

2024

OSHA'S

TOP 10

MOST CITED STANDARDS



OSHA Boston Region Compliance Assistance Team

National and Regional Emphasis programs

National Emphasis

1. Respirable Crystalline Silica
2. Trenching & Excavation
3. Amputations in Manufacturing Industries
4. PSM Covered Chemical Facilities
5. Combustible Dust
6. Hexavalent Chromium
7. Lead
8. Heat
9. Falls (General Industry and Construction)
10. Warehousing

Regional Emphasis

1. Powered Industrial Trucks
2. Cranes in Construction
4. Noise in the Workplace
5. Tree and Landscape Operations

OSHA's TOP 10

MOST CITED STANDARDS

Other topics of interest:

- Heat National Emphasis Program
- Warehousing National Emphasis Program
- Site Specific Targeting (SST)- Full Inspection
- NEP for Amputations

Top Ten Violations

Most frequently cited OSHA standards during FY 2024 inspections

1. **Fall Protection – General Requirements (1926.501)**
2. **Hazard Communication (1910.1200)**
3. **Ladders (1926.1053)**
4. **Respiratory Protection (1910.134)**
5. **Lockout/Tagout (1910.147)**
6. **Powered Industrial Trucks (1910.178)**
7. **Fall Protection – Training Requirements (1926.503)**
8. **Scaffolding (1926.451)**
9. **PPE - Eye and Face Protection (1926.102)**
10. **Machine Guarding (1910.212)**

Top Ten Violations: FY 2024

#1: 1926.501 - Fall Protection

More than 6,307 violations



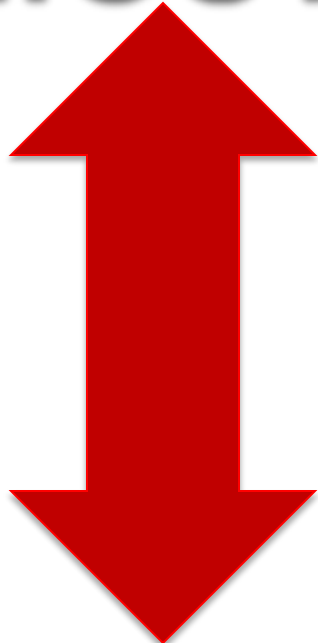
Top 5:

1. 1926.501(b)(13) (4,724 violations) – fall protection in residential construction
2. 1926.501(b)(1) (~700 violations) – unprotected sides and edges
3. 1926.501(b)(10) (~354 violations) – roofing work on low-slope roofs
4. 1926.501(b)(11) (~275 violations)– steep roofs
5. 1926.501(b)(4)(i) (~128 violations)– protection from falling through holes, including skylights

CONTROLLING FALL EXPOSURES

FALL PROTECTION IN ORDER OF EFFECTIVENESS

MOST



Elimination

Engineering/ Prevention

Fall Arrest Systems

Warning Lines

Safety – Monitoring/ Administration

LEAST

1926.501(b)(13) Residential Fall Protection





Unguarded skylights



Top Ten Violations: FY 2024

#2: 1910.1200 - Hazard Communication

More than 2888 violations

Top 5:

1. 1910.1200(e)(1) (1136 violations) – having written program
2. 1910.1200(h)(1) (843 violations) – providing employees with effective information and training on hazardous chemicals in work area
3. 1910.1200(g)(8) (363 violations) – maintaining copies of Safety Data Sheets in the workplace and ensuring they are available to employees
4. 1910.1200(f)(6): (315 violations) - Workplace labeling. Except as provided in paragraphs (f)(7) and (f)(8) of this section, the employer shall ensure each container of hazardous chemicals in the workplace is labeled, tagged or marked.
5. 1910.1200(g)(1): (252 violations)– having SDSs for each hazardous chemical



Unlabeled secondary containers.



Unlabeled secondary containers.



Top Ten Violations: FY 2024

#3: 1926.1053 – Ladders

More than 2,573 violations

Top 5:

1. 1926.1053(b)(1) (1,852 violations) – extending portable ladder side rails at least 3 feet above upper landing surface
2. 1926.1053(b)(4) (310 violations) – using ladders only for purpose for which they were designed
3. 1926.1053(b)(13) (286 violations) – not using the top or top step of a stepladder as a step
4. 1926.1053(b)(22): (92 violations) An employee shall not carry any object or load that could cause the employee to lose balance and fall.
5. 1926.1053(b)(16): (86 violations) Portable ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats or steps; broken or split rails; corroded components; or other faulty or defective components, shall either be immediately marked in a manner that readily identifies them as defective, or be tagged with “Do Not Use” or similar language, and shall be withdrawn from service until repaired.



