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BACK 2 BASICS
As you all know, bin entry is one of the main BIG 6 topics we are continuously emphasizing and reiterating the importance of safety. Bin entry is unique in that the process involves at least two additional BIG 6 topics; LOTO and falls. In some cases there may also be concerns with specialized equipment or potentially hazardous chemicals depending on fumigation or pesticides applied to a grain bin. The unfortunate fact is employees may be exposed to several hazardous or dangerous situations to complete a single task.

With the rise in grain entrapments that occurred in 2016, OSHA has produced an outreach program called a Stand-Down. According to oshastanddown.org, a Safety Stand-Down is,

“...a voluntary event for employers to talk directly to employees about safety. Any workplace can hold a stand-down by taking a break to focus on "Hazards" and reinforcing the importance of "Prevention". It’s an opportunity for employers to have a conversation with workers about hazards, protective methods, and the company’s safety policies and goals. It can also be an opportunity for workers to talk to management about the hazards they see.”

While we hope this is an ongoing process, this is an opportunity to work in conjunction with OSHA and other grain industry leaders to truly focus our efforts on this topic. The “Stand Down” is scheduled during the last week of March from 27th through 31st.

Participation in this event is voluntary, but should remain of the utmost importance to your organizations, as well as, your communities. We ask that you strongly consider participating and advocating this event to your customers, contractors, patrons, and communities. This website provides a place to log your participation in the “Stand Down” to help provide numbers of contact hours trained over the hazards of grain bin entry.

GEAPS hosted a webinar January 26th, which can be found online here, discussing how and why participation is so imperative to our industry. Our safety directors will be heavily involved with this event and we will be encouraging many of you to participate as well. You have access to innumerable amounts of information regarding bin entry safety from your safety director, the KFSA website, the OSHA website, or even the Stand Down event website www.oshastanddown.org. Please encourage your teams to participate the week of March 27th in this event.
DOT CYLINDER REQUALIFICATION UPDATE

As reported in prior editions of NPGA Reports, NPGA is communicating with the Department of Transportation’s Pipeline and Hazardous Materials Safety Administration (PHMSA) to resolve what NPGA believes to be an error in the agency’s actions that implement changes in the DOT cylinder requalification requirements. The changes were part of a broader PHMSA rulemaking (HM-233F) that was published as a final rule on January 21, 2016, which incorporated nearly 100 special permits into the federal hazardous materials regulations (HMR).

The changes modify 49 CFR 180.209(e) of the HMR and appear to reduce the initial requalification period for DOT cylinders following volumetric expansion testing from 12 years to 10 years and to increase the time-frame for requalification following a proof pressure test from 7 years to 10 years. Nowhere, in either the proposed rule or final rule, did PHMSA provide any rationale or substantiation for the changes or address them in any form. The compliance date for these changes is scheduled for January 23, 2017.

NPGA anticipates that a reduction of time for requalification following volumetric expansion testing from 12 years to 10 years will have a significantly negative impact on the propane industry as it essentially accelerates the time-frame for requalification by two years and increases the total number of cylinders that must be re-qualified in order to be in compliance with the regulation as now promulgated. On multiple occasions and over several months NPGA has requested that PHMSA issue a correction or clarification reverting back to the regulatory language in effect prior to the rulemaking. We have yet to receive a formal response to our requests.

NPGA will continue to pursue a favorable response from PHMSA. At the same time, NPGA will make a further formal request for a stay of the implementation and enforcement of these provisions until the matter can be resolved.

Nevertheless, at present, the compliance date for these changes remains January 23, 2017.

NPGA will continue to keep you apprised of developments.

If you have any questions, please feel free to contact Mike Caldarera at mcaldarera@npga.org or Sarah Reboli at sreboli@npga.org.

As was passed and put into effect, the Department of Labor has increased penalty amounts to adjust for inflation. This is for all Department of Labor agencies, including OSHA. These new penalty amounts took effect on January 13, 2017 and can be levied for any violation occurring after November 2, 2015 so long as the penalty wasn’t issued prior to January 13, 2017. The increase is figured at just over 1.6% increase from the nearly 78% increase last year. Below, find the newer fine structure compared to August of last year:

<table>
<thead>
<tr>
<th>VIOLATION</th>
<th>PRE AUGUST 2016 PENALTIES</th>
<th>AUGUST 2016 PENALTIES</th>
<th>JANUARY 2017 PENALTIES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other-than-Serious</td>
<td>Up to $7,000</td>
<td>Up to $12,471</td>
<td>Up to $12,675</td>
</tr>
<tr>
<td>Serious</td>
<td>Up to $7,000</td>
<td>Up to $12,471</td>
<td>Up to $12,675</td>
</tr>
<tr>
<td>Repeat</td>
<td>Up to $70,000</td>
<td>Up to $124,471</td>
<td>Up to $126,749</td>
</tr>
<tr>
<td>Willful</td>
<td>Up to $70,000</td>
<td>Minimum of $8,908 Up to $124,709</td>
<td>Minimum of $9,054 Up to $126,749</td>
</tr>
</tbody>
</table>

