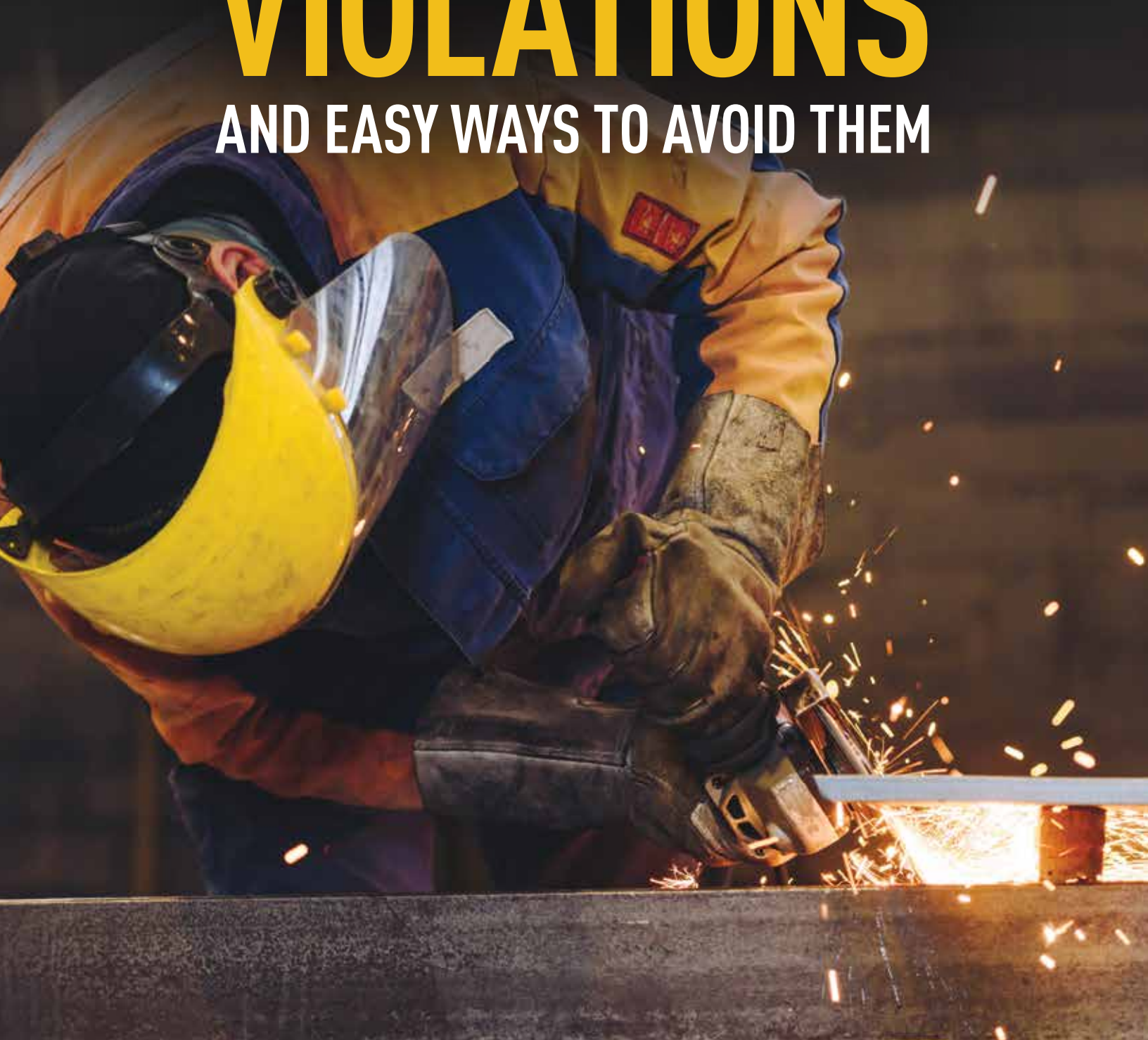




PAPER

# TOP 10 OSHA VIOLATIONS

AND EASY WAYS TO AVOID THEM



# TOP 10 OSHA VIOLATIONS

and easy ways to avoid them.

