

# MIOSHA General Industry National Emphasis Program (NEP) – Warehousing and Distribution Centers





# Michigan Occupational Safety and Health Administration (MIOSHA)

## Disclaimer

*Information provided in this presentation may contain legal information. Legal information is not the same as legal advice – the application of law to an individual’s specific circumstances.*

*The agency will do its best to provide you with information that is accurate and useful, but it is recommended you consult a lawyer if you want professional assurance the information, and your interpretation of it, is appropriate to your particular situation.*

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# Purpose of this NEP:

- MIOSHA adopted OSHA CPL 03-00-026 to focus its enforcement activities to reduce or eliminate hazards in:
  - Warehousing and distribution centers
  - Couriers and express delivery services
  - Local messengers and local delivery industries
  - High injury rate retail establishments



- Improve worker safety by focusing on common hazards associated with the targeted industries:
  - powered industrial vehicle operations
  - material handling/storage
  - walking-working surfaces
  - means of egress
  - hazard communication
  - heat stress
  - ergonomics



# MIOSHA Outreach - Educate Before We Regulate



- Gov Delivery
- MIOSHA eNews
- Social Media
- MIOSHA News article
- Fact sheets
- External Trainings (Safety Conference)



# MIOSHA Agency Instruction: Warehousing and Distribution Center Operations - NEP

- This instruction provides policies and procedures for MIOSHA General Industry to utilize while conducting programmed and unprogrammed inspections of establishments within the designated NAICS listed in this NEP.

## MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)  
Department of Labor and Economic Opportunity (LEO)

## AGENCY INSTRUCTION

DOCUMENT IDENTIFIER:  
MIOSHA-COM-23-2

DATE:  
December 12, 2023

SUBJECT: Warehousing and Distribution Center Operations – National Emphasis Program (NEP)

- I. Purpose. This instruction adopts the federal Occupational Safety and Health Administration (OSHA) National Emphasis Program (NEP) to identify and reduce or eliminate worker exposures to common hazards in warehousing and distribution center operations.
- II. Scope. This instruction applies to the General Industry Safety and Health Division (GISHD) and the Consultation Education and Training (CET) Division.
- III. References.
  - A. General Industry Safety and Health Division, [General Industry System for Programmed Inspections](#), as amended.
  - B. Occupational Safety and Health Administration Instruction CPL 03-00-026, July 13, 2023, [National Emphasis Program on Warehousing and Distribution Center Operations](#).
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.
- V. Next Review Date. This instruction will be reviewed in one year from date of issuance.
- VI. Contact. [Adrian Z. Rocskay](#), GISHD Director, and [Tarah M. Kile](#), CET Director.
- VII. Originator. Barton G. Pickelman, Director.
- VIII. Background. Warehousing and distribution center operations pose a variety of serious safety and health hazards. These include, but are not limited to, struck-by, caught-in-between, slips, trips, and fall hazards; blocked aisles; means of egress; powered industrial vehicles and other material handling equipment; heat hazards; and ergonomic hazards. Incidents resulting from the above-mentioned hazards may result in death or serious physical harm.

Warehousing and distribution centers have experienced growth within the past ten years. From January 2011 to December 2021, the warehousing and distribution centers industry experienced a surge in employment, increasing respectively from 668,900 employed to a total 1,713,900 employed (seasonally adjusted). At the same time the warehousing and distribution center industry has experienced high occupational injuries and illness rates. In the United States, from 2017 through 2021, the incidence rate of nonfatal occupational injuries and illnesses was significantly higher in establishments associated with warehousing and distribution center operations than in all private industry (see [Appendix A](#)). This was true for both the total recordable case rate and the rate of cases involving days away from work, restricted activity, or transfer (DART rate). The elevated rates

# Covered Industries by NAICS (Appendix A)

NAICS	INDUSTRY
491110	Postal Service (Processing and Distribution Centers only)
492110	Couriers and Express Delivery Services
492210	Local Messengers and Local Delivery
493110	General Warehousing and Storage
493120	Refrigerated Warehousing and Storage
493130	Farm Product Warehousing and Storage
493190	Other Warehousing and Storage

