

Hazard Elimination Partnership Agreement

Grain and Feed Association of Illinois and the Occupational Safety and Health Administration

1. Situation Analysis

For the past several years, the Aurora and Peoria OSHA offices of Illinois have participated in a Local Emphasis Program (LEP) for Grain Handling Facilities. The Grain and Feed Association of Illinois (hereafter referred to as GFAI) was a key participant in both the outreach and enforcement components of this emphasis program that was the first of its type in the grain industry in Illinois. Since the LEP has expired, the parties are interested in a partnership that will continue to focus attention on health and safety. The partnership will also allow OSHA to address hazards at facilities with just a few employees. Last year only 25% of the LEP sites were inspected due to size limitation. The partnership has no size limitation for the number of employees. Since hazards can be found at all sizes of facilities, including ones with less than 10 employees, the partnership will serve as an additional method to control hazards and encourage the implementation of effective safety and health programs.

The object of the partnership is to show the value of using cooperative activities and leveraging industry associations to eliminate hazards. The partnership will expand outreach efforts to members of the GFAI. The partnership will increase the participants' knowledge of safety and health programs and promote the use of effective controls for a number of serious hazards associated with the industry. During the outreach/training sessions, OSHA will encourage the implementation of effective safety and health programs, focus attention on industry hazards, and increase awareness of health and safety issues that specific OSHA standards may not address. The partnership will focus attention on the number of hazards member companies voluntarily control and allow OSHA to recognize the industry's positive efforts.

2. Identification of Partners

The partnership is between the GFAI and Illinois Offices of the Occupational Safety and Health Administration. The GFAI is expected to encourage the participation of member company employers, employees, and/or their representatives from individual workplaces within the state of Illinois.

3. Goals and Measurement

This partnership will attempt to prevent work related fatalities and serious injuries by eliminating hazards and establishing a foundation for safety and health activity.

3.1. The partnership will result in an increase in the number of machine guarding hazards eliminated or controlled at GFAI member facilities through voluntary efforts. OSHA will provide at least 3 separate outreach/training sessions within 120 days of signing the agreement to increase the awareness of potential hazards, describe OSHA machine guarding requirements, and discuss control methods to address machine guarding hazards. OSHA will also describe the availability of the Illinois Department of Commerce and Community Affairs On-site Safety and Health Consultation. Following the outreach/training sessions, the GFAI will work with member facilities to eliminate and control the machine guarding hazards. GFAI will be responsible for identifying the number of machine guarding hazards eliminated or controlled.

Issue. Increase the number of machine guarding hazards eliminated or controlled at GFAI member facilities.

Impact: Member companies will voluntarily eliminate machine guarding hazards at their facilities.

Measurements: GFAI will collect data as to the number of machine guarding hazards eliminated or controlled at member facilities, customer feedback/evaluation of the outreach presentations, and data corresponding to the summary line items on the OSHA-300A for facilities required to maintain the form.

Time Frame: 2 calendar years for hazard elimination and data collection.

Completion Date: Three years.

OSHA Resources: OSHA will provide at least 3 outreach/training sessions for member facilities and work with the GFAI to review the collected data and complete the partnership evaluation.

3.2. The Partnership will result in an increase in the number of periodic lockout inspections completed by GFAI member facilities. The inspection shall address the requirements of 29 CFR 1910.147(c)(6)(i) and (ii). An employer is required to complete periodic self-inspections to identify inadequacies in the lockout program and deviations from the procedures. OSHA will provide at least 3 separate outreach/training sessions within 120 days of signing the agreement to increase the awareness of the lockout requirements, potential hazards, and effective controls. OSHA will also describe the availability of the Illinois Department of Commerce and Community Affairs On-site Safety and Health Consultation. Following the outreach/training sessions, the GFAI will work with member facilities to complete and document periodic lockout inspections. GFAI will be responsible for identifying the number of facilities that have completed the periodic lockout inspection.

Issue. Increase the number of periodic lockout inspections completed by GFAI member facilities.

Impact: Member companies will identify inadequacies in their lockout program and deviations from their procedures and voluntarily take steps to improve their lockout program.

Measurements: GFAI will collect data as to the number of periodic lockout inspections completed at member facilities, customer feedback/evaluation of the outreach presentations, and data corresponding to the summary line items on the OSHA-300A for facilities required to maintain the form.

Time Frame: 2 calendar years for periodic lockout inspections and data collection.

Completion Date: Three years.

OSHA Resources: OSHA will provide at least 3 outreach/training sessions for member facilities and work with the GFAI to review the collected data and complete the partnership evaluation.

