

## Contractor Safety

### Overview

Contractor safety is something easily overlooked by breweries. In most cases, the brewery (the host employer) has a joint responsibility for the safety of contractors while work is being performed on-site.

The key is *communication* between the brewery and the contractor to ensure that the necessary protections are provided and hazards are reduced. Never assume every contractor working on-site has been properly trained by their employer prior to starting work. It's a good best practice to ask for training documentation prior to the job.

Take, for example, an accident in which a 39-year-old welder was killed while sealing a crack on a fermentation tank at a brewery. The tank was oversaturated with oxygen. When the contractor lit his torch, a flash-fire erupted. His hair and clothing disintegrated instantly, and he died 75 days later.

This accident could have been avoided by following proper confined space procedures, which should have included testing the atmosphere of the tank prior to entry. As a brewery, it is important to communicate OSHA requirements while contractors are working at your site.

### Defining Types of Contractors

It's a good idea to define the types of contractors the brewery has onsite. Typically, there are three different types:

- 1.) Standing - These are contractors typically at your brewery on a continuous basis. For example, an electrician or refrigeration servicer)
- 2.) Job Specific - These are contractors at the site for a

specific job, typically installations or large repairs. Examples would be tank installation, tap room construction, etc.

- 3.) Office - This is a contractor typically exposed to the office setting only, such as an accountant.

### Developing a Contractor Safety Program

It is best practice to have an overall contractor safety program for your brewery. The contractor safety program should be reviewed with all contractors during the bidding process. This sets the tone and expectation for safety to the contractor. It also opens up the conversation with the contractor concerning unique hazards that may be present at the brewery, as well as hazards the contractor may be bringing in or creating on-site.

### Risk Assessment and Mitigation

If hazards have been identified as high risk (such as working from heights, hot work, electrical work, rigging, use of fork trucks, working in a confined space, etc.) these hazards will need to be managed until the risk is at an acceptable level. For example, if work is being performed in a confined space, the confined space procedures (such as testing the atmosphere, ventilating, and locking out all energy sources) should be followed in order to minimize risk.

### Contractor Training/Safety Brief

After the contractor has confirmed they follow proper OSHA standards (i.e., submit safety plans and training documents) and risks have been mitigated, prior to starting work, an overall safety briefing should be conducted describing the workings of the brewery and how the contractor may be affected.

The safety brief should also describe to the contractor what to do in an emergency and who to go to if they have any questions or need to report an injury.

### Job-Specific Safety Plan

From time to time, job-specific safety plans should be created. Examples would be during large demolition or construction projects. The contractor should provide an acceptable plan to mitigate risk, such as containing dust, conducting work at off hours, rerouting pedestrian traffic, etc., prior to the work being performed. This plan should be acceptable to the brewery and the employee working around the area.

### OSHA Recordkeeping for Contractors

There may be cases when a contractor has an OSHA recordable injury and may need to be logged on the brewery's OSHA 300 log. Typically, this is dependent on who is directing the day-to-day activity of the contractor (see link below on OSHA recordkeeping).

### LINKS

Much of the information provided in this document is generalized, as OSHA has very specific requirements related to contractor safety. Please refer to the links below or ask the Master Brewers Brewery Safety Committee for additional information as needed.

- [OSHA Protecting Temp Workers \(Joint Responsibility\)](#)
- [OSHA Contractor Safety Guidelines](#)
- [OSHA Recordkeeping Letters of Interpretation for Contractors](#)

**FOR MORE INFORMATION ON BREWERY SAFETY PROGRAMS, PLEASE VISIT THE MASTER BREWERS SAFETY WEBSITE AT:**  
[www.mbaa.com/brewresources](http://www.mbaa.com/brewresources)