



STATE OF WASHINGTON
DEPARTMENT OF LABOR AND INDUSTRIES
Division of Occupational Safety and Health
PO Box 44600 • Olympia, Washington 98504-4600

March 9, 2022

AMAZON COM SERVICES LLC
AMAZON COM DEDC
Po Box 80726
Seattle, WA 98108

OSHA #: 1576001
Inspection: 317965723
UBI: 602201545
Region: 2-Health
Inspector ID: M1000
Reference: 209482935

Dear Employer:

Enclosed are the results of the safety and health inspection of your workplace. This packet contains:

- **Citation Invoice** – The total assessed penalty is \$60,000.00
- **Citation and Notice of Assessment** – Washington Administrative Code (WAC) Violations.
- **Employer Certification of Abatement instruction and form** - Correct all violations and return written verification or additional penalties may result.
- **Employer Appeal Rights** – You have 15 working days to appeal this citation.

You must immediately post this Citation and Notice of Assessment at or near where the violation(s) occurred, where employees can easily find and read it, or where employees normally receive posted information. All postings must remain until you have corrected all violations, or for seven working days, whichever is longer. “Working day” means a calendar day, except Saturdays, Sundays and all legal state holidays.

Because this inspection is public information, the result will be posted online 30 days after the above date by the Department of Labor & Industries. You may view it at <https://secure.lni.wa.gov/verify> .

Please visit <https://www.lni.wa.gov/agency/public-disclosure/> if you would like to request a copy of the inspection file. Your choices are:

- Safety & Health Citation Only
- Safety & Health Brief Inspector Summary Report (short description the inspector writes to summarize the reason for the inspection only – not complete file)
- Safety & Health Detailed Inspection Summary Report (detailed summary of inspection including penalty calculation only – not complete file)
- Safety & Health Citation and Complete Inspection File (The complete legal file which contains the detailed information regarding the inspector’s findings, the citation, and calculation of any penalty. This will be especially helpful if you are contemplating filing an appeal.)

If you have questions, call the compliance supervisor, Venetia Runnion, at (206) 515-2821.

Respectfully,

L&I Assistant Director
Division of Occupational Safety & Health

Enclosure(s)



Washington State Department of
Labor & Industries
Division of Occupational Safety and Health

Invoice

Inspection: 317965723

UBI: 602201545
Legal Name: AMAZON COM SERVICES LLC
DBA Name: AMAZON COM DEDC
Inspection: 21005 64th Avenue S,
Site: ATTN Jessica Ang, Kent, WA, 98032

Issued: March 9, 2022
Opening Conference: September 14, 2021
Closing Conference: March 3, 2022
Inspector ID: M1000

Summary of Assessed Penalties Due

The Citation and Notice of Assessment includes a full description of each violation.

Violation Item	Violation Type	WAC	Correction Due Date	Penalty Amount
1-1a	Willful Serious	WAC 296-800-11005	5/11/2022	\$60,000.00
1-1b	Willful Serious	WAC 296-800-11005	5/11/2022	\$0.00
1-1c	Willful Serious	WAC 296-800-11005	5/11/2022	\$0.00
1-1d	Willful Serious	WAC 296-800-11005	5/11/2022	\$0.00
1-1e	Willful Serious	WAC 296-800-11005	5/11/2022	\$0.00
1-1f	Willful Serious	WAC 296-800-11005	5/11/2022	\$0.00
1-1g	Willful Serious	WAC 296-800-11005	5/11/2022	\$0.00
1-1h	Willful Serious	WAC 296-800-11005	5/11/2022	\$0.00
1-1i	Willful Serious	WAC 296-800-11005	5/11/2022	\$0.00
1-1j	Willful Serious	WAC 296-800-11005	5/11/2022	\$0.00
1-1k	Willful Serious	WAC 296-800-11005	5/11/2022	\$0.00
2-1	General	WAC 296-62-60004(1)(a)	Not Applicable	\$0.00
<u>Total Penalty Due</u>				\$60,000.00

PAYMENT INFORMATION

Payment is due 15 working days from receipt of this citation.

