



STATE OF WASHINGTON

DEPARTMENT OF LABOR AND INDUSTRIES

Division of Occupational Safety and Health  
PO Box 44600 • Olympia, Washington 98504-4600

January 19, 2022

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

OSHA #: 1546082  
Inspection: 317965157  
UBI: 602201545  
Region: 3-Safety  
Inspector ID: A1300  
Reference: 209482682

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 \$7,000.00
- **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, Edward Guy, at (253) 596-3912.**

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: 317965157**

**UBI:** 602201545  
**Legal Name:** AMAZON COM SERVICES LLC  
**DBA Name:** AMAZON COM  
**Inspection:** 2700 Center Drive,  
**Site:** Dupont, WA, 98327

**Issued:** January 19, 2022  
**Opening Conference:** August 3, 2021  
**Closing Conference:** January 13, 2022  
**Inspector ID:** A1300

### 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
1-1	Serious	WAC 296-800-11005	2/21/2022	\$7,000.00
<b><u>Total Penalty Due</u></b>				\$7,000.00

#### 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 317965157 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: 317965157**

**UBI:** 602201545

**Issued:** January 19, 2022

**Legal Name:** AMAZON COM SERVICES LLC

**Opening Conference:** August 3, 2021

**DBA Name:** AMAZON COM

**Closing Conference:** January 13, 2022

**Inspection Site:** 2700 Center Drive Dupont, WA 98327

**Inspector ID:** A1300

**Violation 1 Item 1**

Violation Type: Serious

WAC 296-800-11005

The employer did not provide employees with a workplace free from recognized hazards that are causing or likely to cause serious injury. Upon inspection, it was observed that employees at Amazon's BFI3 warehouse in Dupont, Washington 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, which have caused, and are likely to continue to cause, musculoskeletal disorders (MSDs).

Employees are repeatedly lifting loads up to 49 pounds by hand to and from locations that require bending, stooping, and reaching without the assistance of material handling equipment. This is a high frequency exposure over short durations of time. They also frequently need to reach above shoulder level and below knee level to stow and pick items from shelves and use highly repetitive motions and forceful exertions to unpack incoming items and pack outgoing items.

The following work activities are a brief summary of the hazards identified in the Division of Occupational Safety and Health (DOSH) Ergonomic Evaluation of the work site:

Inbound: Unloading trailers, palletizing, pallet to pallet transfer, de-palletizing, and sorting.

Outbound: Transferring and packing items and loading trailers. Lifting, awkward postures, and repetitive motions were the primary risk factors.

Pace of work: 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 MSDs.

**Citation and Notice of Assessment**  
**Citación por Infracción y Multa Civil**  
**Inspection: 317965157**

Employees were not provided the tools and equipment (engineering controls) and the employer did not create and enforce work practices (administrative controls) to make the work safe. The employer did not implement everything reasonably necessary to protect against known hazardous exposures to serious injuries involving MSDs. The employer's current approach has resulted in hazardous exposures in the workplace.

There are a number of elements in Amazon's Ergonomics Program that, if had been implemented, would have resulted in a lower risk of MSDs at the warehouse. These elements include: having a dedicated Ergonomics Leadership Team that is trained and responsible for implementing the program, evaluating jobs using the ergonomic analysis tools in the program, prioritizing jobs for intervention based on level of risk, and implementing solutions according to the hierarchy of controls and evaluating the effectiveness of controls and the overall program. Amazon DuPont has relied on Physical Demands Summaries / Job Hazard Analyses that lack enough detail to help with prioritizing solutions and offer little in the way of engineering controls to reduce the risk for injury.

Additionally, the employer did not follow training requirements Per Section 5.1. (Pg. 5 of 44) of their own Ergonomics Program which states: "Besides on the job body mechanics training, at a minimum all associates will be trained on the following: Amazon's ergonomics program; the exposures which have been associated with RMIs; the symptoms and consequences of injuries caused by repetitive motion; the importance of reporting symptoms and injuries and methods used by the employer to minimize RMIs." Training on lifting techniques and body mechanics have not been shown to be effective ways of reducing MSDs without additional changes, like engineering controls.

**Feasible Methods of Abatement:**

There are a number of engineering and administrative controls that would materially reduce the hazards at BF13. 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.



## Post This Document

# Citation and Notice of Assessment Citación por Infracción y Multa Civil Inspection: 317965157

- 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.

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](mailto:gogr235@lni.wa.gov) and [arre235@lni.wa.gov](mailto:arre235@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: 2/21/2022**  
**Assessed penalty: \$7,000.00**

## Employer Certification of Abatement Instructions Inspection: 317965157

### 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: (253) 596-3912

Edward Guy, Compliance Supervisor

Department of Labor and Industries

950 Broadway

Tacoma, WA 98402

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.



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

# Employer Certification of Abatement Form

## Inspection: 317965157

**UBI:** 602201545

**Issued:** January 19, 2022

**Legal Name:** AMAZON COM SERVICES LLC

**DBA Name:** AMAZON COM

**Site Address:** 2700 Center Drive, Dupont, WA, 98327

**You must complete this form and return it to:** ERIC ARROYO, Department of Labor & Industries  
950 Broadway Suite 200, TACOMA, WA 98402  
Or Fax to: (253) 596-3903

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

Violation, Item & Group#	Type of Violation	WAC# Violated	Correction Due Date
1-1	Serious	WAC 296-800-11005	2/21/2022
Violation Summary: Provide a workplace free from recognized hazards			
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](mailto:DOSHAppeals@Lni.wa.gov)

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



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