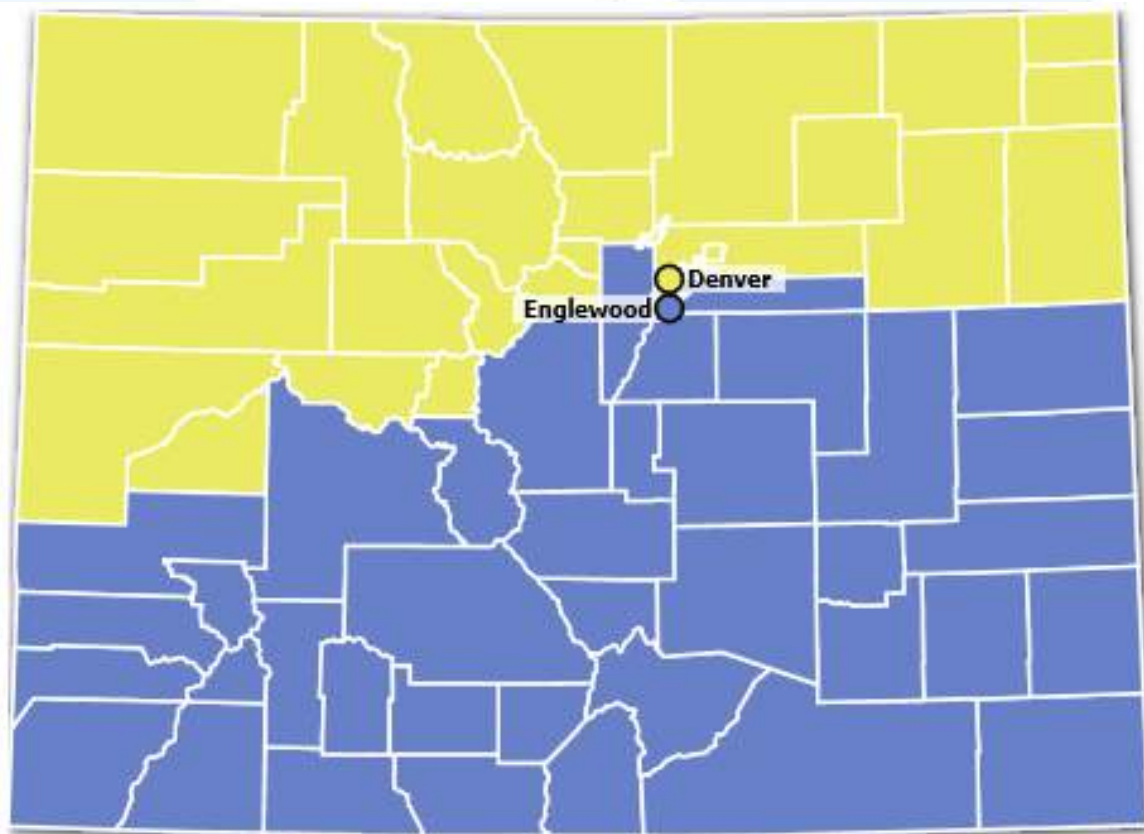


OSHA Inspections Under the Local Emphasis Program for Beverage Manufacturing

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Denver AO - 303-844-5285



Englewood AO
303-843-4500

Overview

- Why Beverage Makers?
- The Inspection Process
- OSHA Standards and Potential Hazards
- Compliance Assistance Resources
- Questions

What does OSHA do?

- Develops safety and health standards
- Conducts inspection and enforcement activities
- Produces compliance assistance products

Employer Rights and Responsibilities

- Employers must provide workplaces free from serious hazards
- Employers must provide training and protective equipment to employees
- Employers may develop workplace safety rules that exceed OSHA requirements
- Employers must enforce work rules to keep employees safe

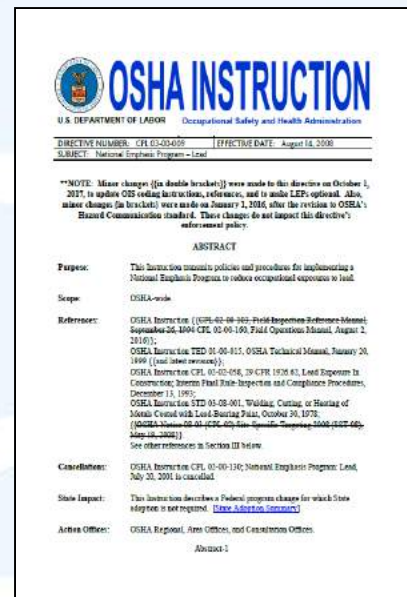
How Does OSHA come to inspect a facility?