Ladders

Training Program

- Each employee using ladders and stairways

Use

- Extend at least 3 feet (.9 m) above the upper landing surface
- Not be loaded beyond the maximum intended load
- Used only for the purpose for which they were designed
- 4 to 1 ratio ~75 degrees
- Not be used on slippery surfaces unless secured
- Top and bottom of ladders shall be kept clear
- Top or top step of a stepladder shall not be used as a step
- Inspected by a competent person for visible defects
- Withdraw a defective ladder from service



Ladder secured incorrectly. Bottom of ladder not kept clear



Ladder installed at greater than 4:1 ratio



Ladder not 3 feet above the upper landing surface or passthrough rails provided.



Top Ten Violations: FY 2024

#4: 1910.134 – Respiratory Protection

More than 2,470 violations



Top 5:

1. 1910.134 (e)(1) (508 violations) – Employee medical evaluation for respirator use
2. 1910.134 (c)(1) (366 violations) – Written respiratory protection program
3. 1910.134 (f)(2) (312 violations) – Fit testing prior to initial use of the respirator
4. 1910.134(c)(2): (251 violations) Where respirator use is not required.
5. 1910.134(k)(6): (144 violations) The basic advisory information on respirators, as presented in appendix D of this section, shall be provided by the employer in any written or oral format, to employers who wear respirators when such use is not required by this section or by the employer.

Written Respirator Program

- The program shall include respirator selection, medical fitness, maintenance, training, fit testing, use, program evaluation, etc.



1910.134(g)(1)(i)

The employer shall not permit respirators with tight-fitting facepieces to be worn by employees who have:

1910.134(g)(1)(i)(A)

Facial hair that comes between the sealing surface of the facepiece and the face or that interferes with valve function; or



Employee Voluntary Use of Respirators

- Employers who allow their employees to wear respirators on a voluntary basis when not required by OSHA or the employer must implement limited provisions of a respiratory protection program. When a filtering face piece respirator is all that is used, the employee must be provided a copy of Appendix D.



N95 respirator in use no training\no appendix D



Improper Respirator Storage



Top Ten Violations: FY 2024

#5: 1910.147 – Lockout/Tagout

More than 2,443 violations



Top 5:

- 1910.147(c)(4) (738 violations) – Energy control procedures
- 1910.147(c)(7) (477 violations) – Training and communication.
- 1910.147(c)(6) (377 violations) – Periodic inspection of energy control procedures
- 1910.147(c)(1) (210 violations) – Establishing an energy control program
- 1910.147(d) (203 violations)– elements of lockout/tagout procedures

LOTO Energy Control Procedure

- Procedures shall be developed, documented and utilized for the control of potentially hazardous energy when employees are engaged in servicing and maintenance

Program

ABC Co.
Lockout Program

Purpose. _____

Compliance with this program

Sequence of Lockout
(1) _____



Company Representatives

- From foreman to Project Manager — you represent the company.
- What supervisors decide to do is treated as a company decision.
- If your supervisor lets visible violations go or pays no attention to safety.

NOT GOOD!

DISCIPLINE

- Implement a progressive disciplinary system or policy
- Train and Communicate the workplace rules.
- Enforce the rules with a disciplinary system for safety infractions by employees, supervisors, etc.
- Management must comply with the policy.
- (What management does → Employees DO).

• **What about Employee Misconduct?**

- Was it a supervisor, foreman or laborer, etc.
- I trained them.
- I provided them with the equipment / tools.
- They knew it was wrong.
- Its not my fault.
- How can I control them?
- Why am I getting a citation?

Employee Misconduct Defense

- Unforeseeable
- Unpreventable, or
- Isolated



Effective Employer Defense

- **The contractor established work rules to prevent the violation from occurring.**
- **The contractor adequately communicated the work rules to employees.**
- **The contractor took steps to discover violations of its work rules.**
- **The contractor effectively enforced its safety rules and took disciplinary action when violations were discovered.**

Documentation is Key...