Whether it's a blueprint for a building project or a map with turn-by-turn directions to reach an unfamiliar destination, it's easier to get the job done right and avoid mistakes when there is a clear set of directions. Workplace safety is no exception; the instructions just look a little bit different.

In addition to rules and regulations, OSHA has published thousands of guidance documents, videos and other materials to help simplify compliance, educate and protect workers. They even provide on-site consultation services to help facilities identify risks and create plans to improve worker safety.

Each year, they also create the Top 10 OSHA Violations list, which contains the most common safety violations that were uncovered during the previous year's workplace inspections.

The list is no secret. In fact, OSHA wants every employer in every workplace to know exactly what violations are on the list. They want every safety director, officer and team to review it and use it as a tool to benchmark compliance and determine whether or not the facility needs to review, update or create plans *before* an injury happens or an inspector shows up.

This paper will help you understand the different violations and provide solutions that you can implement TODAY so that you won't be a part of next year's violations list.



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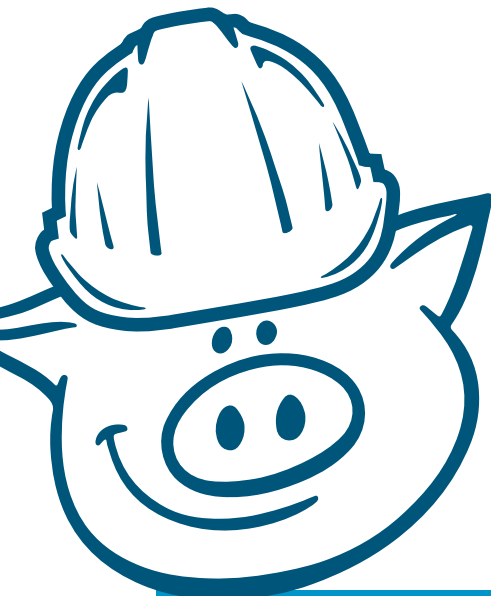
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## Top 10 OSHA Violations 2015–2019

Rank	2019	2018	2017	2016	2015
1	Fall Protection	Fall Protection	Fall Protection	Fall Protection	Fall Protection
2	Hazard Communication	Hazard Communication	Hazard Communication	Hazard Communication	Hazard Communication
3	Scaffolding	Scaffolding	Scaffolding	Scaffolding	Scaffolding
4	Lockout/Tagout	Respiratory Protection	Respiratory Protection	Respiratory Protection	Respiratory Protection
5	Respiratory Protection	Lockout/Tagout	Lockout/Tagout	Lockout/Tagout	Lockout/Tagout
6	Ladders	Ladders	Ladders	Powered Industrial Trucks	Powered Industrial Trucks
7	Powered Industrial Trucks	Powered Industrial Trucks	Powered Industrial Trucks	Ladders	Ladders
8	Fall Protection Training Req.	Fall Protection Training Req.	Machine Guarding	Machine Guarding	Electrical & Wiring Methods
9	Machine Guarding	Machine Guarding	Fall Protection Training Req.	Electrical & Wiring Methods	Machine Guarding
10	Eye & Face Protection	Eye & Face Protection	Electrical & Wiring Methods	Electrical, General Requirements	Electrical, General Requirements

OSHA's annual list of top violations hasn't changed much over the years. Learning about the most common causes of safety violations and eliminating hazards from your facility will help prevent employee injuries and deaths.



# 1. Fall Protection [29 CFR 1926.501]



More than 250 workers die each year as the result of a fall from an elevation. Falls to a lower level are also among the top five causes of employee injuries and lost work time. Effective fall protection plans use a variety of tools and personal protective equipment (PPE) to help ensure worker safety.