- Programmed Inspections
 - National, Regional or Local Emphasis Programs
- Unprogrammed Inspections
 - Complaints (from employees or their reps)
 - Referrals (from other sources)
 - Reports of fatalities or accidents

FY 17 NEP's

- Amputations in Manufacturing
- Lead Exposures (GI and Construction)
- Federal Agency Targeting Inspection Program
- Hexavalent Chromium Exposures
- Process Safety Management
- Combustible Dust
- Trenching and Excavation
- Primary Metals Industries (Foundries)
- Shipbreaking

- <https://www.osha.gov/dep/neps/nep-programs.html>



FY 18 Regional and Local EPs (Region VIII)

- Regional Emphasis Programs
 - Fall Hazards in Construction
 - Roadway Work Zone Activities
 - Silica in Cut Stone and Slab Handling
 - Oil and Gas Industry
 - Grain Handling Facilities
 - Workplace Violence in Residential Intellectual and Developmental Disability Facilities
- Local Emphasis Programs
 - Hazards in Automotive Services (Billings/Bismarck/Englewood)
 - Asbestos Abatement (Englewood)
 - Scrap & Recycling (Englewood)
 - Wood Manufacturing and Processing (Billings)
 - Aircraft Support and Maintenance Facilities (Englewood)
 - **Beverage Manufacturing (Englewood)**

Who will be covered by the program?

- NAICS codes:
 - 312111 (Soft Drink Mfg)
 - 312112 (Bottled Water Mfg)
 - 312113 (Ice Mfg)
 - 312120 (Breweries)
 - 312130 (Wineries)
 - 312140 (Distilleries)
- Emphasis Programs can be found at:
<https://www.osha.gov/dep/leps/leps.html>

Why Beverage Makers?

- Bureau of Labor Statistics (BLS) data reported injury and illness rates higher than national averages
 - Most injury and illness rates around **double** nat'l avg
 - Musculoskeletal Disorders **three times** nat'l average.
 - Hearing Loss Cases **FIVE TIMES** nat'l average

Why Beverage Makers?

- In past 4 years, 22 OSHA inspections in CO, 29 citations issued
- Most common citations:
 - Respiratory Protection
 - Hazard Communication
 - Control of Hazardous Energy (Lockout/Tag-out)
 - Medical Services and First Aid
 - Personal Protective Equipment

The Inspection Process

- Opening conference
 - Discuss purpose and scope of inspection, inform employer of rights, and request documents
- Walkthrough/Inspection
 - Visual inspection of facility
 - Audio/Visual Recording/ Photos
 - Sampling (noise, inhalation hazards)
 - Measurements
 - Employee Interviews (**private and confidential**)

The Inspection Process

- Closing Conference
 - Summarize potential violations observed
 - Discuss employer rights/responsibilities
 - Discuss citation categories
 - Repeat
 - Willful
 - Serious
 - Other than Serious

Tips for a Successful OSHA Inspection

- Know the hazards in your industry
- Know your injury history/trends
- Conduct audits/hazard assessments
- Written Programs and Training Records
- Prepare your staff to participate
- Understand general employer requirements:

<https://www.osha.gov/as/opa/worker/employer-responsibility.html>

Frequently Cited OSHA Standards



UNITED STATES
DEPARTMENT OF LABOR



Find it in OSHA



Occupational Safety and Health Administration

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Frequently Cited OSHA Standards

This page allows the user to list the most frequently cited Federal or State OSHA standards for a specified 6-digit North American Industry Classification System (NAICS) code. Also available is [Industry Profile for OSHA Standard](#) which lists NAICS classifications having the most occurrences of citations for a specified OSHA standard.

Select number of employees in establishment:

☒ All ☐ 1-9 ☐ 1-19 ☐ 1-99 ☐ 20-49 ☐ 20-99 ☐ 50-99 ☐ 100-249 ☐ 1-249 ☐ 250+

Federal or State Jurisdiction:

Federal ▾

NAICS:

(Submit empty for NAICS list.)

Submit

The data shown reflects OSHA citations issued by the Federal or State OSHA during the specified fiscal year; see [definitions](#). If you are interested in obtaining the NAICS code for a particular industry, references are available on the [NAICS Manual](#). This manual contains descriptions of every NAICS sector.