# High-Injury-Rate Retail Establishments by NAICS (Appendix C)

NAICS	INDUSTRY
444110	Home Centers
444130	Hardware Stores
444190	Other Building Material Dealers
445110	Supermarkets and Other Grocery Stores
452311	Warehouse Clubs and Supercenters



# Relevant MIOSHA Standards (not exclusive)

PART #	STANDARD	PART #	STANDARD
1	General Provisions	21	Powered Industrial Trucks
2	Walking-Working Surfaces	33	Personal Protective Equipment
6	Fire Exits	39	Design Safety Standards for Electrical Equipment
8	Portable Fire Extinguishers	40	Safety-Related Work Practices
14	Conveyors	92	Hazard Communication
17	Refuse Packer Units	ADM 11	Recording and Reporting of Occupational Injuries and Illnesses

# PART 1, GENERAL PROVISIONS

- Stacking and storage



- Cylinder storage



- Fan guarding



# PART 6, FIRE EXITS

- Free and unobstructed



- Hasps, bolts, or hooks



- Flammable storage



# Powered Industrial Truck Hazards

- Training and permitting



Equipment Operator Permit	Training Certification / Equipment Operator Permit				
Employee: _____ Company: _____ I.D. No. _____ Date Tested: _____	Employee: _____ I.D. No. _____ Shift: _____				
Authorized to operate the following equipment: <table border="0"> <tr> <td> <b>General Industry</b>  <u>Part 21. Powered Industrial Trucks</u>  <input type="checkbox"/> Fork Lift Truck  <input type="checkbox"/> Industrial Tractor  <input type="checkbox"/> Other: _____                             </td> <td> <b>Construction</b>  <u>Part 12. Scaffold Platforms</u>  <input type="checkbox"/> Rough Terrain Truck    <u>Part 13. Mobile Equipment</u>  <input type="checkbox"/> Forklift Material Handling                             </td> </tr> <tr> <td> <u>Part 58. Aerial Work Platforms</u>  <input type="checkbox"/> Boom Supported Elevating  <input type="checkbox"/> Manual Propelled Elevating  <input type="checkbox"/> Self-Propelled  <input type="checkbox"/> Vehicle Mounted                             </td> <td> <u>Part 32. Aerial Work Platforms</u>  <input type="checkbox"/> Boom Supported Elevating  <input type="checkbox"/> Manual Propelled Elevating  <input type="checkbox"/> Self-Propelled  <input type="checkbox"/> Vehicle Mounted                             </td> </tr> </table>	<b>General Industry</b> <u>Part 21. Powered Industrial Trucks</u> <input type="checkbox"/> Fork Lift Truck <input type="checkbox"/> Industrial Tractor <input type="checkbox"/> Other: _____	<b>Construction</b> <u>Part 12. Scaffold Platforms</u> <input type="checkbox"/> Rough Terrain Truck  <u>Part 13. Mobile Equipment</u> <input type="checkbox"/> Forklift Material Handling	<u>Part 58. Aerial Work Platforms</u> <input type="checkbox"/> Boom Supported Elevating <input type="checkbox"/> Manual Propelled Elevating <input type="checkbox"/> Self-Propelled <input type="checkbox"/> Vehicle Mounted	<u>Part 32. Aerial Work Platforms</u> <input type="checkbox"/> Boom Supported Elevating <input type="checkbox"/> Manual Propelled Elevating <input type="checkbox"/> Self-Propelled <input type="checkbox"/> Vehicle Mounted	Date Tested: _____ Date Permit Issued: _____ Expiration Date: _____ Issued By: _____ Restrictions: _____
<b>General Industry</b> <u>Part 21. Powered Industrial Trucks</u> <input type="checkbox"/> Fork Lift Truck <input type="checkbox"/> Industrial Tractor <input type="checkbox"/> Other: _____	<b>Construction</b> <u>Part 12. Scaffold Platforms</u> <input type="checkbox"/> Rough Terrain Truck  <u>Part 13. Mobile Equipment</u> <input type="checkbox"/> Forklift Material Handling				
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Operator Restrictions: _____ Date Issued: _____ Date Expires: _____ Issued By: _____	_____				

