



Our Industry. Our Passion. Our Voice.

Feed Mill Safety

**Gary Huddleston – Director of Feed
Manufacturing and Regulatory Affairs**



VOICE



REPRESENTATION



EXPERTISE



ENGAGEMENT

Why should you have a safety program at your facility?

- **Concern for your employees**
- **Cost of work-related accidents**
- **Compliance to government regulations**



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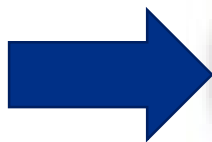


What should a safety program at a feed production facility look like?



- It should be written
- It should include documented job hazard analysis
- It should include employee training
- It should include a facility safety committee
- It should include accident/incident investigation
- It should include compliance to OSHA standards
- Your program should create a **SafetyCulture**

**Start
Here**



Regulations

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Applicable OSHA Standards



Walking Working Surfaces – Fall Protection

- 29 CFR 1910 Subpart D (1910.21-30)
- Ladders, stairways, fall protection systems



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Applicable OSHA Standards



Exit Routes and Emergency Planning

- 29 CFR 1910 Subpart E (1910.33-39)
- Emergency Action Plan (1910.38)
- Fire Prevention Plan (1910.39)



Applicable OSHA Standards

Emergency Response

Planned

Update



- Original standards not designed as comprehensive emergency response standards
- Do not address the full range of hazards or concerns currently facing emergency responders
- Do not reflect all the major developments in safety and health practices that have already been accepted by the emergency response community

Applicable OSHA Standards



Powered Platforms, Manlifts

- 29 CFR 1910 Subpart F (1910.66-68)
- Manlifts (1910.68)



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Applicable OSHA Standards



Occupational Health and Environmental Control

- 29 CFR 1910 Subpart G (1910.94-98)
- Noise Exposure (1910.95)



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Applicable OSHA Standards



Hazardous Materials

- 29 CFR 1910 Subpart H (1910.101-126)
- Compressed Gasses (1910.101)
- Flammable Liquids (1910.106)
- Storage and Handling of LPG (1910.110)



Applicable OSHA Standards



Personal Protective Equipment

- 29 CFR 1910 Subpart I (1910.132-140)
- Eye and Face Protection (1910.133)
- Respiratory Protection (1910.134)
- Head Protection (1910.135)
- Foot Protection (1910.136)
- Electrical Protective Equipment (1910.137)
- Hand Protection (1910.138)
- Personal Fall Protection Systems (1910.140)



Applicable OSHA Standards



General Environmental Controls

- 29 CFR 1910 Subpart J (1910.141-147)
- Permit-required Spaces (1910.146)
- Hazardous Energy – Lockout/Tagout (1910.147)



Applicable OSHA Standards



Hazardous Energy Lockout/Tagout

Planned



- Computer-based controls of hazardous energy
- Programmable logic controllers
- Robotics
- A more modern approach to controlling hazardous energy
- Harmonize U.S. standards with those of other countries

Applicable OSHA Standards



Fire Protection

- 29 CFR 1910 Subpart L (1910.155-165)
- Portable Fire Extinguishers (1910.157)
- Standpipe and Hose Systems (1910.158)
- Automatic Sprinkler Systems (1910.159)



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Applicable OSHA Standards



Materials Handling and Storage

- 29 CFR 1910 Subpart N (1910.176-184)
- Powered Industrial Trucks (1910.178)



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Applicable OSHA Standards



Powered Industrial Trucks

Planned



- Current standard based upon ANSI B56 from 1969
- Will include the latest version of include the latest version of ANSI/ITSDF B56 from 2018
- To include current industry practice and state-of-the-art technology
- Update requirements related to the maintenance and training of operators.

Applicable OSHA Standards



Machinery and Guarding

- 29 CFR 1910 Subpart O (1910.211-219)
- General Requirements for All Machines (1910.212)



Applicable OSHA Standards



Hand and Portable Powered Tools

- 29 CFR 1910 Subpart P (1910.241-244)



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Applicable OSHA Standards



Welding, Cutting and Brazing

- 29 CFR 1910 Subpart Q (1910.251-255)
- Hot Work permits and requirements (1910.252)

A vertical, orange-bordered form titled "HOT WORK PERMIT" in bold, black, sans-serif capital letters. The form contains several sections with checkboxes and lines for text. The sections include: "ALL TEMPORARY OPERATIONS, INCLUDING BUT NOT LIMITED TO: WELDING, CUTTING, BRAZING, HOT TAPPING, AND OTHER HOT WORK OPERATIONS, SHALL BE PERMITTED ONLY WHEN A HOT WORK PERMIT IS OBTAINED AND ALL REQUIREMENTS ARE MET.", "PART I: GENERAL INFORMATION", "PART II: HOT WORK CHECKLIST", "PART III: SIGNATURES", and "PART IV: OTHER INFORMATION". The form is designed to be filled out by a qualified person before any hot work is performed.