We can likely expect these penalties to adjust with inflation on an annual basis as the law now allows.
OVEREXERTION IN THE WORKPLACE

Think back to the last time you over exerted yourself; was it after a strenuous work out at the gym, shoveling the snow off of your driveway or lifting sacks of feed at work? When we think about overexertion we typically think of heavy breathing, feeling exhausted, sometimes even feeling a little nauseous. While overexertion can cause these symptoms, it can also cause more painful and acute injuries. Overexertion affects each person differently; to some it may be mild soreness while others feel exceptional pain and discomfort nearing debilitation due to inflammation of joints or ligaments. Overexertion is the leading cause of nonfatal workplace related injuries. According to the Liberty Mutual Research Institute for Safety, overexertion accounts for roughly a quarter of all nonfatal workplace related injuries resulting in approximately $13 billion in compensation costs per year nationwide. Non-impact injuries caused from excessive physical effort are far more likely to occur in the following situations:

1. **High Force Demands.** This can occur when lifting, carrying, pushing, pulling, or wielding heavy or awkward shaped objects and tools.
2. **Awkward Stationary Posture.** This can happen when bending, kneeling, reaching or twisting your body.
3. **Repetitive Movements or Actions.** Involves performing the same motion repeatedly without pause or periods of rest.
4. **All Other Overexertion Hazards.** This can include contact stress, partial- or whole-body vibration, and working in hot or cold environments.

To assist in preventing overexertion related injuries it is best to take precautions and expend energy in the most efficient way possible. This may be as simple as asking for help, using material handling devices, or alternating between tasks. One of the more utilized precautions should comprise of proper lifting guidelines. Injuries involving overexertion can result from a variety of activities. However, over 50 percent of workplace related overexertion injuries are caused due to lifting objects. According to Safety Toolbox Topics, an online resource for safety topics and injury prevention, the following guidelines are crucial when preventing injuries related to improper lifting:

- **Get a good grip.** Grasp the load firmly, using gloves if they allow a better grip.
- **Get a good footing.** Center your body weight, providing a powerful line of thrust and good balance.
- **Keep it close.** Grasp the load firmly, lifting towards your belt line. Hold the load close to the body while avoiding putting pressure on your back.
- **Lift smoothly.** Raise, carry, and lower the load as smoothly as possible. Never jerk a load.
- **Avoid Twisting.** If turning is required while lifting or carrying a load, turn the feet and body together instead of exclusively twisting your back.
- **Push.** Push the load away rather than pulling the load towards you.

Preventing injuries related to excessive physical effort can be as simple as knowing and respecting your limits; remember to listen to your body when it tells you to stop and seek help or assistance when you need it. If you have questions regarding overexertion in the workplace or would like more information visit with your Safety Director or go online to safetytoolboxtips.com.
Food Safety Modernization Act: cGMP

Over the past few months we have broken down and reviewed the VFD. Now that the deadline has passed, we will be reviewing the upcoming Food Safety Modernization Act: Current Good Manufacturing Practice, Hazard Analysis, and Risk-based Preventative Controls for Food for Animals. If you are considered a small business (less than 500 employees) implementation will be on September 18, 2017 which concerns Good Manufacturing Practices (cGMPs). Before the date approaches, we will dissect each of the eight cGMPs sections in the Food Safety Modernization Act. As each section is reviewed, an updated Good Manufacturing Practice will need to be written for companies the act will affect. This month we will focus on the first section of the act, 507.14 Personnel; It reads as follows:

§ 507.14 Personnel.
(a) The management of the establishment must take reasonable measures and precautions to ensure that all persons working in direct contact with animal food, animal food-contact surfaces, and animal food-packaging materials conform to hygienic practices to the extent necessary to protect against the contamination of animal food.
(b) The methods for conforming to hygienic practices and maintaining cleanliness include:
   (1) Maintaining adequate personal cleanliness;
   (2) Washing hands thoroughly in an adequate hand-washing facility as necessary and appropriate to protect against contamination;
   (3) Removing or securing jewelry and other objects that might fall into animal food, equipment, or containers;
   (4) Storing clothing or other personal belongings in areas other than where animal food is exposed or where equipment or utensils are cleaned; and
   (5) Taking any other necessary precautions to protect against the contamination of animal food, animal food-contact surfaces, or animal food packaging materials.