Make check payable to the Department of Labor and Industries.

Write Inspection number 317965723 on the check and mail to:

Attn: DOSH Cashier
Department of Labor and Industries
PO Box 44835
Olympia, WA 98504-4835
Or deliver to: **Any L&I office**



Post This Document

**Citation and Notice of Assessment
Citación por Infracción y Multa Civil
Inspection: 317965723**

UBI: 602201545

Issued: March 9, 2022

Legal Name: AMAZON COM SERVICES LLC

Opening Conference: September 14, 2021

DBA Name: AMAZON COM DEDC

Closing Conference: March 3, 2022

Inspection Site: 21005 64th Avenue S, ATTN Jessica Ang Kent,
WA 98032

Inspector ID: M1000

Violation 1 Item 1a

Violation Type: Willful Serious

WAC 296-800-11005

The employer did not make sure that employees were provided with a workplace free from recognized hazards at Amazon's BFI4 Fulfillment Center in Kent, Washington. Upon inspection, it was found that employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, carrying, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof in the inbound unloading area, which have caused, and are likely to continue to cause musculoskeletal disorders (MSDs) of the low back.



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Citation and Notice of Assessment Citación por Infracción y Multa Civil Inspection: 317965723

Amazon shall, within 60 calendar days, submit a written plan with details abatement methods for each of the areas listed here and in 1-1 b through k.

Feasible Methods of Abatement:

There are a number of engineering and administrative controls that would materially reduce the hazards at BFI4. These include:

- Telescoping conveyors with height-adjustable worker platforms to reduce awkward lifting when loading and unloading trailers.
- Vacuum lifts for palletizing and de-palletizing products.
- Layer pickers or pallet transfer stations for transferring products from one pallet to another.
- Spring-platform carts to reduce awkward lifting when moving products from one process to another.
- Powered cart tuggers and electric pallet jacks to reduce pushing and pulling forces when moving heavier loads.
- Height-adjustable platforms for associates or for Kiva shelves to reduce awkward lifting during stow and pick tasks.
- Structured job rotation designed to reduce overloading individual employees.
- Setting the pace of work for each process based on the results of ergonomics risk analysis.
- Full implementation of Amazon's Ergonomics Program.
- Establish work-rest cycles based on ergonomics analysis.
- Improved training that includes information on more effective control measures and encourages employee input on solutions to risks in their work.

DOSH is requiring Amazon to take all necessary steps to provide a workplace free of recognized hazards from both an administrative and engineering control standpoint to reduce known hazardous exposures to serious injuries involving MSDs. This includes implementing both engineering and administrative controls.

The following additional correction documentation is required for this violation:

Amazon shall, within 60 calendar days, submit a detailed written initial plan on how abatement methods will be developed and implemented to gogr235@lni.wa.gov and runv235@lni.wa.gov. This plan must include an implementation schedule.

Implementation will be accomplished through the following steps:

- (1) Evaluation of engineering/administrative control options.
- (2) Selection of optimum and feasible control methods and completion of design.
- (3) Procurement, implementation, and installation of control measures.
- (4) Testing, modification, and acceptance of controls.
- (5) Provide quarterly written updates to the inspector detailing abatement progress.

Correct by: 5/11/2022
Assessed penalty: \$60,000.00



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Citation and Notice of Assessment
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Inspection: 317965723

Violation 1 Item 1b

Violation Type: Willful Serious

WAC 296-800-11005

The employer did not make sure that employees were provided with a workplace free from recognized hazards at Amazon's BFI4 Fulfillment Center in Kent, Washington. Upon inspection, it was found that employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, carrying, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof in the inbound unloading with destuffer, which have caused, and are likely to continue to cause musculoskeletal disorders (MSDs) of the low back.