## Frequent Violations:

- ▶ Failure to protect open sides and edges
- ▶ Failure to prevent falls from roofs
- ▶ Failure to cover holes and skylights
- ▶ Lack of fall protection equipment
- ▶ Improper fall protection equipment used

## Solutions:

- ▶ Establish a plan that addresses fall hazards and procedures for connecting activities, leading edge work, unprotected sides, edges and other hazards
- ▶ Consider the use of elevated platforms or aerial lifts to provide safer working surfaces
- ▶ Use guardrail systems with toeboards or warning lines
- ▶ Cover holes and guard skylights
- ▶ Use safety netting systems
- ▶ Train employees on proper use of fall protection equipment
- ▶ Establish changeout guidelines for harnesses, ropes, anchors and other fall arrest equipment

*Install safety gates on fixed ladders and raised platforms to prevent falls.*



# 2. Hazard Communication

## [29 CFR 1910.1200]

Sometimes called the “Right to Know” regulation, OSHA’s Hazard Communication Standard requires employers to evaluate chemical hazards in the workplace and create a plan to educate and protect employees from those hazards. The Hazard Communication Standard has been in the spotlight since 2012 when OSHA adopted the Globally Harmonized Standard (GHS) for Safety Data Sheets (SDS) and chemical labels.

### Frequent Violations:

- ▶ Failure to perform a hazard assessment
- ▶ Failure to have a written program
- ▶ Inadequate employee education
- ▶ Lack of a training program
- ▶ Improper or no labels on containers
- ▶ No SDS or lack of access to them

### Solutions:

- ▶ Evaluate chemical hazards
- ▶ Label containers properly
- ▶ Maintain chemical inventories and have an SDS for each chemical in the facility
- ▶ Assign responsibility for maintaining inventories and SDS
- ▶ Educate employees about chemical hazards and how to read and use an SDS
- ▶ Make SDS accessible to employees at all times
- ▶ Provide proper PPE and enforce its use
- ▶ Maintain a written hazard communication plan and review it regularly



*Failure to provide employees with chemical hazards education in the workplace is a violation of OSHA’s Hazard Communication standard.*

# 3. Scaffolding [29 CFR 1926.451]

Weak, unstable platforms contribute to approximately 72% of falls and other injuries on scaffolds, according to the Bureau of Labor Statistics. Proper construction and maintenance of scaffolds would protect the nearly 2.3 million construction workers who use them from an estimated 4,500 injuries and 50 deaths per year.

## Frequent Violations:

- ▶ Inadequate scaffold decking
- ▶ Unleveled walking/working surfaces
- ▶ Scaffold unable to support the weight of people and equipment
- ▶ Unsafe access to the scaffold
- ▶ Scaffold construction problems, including lack of guardrails
- ▶ Improper access to scaffolding surfaces
- ▶ Failure to inspect the scaffold daily

*Regularly check scaffolding structures to ensure safety.*

## Solutions:

- ▶ Ensure that scaffold platform is tightly planked and able to support its own weight plus four times the maximum intended load
- ▶ Erect scaffolds on solid ground
- ▶ Do not use barrels, boxes, loose bricks or concrete blocks to support scaffolds or planks
- ▶ Equip scaffolds with guardrails, midrails and toeboards
- ▶ Immediately repair or replace damaged braces, brackets, trusses, screw legs or ladders
- ▶ Build scaffolds at least 10 feet from electric power lines
- ▶ Do not move scaffolds while workers are on them, unless they are designed to be moved and workers have been properly trained
- ▶ Ensure that the scaffold is free of snow, ice or other slippery materials before and during its use



## 4. Lockout/Tagout [29 CFR 1910.147]

Officially called the “Control of Hazardous Energy Standard,” OSHA’s lockout/tagout regulation covers electrical, mechanical, hydraulic, pneumatic, chemical, thermal and other power sources. Compliance with this standard protects workers who service or maintain machinery and equipments and prevents about 120 fatalities and 50,000 injuries each year.

### Frequent Violations:

- ▶ Poor or no energy control procedures or program
- ▶ Inadequate worker training
- ▶ Inspections not completed

### Solutions:

- ▶ Identify energy sources throughout the facility
- ▶ Develop, document, implement, and enforce energy control procedures
- ▶ Ensure that lockout/tagout devices are used and that they identify individual users
- ▶ Establish a policy that permits only the employee who applied a lockout/tagout device to remove it
- ▶ Provide effective training for all employees covered by the standard



# 5. Respiratory Protection

## [29 CFR 1910.134]

Written respiratory protection programs protect an estimated 5 million workers from hazards such as harmful chemical vapors, smoke, mist, fog, sprays, dusts and insufficient oxygen atmospheres.

