OSHA REGIONAL NOTICE

U.S. DEPARTMENT OF LABOR — Occupational Safety and Health Administration

DIRECTIVE NUMBER: CPL 17/06 (CPL 04)	**EFFECTIVE DATE:** October 1, 2016
SUBJECT: Regional Emphasis Program addressing Sanitation and Clean-up operations in the NAICS Groups 311xxx & 3121xx.	
REGIONAL IDENTIFIER: REGION IV	

ABSTRACT

Purpose: To identify and reduce or eliminate the workplace hazards associated with sanitation and clean-up operations in the NAICS Groups 311xxx & 3121xx.

References:

- OSHA Instruction CPL 02-00-160, Field Operations Manual (FOM)
- OSHA Instruction CPL 04-00-001, Procedures for Approval of Local Emphasis Program and Experimental Programs
- OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections
- OSHA Instruction CPL 03-00-019 , National Emphasis Program on Amputations

Cancellation: Regional Emphasis Program CPL 16/06, addressing Sanitation and Clean-up operations in the Major SIC Group "20" - Food and Kindred Products. This Instruction replaces and updates an earlier version.

State Impact: None

Action Offices All Federal Enforcement Offices in Region IV

Originating Office: Enforcement Programs

Contact: Billie Kizer, Assistant Regional Administrator Enforcement Programs, 678-237-0400

By and Under the Authority of:

KURT A. PETERMEYER
Regional Administrator

I. PURPOSE:

This notice renews a Regional Emphasis Program for hazards associated with sanitation and clean-up operations in the NAICS Groups 311xxx & 3121xx.

II. SCOPE:

This REP applies to the Federal area offices in Region IV

III. EXPIRATION:

This notice expires within one year of the effective date, unless extended.

IV. BACKGROUND:

Sanitation work is one of the most hazardous jobs at establishments which manufacture or process foods and beverages for human consumption. According to information contained in the OSHA Poultry Processing Industry e Tool, "the daily sanitation or clean-up crew has the responsibility of cleaning all product contact surfaces throughout the plant to comply with requirements of the Food Safety and Inspection Service (FSIS), U.S. Department of Agriculture. If the clean-up crew has not done a satisfactory job, the FSIS inspector will not allow the plant to begin a production shift. The sanitation crew must remove all guards and blades from the processing equipment to clean thoroughly. In some rare cases, the machinery must remain energized for these employees to do their job. In these rare cases such as operational testing of machines or equipment, the employer is still obligated to ensure that employees are protected from coming into contact with moving machine parts or energized parts. Depending on the part of the country, in which the plant is located, the sanitation crew may be plant employees or they may work for a contractor." Sanitation and clean-up crew workers also may be entry-level employees who need extra training to become familiar with the hazards of their work and methods to reduce their exposure to hazards.

As reported in the e Tool, the sanitation workers and clean-up crews are exposed to most of the safety and health hazards found in any food and beverage manufacturing/ processing plant, including:

- Amputation hazards from moving equipment during cleaning operations.
- Cuts and lacerations hazards when removing blades from equipment.
- Struck by, struck against, and caught in equipment, such as chiller paddles, or when climbing over or under equipment.
- Slips, trips and fall hazards, whether from ladders or climbing on equipment, slipping on wet surfaces, or tripping over drain covers that have been removed and not replaced. Strains, sprains, and/or fractures may result.
- Electrical shock hazards, which is an increased risk in meat packing, fish and poultry processing plants because of the wet environment.
- Chemical hazards, such as cleaners, that can cause skin or eye irritation or burns.

Some of the most horrific accidents investigated in Region IV occurred in the food and beverage manufacturing industry. For example, on August 16, 2012, during the cleaning of a palletizer, an employee was crushed when the supervisor activated the palletizer while the employee was underneath in the palletizer. The investigation resulted in the issuance of nine serious violations and two willful violations with proposed penalty of $110,000. The willful violations addressed the company failing to develop and maintain lockout/tagout specific procedures to prevent the unexpected release of energy during maintenance or repair and not instructing employees on the use of procedures. In addition, the serious violations proposed were for the employer failing to guard an opening, failing to provide employees with locks to de-energize equipment, failing to provide authorized employees with lockout/tagout training, and not performing periodic inspection of lockout/tagout procedures.

The purpose of this local emphasis program is to reduce the number of injuries suffered by sanitation and clean-up crew workers in the food and beverage manufacturing/ processing industries.

V. ACTION:

OSHA personnel shall ensure that the procedures contained in this notice are followed when conducting outreach and inspections in the covered NAICS codes.

VI. PROCEDURES:

For all inspections (complaint, referral, fat/cat and accident) conducted in food and beverage manufacturing plants (NAICS Groups 311xxx & 3121xx), the compliance officer shall inspect the sanitation and clean-up operations to include the host employer and contract employers engaged in such work. The inspection of the sanitation and clean-up operations at a minimum shall include observation and evaluation of the sanitation and clean-up operations including any "third-shift" operations that may be employed at the facility. The investigation should focus on the most prevalent hazards and the prevention of the most prevalent injuries and illnesses such as:

- Lockout/tagout and guarding of equipment
- Protection from chemical and physical hazards including appropriate personal protective equipment
- Prevention of slips, trips and falls
- Preventions of cuts and lacerations
- Prevention of electrical shock

VII. Recording in OIS:

The Inspection Forms shall be coded as local emphasis program (LEP) inspections, and marked "FOODPRO."

VIII. Evaluation:

By October 30th of each year, the area directors shall submit to the Regional Administrator an evaluation report that includes:

a. The goal (purpose) of the program.
b. The area director's opinion of how effective the program was in meeting its goal.
c. Data and information to support the conclusions stated above. Data can include number of inspections, enforcement statistics, serious hazards eliminated, and any impact on covered non-inspected employers.
d. Statement and rationale of whether the program should be continued.
e. Description of any legal issues that arose which would necessitate a review by the Solicitor before renewal of the program.
f. Any other comments or recommendations, including findings which might have an impact on how the industry conducts business.

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