



Workplace Safety

## Workplace Safety: Handling OSHA's Top 10 Violations in the Real World

Don Sears | Sep 26, 2019

The OSHA Top 10 list may have seen an overall dip in total violations in 2019, but it doesn't mean companies are necessarily any safer. We take a look at some of the connections between several compliance areas, including fall protection, powered industrial trucks and lockout/tagout, with experienced safety specialists—including one who worked 20 years in a fire department.

Every year, the National Safety Council *announces* the top violations of U.S. government regulations in safety at its fall event.

Yet again, fall protection is the **No. 1 most-violated** Occupational Safety and Health Administration standard for 2019—with over 6,000 violations. It has been at the top of OSHA's top 10 list for nine years running. Those 6,000 violations, however, represent a drop of more than 1,200 violations from 2018 at 7,270.

Fall protection outpaces violations for the other nine standards on the annual list, including fall protection training, which ranked eighth this year with 1,773 violations—and which also dropped from 1,982 last year.

For this article, we spoke with Sean Moser, an MSC safety specialist based in Houston, about the safety areas on the OSHA Top 10 list he has seen in his career working as a member of the fire department for 20 years—and then working for one of the largest online retailers in the country at Amazon.

Moser is certified in OSHA 30 and HAZWOPER. He also has instructor-level credentials for first aid, AED and CPR, and basic certification in emergency medical technician duties. We also feature guidance from Damon Cassell, an MSC safety specialist in Southern California.

### Powered Industrial Trucks and Fall Protection Often Need to Work Together

In Moser's years at Amazon in Fort Worth, Texas, and in Houston, he spent a lot of time training employees on safety in fall protection, powered industrial trucks, first aid and many other common risk areas in manufacturing and public safety.

Some of the biggest risks in a plant setting are when workers have to operate at heights—and are also

using powered industrial trucks such as lift trucks and forklifts. Lift trucks are often found in inventory-heavy plant environments.

"One of the buildings that I worked at had 150 powered industrial trucks. And each one of those had to have a harness, along with a lanyard. So we would do the inspections of the harnesses themselves and of the lanyards and provide safety training for the powered industrial trucks and the fall protection program," says Moser.

There are dangers and risks for both drivers and pickers—especially if someone falls off the lift platform during work and becomes unconscious or unable to move their body.

"Most people think you put on a harness and lanyard, and get on the truck and go," says Moser. "I think the biggest challenge is getting the novice or untrained person to really see the hazards that are associated with fall protection when working at heights and driving the idea of the dangers and cautiousness needed to do the work and not get injured."

***Need help with the biggest risks in safety? Read "How to Avoid OSHA's Top Safety Violations in General Industry."***

Moser describes a situation where a company he worked for had an unfortunate injury. A worker, who had a medical condition, passed out and fell off the platform of a lift truck. The person's lanyard deployed—and no one was hurt—but the worker was unconscious.

"Don't put yourself in unnecessary risk during the process," says Moser. "And don't put your body in a pinch point while you're assisting them. You want to make sure when you pull up that you don't put their body in a pinch point between their platform and yours, so that you are able to safely get them up. So you have to allow enough space for that person to be brought up. You come underneath of them."

If they are conscious, then you can put them on your platform and lift your platform up to theirs and get them on that way. If they are unconscious, then the driver may have to bring them up.

"But you have to make sure that they're not going to be alarmed when they awake, that the injury victim remain calm during the process," he says. "Because if they get agitated and excited, that could cause further injury," explains Moser.

The driver needs to recognize they are in a lifesaving situation and promote calmness and confidence to the victim—and cautiousness.

## **Lockout/Tagout Moves Up the OSHA Top 10 Violations List**

One key and unfortunate area to move up the OSHA Top 10 list is lockout/tagout—which jumped from the No. 5 spot to No. 4—swapping places with respiratory protection. Again, take note, the number of violations dropped, but it's still a concern for safety professionals.

"Lockout/tagout should never move up on the list," says MSC Safety Specialist Damon Cassell in a ***recent Better MRO article***. "It should always move down. When something goes wrong in that situation, it's always serious—losing limbs, dying immediately."

Cassell points out that lockout/tagout issues are prevalent in metalworking environments and that in his experience, "no one is ever 100 percent compliant" and "you have to constantly be on it."

## Seeing Fall Protection Issues in the Real World—and Helping

Earlier this year at ASSP, we spoke with Cassell, who told us all about a metal press and forging company that had major fall protection issues and did not know it.

The company was sending workers down three stories to clean the presses that heat-treat metal. The company had no protection around the openings of the press.

## Preventing Slips, Trips and Falls: It Starts with an Organized Shop Floor

We've spoken to Moser in the past about the most dangerous spots on the shop floor. He told us that when he visits a facility, he likes to start with a tour of the whole building.

"The organization of a building really kind of determines what kind of safety culture they have," he says. "An organized shop floor is going to be an area that you're less likely to have as many slips, trips and falls. It's an area that you have better interactions between equipment and the people working around the equipment."

In essence, it means that the shop is designed with the thought of planning for injuries—which ironically can help avoid them.

## Two Fall Protection Questions for John Dony, Director of Environmental Health and Safety at the National Safety Council

These questions were included in the Better MRO article "*Q&A: John Dony, NSC, On Osha Top 10 And Safety Culture.*"

**There had been an uptick in preventable fatalities from falls in the workplace from 2011 to 2016. Where are we today with falls at work?**

**DONY:** Falls are the third-leading cause of death in the workplace after motor vehicle crashes and violence, and falls from heights in particular were responsible for almost 700 fatalities in 2016, all of them entirely preventable. Today, the issue is by and large a cultural one—given that the technologies and approaches to saving lives in this arena are well-known or continuing to improve (for example, Bluetooth-enabled fall protection harnesses that prevent equipment from being raised to heights when not tied off).

Preventing fall-related deaths, therefore, continues to be more about influencing and building a culture of safety in an organization and ensuring that workers understand and have access to the tools they need to be safe.

Ladders, stairs, raised platforms and other high work areas create the potential for falls from height. Fall protection equipment, regular inspection of equipment and training can help in some cases. Other times, raising awareness may be all that's needed.

"There are things you can do with each of those to help mitigate safety and help make it a safer environment," says Moser, noting that actions like painting steps yellow or having a yellow rail will make workers more visually aware of a stair hazard.

*Creating a safety culture can be hard. Learn how rPlanet Earth did it as a startup.*

## **What Is Hot Work and How Do You Manage It?**

Moser also spent a lot of time on inspections and audits for lockout/tagout—and working with administering and managing “hot work permits” and the hot work process.

What’s a **hot work permit**? Any grinding or welding where high temperatures and flames are involved requires issuing a hot work permit—and following detailed safety protocol.

“It is important for the employer to have a hot work program that covers hot work requirements, including permits,” notes OSHA. “Hazards with hot work are most frequently related to fire and explosion hazards and welding, cutting, brazing and grinding hazards, but also be aware that exposure to welding arcs and welding fumes can result in serious and disabling long-term health injuries.”

When there is a hot work permit issued, the designated safety person or safety manager has to review all of the safety policies and procedures and get permission to do the work, according to Moser.

“Employees need to follow all the hot work rules during and after the work, including having to have a ‘fire watch’ after any work is done—so that there are no sparks or embers present,” says Moser.

*Are you sure you are in compliance? How often do you audit and inspect? Share your thoughts on it.*

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