DETACH

EMPLOYER FILE

Michigan Department of Labor and Economic Opportunity  
 MIOSHA • Consultation Education & Training Division  
[www.michigan.gov/miosha](http://www.michigan.gov/miosha) • (517) 284-7720



# Powered Industrial Truck Hazards

- Boarding of trailers



# Powered Industrial Truck Hazards

- Pre shift inspections



### FORK TRUCK PRE-OPERATION INSPECTION CHECKLIST

Complete the pre-operation checklist with one of the following responses after each item.

- ◆ If working properly, enter an X in the "O.K." column.
- ◆ If not working properly, enter an X in the "Needs Repair" column and explain the condition.

Turn the checklist in to the appropriate person.

Truck No. \_\_\_\_\_ Operator \_\_\_\_\_

Date \_\_\_\_\_ Type of Truck \_\_\_\_\_

Shift 1 2 3 DEPARTMENT \_\_\_\_\_

CHECKLIST	OK	NEEDS REPAIR
Accessory Control		
Battery Indicator		
Brakes/Parking Brakes		
Fluid Levels		
Forks, Mast, Chains, Stops, Backrest		
Horn		
Hydraulic Cylinders		

# Powered Industrial Truck Hazards

- Suitable facilities for flushing eyes



- Personal Protective Equipment



# Walking-Working Surfaces

- *General considerations*
  - Ensure that each worker on a walking-working surface with an unprotected side or edge that is 4 feet or more above a lower level is protected from falling.
- *Stairs*
  - Equip flights of stairs having at least 3 treads and at least 4 risers with handrails and stair rail systems.
- *Ladders*
  - Inspect ladders to identify any visible defects that could cause injury.





