

Q&A for Hazard Assessment: The Safety Tool for Busy Brewers

Date: Thursday, January 17, 2019

Q: Where can I find a copy of the safety hazards placard?

A: Download the Hazard Assessment BMP found here, then look to pg. 17: <https://s3-us-west-2.amazonaws.com/brewersassoc/wp-content/uploads/2018/04/Hazard-Assessment-Principles-BMP.pdf>

Q: What deliverables would be necessary should OSHA inspect my Safety Plan?

A: There are two main types of written deliverables OSHA will want to see: 1) assessment of hazards and the corresponding hazard controls, and 2) any other applicable written programs required by workplace activities. The second part here may include such things as a written hazard communication program, fire protection plan, confined space safety program, energy control program (lockout/tagout), forklift training records, ad nauseum. "If it isn't written down, it didn't happen," said more than one OSHA inspector.

The hazard assessment documentation is the easiest and most flexible, and in my opinion, is the most important long-term influence of workplace safety. OSHA wants to see that the employer has looked for hazards in the workplace and put into effect controls to reduce those hazards. We have a basic template in .doc form located at: <https://www.brewersassociation.org/educational-publications/hazard-assessment-principles/>, click "assessment form" in the toolbox sidebar. A hazard assessment could even be handwritten on a piece of paper. You can find more elaborate ones on the web by searching for "JHA template" or "hazard assessment template," or similar. The important things are: 1) that they ARE written, and 2) that workplace hazard controls, training, recordkeeping, etc., specified by the hazard assessment are in force.

OSHA inspects workplaces as a skeptic would, using a principle called the "rebuttable presumption." They assume that the workplace is full of hazards and it is up to the employer to show that they have evaluated and controlled workplace hazards. Think of it this way: workplaces are considered rife with hazards until the employer has shown them to be controlled or non-existent. By performing hazard assessment and using hazard controls, employers provide their own defense against the rebuttable presumption.

Q: Any specific SOP for pallet racking in cold box? any requirement on the type of pallet racking used?

A: For the most part, OSHA's rules are "performance oriented." This means that rather than demanding that a pallet rack be rated to hold a specified load or be made of specific materials, OSHA wants you to use adequate storage that prevents the load from collapsing the shelving.

In some spheres of influence, OSHA does have prescriptive requirements, such as with the height of railings, the rise and run of stairs, and the like. But for the most part, OSHA lets the employer decide what is an adequate means to control the hazards.

This may not be the same answer that say, an FDA food safety inspector might give you. For example, if you are storing foods or ingredients on wood shelving, that may give the FDA heartburn, even though the shelving is supportive of the load.

Q: Are OSHA inspections currently on hold with the government shut-down?

A: OSHA is not currently part of the Federal government shutdown. State-run OSHA agencies are also still working.

Q: Working at several breweries I have seen various first aid kits, but most are basic with band-aids vs things for lacerations, burns, and more serious issues when time counts. Also make sure eye wash stations are clear for easy access and in working order

A: You can create an SOP for first aid kits. List the required stock list and check and refill first aid kits according to a regular schedule. Some companies hire a service to keep first aid kits stocked.

What goes in your first aid kit? Look to your hazard assessments. For example, if lacerations, minor burns, headaches, and ankle sprains are likely, then stock your first aid station accordingly.

Eye wash and shower stations are very important. They should be located quite close to where splashing could occur and clear aisles must be maintained. When something is in your eye you are essentially blind. You have to find the eye wash/shower without being able to see it.

P.s. You can do the same with your company's PPE storage area. Make a list of required PPE based on your hazard assessments and then restock according to a regular schedule or whenever employees notice a shortage.

Q: Can you tell us some mitigation techniques for avoiding heavy lifting over shoulder height?

A: The least expensive solution is to add steps so that the load is managed below chest height. After that you're looking at things like a forklift, lift gate, lift table, or similar.

Q: Is there a benefit to involving the employee or putting the onus on them entirely to help fill out the SOP and Hazard forms, or is it best practice to have the JHSC own this assessment completely for consistency?

A: Many companies engage the employee in developing hazard assessments. They know the steps of the task and the hazards as well as anyone. I, personally, prefer to make it a joint effort. This results in better buy-in adopting the new procedures that result.