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OSHA Top 10

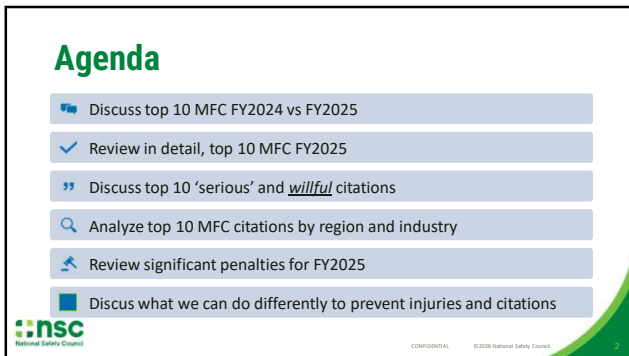
Most Cited Standards

FY2025

JoAnn H. Dankert CSP, CHMM, CIT
PT Consultant/Trainer NSC
dankertjh@gmail.com

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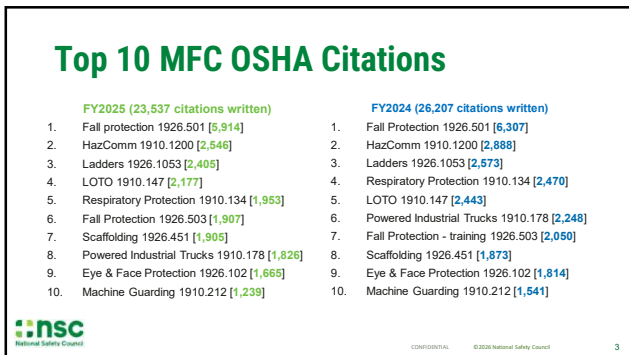
Agenda

- Discuss top 10 MFC FY2024 vs FY2025
- Review in detail, top 10 MFC FY2025
- Discuss top 10 'serious' and *willful* citations
- Analyze top 10 MFC citations by region and industry
- Review significant penalties for FY2025
- Discuss what we can do differently to prevent injuries and citations

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Top 10 MFC OSHA Citations

<p>FY2025 (23,537 citations written)</p> <ol style="list-style-type: none"> Fall protection 1926.501 [5,914] HazComm 1910.1200 [2,546] Ladders 1926.1053 [2,405] LOTO 1910.147 [2,177] Respiratory Protection 1910.134 [1,953] Fall Protection 1926.503 [1,907] Scaffolding 1926.451 [1,905] Powered Industrial Trucks 1910.178 [1,826] Eye & Face Protection 1926.102 [1,665] Machine Guarding 1910.212 [1,239] 	<p>FY2024 (26,207 citations written)</p> <ol style="list-style-type: none"> Fall Protection 1926.501 [6,307] HazComm 1910.1200 [2,888] Ladders 1926.1053 [2,573] Respiratory Protection 1910.134 [2,470] LOTO 1910.147 [2,443] Powered Industrial Trucks 1910.178 [2,248] Fall Protection - training 1926.503 [2,050] Scaffolding 1926.451 [1,873] Eye & Face Protection 1926.102 [1,814] Machine Guarding 1910.212 [1,541]
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FALL PROTECTION - GENERAL REQUIREMENTS

STANDARD: 1926.501
TOTAL VIOLATIONS: 5,914
FISCAL YEAR 2024
RANKING: 1
(6,307 VIOLATIONS)



Source: MSA




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Fall Protection- General Requirements 1926.501

TOP 5 SECTIONS CITED:

1. 1926.501(b)(13): Each employee engaged in residential construction activities 6 feet or more above lower levels shall be protected by guardrail systems, safety net systems or personal fall arrest systems unless another provision in paragraph (b) of this section provides for an alternative fall protection measure. - **4,446** violations
2. 1926.501(b)(1): Each employee on a walking-working surface (horizontal and vertical surface) with an unprotected side or edge that is 6 feet or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems or personal fall arrest systems. - **563**
3. 1926.501(b)(10): Except as otherwise provided in paragraph (b) of this section, each employee engaged in roofing activities on low-slope roofs with unprotected sides and edges 6 feet or more above lower levels shall be protected from falling by guardrail systems; safety net systems; personal fall arrest systems; or a combination of warning line system and guardrail system, warning line system and safety net system, warning line system and personal fall arrest system, or warning line system and safety monitoring system. - **358**
4. 1926.501(b)(11): Each employee on a steep roof with unprotected sides and edges 6 feet or more above lower levels shall be protected from falling by guardrail systems with toeboards, safety net systems or personal fall arrest systems. - **257**
5. 1926.501(b)(4): "Holes." - **1358** (protection from tripping/stepping into around skylights, objects falling thru)