§ 507.4(b)(2) states:
Each individual engaged in manufacturing, processing, packing or holding animal food (including temporary and seasonal personnel) or in the supervision thereof must: Receive training in the principles of animal food hygiene and animal food safety, including the importance of employee health and personal hygiene, as appropriate to the animal food, the facility and the individual's assigned duties.

When writing your updated cGMP, the aforementioned subparts will need to be included as well as any biosecurity requirements of your facility. You will need to decide in regards to your employees what will constitute adequate personal cleanliness and include this in your cGMP. As you see from subpart two of sections b, it states washing hands thoroughly to protect against contamination. Based on your facility, it will need to be decided on when and where you will require your employees to wash their hands. The preamble of the rule states that a hand washing facility does not always have to be a traditional sink with soap and hot water. It could also include waterless hand-washing stations at strategic locations.

The written cGMP will need to include how to handle or secure employee jewelry so it does not become a source of contamination or a safety hazard. Employee storage for personal belongings when in the area of exposed animal food or where equipment or utensils are stored or cleaned will need to be addressed as well. It would be in good practice to have a dedicated area where employees can store their personal belongings. It would also be recommended to include personal items that are allowed in the designated area such as items made of glass, plastic, or other materials that could be a source of contamination in animal food.

In the last segment of the section, it is states you will need to document training and acknowledgment of the importance of training. The documentation will need to be kept for the entirety of the employee’s employment plus an additional two years following their leaving of the company.

In conclusion, to be in compliance with the first section of the animal food rule by September 2017, you will need to begin developing current Good Manufacturing Practices (cGMPs) reviewing personnel hygiene, protection against contamination, and development with documentation of training.
Because of our bountiful fall harvest in 2016, many grain companies across the grain belt still are dealing with ground piles. Listed below are some basic safety tips which workers need to be aware of when working around these massive piles of grain:

**CLIFFED GRAIN**
If workers walk down this pile of crusted and cliffed grain, they can easily be engulfed. Workers need to understand not to walk down or walk on this grain when it is in this condition because of the huge engulfment hazard which is in place.

**SPECIALIZED EQUIPMENT**
In addition to engulfment hazard prevention, workers need to be aware of the equipment which can easily run-over them when working around the pile. When working in this area, workers need to constantly have their head on a swivel and be on the lookout for trucks, loaders, and other equipment. Never walk behind the loader which is being ran at the pile. If you must contact the loader operator, call him on the radio or phone. Ideally workers, who are working on the ground dumping trucks or working near the loader, should wear high visibility shirts or vests so they can be easily seen. Workers should never get between the loader and the truck trailer being loaded due to the potential crush hazards. Check to ensure all workers who are running the loader are trained and authorized by management to operate the equipment.

**GRAIN COVERING**
Remove the grain covering in sections to provide protection for the grain that will not be picked up that day.

**AERATION TUBES**
If aeration tubes need to be moved, ensure the forks on the loader or forklift are long enough and the equipment is large enough to move the tube. If needed, secure the tubes to the forks on the loader or forklift so they do not fall off. Before the aeration tubes are moved, make sure the fans are locked out and fan cords are unplugged to prevent workers from being shocked.

**BUNKER WALLS**
Before moving the bunker walls, ensure all the grain is removed from around the walls. While the bunker walls are being removed, the walls can be highly unstable. Before the walls are lifted, secure the walls with chains or cables to the forks or backrest of the forklift to prevent the walls from falling off the forks. To prevent workers from being crushed by the bunker wall, never allow workers to walk underneath a section of the wall which is being lifted by the forklift or loader.

**PPE**
Recommend workers wear hearing protection, dust masks, and safety goggles or glasses when working at the ground piles. Ensure workers are not wearing loose clothing or jewelry which can get caught in the equipment. If a worker has long hair it needs to be tied up and worn under a hat.
A common sense approach to avoiding back injuries

1. Stay fit
   - Tone your muscles. Exercise your abdominal and leg muscles. The stronger they are, the less your back has to work.
   - Lose extra pounds. Excess weight can exaggerate the curve of the spine and strain the back.
   - Stand up straight. Try to keep your ears, shoulders and hips in a straight line.

2. Lift right
   - Get help. If the object is too heavy to lift by yourself, ask a coworker for assistance.
   - Keep your back straight if you have to squat. Also, bend at the knees and keep the load close to you.
   - Avoid twisting. To lift and turn, point a foot in the direction you want to go before lifting.

*SOURCE: http://www.safetyandhealthmagazine.com/articles/3008-avoid-occupational-back-injuries*