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Applicable OSHA Standards



Special Industries

- 29 CFR 1910 Subpart R (1910.261-272)
- Grain Handling Facilities (1910.272)



Housekeeping Weekly Checklist

DATE: _____

| ROOM | TASK | Sun | Mon | Tues |
|-------------|---|-----|-----|------|
| Room Name | Briefly describe the housekeeping task for this room. <small>Use 2 lines. Foreword only for this column.</small> | | | |
| Room Number | If guest checklist for personal or professional housekeeping services. For personal housekeepers or small hotel/bedroom employees' tasks. | | | |
| Room | Any additional names or notes can be written by hand in the notes section. | | | |
| Room | Write the dates for the current week's tasks on the dates line above. | | | |
| Room | This is an editable PDF file that allows you to edit or delete the text in the Room and Task columns only. (Adobe Reader recommended.) | | | |
| Room | The columns to the right are for checking off which days of the week the individual tasks were completed. | | | |
| Room | NOTE: Tasks and task order cannot be changed. | | | |
| Room | Task | | | |
| Room | Task | | | |
| Room | Task | | | |
| Room | Task | | | |

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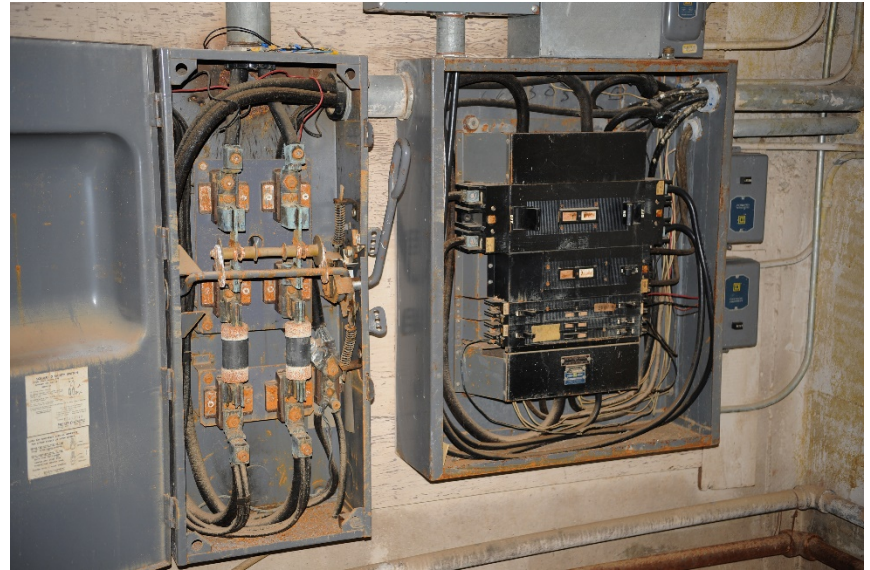


Applicable OSHA Standards



Electrical

- 29 CFR 1910 Subpart S (1910.301-399)



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Applicable OSHA Standards



Toxic and Hazardous Substances

- 29 CFR 1910 Subpart Z (1910.1000-1200)
- Hazard Communication (1910.1200)



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Applicable OSHA Standards

Hazard Communication



- The GHS was adopted by the United Nations in 2008
- OSHA incorporated GHS in 2012
- GHS is a living document and has been updated several times since OSHA's rulemaking
- OSHA's rulemaking was based on the third edition of the GHS and the UN recently completed the seventh
- Rulemaking harmonized the HCS to the latest edition of GHS

Applicable OSHA Standards



Potential Heat Illness Standard



- OSHA currently relies on the general duty clause to protect workers from heat illnesses
- Some states have a heat illness standard
- Will include outdoor and indoor work settings
- A Request for Information (RFI) was published on Oct 27 to begin a dialogue and engage with stakeholders
- Comments are due Dec 27
- There are 114 questions in the RFI



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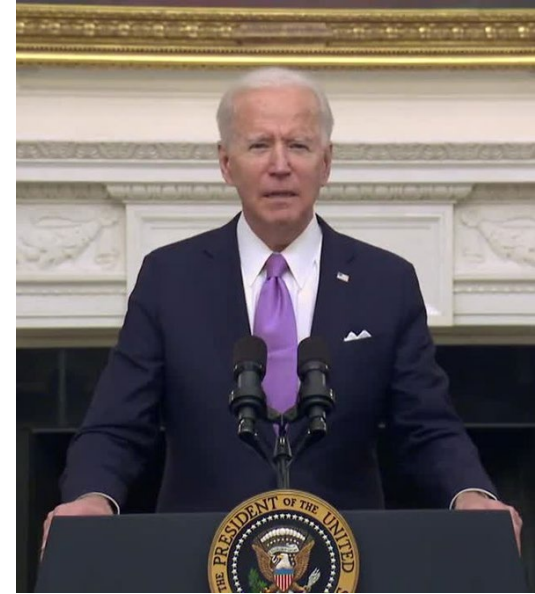
OSHA – COVID Standards



- OSHA originally proposed an ETS for all industry at the end of April (result of Jan 20 EO)
- Concerned about potential political fallout, the administration directed them to change direction
- COVID ETS was issued for health care only in June
- Guidance for other industries was updated to reflect current CDC guidance
- Some states have an ETS in place
- President Biden announced new COVID plan Sep 9

COVID-19 Action Plan

- “Vaccinate the Unvaccinated”
- Hard vaccine mandate for all federal employees, federal contractors and healthcare workers
- Instructed OSHA to issue a second COVID-19 ETS
 - ETS to include a soft vaccine mandate for larger employers



COVID ETS

(Published Nov 5)



- Applies to employers with 100 or more employees
- Paid time off for employees to get vaccinated
- Paid sick leave for time recovering from vaccination
- A written vaccination, testing and face covering policy
- A soft vaccine mandate (proof of fully vaccinated status or weekly negative test result)

COVID ETS



- Face coverings for unvaccinated workers
- Notice, medical removal and return to work procedures for positive COVID cases
- Provide information to employees (ETS, vaccine information and related issues)
- Reporting requirements for all work related COVID 19 hospitalizations or deaths

COVID ETS



- Most requirements go into effect Dec 6
- All unvaccinated employees must begin weekly testing or be removed from the workplace Jan 4
- Employers not required to pay for weekly testing
- Truck drivers generally exempt in most circumstances
- OSHA resources available including templates of policies

But...



Legal challenges are mounting

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Two Great AFIA Programs



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THANK YOU

AFIA'S 4 PROMISES



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— REPRESENTATION —



— EXPERTISE —



— ENGAGEMENT —

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