Correct by: 5/11/2022
Assessed penalty: Included in Violation 1 Item 1A

Violation 1 Item 1c

Violation Type: Willful Serious

WAC 296-800-11005

The employer did not make sure that employees were provided with a workplace free from recognized hazards at Amazon's BFI4 Fulfillment Center in Kent, Washington. Upon inspection, it was found that employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, carrying, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof in the inbound palletizing area, which have caused, and are likely to continue to cause musculoskeletal disorders (MSDs) of the low back.

Correct by: 5/11/2022
Assessed penalty: Included in Violation 1 Item 1A

Violation 1 Item 1d

Violation Type: Willful Serious

WAC 296-800-11005

The employer did not make sure that employees were provided with a workplace free from recognized hazards at Amazon's BFI4 Fulfillment Center in Kent, Washington. Upon inspection, it was found that employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, carrying, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof in the Inbound/outbound water spiders with pallets or gaylords area, which have caused, and are likely to continue to cause musculoskeletal disorders (MSDs) of the low back.

Correct by: 5/11/2022
Assessed penalty: Included in Violation 1 Item 1A



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Citation and Notice of Assessment
Citación por Infracción y Multa Civil
Inspection: 317965723

Violation 1 Item 1e

Violation Type: Willful Serious

WAC 296-800-11005

The employer did not make sure that employees were provided with a workplace free from recognized hazards at Amazon's BFI4 Fulfillment Center in Kent, Washington. Upon inspection, it was found that employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, carrying, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof in the stow process, which have caused, and are likely to continue to cause musculoskeletal disorders (MSDs) of the upper extremities.

Correct by: 5/11/2022

Assessed penalty: Included in Violation 1 Item 1A

Violation 1 Item 1f

Violation Type: Willful Serious

WAC 296-800-11005

The employer did not make sure that employees were provided with a workplace free from recognized hazards at Amazon's BFI4 Fulfillment Center in Kent, Washington. Upon inspection, it was found that employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, carrying, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof in the pick process, which have caused, and are likely to continue to cause musculoskeletal disorders (MSDs) of the upper extremities.

Correct by: 5/11/2022

Assessed penalty: Included in Violation 1 Item 1A

Violation 1 Item 1g

Violation Type: Willful Serious

WAC 296-800-11005

The employer did not make sure that employees were provided with a workplace free from recognized hazards at Amazon's BFI4 Fulfillment Center in Kent, Washington. Upon inspection, it was found that employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, carrying, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof in the single pack process, which have caused, and are likely to continue to cause musculoskeletal disorders (MSDs) of the upper extremities.

Correct by: 5/11/2022

Assessed penalty: Included in Violation 1 Item 1A



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Citation and Notice of Assessment
Citación por Infracción y Multa Civil
Inspection: 317965723

Violation 1 Item 1h

Violation Type: Willful Serious

WAC 296-800-11005

The employer did not make sure that employees were provided with a workplace free from recognized hazards at Amazon's BFI4 Fulfillment Center in Kent, Washington. Upon inspection, it was found that employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, carrying, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof in the AFE wall/rebin area, which have caused, and are likely to continue to cause musculoskeletal disorders (MSDs) of the low back.

Correct by: 5/11/2022

Assessed penalty: Included in Violation 1 Item 1A

Violation 1 Item 1i

Violation Type: Willful Serious

WAC 296-800-11005

The employer did not make sure that employees were provided with a workplace free from recognized hazards at Amazon's BFI4 Fulfillment Center in Kent, Washington. Upon inspection, it was found that employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, carrying, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof in the outbound scanner area, which have caused, and are likely to continue to cause musculoskeletal disorders (MSDs) of the low back.

Correct by: 5/11/2022

Assessed penalty: Included in Violation 1 Item 1A

Violation 1 Item 1j

Violation Type: Willful Serious

WAC 296-800-11005

The employer did not make sure that employees were provided with a workplace free from recognized hazards at Amazon's BFI4 Fulfillment Center in Kent, Washington. Upon inspection, it was found that employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, carrying, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof in the outbound trailer area, which have caused, and are likely to continue to cause musculoskeletal disorders (MSDs) of the low back.

