

MBAA Brewery Safety Committee



Common OSHA Programs

Below is a list of common OSHA Standards which require company specific programs to be developed. Please note that this is NOT a comprehensive list of all OSHA requirements as there are many other OSHA Standards that breweries must follow, but do not necessarily require a written program.

State Managed Programs: The programs below reference the federal OSHA standards. There are 22 states which manage OSHA approved state programs. These state run programs must be "at least as effective as" the federal OSHA standards, but in many cases are more stringent. These states include: Alaska, Arizona, California, Hawaii, Indiana, Iowa, Kentucky, Maryland, Michigan, Minnesota, Nevada, New Mexico, North Carolina, Oregon, Puerto Rico, South Carolina, Tennessee, Utah, Vermont, Virginia, Washington, and Wyoming.

OSHA Program (LINK)	Who Does it Apply to	Summary of Requirements
Bloodborne Pathogen Exposure	Any employee who has a potential exposure to blood or other bodily fluids in the course of their normal duties. An example would be any employee who would be expected to administer first aid in the workplace.	Develop a written program that includes an exposure plan, employee training, personal protective equipment, waste disposal procedures and others.
Confined Space Entry	Any employer who's facility contains a confined space, such as a tank.	All employers must evaluate their facility to determine if they have confined spaces. Confined spaces must be evaluated to determine if they require a permit for entry. If entry will take place, a permit system, employee training, and entry/rescue procedures must be developed.
Crane Program	Employers with overhead cranes and hoisting equipment.	If the crane or hoist is in scope, documented inspections and an employee training program is required
Electrical Safety	Any employees whose work might expose them to a risk of electrical shock while working on or near exposed live parts or other electrical equipment.	Develop a written electrical safety program including training requirements, personal protective equipment, and lockout/tagout.
Emergency Action Plan	Required for all employers. A written plan is required for facilities with over 10 employees.	A written program that includes emergency escape procedures, operation of critical operations, accounting procedures for all employees, and rescue duties.
Fire Prevention Plan	Required for all employers. A written plan is required for facilities with over 10 employees.	A written program that includes a list of major fire hazards and names of personnel responsible for maintenance of fire control and prevention equipment
First Aid	Required for all employers.	Trained, designated first-aid responders must be provided at each work location that is not in "near proximity" to medical assistance. Near proximity would be a response time of five minutes or less for local EMS.
Hazard Communication (HAZCOM)	Required for all employers with hazardous chemicals	Each employer is required to develop a written Hazard Communication (HAZCOM) program to include: 1) an inventory of all hazardous chemicals in the workplace, 2) labelling, tagging, or marking each container of hazardous chemical, 3) employee training on the hazards from these chemicals, 4) maintenance of Safety Data Sheets (SDS's).
Hot Work Program	A Hot Work Program is required when hot work, such as welding or cutting, use of spark-producing powered tools, chipping operations, etc., is performed in an area where combustibles, flammables, or gasses may be ignited.	Prior to hot work, an authorized person must inspect the area to determine: 1) need and feasibility, 2) fire or explosive hazards, and 3) control measures. A written permit should be issued identifying: 1) the scope of work performed, 2) precautions to be take, and 3) any follow-up upon completion of the work.
Laboratory Chemical Safety	Required if facility has laboratory facilities using hazardous chemicals (Example: Production plant having a quality control testing lab). Not required if laboratory only uses commercially prepared kits or dip-and-read testing.	Written program must include chemical hygiene plan, employee monitoring, medical surveillance, hazard identification and recordkeeping where required.
Lockout/Tagout	Required for maintenance and servicing equipment where unexpected and hazardous energy could be released.	A written program must be developed requiring all energy sources to be identified and securely de-energized during work. Other requirements include written energy control

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		procedures, employee training and periodic inspections.
Occupational Noise Exposure	Occupational noise levels must be evaluated to see if they exceed OSHA permissible exposure limits (PELs). If so, a written Hearing Conservation Program must be developed. OSHA PEL = 90 dBA 8hr TWA	A Hearing Conservation Program must be established, to include: 1) noise monitoring, 2) employee training, and 3) periodic hearing examinations.
OSHA Recordkeeping	Employers with more than 10 employees are required to maintain records.	Employers meeting the requirement must maintain a log of all work related injuries and illnesses using various OSHA approved forms.
Personal Protective Equipment	Required for all employers	Each employer is required to perform and document a hazard assessment of the workplace to determine if hazards exist that make the use of personal protective equipment (PPE) necessary. If so, appropriate PPE must be selected. Training is required and includes: 1) when the PPE is necessary, 2) what PPE is required, 3) how to use the PPE, 4) the limitations of PPE, and 5) proper care and maintenance of the PPE
Powered Industrial Trucks (Forklifts)	Required for any employer using forklifts or other powered material handling vehicle.	Employers shall ensure that each powered industrial truck operator is competent to operate a powered industrial truck safely, as demonstrated by completion of training and evaluation. Training elements include: 1) formal instruction, 2) demonstrations performed by the trainer, 3) practical exercises performed by the trainee, and 4) evaluation of the operator's performance in the workplace. Training program content shall include: 1) truck-related topics, 2) workplace-related topics, and 3) specific requirements spelled out in the standard.
Respiratory Protection Program	Required for employers with exposures levels above the OSHA PEL for various chemicals.	For the use of respiratory protection, it is required that either initial air monitoring or a reasonable estimate of exposure be made to determine the need for such protection. If respiratory protection is required (because of an over-exposure or employer requirements), then a formal, written nine step respiratory protection program is required. Items to be included in such a program are: 1) procedures for selecting respirators, 2) medical evaluations, 3) fit testing procedures, 4) procedures for proper use in routine and reasonably expected emergencies, 5) procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding and otherwise maintaining respirators, 6) ensuring adequate air quality for supplied air respirators, 7) employee training relative to the hazards to which they are exposed, 8) employee training relative to the proper use of respirators, including putting them on, and 9) procedures for regularly evaluating the effectiveness of the program.

**FOR MORE INFORMATION ON BREWERY SAFETY, PLEASE VISIT THE
MBAA BREWERY SAFETY WEBSITE AT:
<http://www.mbaa.com/brewresources/brewsafety>**

References:

- Ohio Board of Workers Compensation. *Summary of the Most Common Programs Required by the OSHA Standards.*
<https://www.bwc.ohio.gov/downloads/blankpdf/sh26%20-%20oshaprogramstandards.pdf>
- Occupational Safety and Health Administration. <https://www.osha.gov/>