3.3. The partnership will result in an increase in the number of fall hazards eliminated or controlled at GFAI member facilities through voluntary efforts. OSHA will provide at least 3 separate outreach/training sessions within 120 days of signing the agreement to increase the awareness of potential fall hazards, describe the OSHA requirements, and discuss control methods to address fall hazards. OSHA will also describe the availability of the Illinois Department of Commerce and Community Affairs On-site Safety and Health Consultation. Following the outreach/training sessions, GFAI will work with member facilities to eliminate and control fall hazards. GFAI will be responsible for identifying the number of fall hazards eliminated or controlled.

Issue. Increase the number of fall hazards eliminated or controlled at GFAI member facilities.

Impact: Member companies will voluntarily eliminate fall hazards at their facilities.

Measurements: GFAI will collect data as to the number of fall hazards eliminated or controlled at member facilities, customer feedback/evaluation of the outreach presentations, and data corresponding to the summary line items on the OSHA-300A for facilities required to maintain the form.

Time Frame: 2 calendar years for hazard elimination and data collection.

Completion Date: Three years.

OSHA Resources: OSHA will provide at least 3 outreach/training sessions for member facilities and work with GFAI to review the collected data and complete the partnership evaluation.

3.4. The partnership will result in an increase in the number of GFAI member facilities that develop action items for their safety and health program. OSHA will provide at least 3 separate outreach/training sessions within 120 days of signing

the agreement to increase the awareness of effective safety and health programs. OSHA will discuss the elements of an effective program including: management commitment, employee involvement, hazard recognition, hazard control, training, and continuous improvement. Following the outreach/training sessions, GFAI will work with member facilities to develop action items to improve their safety and health programs. GFAI will be responsible for identifying the number of facilities that develop and implement action items to improve their safety and health program.

Issue. Increase the number of facilities that develop effective safety and health programs at GFAI member facilities.

Impact: Member companies will voluntarily develop action items for the continuous improvement of their safety and health program.

Measurements: GFAI will collect data as to the number of facilities that develop and implement action items to improve their safety and health program, customer feedback/evaluation of the outreach presentations, and data corresponding to the summary line items on the OSHA-300A for facilities required to maintain the form.

Time Frame: 2 calendar years for implementation and data collection.

Completion Date: Three years.

OSHA Resources: OSHA will provide at least 3 outreach/training sessions for member facilities and work with GFAI to review the collected data and complete the partnership evaluation.

4. Safety and Health Programs

GFAI and OSHA agree to encourage effective safety and health programs that include management commitment, employee involvement, hazard recognition, hazard control, training, and continuous improvement.

5. Employee Rights

GFAI member companies are required to ensure employees are aware of and afforded their rights under the OSH Act.

6. Stakeholder Involvement

GFAI will select at least 3 sites throughout the state of Illinois for outreach/training presentations. GFAI will take care of all necessary arrangements. All member companies will be invited and encouraged to attend. GFAI will be responsible for collecting all of the data necessary to complete the annual evaluation and sharing the information by April 16, of each year.

7. OSHA Incentives

All GFAL member companies will be invited to participate in the outreach/training sessions.

GFAL member companies with effective safety and health programs may be afforded up to 25% penalty relief for good faith efforts, in the event of an OSHA inspection resulting in a citation.

8. OSHA Inspections

All GFAL member companies will remain subject to OSHA inspections and investigations in accordance with agency procedures. Participation in the partnership will not be used as a method to target companies for site specific or verification inspections. OSHA will continue to investigate fatalities and catastrophes that occur at member companies. OSHA will continue to investigate all complaints and referrals received by the Illinois Area Offices in accordance with OSHA Instruction CPL 2.115, Complaint Policies and Procedures.

9. Program

A joint evaluation will be completed at 1-year intervals each September to determine if the program needs to be modified, discontinued, or could be improved. A written evaluation will be sent to the Directorate of Federal-State Operations.

10. Leveraging

This partnership requires GFAL member facilities to identify and eliminate serious workplace hazards. GFAL agrees to collect data designed to reflect the impact of the outreach/training activities. The partnership requires an initial commitment of time to conduct the outreach/training. The resources that will be used will be validated by the partnership's expected positive impact in the form of effective safety and health programs and the elimination of hazards. The benefits of the partnership will be long-term effects on safety and health in the industry and serve as a positive foundation for similar partnerships.

11. Termination

The partnership will be terminated when GFAI or the Illinois Area Directors determine that the project does not coincide with the GFAI or OSHA Area office goals, the primary parties withdraw from the Partnership; or when the goals of the program have been met. The program is expected to run until October 1, 2004.