



10 FREQUENT OSHA CITATIONS

HOW TO BE PREPARED



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FOCUS ON WAREHOUSE SAFETY

No one wants to experience an OSHA inspection.

But when you consider the implications of even a single injured-worker incident, it is well worth the time investment to ensure facility hazards are minimized and staff is thoroughly trained. The fatal-injury rate for the warehousing industry is higher than the national average for all industries combined. The majority of workplace injuries could be avoided by implementation, training and enforcement of safety protocols. In an effort to reduce the number of injuries, the Occupational Safety and Health Administration (OSHA) conducts about 100,000 facility inspections each year.



Since OSHA inspections don't come with prior warning, your business should always be prepared.

- ✓ Record keeping compliance (OSHA 300 log, etc.) and program documentation
- ✓ First aid (first aid kits, eyewash stations, etc.)
- ✓ Fire protection systems
- ✓ Personal protective equipment
- ✓ Safe operation of tools and equipment
- ✓ Transportation of employees

OSHA's Top 10 Safety Violations

Each year OSHA publishes a list of the most frequently cited safety violations (<https://www.osha.gov/top10citedstandards>). Although the order may change from year to year, the issues remain fairly constant:

- 1 Forklifts** - Operator training, certifications, pre-shift safety checklist and inspections, enforcement of speed limits, management of congestion and the routing of traffic.
 - 2 Hazard communication** - Employee education regarding spill and control plans, and proper disposal protocol
 - 3 Electrical, wiring methods** - Eliminate or mitigate electrical hazards.
 - 4 Electrical, system design** - OSHA requires that employers provide ground fault circuit interrupters (GFCIs) for receptacle outlets. Charging stations should have adequate ventilation and fire extinguishers.
 - 5 Floor and wall openings or other fall hazards (docks, raised work platforms)** - Eliminate fall hazards by use of guardrails/standard railings, full body harness, warning lines and safety nets.
 - 6 Exit** - Routes must be clearly marked and training provided for quick, safe egress.
 - 7 Conveyors and mechanical power transmission** - Regularly inspection of conveyors, proper guarding at pinch points, adequate lighting, conveyor lockout conveyors for use during repairs.
 - 8 Respiratory protection** - Proper use of personal protective equipment for environmental dust, fumes, paint spray, pesticides, etc.
 - 9 Lockout/tagout** - Access to broken or damaged equipment must be prevented by tagging with an "Out of Service" sign and/or locking out its operation.
 - 10 Portable fire extinguishers** - An adequate number of fire extinguishers, fully charged, must be in place, and employees must be trained on locations and operation.
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Rack-Specific Citations



There are also several federal OSHA regulations that are applicable to storage racks:

- › 1910.176(b), states that stored items must be secured. While the regulation doesn't specifically address racking, it refers to any material storage situation in which materials could fall or collapse.
- › 1910.159, requires that 18 inches of space be left between the height of any storage materials in relationship to fire sprinklers.

For most rack-specific citations, OSHA refers to the [General Duty Clause of the OSH Act](#) to hold employers responsible for worker protection. Most frequently referenced are the equipment manufacturer's installation and maintenance instructions and/or the industry standard ANSI/RMI MH16.1 - Specification for the Design, Testing and Utilization of Industrial Steel Storage Racks.



The following three racking issues are OSHA frequently cited under the General Duty Clause:

- › **Rack columns not anchored to the floor**
The bottom of all columns need to have column base plates and be anchored to the floor with anchor bolts capable of resisting the forces caused by the loads on the rack.
- › **Load ratings not present on racking**
Load ratings must be posted, stating the maximum permissible unit load and/or maximum uniformly distributed load per level, the average unit load, and maximum total load per bay. See ANSI/RMI MH16.1.
- › **Damaged racking**
OSHA recommends that companies develop rack maintenance and inspection programs. The program should include keeping aisles clear and providing sufficient clearance for material handling equipment. Racks need to be properly aligned, plum, and level, per manufacturer's instructions. Employees should promptly report any damage to racks.

