

NORTH RISK PARTNERS<sup>®</sup> KPA

# TOP 10 OSHA VIOLATIONS

HOW TO AVOID THEM

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## PRESENTER



**Nick Hardesty**  
EHS District Manager  
KPA

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## KPA

### Comprehensive Safety & Compliance Solutions

KPA is the leading provider of EHS software, expert safety consulting services, and award-winning training content.

KPA enables clients to identify, remedy, and prevent safety and compliance issues.



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## AGENDA

- The annual OSHA top 10 violations
- Your state's OSHA local emphasis programs
- Best practices to staying compliant with OSHA
- How we can help
- Audience Q & A



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## OSHA TOP 10

**What is it?**

- Annual list: OSHA's Top 10 Most Frequently Cited Standards
- Helps alert employers to address standards before OSHA shows up
- Goal: Reduce preventable injuries and illnesses that regularly occur



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## OSHA'S TOP 10

**2022 Violations**

Standard	2022 Violations	2021 Violations	2020 Violations	2019 Violations
Full Protection - General Requirements (1910.132)	5,500	5,200	5,100	5,000
Hazard Communication (1910.1200)	2,500	2,400	2,300	2,200
Respiratory Protection (1910.134)	2,100	2,000	1,900	1,800
Ladders (1910.1300)	1,800	1,700	1,600	1,500
Skid/Slip/Trip (1910.147)	1,600	1,500	1,400	1,300
Lockout/Tagout (1910.147)	1,400	1,300	1,200	1,100
Powered Industrial Trucks (1910.179)	1,200	1,100	1,000	900
Full Protection - Training Requirements (1910.132)	1,000	900	800	700
PPE - Eye and Face Protection (1910.133)	800	750	700	650
Machine Guarding (1910.212)	700	650	600	550

**2021 Violations**

Standard	2021 Violations	2020 Violations	2019 Violations
Full Protection - General Requirements (1910.132)	5,200	5,100	5,000
Respiratory Protection (1910.134)	2,000	1,900	1,800
Ladders (1910.1300)	1,700	1,600	1,500
Skid/Slip/Trip (1910.147)	1,500	1,400	1,300
Hazard Communication (1910.1200)	1,400	1,300	1,200
Lockout/Tagout (1910.147)	1,300	1,200	1,100
Full Protection - Training Requirements (1910.132)	1,100	1,000	900
PPE - Eye and Face Protection (1910.133)	900	850	800
Powered Industrial Trucks (1910.179)	800	750	700
Machine Guarding (1910.212)	700	650	600

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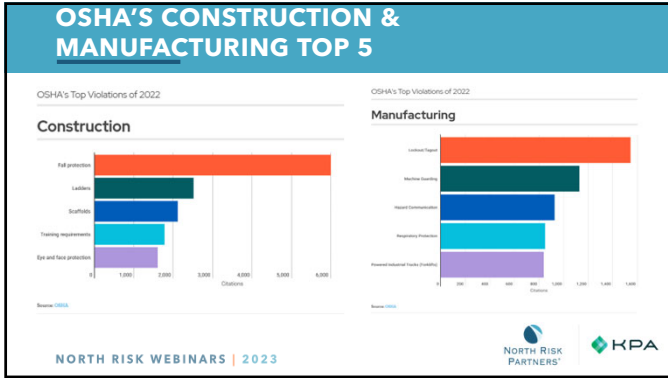
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### OSHA TOP 10

**Why pay attention?**

- Penalties can exceed \$15,000
  - Can be levied per day for every day the issue goes unaddressed
- Willful or repeated violation: 10x fine
- The maximum penalty for such a violation is **\$156,259** ( Jan. 17, 2023)

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### WHAT PROMPTS AN OSHA VISIT?

- 1. Imminent Danger**  
Fatality/Catastrophe Investigations
- 2. Complaint/Referral Investigations**
- 3. Programmed Inspections**  
For programmed inspections, OSHA currently focuses on hazardous industries or those employers who have what appear to be a large number of workers' compensation claims

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## OSHA REGIONAL LEP'S

**Emphasis Programs**  
<https://www.osha.gov/enforcement/directives/lep>



**National Emphasis Programs:**

- Hazardous Machinery
- Hexavalent Chromium
- Combustible Dust
- Lead
- Heat-Related Hazards

**Regional Emphasis Programs:**

- Powered Industrial Trucks
- High Hazard Safety & Health Workplaces
- Noise Hazards
- Automotive Lifts
- Roadway Work Zone Activities

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## BEST PRACTICES TO STAY OSHA COMPLIANT



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## FALL PROTECTION



**1 & 8 General Requirements (1) & Training Requirements (8)**

- Accounted for about ~33% of all violations.
  - OSHA estimates falls account for ~36% of all fatalities
- Risk Signs
  - High risk industry
  - Frequent use of ladders or work at height
  - Wet working conditions
  - Poor workplace housekeeping
  - Lack of protection systems

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## FALL PROTECTION





**1 & 8**

**General Requirements (1) & Training Requirements (8)**

- Top 3 Prevention Tips:
  - Have you found and eliminated all fall risks?
  - Are you using passive engineering controls and fall restraint?
  - Are you training workers on fall protection?