UNITED STATES
DEPARTMENT OF LABOR

<https://www.osha.gov/pls/imis/citedstandard.html>



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NAICS Code: 312120 *Breweries*

Listed below are the standards which were cited by **Federal OSHA** for the specified NAICS Code during the period October 2017 through September 2018. Penalties are initial amounts. For more information, see [definitions](#).

Standard	Citations	Inspections	Penalty	Description
Total	25	11	\$55,558	<i>All Standards cited for Breweries</i>
19101200	7	4	\$4,000	Hazard Communication.
19100146	4	2	\$5,543	Permit-required confined spaces
19100178	3	2	\$500	Powered industrial trucks.
19100212	3	3	\$13,096	General requirements for all machines.
19100147	2	2	\$6,250	The control of hazardous energy (lockout/tagout).
19040029	1	1	\$300	Forms.
19040033	1	1	\$0	Retention and updating.
19100028	1	1	\$7,391	Safety requirements for scaffolding.
19100119	1	1	\$18,478	Process safety management of highly hazardous chemicals.
19100132	1	1	\$0	General requirements.
19100151	1	1	\$0	Medical services and first aid.

Anticipated OSHA Standards

- Powered Industrial Trucks
([1910.178](#))
- Control of Hazardous Energy
([1910.147](#))
- Ergonomics (OSH Act 1970, Section
(5)(a)(1))
- Process Safety Management
([1910.119](#))
- Hazardous Noise ([1910.95](#))
- Confined Spaces ([1910.146](#))
- Hazardous Chemical Exposure
([1910.1000](#), [1910.1200](#))
- Materials Handling and Storage
([1910.176](#))
- Grain Handling Facilities ([1910.272](#))

Electronic Recordkeeping

- Most employers with more than 10 employees in their company must keep OSHA 300 injury and illness logs
- Some of the those employers must submit that information electronically per the schedule below:

Submission year	Establishments with 250 or more employees in industries covered by the recordkeeping rule	Establishments with 20-249 employees In select industries	Submission deadline
2017	CY 2016 300A Form	CY 2016 300A Form	Dec 31, 2017
2018	CY 2017 300A, 300, 301 Forms	CY 2017 300A Form	July 1, 2018
2019 and beyond	300A, 300, 301 Forms	300A Form	March 2

What to Do?

- Conduct hazard assessments to identify hazards
 - Abate/mitigate those hazards
 - Achieve compliance with OSHA regs
 - Develop safety and health programs
 - Assess training needs
-
- Small employers without safety and health experience will likely need assistance

Compliance Assistance Resources

- OSHA Website (www.osha.gov)
 - [A-Z index](#), [regulations](#), [publications](#), [e-tools and advisors](#)
- Compliance Assistance Specialists
- [OSHA Consultation](#)
- [NIOSH](#) (National Institute of Occupational Safety and Health)

Compliance Assistance Resources

Compliance Assistance Quick Start



Step 1 Step 2 Step 3 Step 4 Step 5 Step 6 Step 7

Follow the steps below to identify the major OSHA general industry requirements and guidance materials that may apply to your workplace. These steps will lead you to resources on OSHA's website that will help you comply with OSHA requirements and prevent workplace injuries and illnesses.

- **Step 1:** OSHA Requirements That Apply to Most General Industry Employers
- **Step 2:** OSHA Requirements That May Apply to Your Workplace
- **Step 3:** Survey Your Workplace for Additional Hazards
- **Step 4:** Develop a Comprehensive Jobsite Safety and Health Program
- **Step 5:** Train Your Employees
- **Step 6:** Recordkeeping, Reporting and Posting
- **Step 7:** Find Additional Compliance Assistance Information



https://www.osha.gov/dcsp/compliance_assistance/quickstarts/general_industry/index.html



Occupational Safety and Health Administration

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[Directorate of Technical Support and Emergency Management](#) / [eTools](#), [eMatrix](#), [Expert Advisors](#) and [v-Tools](#)

eTools, eMatrix, Expert Advisors and v-Tools

eTools and the eMatrix are "stand-alone," interactive, Web-based training tools on occupational safety and health topics. They are highly illustrated and utilize graphical menus. Some also use expert system modules, which enable the user to answer questions, and receive reliable advice on how OSHA regulations apply to their work site. Expert Advisors are based solely on expert systems and v-Tools are prevention video training tools. Selected eTools are available as [downloadable](#) files for off-line use.