Top Ten Violations: FY 2024

#6: 1910.178 – Powered Industrial Trucks

More than 2,248 violations



Top 5:

1. 1910.178(l)(1) (531 violations) – Safe Operations. Ensure operator is competent to operate.
2. 1910.178(l)(4) (305 violations) – Evaluate operator's performance at least once every three years
3. 1910.178(l)(6) (286 violations) – Certify that each operator has been trained and evaluated (site specific)
4. 1910.178(q)(7): (172 violations) Industrial trucks shall be examined before being placed in service, and shall not be placed in service if the examination shows any condition adversely affecting the safety of the vehicle. Such examination shall be made at least daily. Where industrial trucks are used on a round-the-clock basis, they shall be examined after each shift. Defects when found shall be immediately reported and corrected.
5. 1910.178(p)(1) (153 violations) – Take out of service PITs that need repair, defective, or are in any way unsafe

PIT's in construction account for 25 percent of the accidents.



Definition

Powered industrial trucks are used to move, raise, lower, or remove large objects or a number of smaller objects on pallets or in boxes, crates, or other containers.

OSHA Standard 1910.178 Powered Industrial Trucks, contains requirements related to fire protection, design, maintenance, and use of fork trucks, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks.

ASME B56.1-1969, Safety Standard for Low Lift and High Lift Trucks, which is incorporated by reference in 1910.178, defines powered industrial trucks as “mobile, power propelled trucks used to carry push, pull, lift, stack, or tier material.”

Excluded

Vehicles used or intended for earth moving and over-the-road hauling.

***Example-
Loader with a fork
attachment.***

**1926.21(b)(2) - General Training
5(a)(1)- General Duty Clause**



Many OSHA Regions have an Local Emphasis for Forklifts (LEP)

- OSHA standards apply to both General Industry, Construction and Shipyards.
- If PIT's are used at a jobsite, Compliance Officers shall expand the inspection.
- Area offices will conduct inspections for all complaints which contain allegations of powered industrial truck hazards.

Performance-Oriented Requirements

- The powered industrial truck operator training requirements are performance-oriented.
- Allows employers to tailor a training program to the workplace and the particular types of powered industrial trucks operated.

Manual Lifting Devices

Covered or not covered?

What standard applies?

How should you treat it?



OPERATOR INSTRUCTIONS

OVERVIEW

The following instructions specify the proper operation procedure and basic functions of this high lift truck.

OWNER/OPERATOR RESPONSIBILITY

Like other vehicles, manually propelled high lift industrial trucks can cause injury if improperly used or maintained.

The owner and/or operator shall study the product instructions and retain them for future reference. Read and comply with all labeling on the lift truck.

Only authorized personnel shall be permitted to operate a manually propelled high lift industrial truck. Operators of manually propelled high lift industrial trucks shall be qualified as to visual, auditory, physical, and mental ability to operate the equipment safely.

The user shall ensure that the operators understand that safe operation is the operators responsibility. The user shall also ensure that operators are knowledgeable of, and observe, the safety rules.

An effective operator training program should center around user company's policies, operating conditions, and trucks. The program should be presented completely to all new operators and not condensed for those claiming previous experience.

Modifications and additions that affect capacity or safe operation shall not be performed.

The user shall see that all nameplates, caution, and instruction markings are in place and legible.

The user shall consider that changes in load dimension may affect truck capacity.

Experience has shown that manually propelled high lift industrial trucks are stable when properly operated. However, improper operation, faulty maintenance, or poor housekeeping may contribute to a condition of instability. Some conditions that may affect stability are: surface and floor conditions, grade, speed, load position, attachments (trucks with attachments behave as partially loaded trucks even when operated without a load on the attachment), dynamic and static forces, and the judgment exercised by the operator.

Safety guards are intended to offer protection to the operator from moving parts but cannot protect against every possible condition. Therefore, they should not be considered a substitute for good judgment.

Good judgment and care shall be exercised in handling of loads extending above the mast.

Controlled lighting of adequate intensity should be provided in operating areas.

Areas of use for manually propelled high lift trucks shall be smooth and level: free from gaps, floor drains, etc.

The floors shall be maintained to keep them free of debris and liquids which hinder safe operation of the truck.

