



OCBA FAQ

Hazard Communication

Q.	What is a hazard communication program?
A.	OSHA requires employers who have hazardous chemicals in their workplace to have and implement a hazard communication program. The program must address chemical container labeling, safety data sheets (SDSs) and employee training.
Q.	Do I have to train my employees on Safety Data Sheets (SDS)?
A.	Yes. The hazard communication standard requires employers to train their employees on how to access the facility's SDSs and have a general understanding of the information contained in them.
Q.	How do I get SDSs for the chemicals I have at my facility?
A.	If you did not receive an SDS from your chemical supplier, you must request one. Many times SDSs can be found online from the manufacture or distributor.

Electrical

Q.	What is lockout/tagout (LO/TO)?
A.	The term lockout/tagout is a term that refers to the practices and procedures used to protect workers from a release of hazardous energy. Hazardous energy sources include electrical, mechanical, hydraulic, pneumatic, chemical, thermal or other sources in machines and equipment that can become hazardous to workers while performing servicing or maintenance activities.
Q.	Does every piece of equipment have to have a LO/TO procedure?
A.	Yes, any piece of equipment that has the potential to release hazardous energy, must have lockout/tagout procedures associated with it.
Q.	What electrical safety training do my employees need?
A.	Most employees should receive training on how to de-energize electrical equipment before inspection or making any repairs; how to use and inspect electrical tools, and how to use appropriate PPE. Any employees who will be performing servicing or maintenance activities on energized equipment will need to receive additional training on the OSHA and facility's lockout/tagout program, elements of the energy control procedures relevant to their job responsibilities, and equipment specific procedures.

Confined Space

Q.	What is a confined space?
A.	<p>OSHA (29 CFR 1910.146(b)) defines a confined space as a space that:</p> <ol style="list-style-type: none"> 1. Is large enough and so configured that an employee can bodily enter and perform assigned work; and 2. Has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.); and 3. Is not designed for continuous employee occupancy.
Q.	What is the difference between a confined space and a permit required confined space?
A.	<p>OSHA (29 CFR 1910.146(b)) defines a non-permit required confined space as a space that does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.</p> <p>A permit-required confined space is a confined space that has one or more of the following characteristics:</p> <ol style="list-style-type: none"> 1. Contains or has a potential to contain a hazardous atmosphere; 2. Contains a material that has the potential for engulfing an entrant; 3. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or 4. Contains any other recognized serious safety or health hazard.
Q.	Who can enter a permit required confined space?
A.	Trained authorized entrants and rescue personnel, ONLY!
Q.	What training do my employees need to enter a confined space?
A.	Each employee who is or is potentially involved in confined space entries must be trained before entering a space, before first assigned duty in a confined space, whenever there is a change in the employee's duties or assignment, whenever there is a change in the permit space itself, or whenever it is determined that there have been or must be changes in or deviations from existing procedures. Employees should fully understand the roles and training requirements for attendants, entrants, entry supervisors, and rescue personnel.

PPE/Safety Equipment

Q.	What personal protective equipment (PPE) should my employees be wearing?
A.	In most general industry settings safety shoes, safety glasses, and hearing protection are sufficient. However, in order to ensure all appropriate PPE has been identified for a specific work-related task, employers should conduct a Job Hazard/Safety Analysis (JH/SA).
Q.	What PPE/work clothes would be useful to prevent injuries from burns/boil-overs?
A.	Boil-over sensors can be installed on new or existing kettles; remote steam shut-off valves; food-grade de-foaming agents kept in the area; tall boots, not tucked into pant legs; heat and liquid resistant aprons; and kettle hatch splash shields. In order to ensure all appropriate PPE has been identified for a specific work-related task, employers should conduct a Job Hazard/Safety Analysis (JH/SA).
Q.	How can I monitor for carbon dioxide (CO ₂)?
A.	Portable monitors are good for spot checks, walk arounds, and leak source identification. Fixed monitoring systems are more sophisticated and will automatically notify personnel to changing conditions. These monitors can also be integrated with ventilation systems to automatically turn on exhaust fans should the detection threshold be met or exceeded.

Fork Trucks

Q.	Does my fork truck have to have a back-up alarm?
A.	No. OSHA regulations state that “certain operating conditions may required the use of additional warning devices, such as back up alarms”; but, they do prohibit the removal/disconnecting of a back up alarm if the fork truck came equipped with one.
Q.	What types of inspections do I need to do on my fork truck?
A.	All fork trucks must be examined daily before use, fork trucks used on a round-the-clock basis must be examined after each shift. The inspection should include a pre-start visual check followed by an operational inspection. Inspections are not required to be documented, however 29 CFR 1910.178(q)(7) states that “Industrial trucks...shall not be placed in service if the examination shows any condition adversely affecting the safety of the vehicle.”

Safety Programs and Recordkeeping

Q.	What safety programs do I have to have?
A.	There are over 35 written program requirements in OSHA's General Industry Standards. While many will not apply to your operations, it is important to review each standard's requirements to determine applicability. Typical written safety plans that should be at your facility, include but are not limited to, Emergency Action Plans, Energy Control Procedures (Lockout/Tagout), Fall Protection, Fire Prevention, Grain Handling Facility Housekeeping, Hazard Assessments, and Hazard Communication.
Q.	Who can do safety training?
A.	More than 100 of OSHA's current standards contain training requirements and in most cases, the OSHA General Industry standards only requires that the trainer have health and safety expertise and instructional skills. There are OSHA 10 and 30-Hour General Industry voluntary training courses available. The 10-hour course focuses more on an awareness of common safety and health concerns, while the 30-hour course is more appropriate for those employees with some safety program responsibilities. Neither course satisfies any OSHA standard specific training requirements, therefore employers are still responsible for providing that additional training.
Q.	Do I need an emergency response plan for my brewery?
A.	OSHA requires certain facilities and operations to have a written emergency action plan. Examples include facilities where employees are required to evacuate when a fire alarm is sounded and grain handling facilities. Some facilities are not required to have a written plan, but all facilities are strongly encouraged by OSHA to have an emergency action plan in place.
Q.	What is an OSHA 300 and 300A Log?
A.	<p>The Log of Work-Related Injuries and Illnesses (Form 300) is used to document, classify and note the extent of work-related injuries and illnesses. When an incident or illness occurs in the workplace the 300 Log is used to record the details of what and how it happened.</p> <p>The OSHA 300A is a summary form that provides the total numbers of work-related injuries and illnesses. The 300A form is required to be posted, annually from February 1 and April 30, in a visible location so employees can see the types of injuries occurring.</p>
Q.	If we didn't have any work-related injuries, do we still need to fill out the OSHA 300 Log?
A.	The 300 Log should be completed as injuries or illnesses occur throughout the year, but if you did not have any work-related injuries or illnesses during the year, you still need to complete and post the 300A Summary Log.
Q.	What do I do with the OSHA 300 Log?
A.	Annually, post the 300A Summary of Work-Related Injuries and Illnesses, in an employee common area from February 1 to April 30.