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HAZARD COMMUNICATION

STANDARD: 1910.1200
TOTAL VIOLATIONS: 2,546
FISCAL YEAR 2024
RANKING: 2
(2,888 VIOLATIONS)

Corrosion



Exclamation Mark



Environment (non-hazardous)



Expanding Bomb



Flame Over Circle



Flame



Gas Cylinder



Skull and Crossbones



Health Hazard



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Source: S+H Magazine

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LOCKOUT/TAGOUT
STANDARD: 1910.147
TOTAL VIOLATIONS: 2,177
FISCAL YEAR 2024
RANKING: 5
(2,443 VIOLATIONS)

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LOTO 1910.147

TOP 5 SECTIONS CITED:

- 1. 1910.147(c)(4):** Energy control *procedure*. – **675 violations**
- 1. 1910.147(c)(7):** *Training and communication*. – **422**
- 1. 1910.147(c)(6):** *Periodic inspection*. – **345**
- 1. 1910.147(c)(1):** 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, startup or release of stored energy could occur and cause injury, the machine or equipment shall be isolated from the energy source and rendered inoperative*. – **208**
- 1. 1910.147(d):** Application of control. The *established procedures* for the application of energy control (the lockout or tagout procedures) shall cover the *following elements and actions and shall be done in the following sequence*. – **152**

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RESPIRATORY PROTECTION
STANDARD: 1910.134
TOTAL VIOLATIONS: 1,953
FISCAL YEAR 2024
RANKING: 4
(2,470 VIOLATIONS)

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What are Air-Purifying Respirators?

Filtering Facepiece Respirator (FFR)

- Must be used with a certified filter, cartridge, or canister
- Must be used with a certified hood or enclosure
- Must be used with a certified hood or enclosure
- Must be used with a certified hood or enclosure

Electronic Full Facepiece Respirator

- Must be used with a certified filter, cartridge, or canister
- Must be used with a certified hood or enclosure
- Must be used with a certified hood or enclosure
- Must be used with a certified hood or enclosure

Powered Air-Purifying Respirator (PAPR)


- Must be used with a certified filter, cartridge, or canister
- Must be used with a certified hood or enclosure
- Must be used with a certified hood or enclosure
- Must be used with a certified hood or enclosure

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Respiratory Protection 1910.134

TOP 5 SECTIONS CITED:

- 1910.134(e)(1):** The employer shall provide a *medical evaluation* to determine the employee's ability to use a respirator, before the employee is fit-tested or required to use the respirator in the workplace. The employer may discontinue an employee's medical evaluations when the employee is no longer required to use a respirator. - **403** (Violations (MAND) ONLY APP C)
- 1910.134(c)(1):** In any workplace where respirators are necessary to protect the health of the employee or whenever respirators are required by the employer, the employer shall establish and implement a written respiratory protection program with worksite-specific procedures. The program shall be updated as necessary to reflect those changes in workplace conditions that affect respirator use. - **488**
- 1910.134(f)(2):** The employer shall ensure an employee using a tight-fitting facepiece respirator is fit-tested prior to initial use of the respirator, whenever a different respirator facepiece (size, style, model or make) is used and at least annually thereafter. - **251** (MANDATORY APP A)
- 1910.134(c)(2):** Where respirator use is not required. - **177** (MANDATORY APP D)
- 1910.134(k):** Training and information. This paragraph requires the employer to provide effective training to employees who are required to use respirators. The training must be comprehensive, understandable and recur annually (more often if necessary). This paragraph also requires the employer to provide basic information on respirators in Appendix D of this section to employees who wear respirators when not required by this section or by the employer to do so. - **122**



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May 4 - 8, 2026

Source: National Safety Stand-Down to Prevent Falls in Construction



FALL PROTECTION - TRAINING REQUIREMENTS

STANDARD: 1926.503

TOTAL VIOLATIONS: 1,907

FISCAL YEAR 2024 RANKING: 7 (2,050 VIOLATIONS)