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## HAZARD COMMUNICATION



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- Requirements
  - SDSs for every chemical on premise
  - Written HCS plan
  - Comprehensive HazComm training
- Why Violations Happen
  - Improper or lack of compliant (GHS) chemical labeling
  - Lack of HCS plan
  - Poor or inconsistent training
- Risk Signs
  - You work with chemicals
  - Insufficient HCS plan
  - Poor SDS database
- Learn more: [www.osha.gov/chemicaldata](http://www.osha.gov/chemicaldata)

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## HAZARD COMMUNICATION



**2**

- Top 3 Prevention Tips:
  - Do all employees or contractors have access to an SDS for every chemical on-site?
  - Do all employees receive the required hazard communication training?
  - Are all secondary chemical containers labeled?

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**RESPIRATORY PROTECTION**

**3**

- Respirator Requirements
  - Air-purifying
  - Atmosphere-supplying
  - Proper fit
- Why Violations Happen
  - No respiratory protection program
  - Fail to perform required fit testing
  - Inadequate medical evaluations
  - Poor or inconsistent training
- Risk Signs
  - High risk industry
  - Haven't checked equipment recently
  - Employees work long hours
  - Poor or inconsistent training

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**RESPIRATORY PROTECTION**

**3**

- Top 3 Prevention Tips:
  - Are all employees trained on respirator procedures?
  - Are the right respirators available?
  - Are you testing the equipment properly?

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**LADDERS**

**4**

- Why Violations Happen
  - Misuse and mismeasurement
    - Improper side rail height
    - Using top of stepladder as a step
    - Use for unintended purposes
    - Structural defects
- Risk Signs
  - High risk industry
  - Cutting corners
  - Not enough ladders available
  - Wet conditions

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**LADDERS**



**4**

- Top 3 Prevention Tips:
  - Are you inspecting every ladder before use?
  - Can ladders support the necessary weight?
  - Are all workers trained on safe ladder use?

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**SCAFFOLDING**



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- Why Violations Happen
  - 70% of scaffolding accidents are a result of:
    - Planking giving way
    - Slips and trips
    - Falling objects
- Risk Signs
  - Work in construction
  - Old equipment
  - Unsecured tools or material
  - Weather
  - Poor or inconsistent training
  - Wrong (or no) person in charge

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**SCAFFOLDING**



**5**

- Top 3 Prevention Tips:
  - Can scaffolds bear the necessary weight?
  - Have all employees been trained on proper scaffolding use?
  - Are inspections conducted as often as necessary?

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**LOCKOUT/TAGOUT**



**6**

- Why Violations Happen
  - Poor documentation
  - Poor or inconsistent training
  - Failure to identify all sources of hazardous energy
  - Wrong LOTO device
  - Poor auditing
  - Not following correct order of LOTO steps:
    1. Notify employees
    2. Shut down equipment
    3. Isolate the source of energy
    4. Attach the lockout device
    5. Release or restrain any energy stored within the machine
    6. Verify the lockout

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**LOCKOUT/TAGOUT**



**6**

- Risk Signs
  - Work with a lot of machines
  - Old or high-maintenance equipment
  - Poor or inconsistent training
  - Inadequate or no auditing

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**LOCKOUT/TAGOUT**



**6**

- Top 3 Prevention Tips:
  - Do you have written lockout/tagout procedures in place for every machine?
  - Are your employees trained on proper maintenance and service protocol?
  - Do you have processes in place to ensure employee safety when proper compliance has been broken?

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**POWERED INDUSTRIAL TRUCKS**



**7**

- Why Violations Happen
  - Forklifts tip over
  - Pedestrian accidents
  - Remember! Must be 18 to operate a forklift
- Risk Signs
  - High risk industry
  - Poor or inconsistent training
  - Lack of certification
  - Reckless driving
  - Lack of consistent inspection or maintenance
- Learn more:
  - [www.osha.gov/SITC/poweredinustrialtrucks/standards.html](http://www.osha.gov/SITC/poweredinustrialtrucks/standards.html)

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**POWERED INDUSTRIAL TRUCKS**



**7**

- Top 3 Prevention Tips:
  - Are all forklift operators trained and certified and have all employees taken forklift safety training?
  - Do all forklift drivers wear safety belts when vehicles are in operation?
  - Do you have processes to ensure proper use?

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**PERSONAL PROTECTIVE EQUIPMENT**  
EYE & FACE PROTECTION



**9**

- Why Violations Happen
  - Underestimating risk of eye and face injury
  - Neglecting to wear PPE
  - Removing PPE before it's safe
  - Equipment isn't accessible, available, or stored properly
  - Poor or inconsistent training
- Risk Signs
  - High risk industry
  - No hazard assessments
  - Work with chemicals or other hazardous substances
  - Poor PPE

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**PERSONAL PROTECTIVE EQUIPMENT**  
EYE & FACE PROTECTION



**9**

- Top 3 Prevention Tips:
  - Does your facility have a completed and signed hazard assessment?
  - Are all employees properly trained on PPE applicable to their role?
  - Are all employees wearing safety glasses, safety goggles, or face shields when performing eye-threatening activities?

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**MACHINE GUARDING**



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- Why Violations Happen
  - Not all equipment has required safety controls in place
  - Use of user-designed safeguards
  - Human error
  - Poor or inconsistent training
- Risk Signs
  - Work with numerous industrial machines
  - Old machines still in use
  - No recent inspections
  - People working close to hazardous machines
  - Poor or inconsistent training

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**MACHINE GUARDING**



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- Top 3 Prevention Tips:
  - Have you identified all machine-related injury risks?
  - Have all operators undergone safeguarding training?
  - Are you continually monitoring your equipment and employees?

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