

Bureau of Workers' Compensation

THE FATAL 4: OSHA'S TOP 4 CITATIONS

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LEARNING OBJECTIVES

- Upon completion of the presentation participants will be able to list the elements of the continuous improvement model based upon the ANSI Z10 Standard.
- Upon completion of the presentation participants will be able to list the elements of the hierarchy of controls according to the Occupational Safety & Health Administration.
- Upon completion of the presentation participants will be able to list the top 4 OSHA citations in General Industry and Construction for Fiscal Year 2023.



ANSIZ10

 ANSI Z10 is an American consensus standard that outlines a complete safety management framework and process for improvement.

• The ANSI Z10 standard is organized to contain eight required elements:

- 1. Scope, Purpose, and Application
- 2. Definitions
- 3. Management Leadership and Employee Participation
- 4. Planning
- 5. Implementation and Operation
- 6. Evaluation and Corrective Action
- 7. Management Review
- 8. Appendices



ANSI Z10 – CONTINUAL IMPROVEMENT

- Processes for continual improvement are to be in place and implemented to ensure that:
 - Hazards are identified and evaluated
 - Risks are assessed and prioritized
 - Management system deficiencies and opportunities for improvement are identified and addressed
 - Risk elimination, reduction, or control measures are taken to
 - Ensure that acceptable risk levels are attained.



ANSI Z10 – CONTINUAL IMPROVEMENT





OSHA HIERARCHY OF CONTROLS

Elimination

Substitution

Engineering

Admin

PPE



OSHA TOP 10 "HONORABLE MENTIONS"

CONSTRUCTION

- #10 Scaffolds
- #8 General Safety & Health
- #7 Aerial Lift

GENERAL INDUSTRY

- #9 Electrical
- #8 Medical Services & First Aid
- #7 Exit Routes
- #6 Powered Industrial Trucks



#4 - HEAD PROTECTION (CONSTRUCTION)

• 1926.100(a) - Employees working in areas where there is a possible danger of head injury from impact, or from falling or flying objects, or from electrical shock and burns, shall be protected by protective helmets.

• FY23 Citations: 1,038

Avg Penalty: \$2,886.56*

*Average cost based on Section not Subsections.



HEAD PROTECTION

Plan

What activities do we engage in that require head protection?

Review

Conduct an annual review of the program and PPE. Acquire employee feedback for suggestions.

Implement

Provide proper fitting PPE & training on PPE to include care and maintenance.

Check / Correct

Conduct assessments for proper use & care. Provide feedback.



#4 - HAZARDOUS ENERGY CONTROL (GENERAL INDUSTRY)

• 1910.147(c)(4)(i) - Procedures shall be developed, documented and utilized for the control of potentially hazardous energy when employees are engaged in the activities covered by this section.

FY23 Citations: 506

Avg Penalty: \$10,944.60*

*Average cost based on Section not Subsections.



HAZARDOUS ENERGY CONTROL

<u>Plan</u>

What tasks require LOTO?

What machines require specific LOTO procedures?

Review

Conduct an annual review of LOTO procedures and document any deviations for correction.

Implement

Develop LOTO machine specific procedures.

Provide LOTO training to all staff.

Check / Correct

Observe LOTO practices routinely and provide feedback based on observations.



#3 - LADDERS (CONSTRUCTION)

- 1926.1053(b)(1) When portable ladders are used for access to an upper landing surface, the ladder side rails shall extend at least 3 feet (.9 m) above the upper landing surface to which the ladder is used to gain access; or, when such an extension is not possible because of the ladder's length, then the ladder shall be secured at its top to a rigid support that will not deflect, and a grasping device, such as a grabrail, shall be provided to assist employees in mounting and dismounting the ladder. In no case shall the extension be such that ladder deflection under a load would, by itself, cause the ladder to slip off its support.
- FY23 Citations: 1,852
- Avg Penalty: \$3,192.75*



^{*}Average cost based on Section not Subsections.

LADDERS

<u>Plan</u>

What tasks require the use of a ladder?

Could the work be done another way?

Review

Conduct an annual review of the program. Monthly conduct a formal inspection of the ladders for damage.

Implement

Provide training on ladder inspections and proper use.

Check / Correct

Conduct random observation of ladders in use and provide feedback based on observations.



#3 - RESPIRATORS (GENERAL INDUSTRY)

• 1910.134(e)(1) - General. The employer shall provide a medical evaluation to determine the employee's ability to use a respirator, before the employee is fit tested or required to use the respirator in the workplace. The employer may discontinue an employee's medical evaluations when the employee is no longer required to use a respirator.

FY23 Citations: 513

Avg Penalty: \$1,887.63*

*Average cost based on Section not Subsections.



RESPIRATORS

Plan

What activities do we engage in that require respirators? Could we substitute the product?

Review

Conduct an annual review of the program. Acquire employee feedback for suggestions.

Perform annual fit testing.

Implement

evaluations, proper fitting respirators & training on PPE to include care and maintenance.

