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- **Hexavalent Chromium.** For sanitation purposes, food manufacturing process equipment is made from stainless steel so that it can be cleaned without rusting. Additionally, the equipment is welded to prevent food from gathering in areas where the equipment would otherwise be bolted together. Employees who perform welding on this equipment as part of in-plant repairs or perform other activities to install new process equipment or lines may be exposed to hexavalent chromium.
  - Hexavalent chromium is covered under CPL 02-02-074 – Inspection Procedures for the Chromium (VI) Standards. Since there may be potential hexavalent chromium exposures during these inspections, CSHOs will need to address this potential hazard.
  - The CSHO will verify with the employer during the opening conference and with employees during interviews, whether work activities/tasks are performed at the facility that may produce employee exposure to Chromium (VI) [specifically welding on stainless steel equipment or components]. If it is determined that no activities with the potential for Chromium (VI) exposure are performed, the CSHO will document this in the Narrative portion of the OSHA-1.
  - If activities/tasks are identified that may involve employee exposure to Chromium (VI) are identified, the CSHO will:
    - Determine when the tasks creating these exposures are performed [scheduled routine maintenance versus non-routine/unplanned repairs; which shifts; etc.]
    - Request copies of the employer's initial exposure monitoring results and any subsequent air monitoring results for Chromium (VI).
    - Evaluate the air monitoring results and discuss with the Area Director if there is a need to conduct further inspection activity for Chromium (VI) in accordance with 29 CFR 1910.1026, the most current revision of CPL 02-02-074 and CPL 02-02-076.
    - If employees have performed work tasks that may have created an exposure to Chromium (VI) and no exposure monitoring has been performed, the CSHO will either conduct air monitoring for Chromium (VI) or make a referral to a Health Compliance Officer (HCO) for sampling. If the sampling indicates a work exposure in excess of the Action Level or Permissible Exposure

Level for Chromium (VI), the CSHO or HCO will discuss with the Area Office managers the need to conduct further inspection activity for Chromium (VI) in accordance with 29 CFR 1910.1026 and CPL 02-02-076.

- **Machine Guarding/ Lockout-Tagout (Control of Hazardous Energy).** Employee contact with or entrapment in moving machine parts have resulted in serious injuries, including amputations and deaths at several NAICS 311615 sites. CSHOs will:
  - Evaluate the employer's process for the inspection and evaluation of new and/or rebuilt machinery to identify and correct hazards before the machinery is released for routine operation.
  - Evaluate the employer's process for preventative maintenance/periodic self-inspection of production, facility, and shop machinery to identify and correct hazards.
  - Evaluate the employer's control of hazardous energy during machine setup, maintenance and repair activities for compliance with the requirements of 29 CFR 1910.147 – Control of Hazardous Energy.
  - Conduct a walk-through inspection of the employer's site to evaluate the adequate guarding of machinery hazards. The inspection should include any shift where operations and tasks may expose workers to unguarded equipment, all production areas, equipment rooms and any maintenance or fabrication shops. This inspection should include, but not be limited to:
    - Conveyors; Cone-Lines; and product moving equipment, such as shackles.
    - Points-of-operation guarding, including: in-running nip-points, cutters, shears, saws, presses, lathes, etc.
    - Mechanical transmission devices: gears, shafts, pulleys and belts, etc.
    - Robotic equipment.
- **Biological Hazards.** Because biological hazards are widespread in this industry, CSHOs will assess incidence and controls of biological hazards such as, but not limited to, campylobacter, psittacosis and histoplasmosis, through review of medical and first aid logs and through employee interviews.
  - Additional guidance is available in CPL 02-01-050 - 29 CFR Part 1910, Subpart I, Enforcement Guidance for Personal Protective Equipment in General Industry.
  - Observe worker hygiene practices and facility housekeeping measures, and review employer's compliance with the sanitation requirements of 29 CFR 1910.141(b)(1)(iii) if

drinking water is provided for employees near any live-hang areas.

- **Other Hazards.** Conditions and hazards vary from plant-to-plant depending on process design. However, a variety of hazards are common industry-wide, including noise, chemicals, thermal, and struck-by hazards. CSHOs will:
  - Evaluate the noise levels and associated hearing conservation program as appropriate in accordance with the Regional Emphasis Program for Noise Hazards (CPL 17/05).
  - Identify and evaluate potential chemical or physical hazards including carbon dioxide (e.g., from dry ice), carbon monoxide from powered industrial truck and other vehicle operations or any other internal combustion engines used within the facility, or materials used in the disinfection of products or facilities, maintenance operations, and food preparation, water treatment or non-PSM refrigerant chemical.
  - Evaluate areas of the plant for thermal stress concerns (heat and cold).
  - Assess pedestrian worker safety in the truck receiving and shipping area to identify potential serious struck-by hazards associated with vehicular movement.
  - Assess slip, trip and fall hazards on walking and working surfaces.
  - Assess the adequacy of toilet and sanitary facilities, and of worker access to them.