Inspection Prep Checklist



Recordkeeping

- ☐ All injuries and illnesses (other than those requiring only minor first aid) are recorded on the OSHA 300 log.
 - ☐ Employee training records are available for review.
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Written Programs

- ☐ Clearly document your active safety program, Hazard Communication Program, Safety Data Sheets (SDS), confined space program, lockout/tagout program and respiratory protection program.
 - ☐ Make sure all program documentation is accessible by employees.
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Employer Posting

- ☐ The mandatory OSHA Job Safety and Health Protection Poster is prominently displayed where employees can see it.
 - ☐ Emergency phone numbers are clearly posted.
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First Aid

- ☐ First aid kits are available in all work areas and someone is assigned to stock them regularly.
 - ☐ Eyewash stations, sinks, and/or showers are available and functioning.
 - ☐ Employees have received appropriate first aid training and emergency instructions.
-

Employee Training

- ☐ Proper work practices are factored into determining the time requirements for an employee to perform a task.
- ☐ Employees performing physical work have adequate periodic rest breaks to avoid fatigue levels that could result in greater risk of accidents and reduced quality of work.
- ☐ Newly hired employees receive general ergonomics training and task-specific training.
- ☐ Employees are instructed on how to avoid heat stress in hot, humid environments.
- ☐ Employees are instructed on how to work in cold environments.

Person Protective Equipment

- ☐ Appropriate PPE is available for employees who need it, and there is a program for testing, storing, and cleaning of equipment.
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General Work Environment

- ☐ Exposed loading dock doors and other areas that employees could fall 4 feet or more or walk off should be blocked.
 - ☐ Sufficient employee restrooms are provided.
 - ☐ Floors and aisles are clear of clutter, electrical cords, hoses, spills and other hazards that could cause employees to trip or fall.
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Walkways

- ☐ All aisles are clearly marked and unobstructed.
 - ☐ Holes in the walking surface are covered or repaired so people can walk safely.
 - ☐ Non-slip materials are used on wet surfaces.
 - ☐ Walkways near moving equipment or other hazards are positioned or guarded so people won't be exposed to hazards.
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Egress & Evacuation

- ☐ Exits are marked with exit signs and illuminated so they're always visible.
 - ☐ All doors and routes that could be mistaken for exits are clearly marked ("NOT AN EXIT").
 - ☐ Enough exits exist so people can leave quickly during an emergency.
 - ☐ All exits are free from obstructions.
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Ladders

- ☐ All ladders are in good condition.
 - ☐ Employees have received ladder safety training.
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Hand Tools & Power Tools

- ☐ All tools are in good condition and stored in a safe location.
 - ☐ Moving parts have intended / sufficient guarding for injury prevention.
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Machine Guarding

- ☐ All machinery and equipment is regularly inspected and serviced as needed.
- ☐ Power shut-offs are within reach of operators and emergency stop buttons in red.



Lockout/Tagout

- ☐ All equipment is powered-down locked out during maintenance or cleaning operations.
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Welding & Cutting

- ☐ Compressed air gas cylinders are examined on a regular basis for leaks, rust, or defects.
 - ☐ Signs clearly state that smoking and other ignition sources are not allowed.
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Fire Protection

- ☐ The fire alarm system is tested annually.
 - ☐ All fire doors are clear from obstructions.
 - ☐ Appropriate fire extinguishers are regularly recharged mounted in accessible locations.
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Compressors/Air Receivers

- ☐ Every receiver has a pressure gauge and at least one automatic safety valve.
 - ☐ There is a current operating permit.
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Flammable & Combustible Materials

- ☐ Proper storage containers and methods are used to prevent spontaneous combustion.
 - ☐ Combustible waste is stored in metal containers and removed from the work site appropriately.
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Compressed Gas Cylinders

- ☐ All cylinders are clearly labeled to identify their contents.
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Forklifts

- ☐ Operators have proper training for the trucks they operate.
 - ☐ Forklifts are equipped with warning horns that can be heard above normal noise levels.
 - ☐ Forktruck brakes are effective even when the truck is fully loaded.
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Confined Spaces

- ☐ Permit-required confined spaces are only entered with the proper permit and according to the procedures.
- ☐ Regular tests of the atmosphere are performed within the confined space and respiratory protection is available if needed.
- ☐ An attendant is posted outside confined spaces while work is performed in case of an emergency.
- ☐ Emergency responders only enter the space with both respiratory protection and a lifeline.

