



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

July 26, 2023

AMAZON COM SERVICES LLC
Po Box 80726
Seattle, WA 98108

OSHA #: 1649120
Inspection: 317972531
UBI: 602201545
Region: 06-Health
Inspector ID: B1800
Reference: 209485446

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 \$85,800.00
- **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, Brian Byrd, at (509) 324-2588.

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: 317972531

UBI: 602201545
Legal Name: AMAZON COM SERVICES LLC
DBA Name: AMAZON COM SERVICES LLC
Inspection: 10010 West Geiger Boulevard,
Site: Spokane, WA, 99224

Issued: July 26, 2023
Opening Conference: February 8, 2023
Closing Conference: July 19, 2023
Inspector ID: B1800

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	9/27/2023	\$66,000.00
1-1b	Willful Serious	WAC 296-800-11005	9/27/2023	\$0.00
1-1c	Willful Serious	WAC 296-800-11005	9/27/2023	\$0.00
1-1d	Willful Serious	WAC 296-800-11005	9/27/2023	\$0.00
2-1	Serious	WAC 296-817-20015(1)	Corrected	\$6,600.00
2-2	Serious	WAC 296-817-20035(1)	10/27/2023	\$6,600.00
2-3	Serious	WAC 296-817-20020(4)	8/28/2023	\$6,600.00
3-1	General	WAC 296-817-20005(5)	Corrected	\$0.00
<u>Total Penalty Due</u>				\$85,800.00

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 317972531 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: 317972531**

UBI: 602201545

Issued: July 26, 2023

Legal Name: AMAZON COM SERVICES LLC

Opening Conference: February 8, 2023

DBA Name: AMAZON COM SERVICES LLC

Closing Conference: July 19, 2023

Inspection 10010 West Geiger Boulevard Spokane, WA

Inspector ID: B1800

Site: 99224

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 GEG1 Fulfillment Center in Spokane, Washington. Upon inspection, it was found that up to 100 employees were 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 Downstacking area, which have caused and are likely to continue to cause musculoskeletal disorders (MSDs) of the low back and upper extremities.

Exposure to musculoskeletal disorder hazards can cause severe lower back and upper extremity injuries that may lead to temporary or permanent disability.



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Citation and Notice of Assessment Citación por Infracción y Multa Civil Inspection: 317972531

The following additional correction documentation is required for this violation: Amazon shall, within 60 calendar days, submit a detailed written plan on how abatement methods will be developed and implemented for each of the areas listed in 1-1a through 1-1d to gogr235@lni.wa.gov and bioa235@lni.wa.gov. This plan must include an implementation schedule.

Feasible Methods of Abatement:

There are a number of engineering and administrative controls that would materially reduce the hazards at GEG1. These include:

- Spring-platform carts to reduce awkward lifting when moving products from one process to another.
- Improved training that includes information on more effective control measures and encourages employee input on solutions to risks in their work.
- Structured job rotation designed to reduce overloading individual employees.
- Set the pace of work and establish work-rest cycles based on ergonomics analysis.
- Full implementation of Amazon's Ergonomics Program.

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. 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: 9/27/2023
Assessed penalty: \$66,000.00



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**Citation and Notice of Assessment
Citación por Infracción y Multa Civil
Inspection: 317972531**

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 GEG1 Fulfillment Center in Spokane, 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.

Exposure to musculoskeletal disorder hazards can cause severe upper extremity injuries that may lead to temporary or permanent disability.

Correct by: 9/27/2023
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 GEG1 Fulfillment Center in Spokane, Washington. Upon inspection, it was found that up to 100 employees were 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 Decant area, which have caused and are likely to continue to cause musculoskeletal disorders (MSDs) of the low back.

Exposure to musculoskeletal disorder hazards can cause severe lower back and upper extremity injuries that may lead to temporary or permanent disability.

Correct by: 9/27/2023
Assessed penalty: Included in Violation 1 Item 1A



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Citation and Notice of Assessment
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Inspection: 317972531

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 GEG1 Fulfillment Center in Spokane, Washington. Upon inspection, it was found that up to 100 employees were 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 Downstacking area, which have caused and are likely to continue to cause musculoskeletal disorders (MSDs) of the low back and upper extremities.

Exposure to musculoskeletal disorder hazards can cause severe lower back and upper extremity injuries that may lead to temporary or permanent disability.

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: 9/27/2023
Assessed penalty: Included in Violation 1 Item 1A

Violation 2 Item 1

Violation Type: Serious

WAC 296-817-20015(1)

The employer did not make sure employees wear hearing protectors that will provide sufficient protection when exposure equals or exceeds 85 dBA TWA8. Four employees, representing up to 1,405 employees in similar exposure groups (SEGs), were conducting inbound unloading, decant, waterspider and sorting work tasks were exposed to noise levels at or above an 8-hour time-weighted average (TWA8) of 85 A-weighted decibels (dBA) without wearing sufficient hearing protection. Exposure to noise at or above an 8-hour TWA of 85 dBA can lead to permanent hearing loss.

This violation was corrected during the inspection.
Assessed penalty: \$6,600.00



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**Citation and Notice of Assessment
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Inspection: 317972531**

Violation 2 Item 2

Violation Type: Serious

WAC 296-817-20035(1)

The employer did not ensure to use audiometric testing to identify and correct deficiencies in their hearing loss prevention program. Four employees, representing up to 1,405 employees in similar exposure groups (SEGs), were conducting inbound unloading, decant, waterspider and sorting work tasks were exposed to noise levels at or above an 8-hour time-weighted average (TWA8) of 85 A-weighted decibels (dBA) without baseline and annual audiometric testing.

