



Brewery Safety: Top Hazards and How to Reduce Risk

Presented by Andrew Dagnan, CHMM May 2, 2014



Agenda



- FORM Introduction
- Why focus on safety?
- Top Hazards
- Additional Hazards Quick Tips
- Proactive Risk Reduction
 - Safety Committees
 - Job Hazard Analysis (JHA) Overview



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About EORM



- Multidisciplinary Environmental, Health, Safety, and Sustainability consulting team
- We make a positive impact on the world every day
- We do this by enabling companies to be socially and globally responsible, protecting employees, preserving the environment, and building long-term sustainable solutions

Why focus on safety?



Prevent injuries, illnesses, and fatalities

Regulatory compliance

Reduce negative business impacts

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Why focus on safety?





- Many hazards are present in brewhouses
- Similar to other hazardous manufacturing operations
 - Ergonomic
 - » Force (e.g., lifting), repetitive motions, awkward and static postures
 - Hazardous Chemicals and Gases
 - Physical: Thermal hazards, moving parts, pressure
 - Other: Confined spaces, fall hazards, housekeeping, noise, respiratory hazards



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Why focus on safety?





- Reuters Data from OSHA Records 2009 2012
 - At least 4 deaths in US craft brewery accidents
 - 2 deaths at large breweries that brew 10x more beer
 - Nearly 4x more safety violations at craft breweries than at large breweries
 - Safety oversight at smaller companies worse than statistics show, so injuries often go unreported

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Why focus on safety?





- Occupational Health and Safety Administration (OSHA)
 - Federal & State OSHA (OR, WA, CA, etc.)
- General Duty Clause
 - Must provide a safe and healthy place of employment
- Example applicable regulations:
 - Hazard Communication, PPE, Confined Spaces, Lockout / Tagout, Powered Industrial Trucks, Fall Protection







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Why focus on safety?





Business

Impacts

- Save money!
 - Reduce quantity, severity, and financial impact of injuries and illnesses
 - Reduced insurance and workers comp. costs
- Equipment down time
- Product loss
- ______
- Brand equity
- More effective/efficient work practices & procedures
- Sustainability



Top Hazards to Evaluate



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Ergonomic Hazards



Repetitive motions: Packaging line
Lifting: malt bags, moving hoses
Awkward postures
Leaning / reaching / bending

Forceful grips

Source: www.lni.wa.gov:

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Ergonomic Hazards



- National Institute of Occupational Safety and Health (NIOSH) study: Ergonomic and Safety Climate Evaluation at a Brewery – Colorado (2011)
- Some conclusions from the study:
 - Employees at increased risk for upper extremity (shoulder and wrist)
 Work-related Musculoskeletal Disorders (WMSDs)
 - Employees exposed to combination of ergonomic risk factors
 - Survey indicated that 50% of employees felt safety training received was not adequate and safety procedures in place don't work

Ergonomic Hazards – Lifting Controls



- Reduce / Eliminate lifts
 - Automate processes
 - Keg robots
 - Hoists / lifts
 - Conveyors
 - Bulk (silos, super sacks)
- Two-person lifts
- Training on proper lifting
- Employee stretching program





Ergonomic Hazards – General Controls

- Redesign tools / areas within appropriate heights
- Height adjustable tools / tables
- Training (e.g., how the body works, how lifting affects the body, why certain movements cause injuries, etc.)
- Employee rotation
- Encourage micro breaks
- Encourage employees to report injuries and near misses

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Walking and Working Surfaces - Hazards



Wet / slippery floors

Trip hazards (e.g., hoses)

Tight spaces

Improperly stacked items

Tools and other items left out





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Walking and Working Surfaces – General Requirements



- Workplaces must be kept clean, orderly, and sanitary
- Workroom floors must be maintained as clean and dry as possible
- Must keep aisles clear and free of obstructions that could create a hazard
- Aisles must be sufficiently wide where mechanical handling equipment is used

Walking and Working Surfaces - Controls



- Marking aisle ways
- Implement general housekeeping procedures
 - Keep aisles, stairs, and platforms free of clutter
 - Store materials properly
 - Store items on shelves safely and securely
- Cleanup spills immediately
- Monthly walk-throughs looking for hazards

Fall Protection – General Requirements

- ents
- Generally...fall protection required when working at heights above 4 ft.
- Elevated work platforms
 - Handrails with a midrail
 - 4" toeboard
 - Guard openings with a swing gate
- Stairways
 - Usable width of ≥22 in. with slip-resistant treads
 - Angled between 30 50 degrees
 - Railings on open sides of exposed stairways, if ≥ 4 steps

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Fall Protection – Prevention is Key!







