

OSHA Top Ten Violations

As the new year begins, many organizations look at ways to improve their safety programs. One way I have found effective over the years is to compare your safety program to OSHA's Top Ten Violations List. Identifying what OSHA sees in the workplace during their inspections and comparing that to your organization is an excellent opportunity to find any gaps or deficiencies within your safety process.

OSHA publishes a top ten list every fiscal year which runs from October to September. For fiscal year 2024, OSHA identified the following on their top ten list:

1. Fall Protection—General Requirements (1926.501): 6,307 violations
2. Hazard Communication (1910.1200): 2,888 violations
3. Ladders (1926.1053): 2,573 violations
4. Respiratory Protection (1910.134): 2,470 violations
5. Lockout/Tagout (1910.147): 2,443 violations
6. Powered Industrial Trucks (1910.178): 2,248 violations
7. Fall Protection – Training Requirements (1926.503): 2,050 violations
8. Scaffolding (1926.451): 1,873 violations
9. Personal Protective and Lifesaving Equipment – Eye and Face Protection (1926.102): 1,814 violations
10. Machine Guarding (1910.212): 1,541 violations

The full text of OSHA's regulations can be found in the Code of Federal Regulations (CFR):

<https://www.osha.gov/laws-regs/regulations/standardnumber> or by clicking on the hyperlinks included above for the specific topics.

General Industry Regulations are found in Part 1910 and Construction Industry Regulations are found in Part 1926. Agriculture Regulations can be found at <https://www.osha.gov/laws-regs/regulations/standardnumber/1928>. For this month's article, we will discuss the top five violations and follow up next month with the second five.

Fall Protection—General Requirements (1926.501)

Generally speaking, fall protection is required if employees work at heights 4 feet or greater in General Industry and Agriculture and 6 feet or greater for Construction. Typically, fall protection for employees can be in the form of guardrail systems, safety net systems or personal fall arrest systems. If these fall protection options are not feasible, then an approved alternate system may be used if it meets the requirements of the standard. Fall protection is required for employees working near unprotected sides and edges, holes, excavations, ramps, runways and other walkways that meet the criteria of the specific height for that industry. The main violation OSHA is finding with this standard is failure of employers to assure proper fall protection is worn when employees are working at the heights identified for that industry.

Hazard Communication (1910.1200):

Known as OSHA's Right To Know standard, this regulation requires employers to inform their employees about the hazards of the chemicals they work with. OSHA violations in the workplace uncovered employers with no written hazard communication program, no list of chemicals, missing or out of date safety data sheets (SDS's) and no employee training.

Ladders (1926.1053)

You may think ladders would not require much in the safety arena, but they show up on OSHA's Top Ten List quite often. Ladders are not something you just set in place and climb; there are specific guidelines to follow. Violations found by OSHA during inspections include: incorrectly accessing upper landing surfaces, ladders not being used for the purpose they are designed for, using the top step of the ladder as a step, carrying objects or loads that could cause the employee to lose balance or fall and not conducting pre-use inspections to ensure they are structurally sound. If your facility uses ladders, review the standard's requirements and ensure employees follow the proper procedures.

Respiratory Protection (1910.134):

The respiratory protection standard is essential when employees are exposed to chemicals above their Permissible Exposure Limits (PEL's). OSHA has thousands of chemical exposure limitations and employers must ensure their employees are not overexposed to them or are properly protected. If employees are determined to be overexposed to any chemicals, employers are required to review engineering options (for example, using a ventilation system) and must implement a respiratory protection program. Citations in this standard include improper medically testing and fit testing employees so they can wear a respirator safely, no employee training on the proper use of the respirator and lack of a written program.

Lockout/Tagout (1910.147):

OSHA's Lockout Tagout (LO/TO) Standard is important when maintenance is performed on machinery in the workplace. The main purpose is to prevent a piece of machinery's unexpected energization (startup) while maintenance is being performed. Lockout Tagout procedures are implemented to prevent crushing injuries, amputations and even death. An effective lockout/tagout program includes developing procedures for each piece of machinery required under the standard and training and communicating those procedures to staff. In the Lockout/Tagout Standard, OSHA is finding noncompliance that includes: unwritten energy control procedures, improper training and communication, incomplete annual periodic inspections and failure to follow procedures. Since this is intended to just be a high-level summary of the Top 5 Most Frequently Violated Standards, it is important to review the regulations thoroughly in order to achieve and maintain compliance. There are several ways to become more familiar with the regulations, including online training classes, brochures and pamphlets, reputable online sources, consulting organizations and the Bureau of Workers Compensation Division of Safety & Hygiene. Once you become familiar with each regulation, compare that to your company's safety program and identify gaps. If you find gaps in your program or areas needing improvement, take the appropriate steps to make the changes and retrain employees if needed.

Next month we'll explore violations 6 through 10 on OSHA's list.

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