**XII. Recording in OIS.** Current instructions for completing Inspection, Complaint, Fatality, and Referral Forms shall be applied when recording inspections under this REP.

- a. The Inspection Report for any inspection expanded or scheduled under this REP shall be marked as “**POULTRY4**” under local emphasis.
- b. The Unprogrammed Activity (UPA)/Fatality for any accident related poultry processing hazards shall be marked as “**POULTRY4**” in the appropriate field.
- c. The UPA/Complaint for any complaint related poultry processing hazards shall be marked as “**POULTRY4**” in the appropriate field.
- d. The UPA/Referral for any referral related poultry processing hazards shall be marked as “**POULTRY4**” in the appropriate field.
- e. All other applicable OIS codes shall be applied, as appropriate.

**XIII. Evaluation.** The Area Director shall submit a written evaluation report of the implementation of this REP to the Regional Administrator, which will include activity and impact measures. The reports shall be submitted no later than October 1, for each fiscal year the REP is in effect. The Regional Office will then submit a report, as appropriate, to the National Office. This evaluation will include a brief description of program activities and results, analysis of factors listed in CPL 04-00-

001, (formerly CPL 2.102), Appendix A, as well as recommendations regarding the continuation of this Regional emphasis program. In addition, the following factors should also be included.

- a. The number of inspections where poultry processing hazards were evaluated and total number and percent violations that are serious, willful, or repeat.
- b. The number of serious or other-than-serious violations for the following hazards:
  - Ergonomics
  - PSM
  - Recordkeeping or medical records
  - Lockout/Tagout
  - Machine guarding
  - Electrical
  - Confined space
  - Hexavalent chromium
  - Hazard Communication
  - PPE
- c. The number of hazard alert letters (EHAL) issued for ergonomic conditions.
- d. Annual number of poultry processing fatalities, hospitalizations, amputations, and serious incidents.
- e. The number of unprogrammed activities concerning poultry processing conducted annually.
- f. The number of employees covered during enforcement and outreach activities.
- g. Narrative that describes the impact that outreach activities may have had for employers and employees.
- h. Abatement measures implemented, if novel and innovative.

**XIV. Outreach.** The Regional and Area Office will conduct outreach activities intended to reach as many employers and stakeholders as is practicable. Outreach activities will be conducted to raise awareness of the hazards associated in the poultry processing industry to inform stakeholders and employers of the elements of the REP.

#### **Enhancing Compliance Assistance and Outreach Activities**

Each Area Director will develop an outreach plan and programs that will support their enforcement efforts, by working with compliance assistance specialists (CAS) and regional labor liaison, when available, to suggest relevant outreach materials and targeted audiences, provide guidance for how to best implement current and new outreach activities, and continue successful outreach strategies implemented in the past and/or currently being implemented.

Outreach activities will utilize OSHA's already established compliance assistance workshops, tools and resources, as well as other mediums, such as news releases, information packets, seminars, etc. In order to maximize and expand the scope, reach and effectiveness of outreach efforts, each Area Office should determine relationships to be established with local organizations, interested parties, stakeholders, and community groups, as well as foster already existing relationships. Emphasis will be

placed on reaching out to organizations such as Consulates, faith based and community groups to assist in reaching limited English proficiency workers.

The Area Office should consider having these stakeholders participate in training, assist in the dissemination of information from this REP, and participate in any other outreach activity where their participation would benefit the program. Stakeholders may include actual physical processing facilities, manufacturers' representatives, industry periodical publishers, safety and health consultants, insurance companies, local and national associations, safety councils, and unions.

The method of outreach is at the Area Director's discretion. A detailed description of outreach activities will be included in each Area Offices' Regional notice of LEPs/REPs, as well as in their subsequent evaluations. Below are examples for outreach activities and other compliance assistance to be incorporated into LEP/REP procedures.