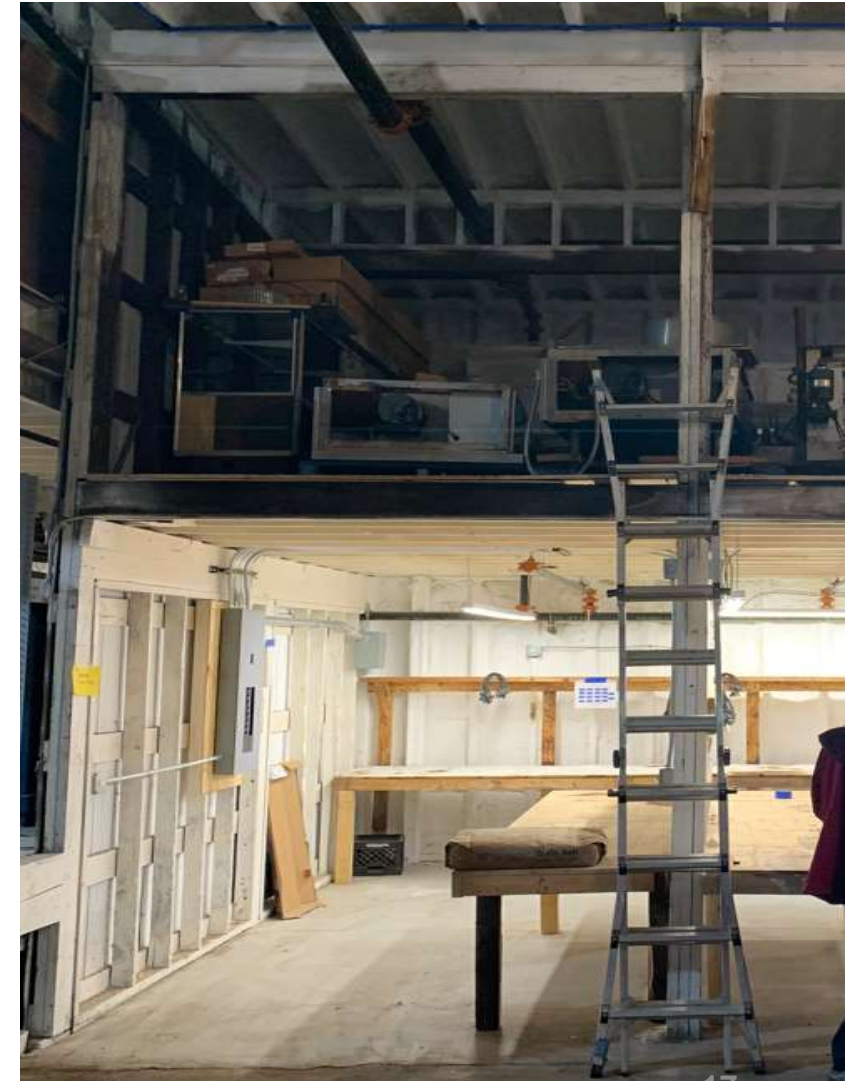
# Walking-Working Surfaces

- *Floors*

- Keep floors and aisles clear of clutter, holes, hoses, spills, and other hazards that could cause slips, trips, or falls.