Environmental

- ☐ Work areas have adequate lighting and ventilation.
 - ☐ Hazardous substances are identified.
 - ☐ Water for drinking, cooking, and washing is potable.
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Hazard Communication & Handling Dangerous Substances

- ☐ Employees are trained and understand hazards, understand SDSs and labels, and know how to safely handle chemicals.
 - ☐ Employees who handle hazardous chemicals must wear appropriate PPE.
 - ☐ There is a comprehensive list of hazardous substances used in the workplace and the corresponding SDS.
 - ☐ Employees are trained so they understand OSHA's blood borne pathogens standard.
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Electrical

- ☐ Electrical equipment is installed appropriately and receives regular maintenance.
 - ☐ Electrical hazards are labeled and posted appropriately.
 - ☐ Employees who will work on or near electrical equipment have received proper training.
 - ☐ Temporary wiring such as extension cords do not cause a trip hazard.
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Noise

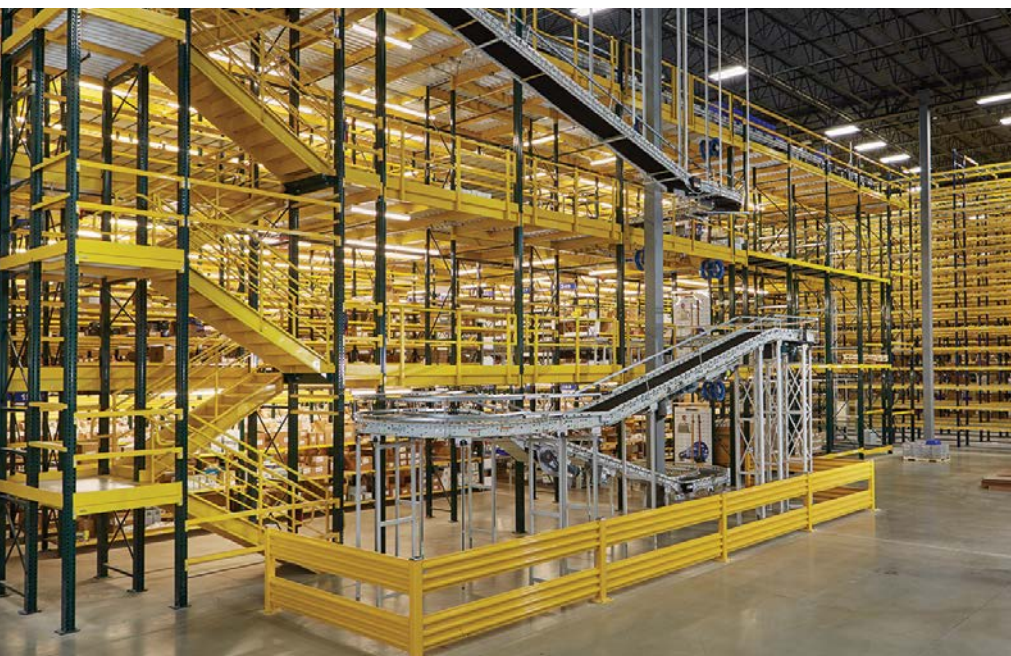
- ☐ Noise levels in the workplace do not exceed 85 decibels.
 - ☐ In locations where loud noises occur, employees wear hearing protection.
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Pipe Identification

- ☐ Taps attached to pipes with non-potable water are marked as unsafe for drinking or washing, and identification is easily visible on pipe labels.
 - ☐ If color coding is used on pipes, it is spaced appropriately and color code is posted for easy identification.
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Transporting Employees

- ☐ Vehicles that transport employees have brakes, lamps, mirrors, horns, windshields, handrails, steps, and turn signals and are in good condition.



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