### Frequent Violations:

- ▶ No written respiratory protection program
- ▶ Poor fit test procedures or no fit test program
- ▶ Unsuitable respirator selection process
- ▶ Lack of procedures for voluntary use of respirators
- ▶ Failure to perform medical evaluations and maintain records
- ▶ Failure to maintain, clean and care for respirators

### Solutions:

- ▶ Develop a written respiratory protection program that addresses specific hazards in the workplace
- ▶ Select appropriate respirators
- ▶ Train employees on the proper use of respirators, including donning, doffing, limitations and maintenance
- ▶ Provide medical evaluation and fit testing for employees who are required to wear respirators
- ▶ Establish schedules for cleaning, disinfecting, storing and repairing respirators



*Employees who regularly work with chemical vapors, smoke and other airborne materials should use respiratory protection.*



# 6. Ladders [29 CFR 1926.1053]

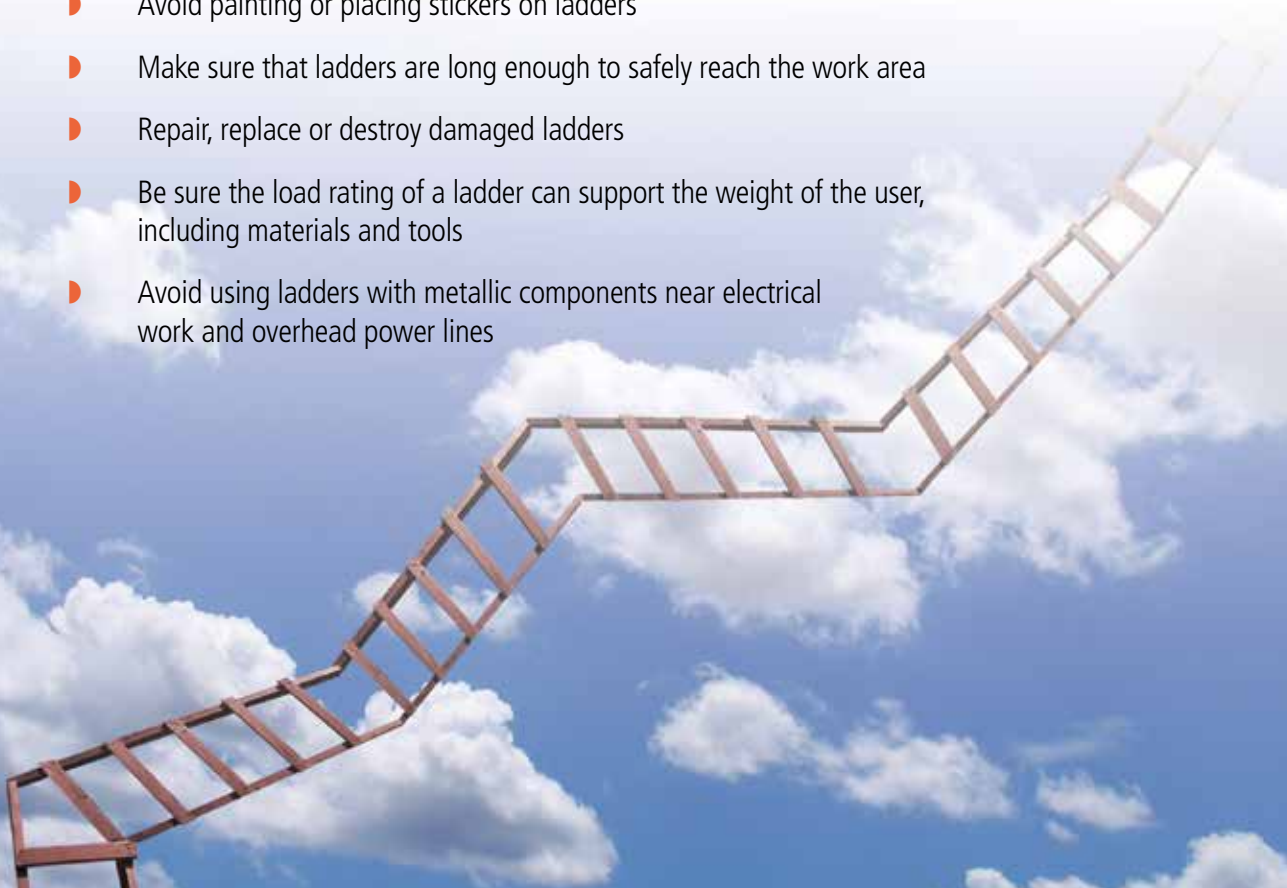
Ladders are tools that are commonly used both in construction and in general industry. Workers can be injured by using damaged ladders or not choosing the correct ladder for the job. High winds, slippery shoes and jumping or sliding down a ladder are also common causes of ladder-related injuries.

