

U.S. Department of Labor

Occupational Safety and Health Administration
Fairview Heights Area Office
11 Executive Drive, Suite 11
Fairview Heights, IL 62208



April 26, 2022

Amazon.com Services LLC
Attn: Mr. Mical Davis
5106 IL-111
Pontoon Beach, IL 62040

Re: Inspection No. 1568095

Dear Mr. Davis:

The Occupational Safety and Health Administration (OSHA) Fairview Heights Area Office conducted an inspection and evaluation of your facility located at 3077 Gateway Commerce Center Dr. S, Edwardsville, IL. 62025. The inspection was initiated on December 11, 2021, in response to media reports which indicated the building received a direct hit from a Category 3 tornado and multiple workers were missing. The inspection included management and private employee interviews, a review of relevant documents associated with the site's Emergency Action Plan (EAP), contractor safety and training records. The inspection disclosed three items which raised concerns about the potential risk to employees during severe weather emergencies.

On or about December 10, 2021, after a tornado struck the Amazon DLI4 facility in Edwardsville, IL, six delivery service provider (DSP) employees were fatally injured, along with one DSP employee who was critically wounded. Three other DSP employees sustained minor injuries. The following workplace conditions have been identified as risk factors:

1. The megaphone, identified by the Emergency Action Plan (EAP) to be used to activate the shelter-in-place procedure, was locked in a cage and not accessible. Per the EAP, managers were to "[a]ctivate the audible warning method to alert personnel about the site emergency." Management adapted to the situation by verbally communicating warnings to personnel, instructing them to take shelter in the restroom.
2. Based on interviews with Amazon and DSP personnel, some employees did not recall the location of the DLI4 designated severe weather shelter-in-place. The personnel did not recall ever participating in any severe weather or shelter-in place drills. Amazon managers began directing employees to go to the restroom in response to local weather alerts and tornado warnings approximately 10 minutes prior to the tornado's touch down. Some employees were unaware the designated tornado shelter was the restroom located in the northern portion of the building and instead took shelter in the restroom located in the southern portion of the building.

3. Amazon's written EAP contained a section which addressed severe weather emergencies. The plan was not customized with specific instructions associated with the anticipated hazards expected for this facility and it contained elements that would not be encountered in Edwardsville, IL, such as a hurricane. The plan did not specifically identify the location of the designated shelter area for the facility. Amazon had posted facility evacuation maps which indicated the location of the designated tornado shelter.

Section 5(a)(1), the General Duty Clause of the Occupational Safety and Health Act, requires each employer to furnish employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to employees. Since no OSHA standard applies and it is not considered appropriate at this time to invoke Section 5(a)(1), I recommend that you voluntarily take the necessary steps to eliminate or materially reduce your employees' exposure to the risk factors described above. Feasible methods of control may include, but are not limited to, the following:

1. All audible warning devices, as well as the location of the device(s), should be clearly identified within the severe weather emergency plan and readily accessible.
2. Ensure that all employees who work throughout the facility including, vendors, and contracted personnel are provided training and participate in drills associated with the layout of the facility, warning and alert methods, and severe weather shelter locations.
3. Site severe weather emergency plans should contain site specific information. When addressing severe weather emergency plan guidance, hazards beyond conditions involving a fire, any applicable exit route, exit door, shelter-in-place, or any other emergency plan guidance, should be identified within the written emergency plan.

OSHA welcomes any report of your efforts to reduce the above-mentioned exposures. If you have any questions concerning this matter, please feel free to contact this office.

Sincerely,

Aaron Priddy
Area Director

cc: Jeffrey B. Youmans, Esq.
Heather MacDougal, Vice President of Workplace Health & Safety