Approved attachment added but data plate not updated

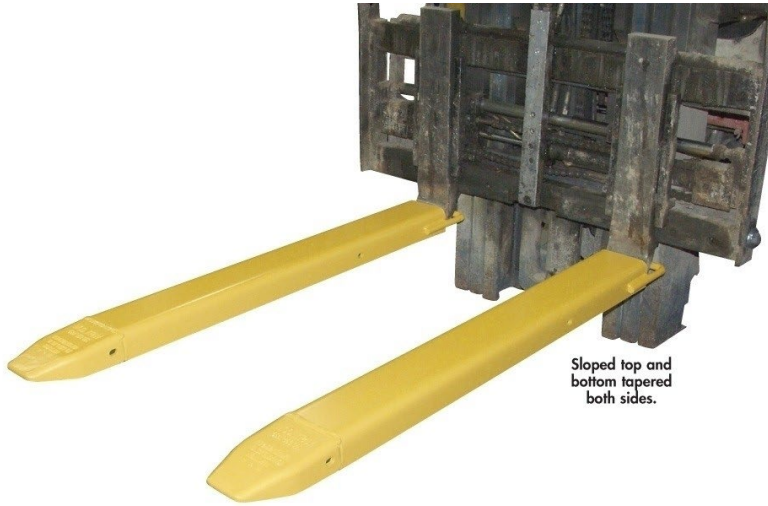


WARNING IMPROPER OPERATION OR MAINTENANCE
COULD RESULT IN INJURY OR DEATH.

MODEL _____ SERIAL No. **3PM000000**
 TYPE **TFS** TRUCK WT. **8,480** lbs
 CAPACITY OF STANDARD TRUCK WITH SIMPLEX MAST
 AND FORKS: **5,000** lbs AT 24 IN. LOAD CENTER WITH
 MAXIMUM HEIGHT OF 130 IN. RATED CAPACITY WITH
 OPTIONAL MAST AND/OR ATTACHMENT LISTED BELOW.

MAST : VERTICAL	A		B		FORKS ONLY	ATTACH
	in	in	in	in		
24 in.			1156	24		4,500

ITCH/MODEL **Slideline**
 MEETS DESIGN SPECS ANSI B56.1



Sloped top and bottom tapered both sides.



Fork Extensions







Top Ten Violations: FY 2024

#7: 1926.503 – Fall Protection, Training

More than 2,050 violations



Top 5:

1. 1926.503(a)(1) (1,351 violations) – training program for each employee who might be exposed to fall hazards
2. 1926.503(b)(1) (489 violations)– written training certification
3. 1926.503(a)(2) (109 violations)– training by a competent person qualified in specified areas
4. 1926.503(c)(3): (94 violations) Inadequacies in an affected employee’s knowledge or use of fall protection systems or equipment indicate that the employee has not retained the requisite understanding or skill.
5. 1926.503(c): (6 violations) “Retraining.” When the employer has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by paragraph (a) of this section, the employer shall retrain each such employee.

1926.503(a)(1) Fall Protection Training



Train...



Top Ten Violations: FY 2024

#8: 1926.451 – Scaffolding

More than 1,873 violations



Top 5:

1. 1926.451(g)(1) (528 violations)– requirement for fall protection at >10 ft above lower level.
2. 1926.451(c)(2): (267 violations) Supported scaffold poles, legs, posts, frames and uprights shall bear on base plates and mud sills or other adequate firm foundation.
3. 1926.451(b)(1): (224 violations) Each platform on all working levels of scaffolds shall be fully planked or decked between the front uprights and the guardrail supports.
4. 1926.451(e)(1) (210 violations) –requirement for ladders or stairs when scaffold is >2 feet above access point
5. 1926.451(b)(1) (101 violations) – requirement that platforms be fully planked or decked
1926.451(g)(4): (101 violations) Guardrail systems installed to meet the requirements of this section shall comply with the following provisions (guardrail systems built in accordance with Appendix A to this subpart will be deemed to meet the requirements of paragraphs (g)(4)(vii), (viii) and (ix) of this section).





Pump Jack Scaffold
missing mid rail or
nets\side rails or
nets\Safe means of
access

Pump Jack Scaffold missing mid rail or nets\side rails or nets\Safe means of access



Access over 2ft.