## Frequent Violations:

- ▶ Damaged side rails
- ▶ Use of the top ladder step
- ▶ Inappropriate ladder for the job
- ▶ Excessive loads on ladders
- ▶ Broken steps

## Solutions:

- ▶ Use the correct ladder for the task
- ▶ Train workers to always maintain three-point (two hands and a foot, or two feet and a hand) contact on the ladder when climbing
- ▶ Have a competent person visually inspect a ladder before use for any defects
- ▶ Avoid painting or placing stickers on ladders
- ▶ Make sure that ladders are long enough to safely reach the work area
- ▶ Repair, replace or destroy damaged ladders
- ▶ Be sure the load rating of a ladder can support the weight of the user, including materials and tools
- ▶ Avoid using ladders with metallic components near electrical work and overhead power lines



# 7. Powered Industrial Trucks

## [29 CFR 1910.178]

More commonly known as forklifts or lift trucks, powered industrial trucks are used to raise, lower and move boxes, pallets, crates and containers. More than 95,000 employees are injured each year while operating powered industrial trucks.

### Frequent Violations:

- ▶ Inadequate operator training and refresher training
- ▶ Operation of lifts by untrained/ unauthorized workers
- ▶ Lack of seatbelts or lanyards
- ▶ Use of lift against manufacturer's recommendations
- ▶ Poor condition of powered industrial trucks when returned to service after repair
- ▶ Improper safety procedures in battery charging areas

### Solutions:

- ▶ Train and certify all operators, and ensure that they operate forklifts safely
- ▶ Provide refresher training and evaluations
- ▶ Inspect equipment, including brakes, horns, steering forks and tires, daily
- ▶ Do not modify or make attachments that affect the capacity and safe operation of the forklift without written approval from the forklift's manufacturer
- ▶ Always wear seatbelts while operating
- ▶ Only permit battery charging in areas specifically designated for that purpose
- ▶ Prevent open flames, sparks and electrical arcs in battery charging areas
- ▶ Remove unsafe and defective trucks from service



***Not only do forklift operators need initial training, they also need refresher training to ensure they continue to operate machinery safely.***

# 8. Fall Protection Training Requirements

## [29 CFR 1926.503]

Working on rooftops, proximity to heavy construction equipment, live electrical components, silica dust and asbestos are just a few of the hazards that construction workers may face daily. The deadliest of these hazards is falls from heights. Construction employees must be taught about fall protection hazards and the specific tools and equipment that will be used to prevent associated injuries and death.

