

Most Cited OSHA Violations How Do We Stack Up? January 2017

As school corporations, we are required to comply with all relevant OSHA regulations. Is your school corporation in compliance with the most cited violations from OSHA? Review these violations and ask yourself if your department and your people are complying with these basics.

School corporations fall under the 1910 General Industry Standards. When performing construction activities (using ladders, scaffolds, personal fall protection, etc.) we are required to comply with the 1926 Standards for construction activities. Below is a list and discussion of OSHA's Top 10 Most Cited Violations for 2016.

Do you need assistance with assessing hazards or complying with these regulations? Contact your risk management safety consultant for assistance. Mr. Mike Reed, President, Reed Environmental Inc., at 800.866.8084 or Mike@reedenvironmental.com.

1 FALL PROTECTION

STANDARD: 1926.501

**TOTAL VIOLATIONS:
6491**

This standard outlines where fall protection is required, which systems are appropriate for given situation, the proper construction and installation of safety systems and the proper supervision of employees to prevent falls from surfaces with an unprotected side of 6 feet or higher.

1. Residential construction - general duty to have fall protection when working six feet or above
2. Unprotected sides/edges - In general industry, we must protect any unprotected side/edge of four feet or more; for construction it is six feet or more).
3. Roofing work on low-sloped roofs – no fall protection.
4. Steep roofs - no fall protection.
5. Holes and skylights – Personnel can fall through skylights. Skylight protection is required.

#2 HAZARD COMMUNICATION

STANDARD: 1910.1200

**TOTAL VIOLATIONS:
4484**

This standard addresses chemical hazards from chemicals produced in the workplace and those imported into the workplace. It also governs the communication of those hazards to workers.

1. Implementation of Hazard Communication program - a written policy document is required.
2. Training - required for all new personnel and when new chemicals are introduced.
3. Requirement to maintain SDS - on-site in binders or online adequate.
4. Requirement to develop SDS - for chemical manufacturers only.
5. Explanation of label received on shipping containers. SDSs, including the order of information and how employees obtain and use appropriate hazard information; again a training issue.

**#3
SCAFFOLDING**

STANDARD: 1926.451

**TOTAL VIOLATIONS:
2212**

This standard covers general safety requirements for scaffolding, which should be designed by a qualified person and be constructed in accordance with that design. Employers are bound to protect workers from falls and falling objects while working on or near scaffolding at heights of 10 feet or higher.

1. Each employee on a scaffold **more** than 10 feet above a lower level shall be protected from falling to that lower level.
2. When scaffold platforms are more than 2 feet above or below a point of access shall not use cross-braces as a means of access.
3. Working levels of scaffolds **shall be** fully planked or decked. Open decks cause falls.
4. Personal fall arrest systems or guardrail systems.
5. Guardrail systems shall be installed along all open sides and ends of platforms. Fall risks from elevated walking areas.

**#4
RESPIRATORY
PROTECTION**

STANDARD: 1910.134

**TOTAL VIOLATIONS:
1931**

This standard directs employers on establishing or maintaining a respiratory protection program. It lists requirements for program administration; worksite-specific procedures; respirator selection; employee training; fit testing; medical evaluation; respirator use; and respirator cleaning, maintenance and repair.

1. Medical evaluation for respiratory protection. Use of disposables okay.
2. Respiratory protection requirement. Not having attic quick equipment
3. Respirator fit testing. Cartridge respirators must be fit-tested.
4. Employer must establish respiratory program (when over exposures exist).
5. The employer shall identify and evaluate the respiratory hazard(s) in the workplace. An assessment is required.

**#5
LOCKOUT/TAGOUT**

STANDARD: 1910.147

**TOTAL VIOLATIONS:
1945**

This standard outlines minimum performance requirements for the control of hazardous energy during servicing and maintenance of machines and equipment.

1. General procedures.
2. Energy control program. No written lockout program. No machine specific lockout procedures.
3. Employer shall conduct periodic inspection. Annual inspection of activities and training required.
4. Training. Initial training required. Retraining when processes change or employees deviate from rules.
5. Each authorized employee shall receive training in the recognition of applicable hazardous energy sources. Training requirement.

**#6
POWERED INDUSTRIAL
TRUCKS**

STANDARD: 1910.178

**TOTAL VIOLATIONS:
1643**

This standard covers the design, maintenance and operation of powered industrial trucks, including forklifts and motorized hand trucks. It also covers operators training requirements.

1. Safe Operation. General requirements.
2. Evaluation for operator's performance at least once every 3 years. Training required every three years.
3. Certification. Not providing certification to operators.
4. Truck repair and maintenance. By providing ongoing and annual maintenance.
5. Training shall consist of a combination of formal instruction, practical training and evaluation of operator's performance. Providing adequate training.

**#7
LADDERS**

STANDARD: 1926.1053

**TOTAL VIOLATIONS:
2,339**

This standard covers general requirements for all ladders.

1. Portable ladder access. No access or improper access to letter when needed.
2. Shall be used only for the purpose for which they were designed. Using ladders as scaffolds, tables, etc.
3. The top or top step of a stepladder should not be used as a step.
4. With structural defects. No safety seat, cracked rungs inside rails.
5. An employee shall not carry any object or load that could cause the employee to lose balance and fall. Maintain three points of contact on ladders (2 hands & 1 foot or 1 hand & 2 feet).

**#8
MACHINE
GUARDING**

STANDARD: 1910.212

**TOTAL VIOLATIONS:
2379**

This standard covers guarding of machinery to protect operators and other employees from hazards, including those created by point of operation, ingoing rep points, rotating parts, flying chips and sparks.

1. One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards. General guarding requirements.
2. Point of operation guarding. Guarding machine hazards (belts, pulleys, cutting points, etc.)
3. Anchoring fixed machinery. Secure drill presses and petals for grinders to floor.
4. General requirements.
5. Exposure of blades. Blades located less than 7 feet above the floor or working level shall be guarded. Any machine hazard below 7 feet must be guarded.

**#9
ELECTRICAL:
WIRING METHODS**

STANDARD: 1910.305

**TOTAL VIOLATIONS:
1280**

This standard covers the grounding of electrical equipment, wiring and insulation. It includes temporary wiring and splicing, such as flexible cords and cables.

1. Substitute for fixed wiring of the structure. Installing temporary wiring.
2. Openings shall be effectively closed. Enclosing "knockouts" on electrical boxes.
3. Flexible cords and *cable* (strain relief). Install strain relief for hanging electrical boxes and shops.
4. Covers and canopies over exposed electrical parts. Exposed electrical parts and panels.

**#10
ELECTRICAL:
GENERAL
REQUIREMENTS**

STANDARD: 1910.303

**TOTAL VIOLATIONS:
1098**

This standard covers general safety requirements for designing electrical systems.

1. Installation and use.
2. Guarding *of live* parts.
3. Working *space* requirements.
4. Adequate space around electrical equipment.
5. Service, feeders, and branch circuits. Each service, theater and branch circuit, and its disconnecting means or overcurrent device, shall be legibly marked to indicate its purpose. Labeling boxes and breakers.