

TerranearPMC Safety Share

Robert Brounstein

Week of February 18, 2019 – OSHA's Top 10

This past October, the Occupational Safety & Health Administration (OSHA) announced its list of the agency's top 10 violations for fiscal year 2018. The list was announced by Patrick Kapust, OSHA's Deputy Director of the Directorate of Enforcement Programs. The top 10 violations accounted for an estimated total of 32,266 violations, based on preliminary data for the last fiscal year. While these numbers represent safety and health violations that pertain strictly to Federal OSHA, they do not account for such violations associated with state enforcement agencies. In addition, these violations do not necessarily mean that a workplace injury or illness was the result; only that workplaces throughout the country – from a Federal OSHA perspective - amassed over 32 thousand actions that were non-compliances to regulations designed to protect the American worker. This list, in order of the regulation that had the greatest infractions to the least, is presented below. Next to each category is the specific corresponding OSHA regulation and number of violations.

1. Fall Protection (1926.501) – 7720 violations
2. Hazard Communication (1910.1200) - 4552 violations
3. Scaffolding - General Requirements (1926.451) - 3336 violations
4. Respiratory Protection (1910.134) - 3118 violations
5. Control of Hazardous Energy - Lockout/Tagout (1910.147) - 2944 violations
6. Ladders (1926.1053) - 2812 violations
7. Powered Industrial Trucks (1910.178) - 2294 violations
8. Fall Protection – Training Requirements (1926.503) - 1982 violations
9. Machine Guarding– General Requirement (1910.212) - 1972 violations
10. Personal Protective and Lifesaving Equipment – Eye and Face Protection (1926.102) - 1536 violations

A comparison to the 2017 “top 10 list” shows that very little has changed. Fall protection (training requirements) and machine guarding exchanged positions, from #'s 8 and 9. In addition, this year marks the first time that Personal Protective and Lifesaving Equipment - Eye and Face Protection - have appeared in the list of top 10 violations. It should also be mentioned that this category references the Construction Industry (29 CFR 1926.102), as opposed to the General Industry practice (29 CFR 1910.133) for eye and face protection. In addition, Electrical – Wiring Methods (1910.305) was removed from the 2018 list (#10 for FY 2017). And, as a comparison to FY 2016, the top 8 spots contained the same classifications as well (with powered industrial trucks and ladders changing positions), while the categories of electrical methods and electrical general requirements were the 2017 positions 9 and 10.

Through a comparison of these yearly infractions, we can see a clear consistency when it comes to compliance with fall protection, hazard communication, scaffolds, respiratory protection, control of hazardous energy (aka lockout/tagout), powered industrial trucks (aka forklifts) and machine guarding. And while these categories only represent non-compliances which do not necessarily correlate to workplace injuries and illnesses, the information they provide can be very useful indications for areas where at-risk behaviors predominate.

OK, so what are the areas where workplace injuries and illnesses occur and is there a correlation between number of non-compliances and incidents.



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The fact is, the number one workplace injury is ergonomic. That is, injuries related to pulling, lifting, pushing, holding, carrying, and throwing activities at work. These incidents can cause muscle injuries, body trauma, and a variety of other medical issues. Not only have ergonomic injuries been recognized as being the number one workplace injury over the years, but they rank as the most costly for US companies.

The number 2 cause of workplace injuries pertains to falls on wet and slippery floors or tripping over misplaced items lying on the floor. Inattention to detail and poor housekeeping are the typical root causes for these incidents.

And then there are falls from elevated surfaces. This category includes persons falling from roofs, ladders, and stairways. They can be caused by slip and fall accidents or due to faulty equipment. These types of accidents can be reduced using proper personal protection gear, training and employee diligence.

Other workplace injuries involve objects falling on workers and persons running into concrete objects such as walls, doors, cabinets, glass windows, table, chairs etc. Head, knee, neck, and foot injuries are common results. These cases, while do not constitute an OSHA violation, is indicative of one of the most common accident-precursors: that is, a loss of focus on the task-at-hand. Employee's diligence and maintaining focus on keeping the work environment free from hazards (such as obstructions) are key to preventing these types of injuries.

Vehicle accidents is another category where workers can get injured – seriously injured. This is where proper training along with safe driver policies and employee diligence can significantly reduce these types of incidents.

Machine entanglements; a category that coincides with the OSHA top 10 non-compliance of machine guarding. Related to guarding machines, this includes the practice of removing loose clothing, jewelry, long hair from the point-of-operation while using protective equipment and practicing the incident precursor of maintaining focus on the task-at-hand are necessary to control these serious cases.

Lastly, is workplace violence. The fact is, OSHA does not have a regulation that directly addresses these circumstances; However, OSHA, as well as NIOSH, does have a number of publications and guidance documents that deal with this subject.

So why is the OSHA top 10 list important when, in fact, a direct correlation between workplace non-compliances and injuries are not congruent? The point is, by identifying unsafe conditions as well as workplace infractions, we can see areas-of-improvement that, if left unchecked, have a potential to manifest into a workplace incident. Meanwhile, as OSHA reports these same violations every year, the question needs to be asked if employers and workers are missing something or maybe, a problem exists, that has yet to be identified; maybe, quite possibly, the infractions that are being reported are the most obvious to identify while the underlying problems that cause serious injuries and illnesses are still left uncovered only to be realized when it is too late.

One earnest worker can do more by personal suggestion to prevent accidents than a carload of safety signs

~Making Paper, E.R. Brown