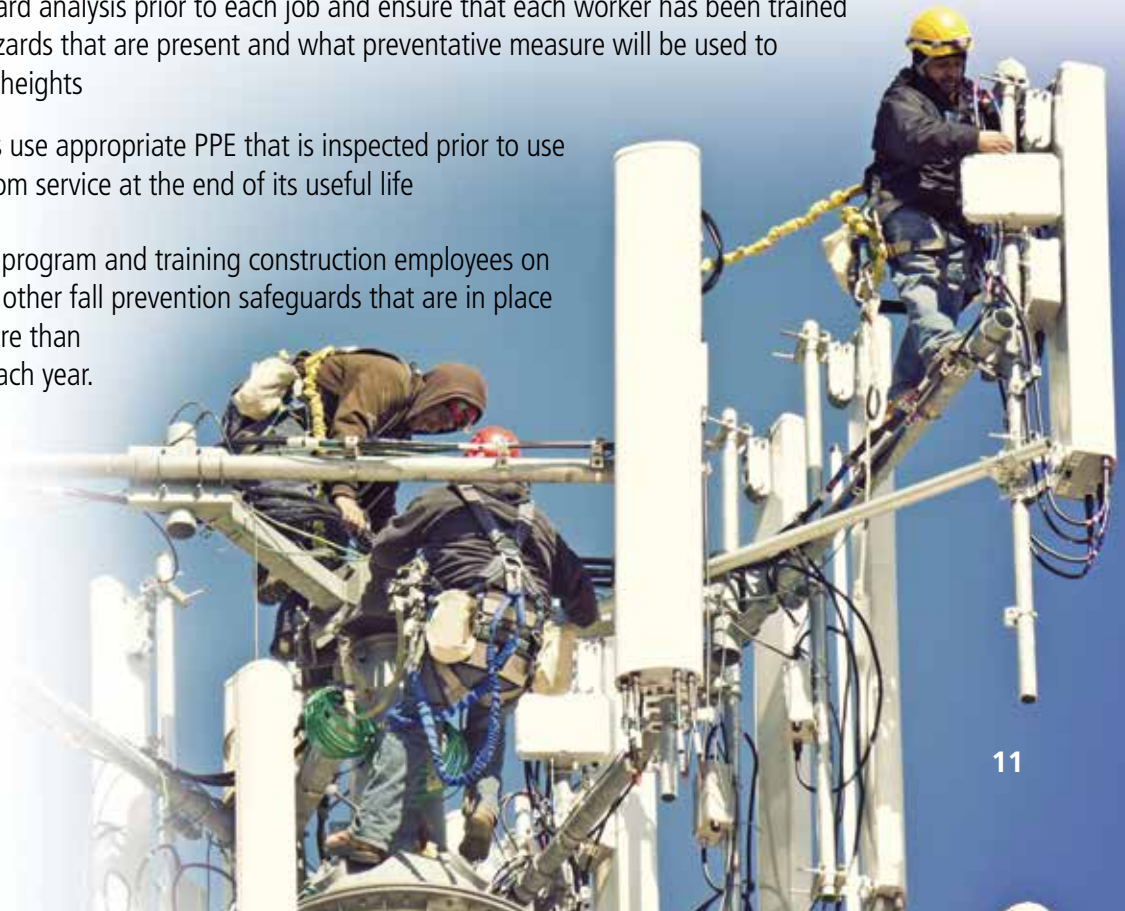
### Frequent Violations:

- ▶ Failure to have a fall protection training program
- ▶ Lack of competent trainers
- ▶ No written certification to document training

### Solutions:

- ▶ Partner with tool and PPE suppliers who can provide training on how to use fall protection and prevention equipment safely
- ▶ Perform a job hazard analysis prior to each job and ensure that each worker has been trained on the specific hazards that are present and what preventative measure will be used to prevent falls from heights
- ▶ Insist that workers use appropriate PPE that is inspected prior to use and is removed from service at the end of its useful life

Having a fall prevention program and training construction employees on how to use the PPE and other fall prevention safeguards that are in place can help prevent the more than 200 deaths that occur each year.



# 9. Machine Guarding

## [29 CFR 1910.212]

OSHA estimates that about 10% of workplace injuries are caused by machines. Machine guards are forms of engineering controls that can be used at points of operation to provide a first line of protection against machine hazards. Properly installed machine guards can help avoid injuries such as cuts, burns, bruises, blindness and amputations.

