**5 Ways OSHA’s Top 10 Can Make Your Safety Job Easier**

*Getting Value Out of the “Same Ol’ List”*

The yearly announcement of OSHA’s Top 10 violations came out. So what! The top 5 violations have not changed in 4 years and most of the time it’s the same violations with the order switched around. The only “exciting” part is to see if a newcomer violation got on list. Well as un-newsworthy as this is, the annual confirmation can actually make your job easier.

**What’s on the List?**

Below is a list of the Top 10 OSHA Violations for 2018 (*through September 30, 2018*)

1. Fall Protection – General Requirements (1926.501): 7,270 violations
2. Hazard Communication (1910.1200): 4,552
3. Scaffolding (1926.451): 3,336
4. Respiratory Protection (1910.134): 3,118
5. Lockout/Tagout (1910.147): 2,944
6. Ladders (1926.1053): 2,812
7. Powered Industrial Trucks (1910.178): 2,294
8. Fall Protection – Training Requirements (1926.503): 1,982
9. Machine Guarding (1910.212): 1,972
10. Eye and Face Protection (1926.102): 1,536 (2018 list newcomer)

**It’s the Top 10 for a Reason**

First, companies continue to have problems with these issues. Many of them can be affected by employee behaviors such as how they choose to wear (or not wear) their PPE, conducting (or not) inspections, using (or not) injury saving controls, and situational awareness pitfalls. As a result, some of these are going to be easier to come across on any given day.

Next, these top 10 may also be considered the low hanging fruit of inspections. If these are the most common violations, then you could surmise inspectors are going to be looking at these. Further proof comes from OSHA’s national, regional and local emphasis programs. Emphasis programs allow an inspector to add to their investigation. For example, if you are having an inspection related to an employee complaint for respirators and there is an emphasis program in your area for powered industrial vehicles, OSHA inspectors can broaden their inspection if they see a forklift in your building.

A check of OSHA’s current emphasis programs includes items from the top 10. Out of 10 OSHA regions, there are emphasis programs for:

* Amputations (including machine guarding) – All 10 regions (national emphasis)
* Falls – 6 regions
* Powered Industrial Vehicles – 5 regions
* Electrical (including lockout/tagout) – 2 regions
* Overall Construction Worksites – 4 regions
* “High Health Hazard Top 50” – 2 regions

**Make Your Job Easier Tip 1: Break it Down**

The top 10 have specific standard references with them and from there we can see it’s a mix of general industry and construction standards. All 10 areas of safety are important. However, if you break the list down by the standard your company typically operates under, your focus areas are nearly cut in half and this becomes much more manageable.

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| --- | --- |
| General Industry-Related Violations | Construction Industry-Related Violations |
| Hazard Communication | Fall Protection – General Requirements |
| Respiratory Protection | Fall Protection – Training |
| Lockout-Tagout | Scaffolding |
| Powered Industrial Trucks | Ladders |
| Machine Guarding | Face and Eye Protection |
| Consider: Electrical – Wiring Methods 1910.305\* | Hazard Communication\*\* |

*\* This is the violation that dropped off the list, but it has been on in previous years.*

*\*\*The 1926 standard for hazard communication refers to the 1910 standard.*

**Make Your Job Easier Tip 2: Instant Safety Topics!**

Dealing with the immediate site-specific injury-causing issues should always be your first focus. However, you likely have safety committees, employee safety briefings, toolbox meetings, newsletters to write, safety emails to send, etc. The shortened list can now be easy go-to topics. Get your co-workers and safety teams talking about them. As mentioned before, some of these items are going to be related to their behaviors and decisions anyway. Head off the top 10 one person at a time and don’t feel bad if you need to continue to cover them. The world of sales tells us that most people need to hear about something 7 times before it sticks.

**Make Your Job Easier Tip 3: Get Your Documentation in Order**

A number of these areas have specific training and/or inspection requirements. Document, document, document! For training, keep records of who took training, when training was conducted, who the trainer was and what the content of the training included. For inspections, find a way to document these and have a process in place for taking equipment which fails out of service. This will be important information for you during an inspection and can go a long way in staying away from the top 10.

**Make Your Job Easier Tip 4: Incorporate These Into Your Walkthroughs**

If you’re not doing so already, set aside a little bit of time each week to conduct a safety walkthrough and incorporate these items into your checklist. Routine walkthroughs will allow you to keep up on what’s going on at your site, gives you a chance to correct deficiencies, and gives you an opportunity to take advantage of teachable moments to the workers in those areas. Get your employees involved in inspecting their workplace. Have them be on the lookout for these same issues in walkthroughs and peer-to-peer observations.

**Make Your Job Easier Tip 5: Get Help**

You are not Superman/Superwoman. There are too many tasks, crises, and other forces that can get in the way of getting it all accomplished. A good manager needs a supporting cast. If you can get someone at your company to help you with tasks, that would be great. However, if you cannot, consider getting an outside company or safety professional to help. Consultants like iSi are here for a reason. We have people on-staff who have been in your position and have experience with the regulations. We can often do what needs to be done (and done correctly) in a fraction of the time it would take for you to do it, or for you to train someone else internally to do it. This can be as simple as getting help a writing program or conducting training. It could be having an audit done to see where you stand on compliance or a bigger project such as revamping a safety program or day-to-day onsite assistance.

**In Conclusion**

Use the data from the Top 10 as your instant to-do list. If you can tackle the items that pertain to you, you can help do your part in avoiding those common fines and maybe shaking up the list for next year.