Top Ten Violations: FY 2024

#9: 1926.102 – Eye and Face Protection

More than 1,814 Violations



1. 1926.102(a)(1): The employer shall ensure each affected employee uses appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation.
2. 1926.102(a)(2): The employer shall ensure each affected employee uses eye protection that provides side protection when there is a hazard from flying objects. Detachable side protectors (e.g., clip-on or slide-on side shields) meeting the pertinent requirements of this section are acceptable.
3. 1926.102(b)(1): Protective eye and face protection devices must comply with any of the following consensus standards.
4. 1926.102(a)(3): The employer shall ensure each affected employee who wears prescription lenses while engaged in operations that involve eye hazards wears eye protection that incorporates the prescription in its design, or wears eye protection that can be worn over the prescription lenses without disturbing the proper position of the prescription lenses or the protective lenses.

1926.102(a)(1) Eye & Face Protection



Improper Storage



Lack of eye and face protection when placing concrete



Use of pneumatic hammer (nail gun) no eye protection



Top Ten Violations: FY 2024

#10: 1910.212 – Machine Guarding

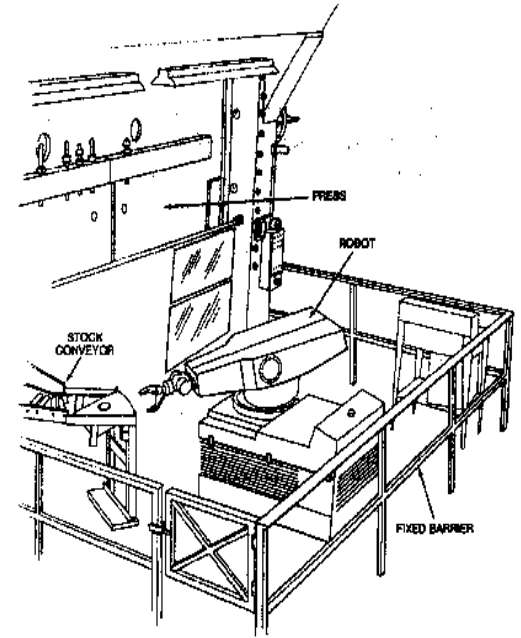
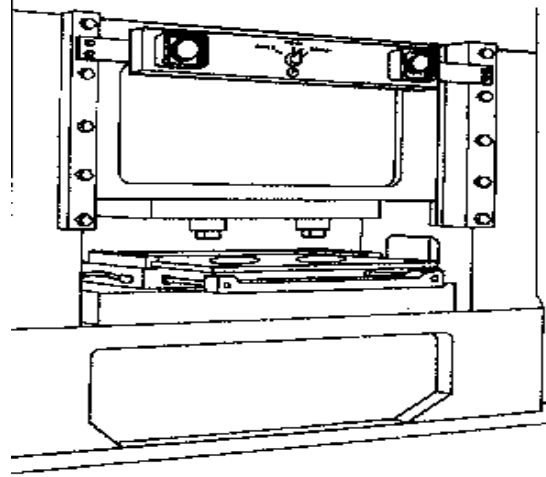
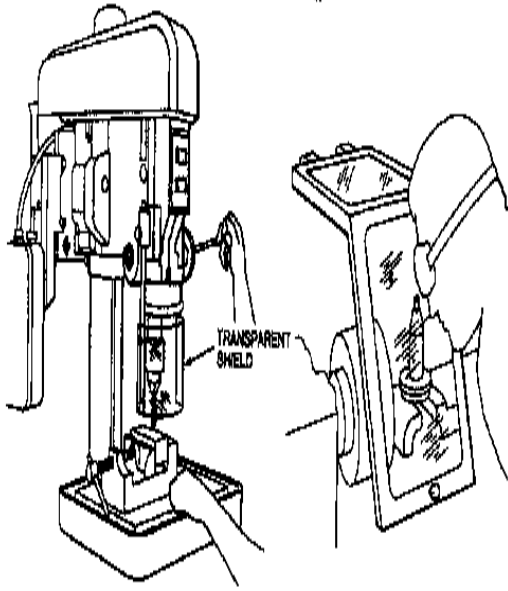
More than 1,541 violations



Top 5:

1. 1910.212(a)(1): (1,089 Violations) Types of guarding. One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks.
2. 1910.212(a)(3): (402 Violations) Point of operation guarding.
3. 1910.212(a)(2): (60 Violations) General requirements for machine guards. Guards shall be affixed to the machine where possible and secured elsewhere if for any reason attachment to the machine is not possible. The guard shall be such that it does not offer an accident hazard in itself.
4. 1910.212(b): (57 Violations) Anchoring fixed machinery. Machines designed for a fixed location shall be securely anchored to prevent walking or moving.
5. 1910.212(a)(4): (13 Violations) Barrels, containers and drums. Revolving drums, barrels and containers shall be guarded by an enclosure that is interlocked with the drive mechanism, so that the barrel, drum or container cannot rotate if the guard enclosure is in place.

