

OSHA INSPECTIONS THE MAINE EXPERIENCE

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The Maine Occupational Safety and Health Administration (OSHA) has introduced a Local Emphasis Program for the Food and Kindred Products Manufacturing Industries. The purpose is to reduce the incidence of occupational injuries and illnesses that are found in these industries. Maine's OSHA specialists found the Maine rate of illness or injury in these industries to be higher than the national average and have instituted an inspection program to identify reasons why this may be occurring. The inspection program will cover 49 different food production industries, including maple syrup. While maple syrup is included along with the great variety of other food production industries such as flour mixes, dog and cat food and poultry slaughter, the concern in this program is with the larger producers of food products with many employees and not the small operations with few employees although everyone will be inspected.

OSHA is only concerned with worker safety and not food safety so the fact that Maine producers have licenses from the state does not affect or exempt them from these OSHA inspections. Family run operations will not be inspected since family members are not technically employees. As defined by OSHA, the sugarbush is an agricultural enterprise and therefore subject to different rules than a manufacturing operation, which is defined as the sugarhouse and any facility that produces a value added product from the sap or syrup.

Nationally, the ten most commonly cited OSHA standards with which food manufacturing worksites are not in compliance are:

- Mechanical Power-Transmission Apparatus: examples—Chains, sprockets and pulleys
- Electrical, Wiring Methods, Components & Equipment: examples—lack of grounding and improper use of extension cords
- Hazard Communication: example—chemical safety equipment, MSDS sheets
- General Guarding Requirement for All Machines: example—guards removed from machinery
- Control of Hazardous Energy, Lockout/Tagout: example—improper lockouts when working on machinery
- General Wiring Requirements: example—insufficient wiring or fuses for the size of the facility
- Portable Fire Extinguishers: example—missing or outdated
- Guarding Floor & Wall Openings & Holes: example—open trap doors, wall openings, lack of guardrails for protection from falls or body harnesses
- Abrasive Wheel Machinery: example—bench grinders
- Means of Egress, General Requirements: examples—exit signs, adequate exits and cleared of snow and ice in winter

Soft tissue injuries are another area of concern and industry specific ergonomic guidelines for the food processing industry nationwide will be the next set of ergonomic guidelines developed.

They will be available on the OSHA website in late winter or early spring of 2003 at <http://www.osha.gov/ergonomics/index.html>.

**HOW TO BE IN COMPLIANCE WITH OSHA STANDARDS
GUIDELINES FOR AN OSHA INSPECTION**
From the Federal Register Vol. 54, No. 16

Management and Commitment

- Clearly state a worksite policy with clear goals for the safety program. (Post a safety handbook on the wall or where employees gather.)
- Provide visible management support and encourage employee involvement.
- Provide a reliable system for employees to inform management of safety issues.
- Keep records of trainings, drills etc.
- Look for other sources of safety information besides OSHA: NEC (National Electrical Code), ANSI (America National Standards Institute) in order to prevent or control hazards not addressed in the government standards.



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Work Analysis

- Conduct a comprehensive baseline worksite survey for safety and health to identify not only existing hazards but also conditions and operations in which changes might occur to create hazards.
- Analyze new and planned facilities, materials and equipment for safety.
- Perform routine job hazard analysis annually.

Hazard Prevention and Control

- Establish procedures for current and potential hazards and document your changes to minimize hazards.
- Establish training procedures and be sure all employees follow procedures.
- Provide personal protective equipment.
- Provide for facility and equipment maintenance.
- Plan and prepare for emergencies and conduct drills so that employee response is second nature.
- Provide first aid kits and emergency contact information for medical care.

Safety and Health Training

- Analyze the work to identify unrecognized hazards.
- Maintain physical protections in the work area.

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- Reinforce employee training on the nature of potential hazards and needed protective measures.
- Document employee comprehension through observation, testing or oral questioning.
- Display the OSHA poster found on this website: <http://www.osha.gov/Publications/osh3165.pdf>

Most sugar operations are simpler than large food production operations and will result in few standards violations. However, there are many easy things a producer who might be subject to safety inspections can do before an inspection takes place. Survey the operation for the frequent safety standard violations listed above and correct any violations. Display an attitude of safety by incorporating the simple guidelines listed above for an OSHA inspection. Label exits, post a safety manual for staff and inspectors to refer to, post emergency numbers by the phone, check fire extinguishers to make sure they are fully charged and make sure they are accessible. Lastly, make sure to have OSHA's poster on the wall if you think you might be receiving a visit. Remember that safety is both attitude and action and the accident you prevent could be your own.



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