

OSHA Top Ten Violations (part 2)

In last month's article, we discussed OSHA's Top Ten violations for fiscal year 2024 focusing on violations 1 through 5. In this month's article, the goal is to focus on 6 through 10. The objective is to identify what OSHA sees in the workplace during their inspections and compare that to your organization as an opportunity to find any gaps or deficiencies within your safety process. This is a great way to develop goals and objectives in 2025 and compare your safety program to OSHA's Top Ten Violations List.

As we discussed, 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 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**

As a reminder, 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>.

Let's look into some of the specific findings OSHA uncovered for violations 6 through 10.

#6 - Powered Industrial Trucks ([1910.178](#))

Powered Industrial Trucks are extremely useful for moving material. The OSHA standard includes not only forklifts, but any Powered Industrial Vehicle (PIV) that operates by battery or engine and can be sit down, stand up or walk behind. There has been a significant increase in the use of PIV's over the past 12 years which is resulting in a surge of injuries. During their inspections, OSHA found that employees are not being trained and certified prior to operating the vehicle. Whether they are used outdoor or indoors, operators must be appropriately trained prior to use. Additionally, employers are not retraining employees after an unsafe incident or re-certifying them at least every three years, which are required in the standard. OSHA also finds that pre-operation inspections are not being completed and documented. Finally, trucks needing repair are not taken out of operation, but instead, are being used, which not only can result in a violation, but also lead to potential injuries in the workplace.

#7 - Fall Protection – Training Requirements ([1926.503](#)):

Last month's article identified Fall Protection – General Requirements as the number one violation. Fall Protection shows up a second time, however in this instance, it references training requirements. Employers cannot give employees fall protection and expect them to go to work safely without proper training. Violations include failure to train employees on recognizing fall hazards in the workplace and the knowledge to identify and resolve those hazards. Employers are also not properly certifying their training with the required information including the

name, or other identity of the employee trained, the date(s) of training and signature of the person conducting the training. Additionally, the employers are not ensuring each employee is trained by a competent person. According to OSHA, a “competent person” is defined as “one capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees and who has authorization to take prompt corrective measures to eliminate them”.

#8 - Scaffolding (1926.451)

Scaffolding is useful in the workplace, but can be dangerous if not used correctly. Guidelines for proper installation of scaffolding are very specific and must be followed to prevent accidental tip over, falls or collapse. According to OSHA, employers are not erecting scaffolds per manufacturers’ guidelines. Scaffolding is being built on inadequate foundations causing a potential tip over. Planks and decks are not being used between the front uprights and the guard rail supports causing a potential fall hazard. The OSHA standard states that scaffolds shall be erected, moved, dismantled, or altered only under the supervision and direction of a competent person qualified in scaffold erection. Therefore, the employer must either ensure they have properly trained and authorized employee(s) to oversee this work or use a professional outside installer.

#9 - Personal Protective (PPE) and Lifesaving Equipment (1926.102):

Number 9 on the list is PPE and Lifesaving Equipment that focuses on eye and face protection. OSHA requires employers to perform a PPE hazard assessment of the jobsite to determine appropriate protection for all body parts. However, OSHA is finding that employers fail to identify hazards to the eyes and face within the workplace. Some of the findings include not performing a hazard assessment, employees not wearing approved PPE and employees wearing prescription lenses not designed or rated for the work environment. Remember, PPE is the last line of defense for employees, so before PPE is issued, determine if the hazards can be eliminated using the [Hierarchy of Controls](#). If not, then OSHA allows the use of PPE.

#10 - Machine Guarding (1910.212):

Performing an assessment of machinery and assuring guards are installed is key to preventing serious injuries such as being caught in, amputations and death. According to OSHA, employees must be protected from machine hazards created by point of operation, ingoing nip points, rotating parts, flying chips and sparks. The OSHA inspections uncovered that many types of machines were not properly guarded to protect employees, guards were missing or not being used, and certain types of machines were not anchored to prevent walking or tipping. In addition, OSHA found improper guarding for operations that include revolving drums, barrels and containers. The employer must ensure that all equipment and machinery is guarded properly and is maintained in place.

This article is intended to be a high-level summary of violations 6-10 of OSHA’s most frequently cited standards for fiscal year 2024. It is important that you review the regulations thoroughly in order to identify other parts of the standard to achieve and maintain compliance. Having a successful safety program starts with understanding what the standard requires, identifying gaps in your program and making the appropriate changes. Once those changes are made, don’t forget to retrain employees where necessary. If you are new to the safety world or looking to increase your knowledge of safety, consider online training classes, brochures, pamphlets, reputable online sources, consulting organizations, your Sedgwick Safety Representative or the Bureau of Workers Compensation Division of Safety & Hygiene.

For more information, please contact Sedgwick’s Andy Sawan at 330.819.4728 or andrew.sawan@sedgwick.com.