

Surprising Development in the Top 10 OSHA Violations for 2018

By Miles Free – Interim Director, PMPA

Every year, we review the top 10 OSHA violations for the prior calendar year in order to help our members proactively make their shops safer and more compliant. OSHA just released its “Top 10 Violations” at the National Safety Council Congress and Expo. As we reviewed the top reported violations, we noticed a trend. A surprising trend. Let’s see if you can notice it, too.

Most Cited Violations of 2018:

1. Fall Protection (1926.501)
2. Hazard Communication (1910.1200)
3. Scaffolding - General Requirements (1926.451)
4. Respiratory Protection (1910.134)
5. Control of Hazardous Energy - Lockout/Tagout (1910.147)
6. Ladders (1926.1053)
7. Powered Industrial Trucks (1910.178)
8. Fall Protection - Training Requirements (1926.503)
9. Machine Guarding - General Requirement (1910.212)
10. Personal Protective and Lifesaving Equipment - Eye and Face Protection (1926.102)

Hazard communications, control of hazardous energy, powered industrial trucks, machine guarding (general requirements). These are the top standards that are generally applicable to the shops in our industry, NAICS 332721. Respiratory protection (1910.134) is the sole remaining general industry standard in the top 10. Our precision machining shops seldom have situations requiring respiratory protection.

Hazard communications is an important matter for our performers due to the high number of different substances that are encountered in our shops on a daily basis. Substances with potential health impacts can be found in our workpiece materials and their residues, the metalworking fluids used to machine our workpieces, as well as the lubricants and operating fluids in the machines themselves. Now consider cleaners, rust preventives, mist and fumes and it is obvious that a formal process of training and education is needed to help our performers understand the potential hazards they may face.



Control of hazardous energy (lock-out/tag-out) is of critical importance in our shops where our performers are working with high-horsepower, high-torque equipment equipped with hardened steel and carbide tools, pinch points and high voltage energy sources.

Powered industrial trucks are in widespread use in our shops, and there is no denying the potential for injury and/or property damage that such a vehicle can inflict if carelessly operated. Depending on type, these vehicles can present unseen and unheard dangers, such as carbon monoxide in exhaust fumes or silent running when electric trucks are used. The need for flashing lights and audible alarms is an important means of protecting those in the area who might otherwise not be aware of their movement and possible hazards.

Machine guarding is, to me, the most obvious of these in importance in our shops. Our shops use high rates of kinetic energy and rotational speed to modify raw materials into finished products. Clearly the forces involved are capable of removing cubic inches of metal per minute off of solid steel are more than powerful enough to permanently remove human appendages, flesh and bone. All of us recognize the potential for injury, entanglement and even death from accidental contact with our equipment. Defeating or failing to use guards is never justified in our shops.

So what was the surprise in this year’s “OSHA Top 10 Violations” as applied to our precision machining and general industry shops? Only four of those 10 violations are applicable to us. For the first year that I can remember, the number of violations in the OSHA Top 10 is evenly split between general industry and construction at five apiece. In 2017, general industry outnumbered construction 6:4. In 2016, 2015, 2014 and 2013, the ratio of general industry to construction was 7:3.

The relative share of general industry standards being violated in the OSHA Top 10 Violations in 2018 has declined, compared with the share from construction. Some might

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PMPA Member JC Gibbons Manufacturing Finds Success in Diversification and Exceptional Customer Service

"There were some fantastic times, and then there were some hard times and a lot of long hours," Mr. Gibbons says. "My dad and my grandfather were always looking two steps ahead, and we continue to diversify our portfolio of customers so we are less reliant on an industry's cyclical nature. Not putting all our eggs in one basket has helped us continue doing business for 60 years now."

JC Gibbons joined PMPA in 1992. Since becoming a member, Mr. Gibbons says he and his team greatly benefit from the openness and friendliness when it comes to the sharing of information between members. The company also stays up to date on all the latest

trends and issues within the industry by taking advantage of PMPA's listserves, conferences, shop visits and other helpful tools the organization provides.

"PMPA has been a terrific resource we've enjoyed through the years," Mr. Gibbons says. "The number one thing we've gained is the opportunity to know and meet other companies doing the same thing who open up their shops, so we can all gain new information that we would've otherwise had to learn the hard way."

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rush to say this is a result of a change in OSHA enforcement priorities. We are convinced that the decline of standards being violated that relate to our shops reflects a reduced incidence of these kind of violations in our shops as a contributing factor.

There is no doubt that OSHA is addressing the top violation priorities under its authority. We are pleased to note that the share that might be found in our shops has declined. That is good news for OSHA, for our shops and, most important of all, our performers.

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