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Confined Spaces

- Prevalent in brewhouses
- Conditions can rapidly change from nonhazardous to life-threatening
- Confined Space:
 - Large enough to bodily enter and perform work
 - Limited means of entry or exit
 - Not designed for continuous human occupancy
- Permit Required Confined Space
 - "Permit Space"
 - Confined space with certain hazards





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Confined Spaces – Entry Methods



- "Entry" = any body part crosses plane of opening
- Only enter if absolutely necessary!!
 - Create non-restricted access (e.g., add stairs or walkway)
 - Perform tank inspections from outside space
 - Clean-in-place (CIP) systems
 - Add to tanks without entering
 - Design area for human occupancy



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- Only hazard is atmospheric
- If hazard is controlled, may use less restrictive alternate entry procedures
- Control by ventilation and air monitoring

- No potential for atmospheric hazard
- Reclassify as non-permit required if all hazards eliminated
- Example control: Isolate power and us lockout/tagout

- Most restrictive
- Permit system with training, monitoring, rescue services, etc.

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Confined Spaces - Changes in Oregon



- OR-OSHA proposed changes coming soon!
- Biggest change to general industry regulations involves reclassification and entry procedures
 - Additional changes for construction industry
- Keep an eye out for changing regulations







- Mobile, power-propelled truck used to carry, push, pull, lift, or stack materials
- AKA: forklifts, pallet trucks, rider trucks, forktrucks, or lift trucks

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Powered Industrial Trucks - General Requirements



- Written program & documented training
- Daily inspections (each shift if 24-hour facility)
- Various truck requirements including maintenance
- Never load a PIT outside of its rated capacity
- Safe Operation: Seat belt, lower load before moving, etc.

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Powered Industrial Trucks - Controls



- Designate areas / aisle ways
- Inspect pallets before moving
- Train all employees on safely working around PITs
- High-visibility vests in PIT areas
- Limit access to PIT areas
- No speeding!!





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Chemical Safety - Common Chemicals



- Caustics: potassium hydroxide, sodium hydroxide, sodium hypochlorite
- Acids: phosphoric, nitric, iodophor, and peracetic acid
- Gases: CO₂, oxygen, ammonia, ozone
- Flammables: isopropanol, aerosols
- Glues

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- Oils & lubricants
- Refrigerants





Chemical Safety - General Requirements



- Documented program and training
 - "Hazard Communication"
- Chemical inventory
- Storage: Cabinet or containment pallet
- Separate incompatibles (e.g., acids / bases)
- Label all chemical containers
- Must have for each MSDSs for each chemical
- NOTE: Always add chemicals to water!



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Hazard Communication Changes

- U.S. adopted UN standard for labeling and communicating chemical information
 - Referred to as the "Globally Harmonized System (GHS)"
- MSDSs renamed SDSs (Safety Data Sheets)
 - New SDS format will be implemented over next several years
- Updated labeling requirements
- Additional training requirements



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Hazard Communication Changes Timeline

Dec 1, 2013

 Employers must train employees on new label elements & SDS format

June 1, 2015

 Chemical manufacturers, importers, and employers must comply with modified provisions the final rule

Dec 1, 2015

 Distributors shall not ship containers labeled by the manufacturer or importer unless it has a GHS label June 1. 2016

- Employers to update labeling and hazard communication programs
- Additional training

PPE - General Requirements



- Personal Protective Equipment (PPE) = last line of defense
- Documented program and training
 - Selection, use, maintenance, limitations, & when to change
- Hazard assessments of tasks
- Provide PPF
 - Ex: safety glasses, goggles, gloves, steel toed boots
- Separate programs for respirators & hearing protection











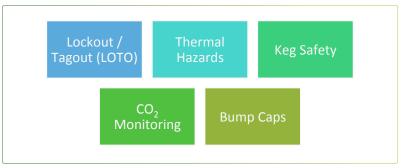






Additional Hazards - Quick Tips!