Other [training and reference materials](#) are also available from the OSHA Directorate of Training and Education (DTE). In addition, OSHA also has other training [videos](#) available.

eTools

- [Ammonia Refrigeration](#) (08/2014)
- [Battery Manufacturing](#) (02/2004)
- [Construction](#) (08/2014) | [Spanish](#) (Translation Updated 02/2006)
- [Electric Power Generation, Transmission, and Distribution](#) (01/2010)
- [Evacuation Plans and Procedures](#) (09/2002)
- [Eye and Face Protection](#) (07/2002)
- [Hazard Identification](#) (07/2014)
- [Hospital](#) (02/2002)
- [Lead: Secondary Lead Smelter](#) (12/2002)
- [Lockout/Tagout](#) (09/1999)
- [Logging](#) (10/1998)
- [Machine Guarding](#) (06/2007)
- [Nursing Home](#) (10/2000)
- [Oil and Gas Well Drilling and Servicing](#) (05/2009)
- [Poultry Processing](#) (06/2001)

Ergonomics-related eTools

- [Baggage Handling](#) (09/2003)
- [Beverage Delivery](#) (01/2001)
- [Computer Workstations](#) (08/2003)
- [Electrical Contractors](#) (07/2003)
- [Grocery Warehousing](#) (01/2001)
- [Printing Industry](#) (08/2006)
- [Sewing](#) (01/2001) | [Spanish](#) (10/2001)

Expert Advisors

- [Asbestos](#)
- [Cadmium Biological Monitoring Advisor](#)
- [Confined Spaces](#)
- [Electronic Health and Safety Program \(eHASP\)₂](#)
- [Evacuation - Am I Required to have an Emergency Action Plan?](#)

Prevention Videos (v-Tools)



Construction Hazards. The videos show how quickly workers can be injured or killed on the job and are intended to assist those in the industry to identify, reduce, and eliminate construction-related hazards. Most of the videos are 2 to 4 minutes long, presented in clear, easily accessible vocabulary, and show common construction worksite activities. The videos may be used for employer and worker training.

DISCLAIMER: Some of the Expert Advisors referenced on this page were designed several years ago and although they should function using the latest versions of Windows without problem, there may be instances where they are no longer compatible (i.e., Windows 64-bit).



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Help for Employers

How to comply, go beyond compliance, and improve your bottom line

Am I covered by OSHA?

What are my responsibilities as an employer?

How do I identify and control safety and health hazards in my business?

How do I comply with OSHA standards and rules?

How do I comply with OSHA's injury and illness recordkeeping, reporting and poster requirements?

How can I go beyond compliance and improve my bottom line?

What happens if OSHA inspects my workplace?

What resources does OSHA have for my small business?

Where can I get information on safety and health training for my workers?

What rights do my workers have under the OSHA law?

Where can I find resources to protect my diverse workforce?

How can I work cooperatively with OSHA?

What if I am in a state with an OSHA-approved State Program?

Remember: Under the Occupational Safety and Health Act, employers are responsible for providing a safe and healthy workplace and workers have rights.

Quick Links ▾



Updates to OSHA's Recordkeeping/Reporting Rule

Final Rule Requiring Certain Employers to Submit Injury and Illness Data Electronically



Quick Start OSHA Compliance Assistance Quick Start

Compliance Assistance Quick Start is a tool to introduce employers and workers, especially those at new or small businesses, to the compliance assistance resources on OSHA's website. Quick Start currently includes modules for:

<https://www.osha.gov/employers/index.html>



Occupational
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Administration

Interactive Hazard ID Safety Tool

- Helps small businesses learn how to identify workplace hazards
- Interactive features challenge users: “Can you spot all the hazards?”
- Now updated with a new healthcare scenario and two new visual inspections



osha.gov/hazfinder

OSHA Consultation

In FY 2017, responding to requests from small employers looking to create or improve their workplace safety and health programs, OSHA's On-Site Consultation Program conducted approximately 26,000 visits to small business worksites covering over 1.1 million workers across the nation.



OSHA's Consultation Directory
Find the Local Office in Your State

OSHA Consultation in Colorado

- OSHA Consultation Office
 - Free
 - Confidential
 - On-site audits
 - Training
 - Sampling/Monitoring
 - Program Review



<http://csu-cvmbs.colostate.edu/academics/erhs/osha/Pages/default.aspx>

Colorado State University
Health and Safety Consultation Department of Environmental and Radiological Services
1681 Campus Delivery
Ft. Collins, CO 80523
(970) 491-6151

Compliance Assistance Resources

- Regional Compliance Assistance Newsletter
- Send request to olaechea.john@dol.gov to subscribe

OSHA Region VIII Compliance Assistance Newsletter

Spring 2018

OSHA's On-site Consultation Program offers free and confidential safety and occupational health advice to small and medium-sized businesses. To find a program office near you, click on the map.