### Frequent Violations:

- ▶ Point of operation exposures
- ▶ Inadequate or no anchoring of fixed machinery
- ▶ Exposure to blades
- ▶ Guards not attached to machines

### Solutions:

- ▶ Evaluate risks posed by all machinery
- ▶ Choose guards that are durable, allow for routine maintenance and do not create a new hazard
- ▶ Evaluate the use of guards regularly

*Without machine guards, employees operating equipment run the risk of being cut, burned and bruised, as well as going blind and losing a limb.*

# 10. Eye and Face Protection

## [29 CFR 1926.102]

Nearly 2,000 occupational eye injuries from flying particles, molten metal, liquid chemicals, acid or caustic liquids, chemical vapors and injurious light radiation happen every day, according to National Institute for Occupational Safety and Health. About 60% of these injuries are caused by failure to wear eye and face protection.

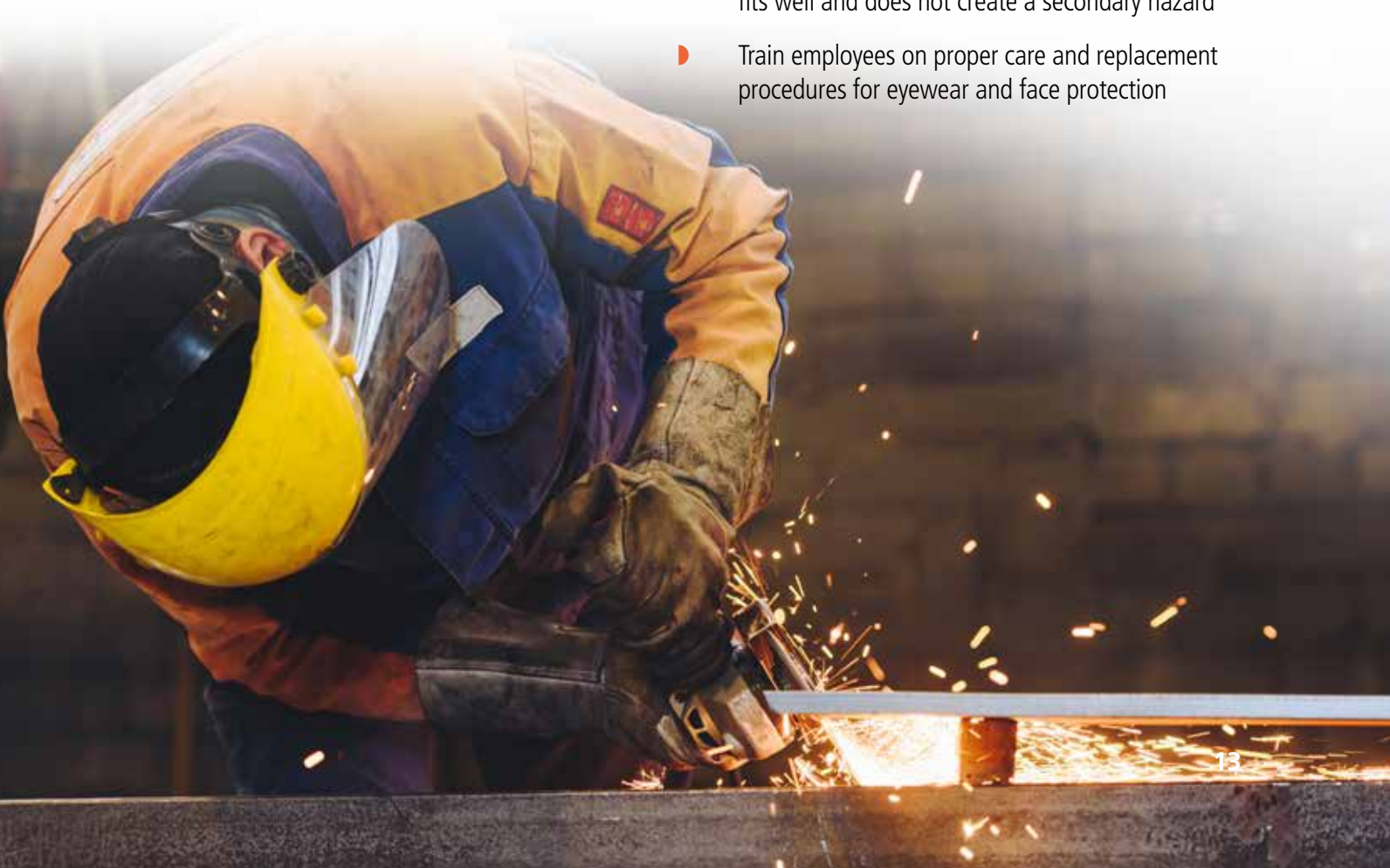
The remaining 40% are caused by wearing the wrong type of eye protection for the task. Most eye and face injuries are preventable when hazards are properly identified and the right types of eye and face protection are worn.