Check / Correct

Conduct random observation of respirators in use and provide feedback based on observations.



#2 - EYE & FACE PROTECTION (CONSTRUCTION)

• 1926.102(a)(1) - The employer shall ensure that 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.

• FY23 Citations: 2,032

Avg Penalty: \$3,602.20*

*Average cost based on Section not Subsections.



EYE & FACE PROTECTION

Plan

What activities do we engage in that require eye & face protection?

Review

Conduct an annual review of the program and PPE. Provide employee feedback for suggestions.

Implement

Provide proper fitting PPE & training on PPE to include care and maintenance.

Check / Correct

Conduct assessments for proper use & care. Provide feedback.



#2 - HAZARD COMMUNICATION (GENERAL INDUSTRY)

- 1910.1200(e)(1) Employers shall develop, implement, and maintain at each workplace, a written hazard communication program which at least describes how the criteria specified in paragraphs (f), (g), and (h) of this section for labels and other forms of warning, safety data sheets, and employee information and training will be met, and which also includes the following:
- 1910.1200(h)(1) Employers shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and safety data sheets.
- FY23 Citations: 1826
- Avg Penalty: \$2,211.00*



^{*}Average cost based on Section not Subsections.

HAZARD COMMUNICATION

Plan

What chemicals do we have onsite?

Review

Conduct an annual review of the program and identify ways to reduce hazardous chemicals from processes.

Implement

Provide SDS for each chemical, identify the hazards related to those chemicals and provide specific training for your hazards.

Check / Correct

Conduct assessments for proper labeling of chemicals and up-to-date inventory.



#1 - FALL PROTECTION (CONSTRUCTION)

- 1926.501(b)(13)- Residential construction. Each employee engaged in residential construction activities 6 feet (1.8 m) or more above lower levels shall be protected by guardrail systems, safety net system, or personal fall arrest system unless another provision in paragraph (b) of this section provides for an alternative fall protection measure.
- 1926.503(a)(1) The employer shall provide a training program for each employee who might be exposed to fall hazards. The program shall enable each employee to recognize the hazards of falling and shall train each employee in the procedures to be followed in order to minimize these hazards.
- FY23 Citations: 6,546
- Avg Penalty: \$5,678.52*



FALL PROTECTION

Plan

What activities do we engage in that requires elevated work?

Review

Conduct an annual review of the program and PPE. Provide employee feedback for suggestions.

Implement

Provide proper fall protection equipment for each scenario, provide training to your competent persons and workers.

Check / Correct

Conduct assessments for proper use & care. Conduct routine inspections of fall restraint and arrest systems.



#1 - MACHINE GUARDING (GENERAL INDUSTRY)

• 1910.212(a)(1) - 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. Examples of guarding methods are - barrier guards, two-hand tripping devices, electronic safety devices, etc.

• FY23 Citations: 1096

Avg Penalty: \$8,424.36*



^{*}Average cost based on Section not Subsections.

MACHINE GUARDING

<u>Plan</u>

What equipment do you have that employee could come into contact with? Remember "Over, Under, Around and Through"

Review

Annual review the machine risk assessments for opportunities to reduce risk.

Implement

Conduct a risk assessment to determine proper level of machine guarding and implement those guarding options.

Check / Correct

Conduct routine checks for proper guard placement and use of guarding.



NATIONAL EMPHASIS PROGRAMS

• Combustible Dust – 01/30/2023

• Fall Prevention/Protection – 05/01/2023

Warehousing and Distribution Center Operations – 07/13/2023



REGION 5 LOCAL EMPHASIS PROGRAM

• Exposure To Noise Hazards In the Workplace – 06/01/2021

Wood Pallet Manufacturing – 10/01/2023

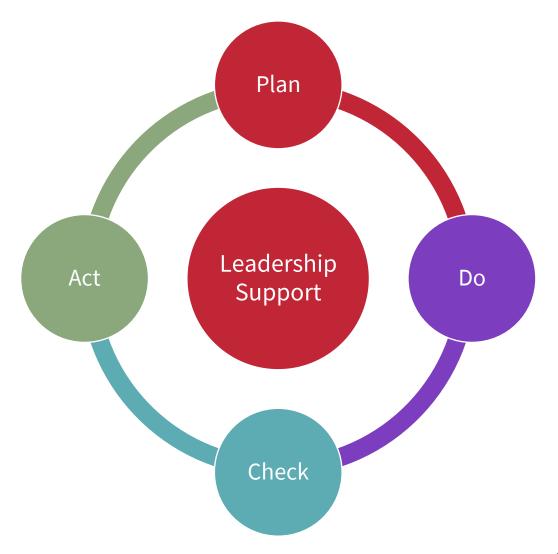
Food Manufacturing Industry – 10/01/2023

Grain Handling Facilities – 10/01/2023



WHERE DO WE START?

- 1. Leadership Support
- 2. Employee Engagement
- 3. Facility & Program Audits
- 4. Program Development / Improvement
- 5. Evaluation / Feedback





QUESTIONS?

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