



# OSHA Top Ten Industry Fines and How to Stay in Compliance

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# Topics

☰ OSHA citations

☰ Top 10

☰ OSHA written programs

# OSHA Citations Top 10 Violations



# Inspection Statistics

☰ Period from October 2004 – September 2005

☰ SIC Division D “Manufacturing”

☰ Federal only

☰ Inspections – 5,671

☰ Citations – 32,850

☰ Penalties - > \$20 M

☰ Average penalty per inspection ~ \$3,500

# OSHA Top 10

- 1. The Control of Hazardous Energy, Lockout/Tagout**
- 2. Hazard Communication**
- 3. Machines, General Requirements**
- 4. Respiratory Protection**
- 5. Electrical, Wiring Methods, Components and Equipment**
- 6. Mechanical Power-Transmission Apparatus**
- 7. Powered Industrial Trucks**
- 8. Electrical Systems Design, General Requirements**
- 9. Woodworking Machinery Requirements**
- 10. Abrasive Wheel Machinery**

# OSHA General Industry Written Programs



# Written Program Focus

- ☰ Hazard Communication
- ☰ Emergency Action Plans
- ☰ Energy Control (Lockout/Tagout)
- ☰ Personal Protective Equipment Hazard Assessments
  
- ☰ Performance based standards

# Hazard Communication Program

## 29 CFR 1910.1200(e)

☰ Describes how program is implemented

- Labeling
- Training
- MSDS

☰ Provides chemical safety information

# Hazard Communication Program

- ☰ Include a list of hazardous chemicals

- ☰ Must address

- Non-routine tasks
- Unlabeled pipe
- Communication with “contractors”

- ☰ Right of access

- ☰ Consider multi-lingual employees

- ☰ Program must

- Meet the requirements of the standard
- Be effective

# Emergency Action Plan - Required Elements

## 29 CFR 1910.38(c)

- ☐ Evacuation procedures and routes
- ☐ Employee accounting procedures
- ☐ Emergency reporting procedures (internal / external)
- ☐ Personnel with special duties (rescue, medical)
- ☐ Procedures for personnel who must operate critical plant equipment before they evacuate
- ☐ Names of persons to contact for additional information about their duties

# Emergency Events

- ☰ Explosion / fire
- ☰ Gas leak
- ☰ Tank breach
- ☰ Hazardous material
- ☰ Medical emergency
- ☰ Weather disaster
- ☰ Bomb threat
- ☰ Public demonstration

# Coordinated Plan

- ☐ Private response teams
- ☐ Local / regional / state response
- ☐ General public / media

# Need for Additional Emergency Planning

- ☐ If you perform chemical emergency response
- ☐ If you have a fire brigade
- ☐ If you're subject to the OSHA Process Safety Management Standard
- ☐ If you perform medical response or clean blood spills
- ☐ If you work with certain hazardous chemicals (e.g., ethylene oxide)
- ☐ If you perform confined space entry

# Energy Control Program Elements

**Energy Control  
Procedures**

**Employee  
Training**

**Periodic  
Inspections**

# Written Program

## 29 CFR 1910.147(c)

- ☐ Responsibilities
- ☐ Energy control system in the workplace
- ☐ Procedures
- ☐ Emergencies

# Energy Control Procedures

## 29 CFR 1910.147(c)(4)

- ☐ Use of the procedure
- ☐ Specific isolating activities
- ☐ De-energizing and verification procedures
- ☐ Must be specific to the equipment being serviced

# Energy Control Procedures

- ☐ Available to affected employees
- ☐ Use as a checklist
- ☐ Provide copy for review

# Personal Protective Equipment Hazard Assessment 29 CFR 1910.132(d)

- ☐ Evaluation of the work area to determine hazards
- ☐ Focus on elimination or reduction of the hazard
- ☐ Selection of PPE based on hazards encountered
- ☐ Guidance in 29 CFR 1910 Subpart I, Appendix B

# Hazard Assessment – Communication

## Certification required

- Areas assessed
- Name of the person performing the assessment
- Dates of the assessment

## Assessment report (not-required)

- Communicates requirements
- Identifies the hazards
- Provides focus for on the job training
- Should be immediately available in the workplace

# Job Hazard and Safety Analysis

- ☐ Take your PPE assessments one step further
- ☐ Identifies hazards and documents mitigation steps first
- ☐ Recommend PPE where hazards have not been adequately abated by
  - Hazard elimination
  - Engineering controls
  - Employee isolation

# RESPIRATORS 29CFR1910.134

- ☰ Qualified Person

- ☰ Specific Procedures

- ☰ Change Out Schedules

- ☰ Hazard Evaluation

- ☰ Medicals

- ☰ Written Program

- ☰ Fit Tests

- ☰ Voluntary Usage\*

# TYPES OF RESPIRATORS

 AIR-PURIFYING

 AIR SUPPLY

# Summary - OSHA Standard 1910.146

## ☰ Confined Spaces

- Definitions - Walkthrough
- Policy - Keep Out!

## ☰ Eliminate Hazards

- Assessments
- Procedures

## ☰ Permit Spaces\*

- Contractor
- Air Monitoring

# Typical Confined Spaces

- **Limited Openings for Entry and Exit**
  - Doorway vs. Hatch
- **Bodily Enter**
  - Pipe Trench
- **Not Designed for Continuous Worker Occupancy**
  - Ventilation

# Permit-Required Confined Spaces

- **Hazardous Atmosphere**
  - Wastewater
- **Engulfment**
  - Water
- **Entrapment**
  - Air Ducts
- **Other Serious Hazard**
  - Electrical
- **Wastewater  
Pits/Manholes**
  - Uncontrollable Plant Flow
- **Mandatory Attendant and  
Rescue\***