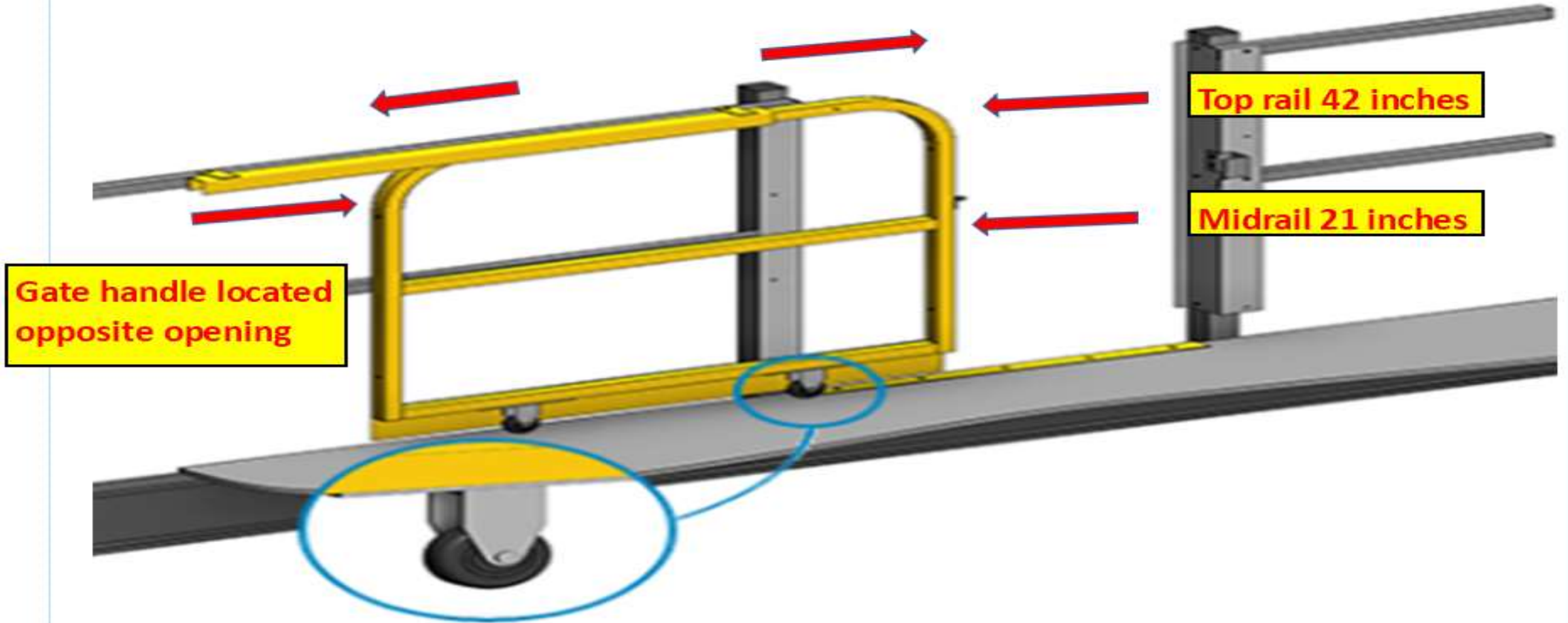


- *Hoist areas*



# Walking-Working Surfaces - Hoist Areas

Minimum gate length is 72 inches in length



# Electrical



# Electrical

- Install and use listed or labeled equipment in accordance with the instructions included in the listing or labeling.
- Ensure sufficient clearance in front of electrical panels and around all electrical equipment. Do not use these areas for storage.



# Electrical

- Guarding of live parts



# Electrical



- *Flexible Cords and Cables:*
  - Do not use:
    - As a substitute for fixed wiring.
    - Where attached to building surfaces.
    - Through or concealed behind holes in walls, ceilings, or floors or through doorways or windows.
    - Ensure flexible cords and cables are connected to devices and fittings so that strain relief is provided to prevent pull on joints or terminal screws.

# Conveyors

- Repairs or clean up, where unexpected motion would cause injury, shall be done when power is off and locked out.



# Conveyors



- A clearance of 80 inches above a floor or platform must be maintained as a means of egress. Where a conveyor reduces this clearance, a crossover, passageway, or different means of egress must be provided.

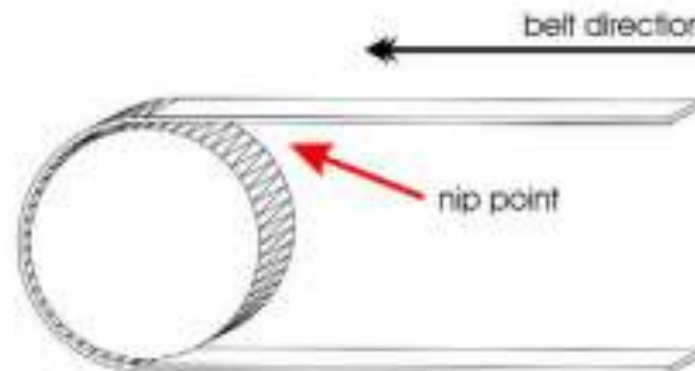


- A crossover must be in compliance with General Industry Safety and Health Standard Part 2. “Walking-Working Surfaces,”

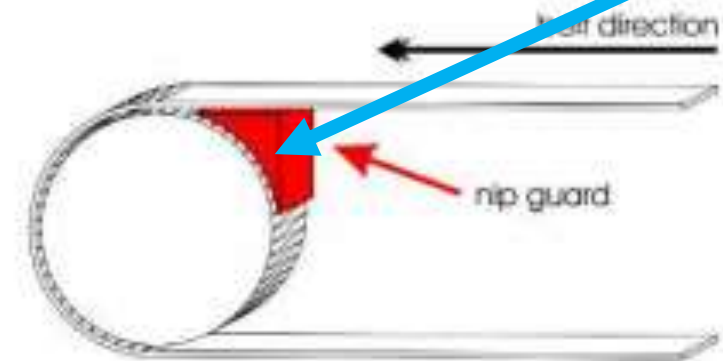


# Conveyors

A nip point at a pulley shall be guarded by an enclosure or barrier constructed to prevent access by an employee's body members or loose clothing



sketch A - Identified Nip Point



sketch B - Nip Guard Fitted


# HAZARD COMMUNICATION



- Written hazard communication program, chemical list, Safety Data Sheets, and training

- If only sealed containers are handled, then only labeling, SDS, and training, “to the extent necessary to protect them in the event of a spill or leak of a hazardous chemical from a sealed container,” is required.

