Feed Mill Safety

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Why should you have a safety program at your facility?

• Concern for your employees
• Cost of work-related accidents
• Compliance to government regulations
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 safety culture
Applicable OSHA Standards

Walking Working Surfaces – Fall Protection
- 29 CFR 1910 Subpart D (1910.21-30)
- Ladders, stairways, fall protection systems
Applicable OSHA Standards

Exit Routes and Emergency Planning

- Emergency Action Plan (1910.38)
- Fire Prevention Plan (1910.39)
Applicable OSHA Standards

Emergency Response

- 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)
Applicable OSHA Standards

Occupational Health and Environmental Control

- 29 CFR 1910 Subpart G (1910.94-98)
- Noise Exposure (1910.95)
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
- Programable 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)
Applicable OSHA Standards

Materials Handling and Storage
- 29 CFR 1910 Subpart N (1910.176-184)
- Powered Industrial Trucks (1910.178)
Applicable OSHA Standards

Powered Industrial Trucks

- Current standard based upon ANSI B56 from 1969
- Will 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)
Applicable OSHA Standards

Welding, Cutting and Brazing

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

Special Industries

• 29 CFR 1910 Subpart R (1910.261-272)
• Grain Handling Facilities (1910.272)
Applicable OSHA Standards

Electrical

• 29 CFR 1910 Subpart S (1910.301-399)
Applicable OSHA Standards

Toxic and Hazardous Substances

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

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