



# Why (and How) You Should Reboot Your Shop's Safety Program Today

Now may be the perfect time for a safety reboot before complacency sets in.

One of the best business lessons I ever learned came from a customer experience when I was selling steel. This customer objected to the sales advances with the statement, "I get zero defects and 100% on-time from my ordinary suppliers. What can you possibly offer me?" It was a great rebuttal and would have been even better had either claim been true. But as we worked through a pilot program to earn their confidence, we learned that they had neither zero defects nor 100% on-time delivery performance from any of their suppliers.

Complacency is easy to spot. It can be seen in swagger, both in physical presence and manner, or in speech and the attitudes revealed. It can also be seen when managers just take for granted that things are going to remain the way they are, because, well, they have so far. It has been my experience that things will remain the same. Until they do not.

So, congratulations on your shop's safety performance to date. Good job, team. But what is your plan for continuous improvement?

## A Blueprint to Enhance Your Shop's Safety Performance

What if I told you that there is a website that can show you, prioritized by Frequency of Occurrence as well as by Dollars of Penalties imposed, the safety violations / vulnerabilities specific to our shops? Wouldn't that be a great place to start? Why wouldn't we want to prioritize the items that the regulators have identified most often — and most expensively — as likely to be found in our shops? Such a website exists, and when you plug in your shop's North American Industry Classification System Code (NAICS) it will return a list of the standards cited by Federal OSHA for the NAICS Code for establishments with any employment size, issued during the most recently completed fiscal year ([bit.ly/PMPA-PM0824a](https://bit.ly/PMPA-PM0824a)).

Once you retrieve the data, I suggest using Pareto Analysis (80/20) to identify and then tackle the "significant few," rather than the "trivial many." Then, you can apply your findings to rebooting your shop's safety program.

Standard	Citations	Inspections	Penalty	Description
1910.147	12	5	\$35,725	The control of hazardous energy (lockout/tagout).
1910.12	7	5	\$1,607	Hazard communication.
1910.215	5	2	\$7,857	Abrasive wheel machinery.
1910.95	3	1	\$2,800	Occupational noise exposure.
1910.178	2	1	\$2,812	Powered industrial trucks.
1910.184	2	1	\$7,031	Slings.
1910.212	2	2	\$11,641	General requirements for all machines.
1910.242	2	2	\$3,750	Hand and portable powered tools and general equipment.

For Fiscal Year 2023 (October 2022 through September 2023), the site summarizes the 42 citations from 13 inspections, resulting in \$85,745 in penalties from our Precision Turned Product Manufacturing (NAICS 332721) shops.

The table provided lists the eight standards that had multiple

violations in our industry's shops last year. This would be a perfect place to refocus your attention to improve your shop's safety program.


The data suggests that starting with control of hazardous energy (lockout/tagout) would be the best place to start. It was the standard most frequently cited, often multiple times per inspection, and generated the most penalty dollars. The \$35,725 in penalties against our NAICS 332721 shops are a pittance compared to those from our broader Manufacturing (NAICS 33) industry, which logged \$3,717,329 in penalties. The penalties for just this one standard across all industries were \$20,849,055 in FY 2023.

### Continuous Improvement – In Safety Too

We looked at the citations and penalties for each of the standards in the table on the previous page. If you are serious about continuous improvement and proactive diligence to avoid penalties, these are the standards that you need to focus on for your shop. Our analysis of the enforcement record for each of these regulations showed that our NAICS 2-digit Manufacturing Industry (33) was the first shown because of the highest number of citations and for penalty dollars. Violations of these eight standards are the top findings against shops in the NAICS 33 manufacturing industry, as well as for our NAICS 332721 specific industry of precision-turned product manufacturing.

Here is the link to the official OSHA Frequently Cited Standards page for NAICS 332721: [bit.ly/PMPA-0824b](https://bit.ly/PMPA-0824b).

If you classify your shop under a different NAICS Industry than 332721, use this link to find out the most frequent citations in your industry: [bit.ly/PMPA-PM0824a](https://bit.ly/PMPA-PM0824a).

We have done the preliminary analysis to help you understand the importance of ensuring your shop's compliance. We have provided the facts regarding prevalence (frequency of citation) and severity (in penalty dollars) for noncompliance. Now it is time for you to commit to continuous improvement of your shop's safety program. We have given you exactly what you need to start. 

Miles Free III is the PMPA Director of Industry Affairs with over 50 years of experience in the areas of manufacturing, quality and steelmaking. Miles' podcast is at [pmpa.org/podcast](https://pmpa.org/podcast). Email: [mfree@pmpa.org](mailto:mfree@pmpa.org) — Website: [pmpa.org](https://pmpa.org).

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- 3rd Generation Family Owned Steel Company Provides Supply Chain Solutions



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