OSHA's Consultation Directory
Find the right office to help you.

Work Safely with Silica

The Center for Construction Research and Training (CPWR) has created an [eTool](#) that takes employers through a step-by-step assessment of their workplace and assists them in determining appropriate dust controls and creating a written plan to minimize silica dust hazards.

Control the Dust 

Tools to help employers control the dust and reduce the hazard. The tool is an online tool that can help you identify dust hazards in your workplace and create a written plan to control the dust. It includes a checklist of dust control measures and a template for a written plan. It also includes a list of resources for more information on dust control.

[CREATE A PLAN](#)
[Click Here](#)

Top Stories/National News

OSHA Issues Final Rule for Respirable Crystalline Silica

The Occupational Safety and Health Administration (OSHA) has [issued a final rule](#) to curb lung cancer, silicosis, chronic obstructive pulmonary disease and kidney disease in America's workers by limiting their exposure to respirable crystalline silica. The rule is comprised of two standards, one for [Construction](#) and one for [General Industry and Maritime](#). The new rule requires that employers use engineering controls – such as ventilation and wet methods for cutting and sawing crystalline silica-containing materials – to reduce workers' exposure to silica dust.

OSHA issued this rule because the previous permissible exposure limits (PELs) for silica were outdated, inconsistent and did not adequately protect worker health. OSHA determined that occupational exposure to respirable crystalline silica at the previous PELs resulted in significant risk of developing or dying from silicosis, lung cancer, other lung diseases or kidney disease. OSHA estimates that the rule will save over 600 lives and prevent more than 900 new cases of silicosis each year, once its effects are fully realized.

About 2.3 million workers are exposed to respirable crystalline silica in their workplaces, including 2 million construction workers who drill, cut, crush, or grind silica-containing materials such as concrete and stone, and 300,000 workers in general industry operations such as brick manufacturing, foundries, and hydraulic fracturing, also known as fracking. The Final Rule is projected to provide net benefits of about \$7.7 billion, annually.

The construction standard provides for flexible alternatives, especially useful for small employers. Employers can either use a control method employed in Table 1 or they can measure workers' exposure and independently determine which dust control methods work best to limit exposures in their workplaces.



SOME KEY PROVISIONS OF THE SILICA STANDARD:

- Reduces the permissible exposure limit (PEL) for respirable crystalline silica to 50 micrograms per cubic meter of air (50ug/m3) as an 8-hour average
- Requires employers to use engineering controls to limit exposure
- Requires employers to provide respirators when engineering controls cannot adequately limit exposures
- Requires employers to develop a written control plan
- Requires employers to offer medical exams to highly exposed workers

COMPLIANCE DEADLINES

[Construction:](#) June 23, 2017

[General Industry/ Maritime:](#) June 23, 2018

[Hydraulic Fracturing:](#) June 23, 2018 for all provisions except Engineering Controls, which have a compliance date of June 23, 2021



**Occupational
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Alliances

- Participants are groups committed to worker safety
 - Unions, trade associations, consulates, educational institutions
- Work to develop compliance assistance tools and resources, share information, and educate workers
- No exemptions from inspections
- Formal agreement
- Work plan required

Alliance Program Info:

<https://www.osha.gov/dcsp/alliances/index.html>



Questions?



Disclaimer

- This information has been developed by an OSHA Compliance Assistance Specialist and is intended to assist employers, workers, and others as they strive to improve workplace health and safety. While we attempt to thoroughly address specific topics, it is not possible to include discussion of everything necessary to ensure a healthy and safe working environment in a presentation of this nature. Thus, this information must be understood as a tool for addressing workplace hazards, rather than an exhaustive statement of an employer's legal obligations, which are defined by statute, regulations, and standards. Likewise, to the extent that this information references practices or procedures that may enhance health or safety, but which are not required by a statute, regulation, or standard, it cannot, and does not, create additional legal obligations. Finally, over time, OSHA may modify rules and interpretations in light of new technology, information, or circumstances; to keep apprised of such developments, or to review information on a wide range of occupational safety and health topics, you can visit OSHA's website at www.osha.gov.