Correct by: 5/11/2022

Assessed penalty: Included in Violation 1 Item 1A



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**Citation and Notice of Assessment
Citación por Infracción y Multa Civil
Inspection: 317965723**

Violation 1 Item 1k

Violation Type: Willful Serious

WAC 296-800-11005

The employer did not make sure that employees were provided with a workplace free from recognized hazards at Amazon's BFI4 Fulfillment Center in Kent, Washington. Upon inspection, it was found that employees are expected to maintain a very high pace of work. Information collected documented that pressure is put on workers to maintain that pace without adequate recovery time to reduce the risk of MSDs. There is a direct connection between Amazon's employee monitoring and discipline systems and workplace musculoskeletal disorders (MSDs).

The violations above have been grouped because they involve similar or related hazards that may increase the potential for illness or injury resulting from an exposure or accident. A single penalty is applied to the first item in the group.

Correct by: 5/11/2022

Assessed penalty: Included in Violation 1 Item 1A

Violation 2 Item 1

Violation Type: General

WAC 296-62-60004(1)(a)

The employer did not report to L&I's Division of Occupational Safety and Health when ten or more tests confirmed employees were confirmed within fourteen consecutive calendar days of each other. According to the employer's employee COVID case logs, there have been more than 10 confirmed cases within a 14 day period, including during September 2021.

Situation not believed to exist any longer. However, if this violation is identified again during future inspections, it may result in repeat or failure to abate violations which may include penalties.

Assessed penalty: \$0.00

Employer Certification of Abatement Instructions Inspection: 317965723

What you must do now:

- Check the correction due date(s) shown on the enclosed Employer Certification of Abatement Form. You must fully correct the hazards by these dates.
 - Describe on the form how you corrected each hazard, rather than what you *intend to do* in the future. Examples:
 - Right:** *All staff have received the required training.*
 - Wrong:** *All staff will receive the required training next week.*
- Use attachments if you need more space. Submit additional documentation of hazard correction if requested in the citation packet.
- Fill in the date you corrected the hazard and sign.
 - Post a copy of the completed form for at least seven working days, or until you have corrected all violations, whichever is longer. It must be posted near the hazard location or in a place that is readily accessible by affected employees and their representatives.
 - Send your completed form to the address provided.

Note: If we do not receive written confirmation you have corrected the hazards, we will take follow-up action, which may include additional penalties. If you provide us with false information, you may face criminal penalties.

If you are unable to fix the hazard(s) by the correction due date(s):

We must receive your written request for an extension **before** the correction due date(s) listed for the hazard(s). Correction due dates are shown on the enclosed Citation and Notice of Assessment and on your Employer Certification of Abatement Form(s).

Extensions are not automatically granted. To be considered for an extension, you must provide the following:

- Inspection number, employer name, telephone number, and site address.
- Violation and Item number for each requested extension.
- Correction due date on the citation and additional time needed.
- Steps taken to fix the hazard by the correction due date.
- Why you cannot correct the hazard by the correction due date.
- How you will protect your employees until you fix the hazard.

For more information, contact:

Or call: (206) 515-2821

Venetia Runnion, Compliance Supervisor

Department of Labor and Industries

12806 Gateway Dr S

TUKWILA, WA 98168

You must post all documentation associated with your request for extension with your citation packet. All postings must remain until you have corrected all violations, or unless you have appealed and received and posted your hearing notice.



Employer Certification of Abatement Form

Inspection: 317965723

UBI: 602201545

Issued: March 9, 2022

Legal Name: AMAZON COM SERVICES LLC

DBA Name: AMAZON COM DEDC

Site Address: 21005 64th Avenue S, ATTN Jessica Ang, Kent, WA, 98032

You must complete this form and return it to: Karen Michael, Department of Labor & Industries
2111 N Northgate Way, Suite 300, SEATTLE, WA 98133
Or Fax to: (206) 515-2879

Violation(s) are fully described in the Citation and Notice of Assessment section.