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Lockout / Tagout (LOTO) - Control of **Hazardous Energies**



- Prevent injury to employees working with hazardous energies
- Example situations to use LOTO:
 - Permit required confined space entry
 - Remove a guard or bypass a safety device
 - Perform maintenance on automatic starting equipment



- Written program with equipment specific procedures
- Equipment: ID tags and locks that are uniquely keyed for each individual



Thermal Hazards



- OSHA Requirement
 - Cover or guard steam & hot-water pipes within 7 ft. of floor or working platform or within 15 in. of stairways, ramps, or fixed ladders to prevent contact
- Example Controls
 - Steam and hot water pipe insulation
 - Label hot surfaces
 - Written procedures for employees
 - Training: Ensure employees familiar with systems
 - PPE: long sleeves and pants, safety glasses, and gloves





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Keg Safety



- Brewers Association Performance Guidelines for Refillable Kegs (2014)
 - Never alter or tamper with safety devices
 - Never tamper with keg valve
 - Systems connected to kegs should have a pressure regulator and pressure relief
 - Maintain pressure, temperature, volume, and flow settings on wash/fill equipment according to the manufacturer
- Only use kegs from your own brewery
- Enclosed pressurized cleaning procedure
- Always inspect kegs, sankey valve, steel ball, and o-ring



CO₂ Monitoring

- Ensure adequate ventilation throughout brewhouse
 - Even in large rooms, CO₂ can accumulate
- CO₂ area monitors/alarms
- Personal O₂ / CO₂ monitors
- Develop protocols for evacuations, posted at each monitor
- Train employees on alarms and evacuation procedures



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Bump Cap



- Head injuries (e.g., bumps, cuts) common, especially near bottling lines
- Bump cap: http://www.northernsafety.com/Product/11207/NS-Ha Protection-Baseball-Bump-Cap
- Looks / feels like regular baseball cap
- Customizable with brewery logo



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Proactive Approach to Reducing Hazards



Safety Meetings / Committees

Job Hazard Analysis (JHA)

Safety Meetings / Committees



- Safety meetings or committees required based on company size
- Use meetings to proactively identify and fix hazards
 - Discuss accidents and near misses, develop recommendations, and assign actions
- Empowers all employees to have a voice and share responsibility in maintaining a safe working environment
- Creates and promotes a safety culture

Job Hazard Analyses (JHA)

- JHA: Proactive method for identification, evaluation, and mitigation or prevention of hazards
- Job: A typical "job" includes numerous "tasks"
- Hazard: Potential for harm
 - If left uncontrolled, can result in an injury or illness
- Good for observing and eliminating hazards and meeting regulatory requirements

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JHA Process

- 1. Select tasks and prioritize
- 2. Review procedures, manuals, and/or applicable safety documentation
- 3. Observe work & interview employees
- 4. Complete JHA documentation
 - Develop recommended controls
- 5. Present & review JHA findings with key stakeholders
- 6. Prioritize recommendations and assign actions
- 7. Update JHAs as necessary

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JHA Process – Reducing Hazards



• Implement controls based on the following hierarchy:







- Brewing Engineering and Plant Operations, MBAA Practical Handbook for the Specialty Brewer, Volume 3
- Brewers Association Safety Committee recently formed
- GOSH 2015 Conference: Craft Beer Safety Track
- Insurance carrier and/or vendors
- Contact me!





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In Summary...



- Breweries have many hazards
- Safety should be a state of mind
- Report, track, and investigate accidents and near misses
- Train...Train...TRAIN!
- Documentation / program writing important for compliance
- Proactively identify and control hazards
 - Don't wait until an injury or death before developing safe procedures!!



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