



Top 10 Most Frequently Cited OSHA Standards, 2018 Edition

Insights

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While it is not comparable to David Letterman's Top 10 lists, at a recent industry gathering, OSHA announced its annual top 10 violations for fiscal year 2018 (October 1, 2017, through September 30, 2018). For those who have followed these lists in past years, there is a substantial amount of overlap but also new standards that have not made the list in the past.

Without further ado, the list is:

1. **Fall protection – general requirements for construction industry.** 29 C.F.R. § 1926.501. OSHA cited employers for 7,270 violations of this standard in 2018. OSHA's focus on fall protection makes sense, as falls are the leading cause of deaths at construction sites.
2. **Hazard communication – general industry.** 29 C.F.R. § 1910.1200. OSHA cited employers for 4,552 violations of this standard in 2018. The HAZCOM standard is long and detailed with specific requirements, creating a number of potential pitfalls for employers, including everything from substantial training requirements to maintaining safety data sheets (SDSs) and chemical lists.
3. **Scaffolds – construction industry.** 29 C.F.R. § 1926.451. OSHA cited employers for 3,336 violations for this standard in 2018. This standard goes hand in hand with fall protection requirements, which is a major reason for OSHA's focus here.
4. **Respiratory protection – general industry.** 29 C.F.R. § 1910.134. OSHA cited employers for 3,118 violations for this standard in 2018.
5. **Lockout/tagout – general industry.** 29 C.F.R. § 1910.147. OSHA cited employers for 2,944 violations for this standard in 2018. This standard is a perennial favorite for OSHA and has appeared on the top 10 list consistently over the years.
6. **Ladders – construction industry.** 29 C.F.R. § 1926.1053. OSHA cited employers for 2,812 violations for this standard in 2018. Another fall protection-related standard: see a pattern?
7. **Powered industrial trucks – general industry.** 29 C.F.R. § 1910.178. OSHA cited employers for 2,294 violations of this standard in 2018. This is another common target for OSHA inspections due to the high risk associated with operating forklifts and other POTs. Common citations include not having certified drivers and failing to recertify drivers every three years.
8. **Fall protection – training requirements for construction industry.** 29 C.F.R. § 1926.503. OSHA cited employers for 1,982 violations for this standard in 2018. When OSHA cannot cite the employer for another violation, the agency loves to see if they can find a training violation. This is

especially common in cases of employee misconduct resulting in an accident: OSHA cannot prove employer knowledge of the accident, but they claim the accident happened because the employee was trained properly. Having robust training records can mitigate against the risk of OSHA snooping around for a violation simply because an accident has occurred.

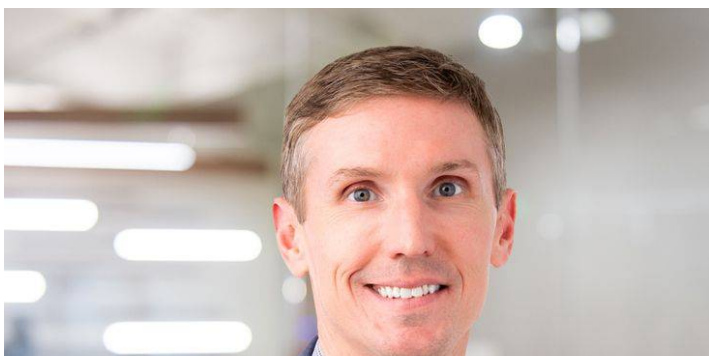
9. **Machine guarding – general industry.** 29 C.F.R. § 1910.212. OSHA cited employers for 1,972 violations for this standard in 2018. Like LOTO, this is a perennial member of the top 10 list.
10. **Personal protective and lifesaving equipment – eye and face protection – construction industry.** 29 C.F.R. § 1926.102. OSHA cited employers for 1,536 violations for this standard in 2018. This standard is new to the list this year.

Employers should take away from this list that fall protection remains the number one concern for OSHA, as four of the top 10 relate directly to this hazard. Similarly, known high-risk areas of employment, including lockout/tagout and machine guarding, remain perennial concerns for OSHA. Take advantage of this information to refocus your efforts on maintaining a robust safety program at your workplace.

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