Without conducting annual audiometric testing, deficiencies in a hearing loss program may not be identified and employees may suffer from noise induced hearing loss from working in a noisy environment.

**Correct by: 10/27/2023
Assessed penalty: \$6,600.00**

Violation 2 Item 3

Violation Type: Serious

WAC 296-817-20020(4)

The employer did not make sure exposed employees received training about noise and hearing protection that included all required elements.

Four employees, representing up to 1,405 employees in similar exposure groups (SEGs), conducting inbound unloading, decant, waterspider and sorting work tasks were exposed to noise levels at or above an 8-hour time-weighted average (TWA8) of 85 A-weighted decibels (dBA) without receiving training on all required elements, including the effects of noise on hearing, noise controls in the workplace, the purpose of hearing protectors, instructions about proper use of hearing protection, the purpose and procedures for program evaluations, and the employees' rights to access records.

Without effective training, employees may not know how to adequately protect themselves from noise exposure. Exposure to noise at or above an 8-hour TWA of 85 dBA can lead to permanent hearing loss.

**Correct by: 8/28/2023
Assessed penalty: \$6,600.00**



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Inspection: 317972531**

Violation 3 Item 1

Violation Type: General

WAC 296-817-20005(5)

The employer did not make sure to notify each employee whose exposure equals or exceeds 85 dBA TWA8 of the monitoring results within five working days of received results. In September of 2022, ten employees were exposed to noise levels at or above an 8-hour time-weighted average (TWA8) of 85 A-weighted decibels (dBA) without receiving exposure monitoring results within five working days of the employer receiving final results.

Employees not receiving monitoring results could lead to misunderstanding and confusion in regards to protecting themselves.

This violation was corrected during the inspection.

Assessed penalty: \$0.00

Employer Certification of Abatement Instructions Inspection: 317972531

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: (509) 324-2588

Brian Byrd, Compliance Supervisor

Department of Labor and Industries

901 N. Monroe St. Ste 100

Spokane, WA 99201

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: 317972531

UBI: 602201545

Issued: July 26, 2023

Legal Name: AMAZON COM SERVICES LLC

DBA Name: AMAZON COM SERVICES LLC

Site Address: 10010 West Geiger Boulevard, Spokane, WA, 99224

You must complete this form and return it to: **Amanda Biondi**
Department of Labor & Industries
901 N Monroe Suite 100,
Spokane, WA 99201-2148
 Or Fax to: **(509) 324-2618**
 Or Email to: **bioa235@LNI.WA.GOV**

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	9/27/2023

Violation Summary: IB Downstacking; risk for low back and upper extremity WMSD

How you corrected the hazard →

Date you corrected the hazard →

1-1b	Willful Serious	WAC 296-800-11005	9/27/2023
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Violation Summary: OB Pack Singles; risk for upper extremity WMSD

How you corrected the hazard →

Date you corrected the hazard →

1-1c	Willful Serious	WAC 296-800-11005	9/27/2023
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Violation Summary: IB Decant; risk for upper extremity WMSD

How 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



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

Employer Certification of Abatement Form

Inspection: 317972531

UBI: 602201545

Issued: July 26, 2023

Legal Name: AMAZON COM SERVICES LLC

DBA Name: AMAZON COM SERVICES LLC

Site Address: 10010 West Geiger Boulevard, Spokane, WA, 99224

You must complete this form and return it to:

Amanda Biondi
Department of Labor & Industries
901 N Monroe Suite 100,
Spokane, WA 99201-2148
Or Fax to: **(509) 324-2618**
Or Email to: **bioa235@LNI.WA.GOV**

Date you corrected the hazard →	
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1-1d	Willful Serious	WAC 296-800-11005	9/27/2023
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Violation Summary: IB Stow Supply Waterspider; risk for low back and upper ext

How you corrected the hazard →

Date you corrected the hazard →	
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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: 317972531

UBI: 602201545

Issued: July 26, 2023

Legal Name: AMAZON COM SERVICES LLC

DBA Name: AMAZON COM SERVICES LLC

Site Address: 10010 West Geiger Boulevard, Spokane, WA, 99224

You must complete this form and return it to: **Amanda Biondi**
Department of Labor & Industries
901 N Monroe Suite 100,
Spokane, WA 99201-2148
 Or Fax to: **(509) 324-2618**
 Or Email to: **bioa235@LNI.WA.GOV**

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

Violation, Item & Group#	Type of Violation	WAC# Violated	Correction Due Date
2-2	Serious	WAC 296-817-20035(1)	10/27/2023
Violation Summary: Provide audiograms to employees in Hearing Conservation Program			
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: 317972531

UBI: 602201545

Issued: July 26, 2023

Legal Name: AMAZON COM SERVICES LLC

DBA Name: AMAZON COM SERVICES LLC

Site Address: 10010 West Geiger Boulevard, Spokane, WA, 99224

You must complete this form and return it to: **Amanda Biondi**
Department of Labor & Industries
901 N Monroe Suite 100,
Spokane, WA 99201-2148
 Or Fax to: **(509) 324-2618**
 Or Email to: **bioa235@LNI.WA.GOV**

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

Violation, Item & Group#	Type of Violation	WAC# Violated	Correction Due Date
2-3	Serious	WAC 296-817-20020(4)	8/28/2023
Violation Summary: Include all noise and hearing protection training elements			
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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