### Frequent Violations:

- ▶ No eye or face protection
- ▶ Incorrect eye or face protection for the task
- ▶ Improper hazard assessment

### Solutions:

- ▶ Review hazard assessments to look for deficiencies
- ▶ Use engineering controls to minimize the need for PPE
- ▶ Offer a variety of appropriate eye and face protection to ensure that everyone has PPE that fits well and does not create a secondary hazard
- ▶ Train employees on proper care and replacement procedures for eyewear and face protection



Although they didn't make this year's Top 10 list, the next two regulations have historically been among the top violations and may also warrant a second look.

# Electrical - Wiring Methods

## [29 CFR 1910.305]


Employees, such as engineers and electricians often work directly with electrical wiring, splicing and ground fault systems. Other employees, including office and administrative staff, can also indirectly affect compliance with this standard. When all employees understand the basics of electrical equipment, wiring, insulation and grounding, fires and electrical shock injuries can be avoided.

### Frequent Violations:

- ▶ Problems with flexible cords and cables
- ▶ Issues with temporary wiring
- ▶ Improper use of extension cords
- ▶ Use of temporary wiring as permanent wiring
- ▶ Failure to protect lightbulbs from damage
- ▶ Failure to cover electrical box knockout and circuit breaker holes
- ▶ Unsafe wiring of flexible cords and cables through walls, ceilings, doorways, windows and floors
- ▶ Failure to ground or properly insulate hand tools

### Solutions:

- ▶ Analyze and identify electrical hazards
- ▶ Install permanent wiring where it is needed
- ▶ Consider installing additional outlets to limit the use of extension cords
- ▶ Ensure proper bonding and grounding



*Reduce fire and shock injuries by discussing the facility's electrical equipment and wiring with all employees.*

# Electrical, General Requirements

## [29 CFR 1910.303]

Unguarded electrical currents expose workers to dangerous shock, electrocution, fire and explosion hazards. Effective training helps engineers and electricians recognize, evaluate and control these hazards.

### Frequent Violations:

- ▶ Electric shock and electrocution exposures
- ▶ Failure to examine, install and use the correct electrical equipment
- ▶ Failure to observe procedures for equipment rated at more than 600 volts
- ▶ Use of consumer-rated products in an industrial work environment
- ▶ Use of electrical receptacles designed for indoor use in an outdoor environment
- ▶ Electrical equipment without the proper National Electrical Manufacturers Association rating
- ▶ Electrical equipment not protected from damage
- ▶ Exposed electrical wiring
- ▶ Unapproved gang boxes
- ▶ Spliced flexible cords or cords that are not of continuous length
- ▶ Circuit breakers that are not properly labeled

### Solutions:

- ▶ Identify all possible sources of electrical energy to equipment
- ▶ Follow lockout/tagout procedures
- ▶ Verify that equipment is de-energized using a voltmeter
- ▶ Assume equipment is energized until it is tested
- ▶ Use grounding devices
- ▶ Replace frayed, damaged or worn electrical cords
- ▶ Do not bypass any protective system or device

*Implement energy control procedures during equipment maintenance to keep workers who service machinery safe.*

Although OSHA can't possibly inspect all of the more than 111 million workplaces in the U.S., over 40,000 inspections are conducted each year. Most are unannounced, and when severe violations are found, they can be costly. Serious violations can cost employers up to \$7,000 **per violation**. Willful violations can range from \$5,000 to \$70,000.

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