Violation, Item & Group#	Type of Violation	WAC# Violated	Correction Due Date
1-1a	Willful Serious	WAC 296-800-11005	5/11/2022
Violation Summary: Inbound unloading; risk for low back WMSD			
How you corrected the hazard →			
Date you corrected the hazard →			

1-1b	Willful Serious	WAC 296-800-11005	5/11/2022
Violation Summary: Inbound unloading with destuffer; low back, lift rate exceeds allowable			
How you corrected the hazard →			
Date you corrected the hazard →			

1-1c	Willful Serious	WAC 296-800-11005	5/11/2022
Violation Summary: Inbound palletizing; WMSD low back			
How you corrected the hazard →			
Date you corrected the hazard →			

I certify that the hazards described in this Employer Certification of Abatement Form have been corrected as described above. Affected employees and their representatives have been informed of the correction activities. I am aware that knowingly providing false information may result in criminal penalties (RCW 49.17.190(2)).

Signature Name

Title Date Phone No.

DOSH USE ONLY

DOSH Reviewer's Signature Date



Employer Certification of Abatement Form

Inspection: 317965723

UBI: 602201545

Issued: March 9, 2022

Legal Name: AMAZON COM SERVICES LLC

DBA Name: AMAZON COM DEDC

Site Address: 21005 64th Avenue S, ATTN Jessica Ang, Kent, WA, 98032

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2111 N Northgate Way, Suite 300, SEATTLE, WA 98133
Or Fax to: (206) 515-2879

1-1d	Willful Serious	WAC 296-800-11005	5/11/2022
Violation Summary: Inbound/outbound water spiders with pallets or gaylords; WMSD low back			
How you corrected the hazard →			
Date you corrected the hazard →			

1-1e	Willful Serious	WAC 296-800-11005	5/11/2022
Violation Summary: Stow process; upper extremity WMSD risk			
How you corrected the hazard →			
Date you corrected the hazard →			

1-1f	Willful Serious	WAC 296-800-11005	5/11/2022
Violation Summary: Pick process; upper extremity WMSD risk			
How you corrected the hazard →			
Date you corrected the hazard →			

I certify that the hazards described in this Employer Certification of Abatement Form have been corrected as described above. Affected employees and their representatives have been informed of the correction activities. I am aware that knowingly providing false information may result in criminal penalties (RCW 49.17.190(2)).

Signature Name

Title Date Phone No.

DOSH USE ONLY

DOSH Reviewer's Signature Date



Employer Certification of Abatement Form

Inspection: 317965723

UBI: 602201545

Issued: March 9, 2022

Legal Name: AMAZON COM SERVICES LLC

DBA Name: AMAZON COM DEDC

Site Address: 21005 64th Avenue S, ATTN Jessica Ang, Kent, WA, 98032

You must complete this form and return it to: Karen Michael, Department of Labor & Industries
2111 N Northgate Way, Suite 300, SEATTLE, WA 98133
Or Fax to: (206) 515-2879

1-1g	Willful Serious	WAC 296-800-11005	5/11/2022
Violation Summary: Single pack; upper extremity WMSD risk			
How you corrected the hazard →			
Date you corrected the hazard →			

1-1h	Willful Serious	WAC 296-800-11005	5/11/2022
Violation Summary: AFE wall/rebin; low back WMSD risk			
How you corrected the hazard →			
Date you corrected the hazard →			

1-1i	Willful Serious	WAC 296-800-11005	5/11/2022
Violation Summary: Outbound scanner; risk for low back WMSD due to lifting			
How you corrected the hazard →			
Date you corrected the hazard →			

I certify that the hazards described in this Employer Certification of Abatement Form have been corrected as described above. Affected employees and their representatives have been informed of the correction activities. I am aware that knowingly providing false information may result in criminal penalties (RCW 49.17.190(2)).