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Fall Protection - Training Requirements 1926.503

TOP 5 SECTIONS CITED:

- 1926.503(a)(1):** The employer shall provide a training program for each employee who might be exposed to fall hazards. The program shall enable each employee to recognize the hazards of falling and shall train each employee in the procedures to be followed in order to minimize these hazards. - **1,216** violations
- 1926.503(b)(1):** The employer shall verify compliance with paragraph (a) of this section by preparing a written certification record. The written certification record shall contain the name or other identity of the employee trained, the date(s) of the training, and the signature of the person who conducted the training or the signature of the employer. If the employer relies on training conducted by another employer or completed prior to the effective date of this section, the certification record shall indicate the date the employer determined the prior training was adequate rather than the date of actual training. - **491**
- 1926.503(a)(2):** The employer shall ensure each employee has been trained, as necessary, by a competent person. - **97**
- 1926.503(c)(3):** Inadequacies in an affected employee's knowledge or use of fall protection systems or equipment indicate that the employee has not retained the requisite understanding or skill. - **90** (RETRAINING REQUIRED)
- 1926.503(c):** "Retraining." When the employer has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by paragraph (a) of this section, the employer shall retrain each such employee. - **1**



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SCAFFOLDING
 STANDARD: 1926.451
 TOTAL VIOLATIONS: 1,905
 FISCAL YEAR 2024
 RANKING: 8
 (1,873 VIOLATIONS)

Source: S+H Magazine

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Scaffolding 1926.451

TOP 5 SECTIONS CITED:

1. **1926.451(g)(1):** Each employee on a scaffold more than 10 feet above a lower level shall be protected from falling to that lower level. – **583 violations**
2. **1926.451(c)(2):** Supported scaffold poles, legs, posts, frames and uprights shall bear on base plates and mud sills or other adequate firm foundation. – **224**
3. **1926.451(e)(1):** When scaffold platforms are more than 2 feet above or below a point of access, portable ladders, hook-on ladders, attachable ladders, stair towers (scaffold stairways/towers), stairway-type ladders (such as ladder stands), ramps, walkways, integral prefabricated scaffold access, or direct access from another scaffold, structure, personnel hoist or similar surface shall be used. Cross braces shall not be used as a means of access. – **196**
4. **1926.451(b)(1):** Each platform on all working levels of scaffolds shall be fully planked or decked between the front uprights and the guardrail supports. – **190**
5. **1926.451(g)(4):** Guardrail systems installed to meet the requirements of this section shall comply with the following provisions (guardrail systems built in accordance with Appendix A to this subpart will be deemed to meet the requirements of paragraphs (g)(4)(vii), (viii) and (ix) of this section). – **104**

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POWERED INDUSTRIAL TRUCKS
 STANDARD: 1910.178
 TOTAL VIOLATIONS: 1,826
 FISCAL YEAR 2024
 RANKING: 6
 (2,248 VIOLATIONS)

Source: OSHA eTool

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PITs 1910.178

TOP 5 SECTIONS CITED:


1. **1910.178(l)(1):** Safe operation. – **413 violations**
2. **1910.178(l)(4):** Refresher training and evaluation. – **223**
3. **1910.178(l)(6):** The employer shall *certify* that *each operator has been trained and evaluated as required* by this paragraph (l). The certification shall include the name of the operator, the date of the training, the date of the evaluation and the identity of the person(s) performing the training or evaluation. – **223**
4. **1910.178(l)(2):** Training program implementation. – **134**
5. **1910.178(p)(1):** If at *any time* a powered industrial truck is found to be in need of repair, defective or in any way unsafe, the truck shall be taken out of service until it has been restored to safe operating condition. – **120**



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PERSONAL PROTECTIVE AND LIFESAVING EQUIPMENT – EYE AND FACE PROTECTION


STANDARD: 1926.102

TOTAL VIOLATIONS: 1,645

FISCAL YEAR 2024 RANKING: 9 (1,814 VIOLATIONS)



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Source: S+H Magazine

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PPE & Lifesaving Equipment – Eye & Face Protection 1926.102

TOP 5 SECTIONS CITED:

1. **1926.102(a)(1):** The employer shall *ensure each affected employee uses appropriate eye or face protection when exposed to eye or face hazards* from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation. – **1,648 violations**
2. **1926.102(a)(2):** The employer shall ensure each affected employee *uses eye protection that provides side protection when there is a hazard* from flying objects. Detachable side protectors (e.g., clip-on or slide-on side shields) meeting the pertinent requirements of this section are acceptable. – **5**
3. **1926.102(b)(1):** Protective eye and face protection devices must comply with any of the following consensus standards: – **7 (Z87.1-2010, -2003, -1998)**
4. **1926.102(a)(3):** The employer shall ensure each affected *employee who wears prescription lenses* while engaged in operations that involve eye hazards wears eye protection that incorporates the prescription in its design or *wears eye protection that can be worn over the prescription lenses* without disturbing the proper position of the prescription lenses or the protective lenses. – **1**
5. **1926.102(a)(5):** Protectors shall meet the following minimum requirements. – **1**



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Source: OSHA eTool

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Machine Guarding 1910.212

TOP 5 SECTIONS CITED:

- 1. 1910.212(a)(1):** Types of guarding. One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by *point of operation, ingoing nip points, rotating parts, flying chips and sparks.* – **858 violations**
- 2. 1910.212(a)(3):** Point of operation guarding. – **284**
- 3. 1910.212(a)(2):** General requirements for machine guards. *Guards shall be affixed to the machine where possible and secured elsewhere if for any reason attachment to the machine is not possible.* The guard shall be such that *it does not offer an accident hazard in itself.* – **41**
- 4. 1910.212(b):** *Anchoring fixed machinery.* Machines designed for a fixed location shall be securely anchored to prevent walking or moving. – **38**
- 5. 1910.212(a)(5):** Exposure of blades. *When the periphery of the blades of a fan is less than 7 feet above the floor or working level, the blades shall be guarded.* The guard shall have openings no larger than one-half inch – **9**

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<p>Fall Protection – General Requirements (1926.501)</p> <ul style="list-style-type: none"> 21840 - Roofing Contractors 21850 - Framing Contractors 21870 - Siding Contractors 21875 - New Single-Family Housing Construction 21620 - Commercial and Institutional Building Construction <p>Hazard Communication (1910.1200)</p> <ul style="list-style-type: none"> 21840 - Roofing Contractors 32791 - Cut Stone and Stone Product Manufacturing 21840 - Masonry Contractors 33270 - Machine Shops 72110 - Hotels (except Casino Hotels) and Motels <p>Ladders (1926.1053)</p> <ul style="list-style-type: none"> 21840 - Roofing Contractors 21850 - Framing Contractors 21870 - Siding Contractors 21875 - New Single-Family Housing Construction 21618 - Residential Remodelers <p>Lockout/Tagout (1910.147)</p> <ul style="list-style-type: none"> 33270 - Machine Shops 33299 - All Other Miscellaneous Fabricated Metal Product Manufacturing 31812 - Commercial Bakeries 33150 - Wood Container and Pallet Manufacturing <p>Respiratory Protection (1910.134)</p> <ul style="list-style-type: none"> 32791 - Cut Stone and Stone Product Manufacturing 31151 - Automobile Body, Panel, and Interior Repair and Maintenance 33272 - Fabricated Structural Metal Manufacturing 21840 - Masonry Contractors 21710 - Woodworker, Cabinet and Countertop Manufacturing 	<p>Fall Protection – Training Requirements (1926.503)</p> <ul style="list-style-type: none"> 21840 - Roofing Contractors 21850 - Framing Contractors 21870 - Siding Contractors 21875 - New Single-Family Housing Construction 21620 - Commercial and Institutional Building Construction <p>Scaffolding (1926.451)</p> <ul style="list-style-type: none"> 21840 - Masonry Contractors 21850 - Framing Contractors 21870 - Siding Contractors 21840 - Roofing Contractors 21620 - Commercial and Institutional Building Contractors <p>Powered Industrial Trucks (1910.178)</p> <ul style="list-style-type: none"> 44110 - General Warehousing and Storage 21850 - Framing Contractors 33270 - Machine Shops 32791 - Cut Stone and Stone Product Manufacturing 32700 - Wood Container and Pallet Product Manufacturing <p>Personal Protective and Lifesaving Equipment – Eye and Face Protection (1926.102)</p> <ul style="list-style-type: none"> 21840 - Roofing Contractors 21850 - Framing Contractors 21870 - Siding Contractors 21840 - Masonry Contractors 21875 - New Single-Family Housing Construction <p>Machine Guarding (1910.212)</p> <ul style="list-style-type: none"> 33270 - Machine Shops 33299 - All Other Miscellaneous Fabricated Metal Product Manufacturing 32699 - All Other Plastics Product Manufacturing 33272 - Fabricated Structural Metal Manufacturing 33232 - Sheet Metal Working Manufacturing
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Which Industries Had the Most Citations?