1910.212(a)(1) – Machine guarding, general

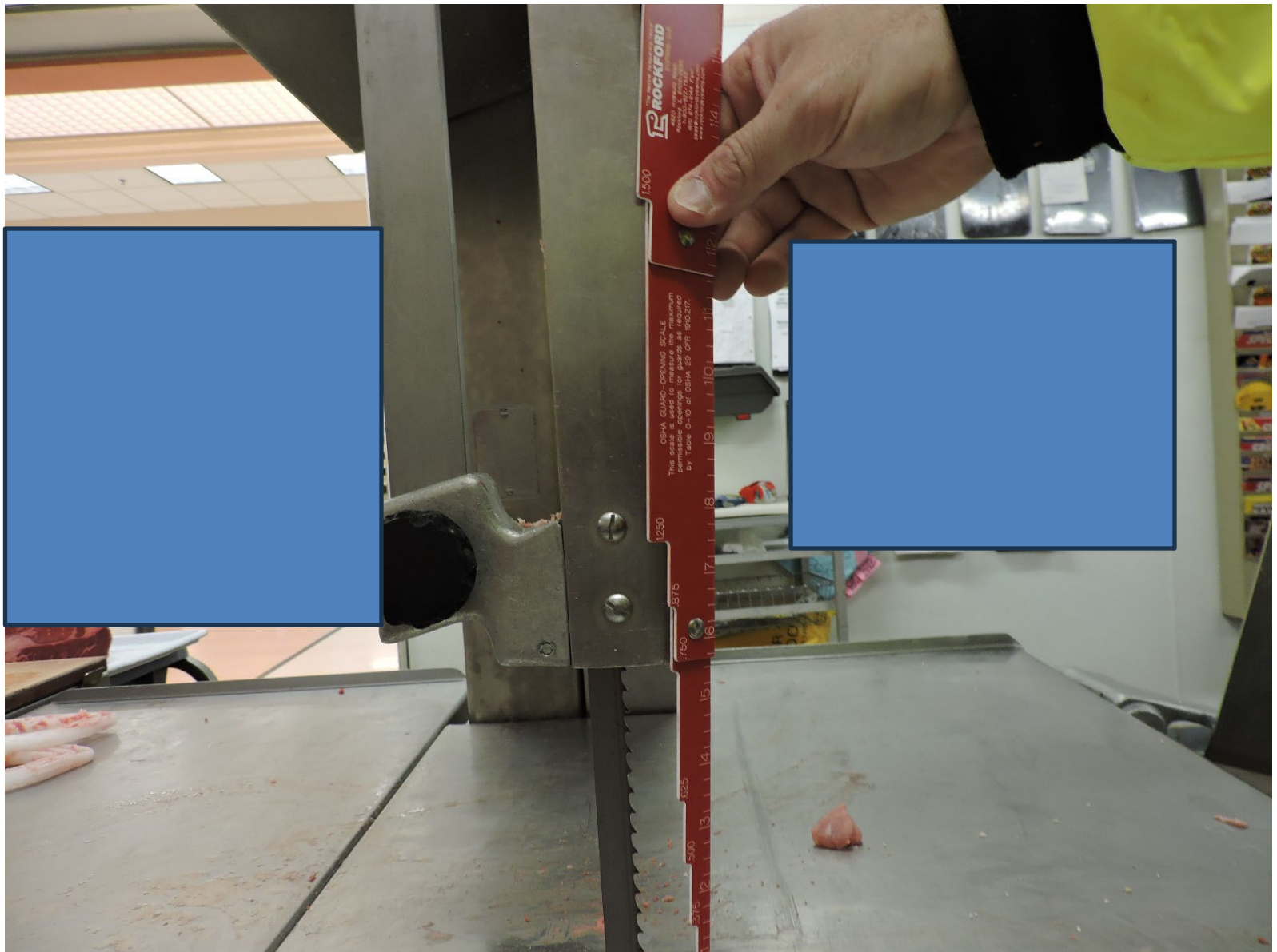


Unguarded lathe

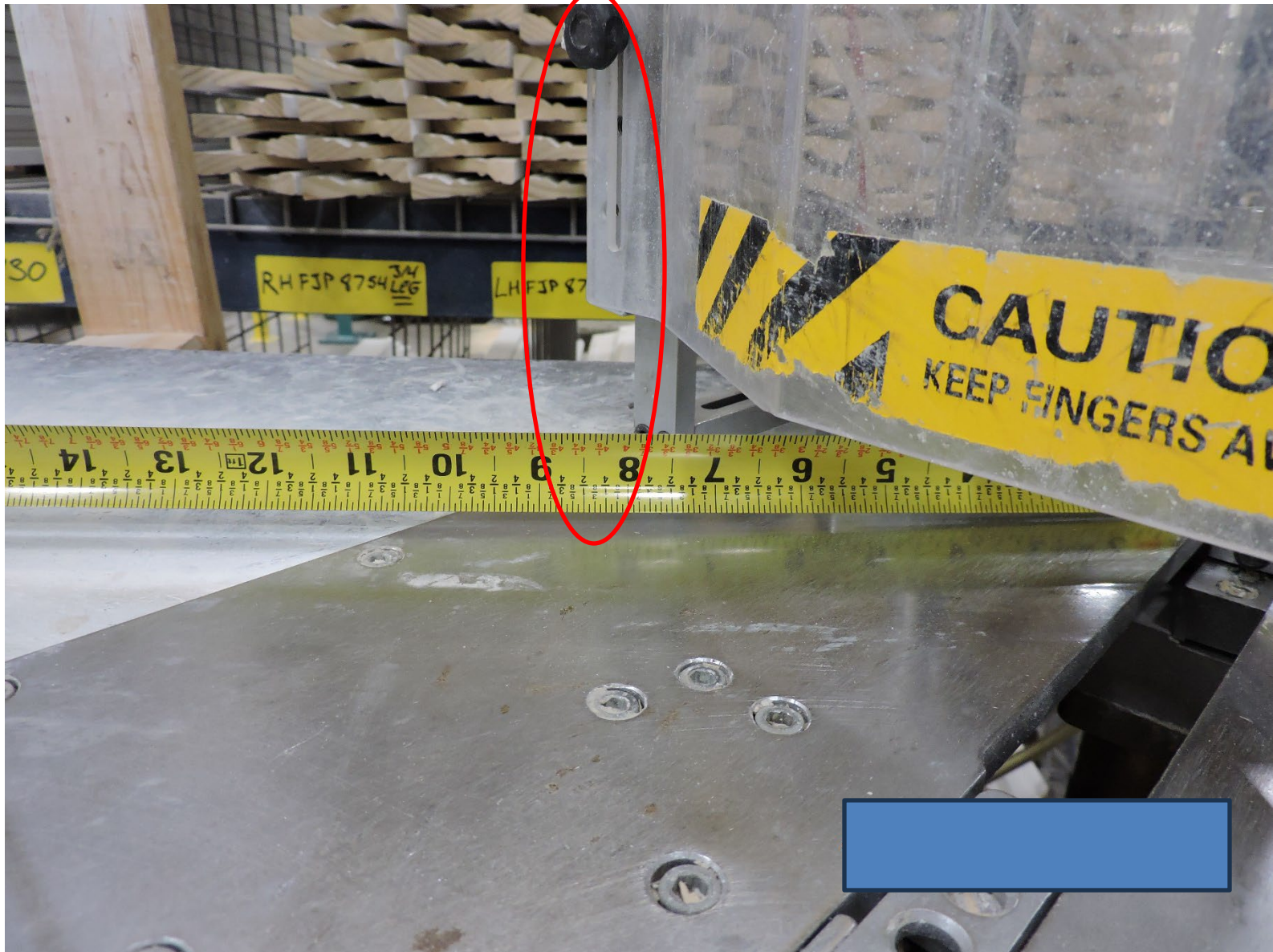




Bandsaw, unused portion of blade not covered.



Point of operation guard not lowered to prevent insertion of fingers into machine



QUESTIONS?