Signature Name

Title Date Phone No.

DOSH USE ONLY

DOSH Reviewer's Signature Date



Employer Certification of Abatement Form

Inspection: 317965723

UBI: 602201545

Issued: March 9, 2022

Legal Name: AMAZON COM SERVICES LLC

DBA Name: AMAZON COM DEDC

Site Address: 21005 64th Avenue S, ATTN Jessica Ang, Kent, WA, 98032

You must complete this form and return it to: Karen Michael, Department of Labor & Industries
2111 N Northgate Way, Suite 300, SEATTLE, WA 98133
Or Fax to: (206) 515-2879

1-1j	Willful Serious	WAC 296-800-11005	5/11/2022
Violation Summary: Outbound trailer; risk for low back WMSD			
How you corrected the hazard →			
Date you corrected the hazard →			

1-1k	Willful Serious	WAC 296-800-11005	5/11/2022
Violation Summary: Pace of work			
How you corrected the hazard →			
Date you corrected the hazard →			

I certify that the hazards described in this Employer Certification of Abatement Form have been corrected as described above. Affected employees and their representatives have been informed of the correction activities. I am aware that knowingly providing false information may result in criminal penalties (RCW 49.17.190(2)).

Signature Name

Title Date Phone No.

DOSH USE ONLY

DOSH Reviewer's Signature Date

For Employers

If you are cited for a violation of Occupational Safety and/or Health rules, you have the right to appeal the citation. **You have 15 working days from the date you receive this citation to appeal.** (RCW 49.17.140(1)) "Working day" means a calendar day, except Saturdays, Sundays and all legal state holidays. Your appeal must be in writing. It may be mailed, faxed, personally delivered or electronically filed. If you electronically file, the Department will send an automated acknowledgement that the appeal was received. **If you do not receive acknowledgement, please ensure you have addressed it to the correct email.** You can also contact the Appeals Program at the number listed below.

For violations classified as serious, willful, repeat serious, or failure to abate serious, an employer must correct the violations by the date listed on the Citation and Notice / Employer's Certification of Abatement form unless a stay of abatement date is requested in the appeal as described on this page. A stay of abatement date means the employer's requirement to abate or correct the hazard is put on hold until the appeal is resolved. All general and repeat general violations under appeal automatically have stay of abatement dates until a final order on those violations has been issued. If you only need an extension of an abatement date, please see the above section entitled, **"If you are unable to fix the hazard(s) by the correction due date(s)"**.

Your appeal must include:

- Name, address, telephone number, and fax number if available of the employer who is appealing, and for the employer's representative, if any, such as an attorney or interpreter.
- Inspection Number (You will find this nine-digit number in the top right corner of this page.)
- Statement explaining:
 1. What you think is wrong with the citation and any related facts.
 2. How you think the citation should be changed.
 3. What relief you are seeking and why.

If you are requesting a stay of abatement date for serious, willful, repeat serious or failure to abate serious, you must also include:

- Each violation and item number for which a stay of abatement date is requested; and
- The reason for the stay of abatement date request.

Note: Employees and/or employee representatives may elect to participate in appeal hearings.

Posting requirement:

You must post your appeal documents (along with this citation packet) until the appeal is resolved. You must also post all other documents related to this appeal.

For Employees or Their Representatives

If your employer is cited, you may only appeal the correction due date(s).

Your appeal must include:

- Your name, address, telephone number, and fax number if available and the same information for anyone who is representing you, if any.
- Inspection number.
- Statement explaining why the correction due date should be changed.

Send all appeals to:

Assistant Director for DOSH
Attn: Appeals Program
PO Box 44604
Olympia, WA 98504-4604
Fax to: **(360) 902-5581** or deliver to: **Any L&I office**
Electronically to: DOSHAppeals@Lni.wa.gov

For more information call the Appeals Program: **(360) 902-5486.**

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Po Box 80726
Seattle, WA 98108

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