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STANDARD	TOTAL VIOLATIONS
1 Fall Protection – General Requirements (1926.501)	130
2 Lockout/Tagout (1910.147)	15
3 Excavations – Requirements for Protective Systems (1926.652)	14
Scaffolding (1926.451)	14
5 Permits-required Confined Spaces (1910.146)	9
Fall Protection – Training Requirements (1926.503)	9
7 Ladders (1926.1053)	7
8 Excavations – Specific Excavation Requirements (1926.651)	6
9 OSH Act of 1970	5
Personal Protective and Lifesaving Equipment – Eye and Face Protection (1926.102)	5

OSHA Top 10 “willful” FY 2025

OSHA defines a “willful” violation as one “committed with an intentional disregard of or plain indifference to the requirements of the Occupational Safety and Health Act and requirements.”

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OSHA Top 10 standards cited in fiscal year 2025 with the highest cumulative proposed penalties

STANDARD	PENALTY
1 1926.501(b) – Duty to provide fall protection in construction	\$48,388,975.63
2 1910.147 (c) – General requirements for hazardous energy control programs	\$13,134,743.26
3 1910.212 (a) – General requirements for machine guarding	\$11,897,408.87
4 1926.1053(b) – Use of ladders	\$10,168,918.87
5 1926.102(a) – General requirements for eye and face protection	\$6,951,273.90
6 OSH Act of 1970.5(a) – General Duty Clause violations	\$6,459,089.55
7 1910.28(b) – Protection from fall hazards in general industry	\$3,992,226.24
8 1926.503(a) – Training requirements for fall protection in construction	\$3,979,763.25
9 1926.652(a) – Protection of employees in excavations	\$3,896,047.25
10 1910.178(i) – Powered industrial truck training	\$3,808,389.45

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Fatalities FY 2024

- Total (all sectors) 5,070
- Roadway (all sectors) 1,146
- Falls, slips, trips (all sectors) 844
- Homicides (all sectors) 470

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What Can be Done Differently?

Hierarchy of Controls

- Elimination** (Blue): Physically remove the hazard
- Substitution** (Green): Replace the hazard
- Engineering Controls** (Yellow): Isolate people from the hazard
- Administrative Controls** (Orange): Change the way people work
- PPE** (Red): Protect the worker with Personal Protective Equipment

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- Hazard identification & risk assessment
- Implement controls
- Culture of engagement
- Audits/inspections
- Continuous improvement

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Serious Incidents and Fatalities (SIFs)

Potential SIFs (pSIFs) are near misses or lower-severity incidents that could have resulted in a SIF if one or two factors were different. This helps:

- Expose where critical safeguards and controls are weak or missing
- Show how a critical safeguard can prevent the worst outcome
- Provide the opportunity to learn and improve safety efforts

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QUESTIONS?

Comments?

Concerns?

JoAnn H. Dankert CSP, CHMM, CIT
PT Consultant/Trainer NSC
dankertjh@gmail.com

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RESOURCES:

- <https://www.safetyandhealthmagazine.com/27597-the-most-frequently-cited-standards-in-fy-2025/>
- <https://www.osha.gov/top10citedstandards>
- <https://www.osha.gov/penalties>
- <https://www.lion.com/lion-news/september-2025/10-most-cited-osha-violations-of-2025-revealed>
- <https://www.bls.gov/iif/>
- <https://www.bls.gov/iif/latest-numbers.htm>
- <https://www.osha.gov/data/commonstats>
- <https://www.nsc.org/workplace/sif-prevention-model?srsId=AfmBOop9PJD3ci0zPcx34Kz-zle7PbWuCDK599K1CG5zWsrAaDEISZD>
- <https://www.nsc.org/getmedia/abdc94f2-651b-4843-919c-81e1629755fe/sif-guidebook.pdf>



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