### **Outreach to Industry, Workers and other Stakeholders**

Outreach activities may include, but are not limited to:

- Encourage employers to utilize OSHA's free on-site consultation programs and provide educational and compliance assistance information relevant to the industry, along with other applicable outreach materials to appropriate stakeholders.
- Inform employers and other stakeholders that many new resources exist in many languages on hazard identification and prevention.
- Upon establishing a list of affected worksites, provide a letter to inform industry, employees, government and other stakeholders of hazards associated with that particular industry, and inform employers of your outreach and targeting plan prior to commencement of inspection activities. Furthermore, inform employers and workers of educational resources, such as these listed below, that give them information on potential hazards and how to prevent them:
  - OSHA and USDA poster for poultry workers' rights, [Protect Your Health – Report Your Injuries and Illnesses](#), OSHA 3769-02 2015.
  - OSHA's safety and health topics webpage, Poultry Processing, <https://www.osha.gov/SLTC/poultryprocessing/index.html>.
  - OSHA Publication, [Guidelines: Prevention of Musculoskeletal Injuries in Poultry Processing](#), OSHA 3213-12R 2013.
  - CDC webpage, How does food or water get contaminated with Campylobacter? <http://www.cdc.gov/nczved/divisions/dfbmd/diseases/campylobacter/>
- Distribute worker protection training, information and materials to specific groups, appropriate to the industry.

### **Utilization of Existing OSHA resources and Outreach Tools**

- Conduct targeted training sessions for employers on the recognition, prevention, and abatement of safety and health hazards in the workplaces. Provide information to



workers on regarding workers' rights, job hazards, employer responsibilities, and how to file complaints.

- Conduct stakeholder meetings and disseminate information through speeches, training sessions and Area Office newsletters.

### **Leveraging of Community Knowledge and Local Institutions**

- Outreach will be tailored to the poultry industry and the communities of workers and stakeholders. Therefore, outreach programs with employers and trade associations, unions, professional associations, advocacy groups, community and faith-based organizations and others, will be in conjunction with local resources, knowledge and relationships to involve employee and management stakeholders in the identification and elimination of worksite hazards.
- State Consultation Programs should be encouraged to participate in local outreach efforts performed by Area Offices.

## APPENDIX A

Date

Company Name

Address

Dear Stakeholder:

The United States Department of Labor/Occupational Safety and Health Administration (OSHA), Region IV, has developed a local outreach, education, prevention, and inspection program pertaining to employers who may have poultry processing facilities, located in Georgia, Alabama, Mississippi, and Florida. We will be conducting outreach efforts to employers in order to raise awareness of the hazards related to poultry processing operations. We are writing to invite you to participate in our future outreach efforts and to begin evaluating your workplaces to identify and remove hazards.

The intent of this emphasis program is to encourage employers to take steps to address and correct these hazards in poultry processing facilities thereby reducing potential injuries, illnesses and death to their workers. Hazards associated with poultry processing operations include, ergonomics, Process Safety Management (PSM), lockout-tagout, machine guarding, electrical, walking/working surfaces, chemical hazards, biological hazards, and confined-space, among others. OSHA in Region IV proposes to accomplish this through outreach and enforcement activities. Outreach activities will include letters to employers; training sessions; electronic information sharing activities; public service announcements and other outreach with stakeholders. Enforcement activities will begin not sooner than three months after outreach begins and will include, but not be limited to, the on-site inspection and review of production operations; working conditions; records; safety and health programs; chemical handling and use; and process safety management systems to identify and obtain corrections of workplace hazards at all applicable inspections. A comprehensive recordkeeping review will also be conducted, which include an extensive evaluation the employer's protocols for medical treatment to ensure all cases are appropriately recorded in the site OSHA-300 injury and illness log.

Small employers may contact the On-Site (State) Consultation Program for a free confidential safety and health consultative visit. The consultation program, funded primarily by federal OSHA, provides safety and health consultative services to help employers establish and maintain a safe work place by coming into compliance with OSHA's regulations. Although the consultants' findings are confidential, employers are required to correct any serious hazards they observe on their visit. Information related to the On-Site Consultation Program may be found at the OSHA website, [www.OSHA.gov](http://www.OSHA.gov).

The mission of OSHA is to ensure that working men and women arrive home safe each night from their place of employment. Together, we can accomplish this task. OSHA shares each employer's goal of reducing occupational injuries and illnesses to the maximum extent practical. Should you wish to participate with us in our efforts or if you have any questions or comments, please contact me at (xxx) xxx-xxxx. More information on hazards and means of control in the

poultry industry are available at <http://www.osha.gov/SLTC/poultryprocessing/index.html>. We look forward to working with you toward this common objective.

Sincerely,

Area Director (xxxx)