**This Workplace Covered by the Michigan Right To Know Law**



**MIOSHA**  
Michigan Occupational Safety and Health Administration

**SDS(s) For This Workplace Are Located At**

Location(s) \_\_\_\_\_

Location(s) \_\_\_\_\_

Person(s) responsible for SDS(s) \_\_\_\_\_

Phone \_\_\_\_\_

Employees must make available for employees in a readily accessible manner, Safety Data Sheets (SDS) for those hazardous chemicals in their workplace.  
Employees cannot be discharged or discriminated against for exercising their rights including the request for information on hazardous chemicals.  
Employees must be notified and given direction by employer (posting) for locating Safety Data Sheets and the receipt of new or revised SDS(s).  
When the employer has not provided a SDS, employees may request assistance in obtaining SDS from the:  
Michigan Department of Labor and Economic Opportunity (LEO)  
Michigan Occupational Safety and Health Administration  
General Industry Safety and Health Division (317) 294-1792  
Construction Safety and Health Division and Robotics Learning (317) 294-7080  
www.michigan.gov/miosha  
MICHVACT 42108 (Rev. 12/16)  
LEO is an equal opportunity employer@mi.gov.

**As Required by the Michigan Right To Know Law**



**New or Revised SDS**

TO BE POSTED PROMINENTLY IN WORKPLACE NEXT TO THE SAFETY DATA SHEETS (SDS) LOCATION POSTER

New or Revised	Receipt Date	Posting Date	Location of New or Revised SDS

**MIOSHA**  
Michigan Occupational Safety and Health Administration

Michigan Department of Labor and Economic Opportunity (LEO)  
Michigan Occupational Safety and Health Administration  
Construction Safety and Health Division  
317.294.7721  
Paid by post with  
Michigan OSHA Label  
MICHVACT 42108 (Revised 12/16)  
LEO is an equal opportunity employer@mi.gov  
For further information visit our website at  
www.michigan.gov/miosha

# Heat Hazards

- Inspectors will evaluate heat-related hazards:
  - Illness and injury 300 and first aid logs for heat-related entries
  - Walk through - outdoor and indoor conditions and heat sources
  - Weather and current or historical Heat Index
  - Employee tasks, workload, and clothing / PPE
  - Employee interviews
- Open a Health Inspection if heat hazards are found without adequate protection. Follow the OSHA Heat NEP, 2003 Summer Heat Memo
- Heat inspections can result in a Safety Recommendation or a General Duty.



# Ergonomic Hazards

- Inspectors will evaluate determine if employees are exposed to ergonomic hazards:
  - MIOSHA 300 and first aid logs - documented strains, sprains, and MSD injuries
  - Walk through observations - lifting heavy items from the floor or above the head, routine, repetitive motions, or pushing and pulling of heavy loads.
  - Employee interviews



# Ergonomics Violations

Standard	Description
General Duty Clause -	The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause serious physical harm to employees, in that employees were required to perform tasks resulting in stressors that had caused, were causing or were likely to cause musculoskeletal disorders (MSDs).
408.22129(1)	Recordkeeping regulations require that employers record certain work-related injuries and illnesses. If a worker requires medical treatment beyond first aid, the worker's illness or injury must be recorded.

# CSHO Assignments, continued



If you have Programmed Assignments for establishments with NAICS codes covered by this NEP, consider moving them to the top of the pile.



At the very least these should be completed by the expiration of the NEP, July 13, 2026



Management may consider increasing the number of onsite assignments for companies with NAICS codes covered by this NEP

# Enforcement Assignments

- This NEP covers both programmed and unprogrammed safety inspections.
  - Unprogrammed inspections based upon complaints, or referrals related to establishments in the NAICS codes covered under Appendix A of this NEP ***shall be expanded to comprehensive safety inspections*** in accordance with this Instruction.
  - Companion inspections must be opened along with any Fatality inspection.



**Thank you.**

**Any Questions?**

