

SAFETY DIRECTOR BULLETIN

PEOSH MOST-CITED STANDARDS FROM OCTOBER 1ST - DECEMBER 31ST IN 2024

The PEOSH Advisory Board held their quarterly virtual meeting on January 23, 2025. During the meeting, PEOSH reported the following on their inspection activity.

General Inspections	41
Accident Inspections	6
Complaint Inspections	13
Fatality/Catastrophe Inspections	3 **
Follow-up Inspections	62
Referral & Employee Reported	20
Total Inspections	145
Total Violations	426

^{**} All three Fatality Inspections were of Crossing Guards being struck by vehicles

PEOSH also reported its most-cited violations from October 1, 2024, through December 31, 2024.

1904.29(a) Recordkeeping – 69 citations

Employers must use OSHA 300, 300-A, and 301 forms, or equivalent forms, for recordable injuries and illnesses.

Resources: MSI Safety Director Bulletin: PEOSH Recording and Reporting Occupational Injuries and Illnesses

NJSA 34:6A-33(a) General Duty - 46 citations

Every employer shall provide employees with employment and a place of employment which are free from recognized hazards which may cause serious injury, physical harm or death.

Resources: The MSI Toolkit provides MSI Bulletins and MSI Model Policies for each of these hazards.

1910.147(c)(6)(i) Lockout/Tagout (LOTO) Periodic Inspection – 18 citations

The employer shall conduct a periodic inspection of the energy control procedure at least annually to ensure that the procedure and the requirements of this standard are being followed.

Resources: Energy Control (LOTO) Annual Evaluation Form and MSI Video Briefing LOTO: Control of Hazardous Energy.

1910.132(d)(2) Certification of Personal Protective Equipment (PPE) Hazard Assessment - 17 citations

The employer shall verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date(s) of the hazard assessment; and, which identifies the document as a certification of hazard assessment.

Resources: MSI Forms & Documents contains many samples of Personal Protective Equipment/Job Hazard Analysis.

1910.157(e)(2) Monthly Inspection of Fire Extinguishers – 14 citations

Portable extinguishers or hose used in lieu thereof under paragraph (d)(3) shall be visually inspected monthly.

Resources: MSI Safety Director Bulletin: Fire Extinguisher Best Practices, MSI Video Briefing: Fire Extinguisher Inspections, and MSI LIVE Class: Fire Extinguisher Safety.

NJAC 12:100-7.3(a) Hazard Communication - 12 citations

Employers shall provide refresher training to all employees every two years.

Resources: MSI LIVE Class: Hazard Communication/Globally Harmonized System (GHS) and MSI NOW Class: HazCom with GHS Refresher.

1910.147(c)(6)(ii) Certification of Periodic Lockout/Tagout (LOTO) Inspection – 11 citations

The employer shall certify that the periodic inspections have been performed. The certification shall identify the machine or equipment on which the energy control procedure was being utilized, the date of the inspection, the employees included in the inspection, and the person performing the inspection.

Resources: Energy Control (LOTO) Annual Evaluation Form and MSI Video Briefing LOTO: Control of Hazardous Energy.

1910.147(c)(1) Lockout/Tagout (LOTO) Program - 10 citations

The employer shall establish a program consisting of energy control procedures, employee training and periodic inspections to ensure that before any employee performs any servicing or maintenance on a machine or equipment where the unexpected energizing, start up or release of stored energy could occur and cause injury, the machine or equipment shall be isolated from the energy source, and rendered inoperative.

Resources: MSI Model Template Lockout/Tagout: Control of Hazardous Energy Program

1910.176(b) Material Storage – 10 citations

Storage of material shall not create a hazard. Bags, containers, bundles, etc., stored in tiers shall be stacked, blocked, interlocked and limited in height so that they are stable and secure against sliding or collapse.

1910.303(g)(1) Electrical Clearance – 9 citations

Sufficient access and working space shall be provided and maintained about all electric equipment to permit ready and safe operation and maintenance of such equipment.

1910.147(c)(4)(ii) LOTO Specific Procedures – 8 citations

The procedures shall clearly and specifically outline the scope, purpose, authorization, rules, and techniques to be utilized for the control of hazardous energy, and the means to enforce compliance including, but not limited to, the specific procedural steps for shutting down, isolating, blocking and securing machines or equipment to control hazardous energy;

1910.147(c)(7)(i) LOTO Training - 8 citations

The employer shall provide training to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees.

Resources: MSI LIVE Class: Lockout/Tagout (Control of Hazardous Energy)

1910.215(a)(4) Machine Guarding, Abrasive Wheels - 8 citations

On offhand grinding machines, work rests shall be used to support the work. Work rests shall be kept adjusted closely to the wheel with a maximum opening of one-eighth inch to prevent the work from being jammed.

Resources: MSI Infographic: Bench Grinder Safety