Are you prepared for an Occupational Safety and Health Administration inspection?

By Eleanor Jacobs

The folks at Matlink Dairy were more than a little surprised when an OSHA inspector showed up. OSHA hadn’t called ahead, says Ted Mathews, managing partner of the 575-cow Clymer, N.Y., dairy. “She (the inspector) said we could ask her to leave, but she’d be back with a Marshall.”

That settled, the OSHA inspection went forward with civility. Mathews credits his cooperation and that of the dairy’s staff to avoiding a possible $10,000 fine. Instead, OSHA fined the dairy $750 for one violation.

A complaint to the Department of Labor precipitated the inspection. Though the OSHA inspector couldn’t say who filed the complaint, it was clearly a disgruntled fired employee, Mathews says. The OSHA Notice of Alleged Safety or Health Hazards cited that an employee suffered eye burns from spraying iodine as teat dip and lung irritation from sawdust bedding. Also the dairy had not conducted hazard communication training for employees.

What OSHA sees

The inspector asked to see only those areas where the employee would normally go as part of his job, explains Mike Frederickson, herd manager. That included the parlor, freestall housing and utility room. She did not look at any component of the manure handling system, which includes an anaerobic digester built in 2001. But wherever an inspector goes on a farm, “if she sees an OSHA violation, she’s bound to bring it to our attention whether or not it’s part of the complaint,” says Frederickson.

In the utility room, the inspector cited the dairy for not closing the covers on the breaker boxes and for not installing “dummy” breakers where ones were removed. The dairy had a week to correct those violations before re-inspection.

“This is an indication of the sensitivity of OSHA’s safety threshold,” Mathews says.

OSHA also cited the dairy for not having:

• A written hazard communication for employees, prompting the $750 fine.
• Hazard communication training for employees, and written proof of training.
• A copy of Material Safety Data Sheets (MSDS) for hazardous chemicals, which include everything from WD40 to Clorox.

• A log of all OSHA 300 occupational injuries and illnesses, required of businesses with more than 10 employees.

For items cited, Matlink Dairy had to develop an “abatement certification” that states what was done to correct the problem and when it was done. Vinny Howden, bookkeeper and parlor manager, spent many hours to complete these.

Changes made

The complaints that initiated OSHA’s visit to Matlink Dairy were dismissed. The dairy uses teat cups, not spray, and the sawdust wasn’t considered a hazard.

The OSHA inspection, trying as it was, produced positive results. The dairy contracted with the Cornell Agriculture Health & Safety Program for training in how to comply with OSHA’s hazard communication standard. (See FYI.) Among other changes, Howden now conducts safety training and has new employees sign a form to verify they were trained.

The OSHA inspection set off alarms for Mathews regarding the manure handling system. “I thought, are we nipping at the tip of the iceberg? What about the digester?” he says, wondering about possible hazards in the system.

Mathews arranged for a safety inspection of the manure handling system, conducted by Nellie Brown, a certified industrial hygienist and director of the Cornell Workplace Health and Safety Program, and Curt Gooch, PRO-DAIRY agriculture engineer.

Safety walkthrough

Brown assessed each component of the manure handling system from alley cleaning to collection, digestion, separation and distribution of the final products – solids, liquids and biogas. She evaluated the tasks related to every phase and interviewed employees on those jobs. She assessed the ramifications of system failure or vandalism, making it possible to develop risk management strategies, Brown says.

Two issues related to Matlink’s manure system stood out in her evaluation:

• Confined space. “It’s a maintenance task issue,” Brown

As a result of an OSHA inspection at Matlink Dairy, Clymer, N.Y., Vinny Howden, the dairy’s bookkeeper and parlor manager, now conducts employee hazard training and has employees sign a form to verify they were trained. The dairy also bought safety equipment such as these gloves. And it conducted a safety inspection of the manure handling system, which includes an anaerobic digester.
Manure gas can be deadly from page 16

Manure gas can be deadly. One without wearing a SCBA around manure hazards and can help keep you and others on your farm safe.

Provide adequate ventilation has been proven. If you find an unconscious person overcome by manure gas, call 911. Be sure rescue is done by someone with adequate training. If you enter a pit and try to rescue someone by “holding your breath,” you may well become a fatality, too. Do not enter a pit to rescue someone without wearing a SCBA or until adequate ventilation has been proven.

Prevent accidents

Implementing the following practices can help keep you and others on your dairy safe around manure hazards and confined spaces

1. Conduct on-going worker training that helps employees recognize manure hazards, how to work safely around them and what to do in emergencies.

2. Provide Farm medic training to local rescue squad personnel. Include farm facilities in the actual training so that emergency personnel are familiar with your dairy’s layout and potential hazards.

3. Conduct first-on-the-scene training with employees so they know what steps to take in the event of an emergency.

4. Post hazard signs at all openings to manure pits and confined spaces, on manure storage tanks, and around manure ponds and lagoons.

5. Fit all openings to manure pits with metal grill covers to prevent falls or other accidental entries, and periodically check these covers for corrosion to ensure they will support a person standing on them.

6. Incorporate safe designs that minimize confined spaces and the need to enter them when building new facilities.

Follow the same advice when working around manure storages as you would for any job on a dairy: If you have a bad feeling about a situation – it doesn’t look right, smell right or feel right – stop and find out the hazards before you begin the job.

When OSHA comes calling from page 17

says, “How do employees maintain the system and avoid entering into confined spaces, which is the goal.” Employees had developed a number of ways to do both, she found.

The layout of the system puts the PVC pipe that biogas travels through to the flare and generator very close to the digester cover. “The system didn’t have a flame arrester,” Brown says. “It’s important to look at where the layout may be hazardous.”

Brown is developing a checklist for farmers to use to evaluate safety factors related to their manure handling system, no matter what type.

“It’s a misconception that agriculture is exempt from OSHA standards,” says Ellen Abend, safety and health educator with the Cornell Agriculture Health & Safety Program. OSHA must visit every farm where there’s a fatality, which farms must report, she says. But under its “General Duty” clause, which states a business must provide a safe work environment, OSHA can inspect dairies. Abend also points out that some OSHA offices, such as those in Syracuse and western New York, seem to be taking more interest in what is happening on farms.

Vendors of safety danger signs

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The Cornell Agriculture Health & Safety Program has a grant through the Department of Labor to conduct Worker Safety Training to bring farms into compliance with OSHA hazard communication standards. The training is available to all farms. For information, contact Ellen Abend at (607) 255-1597. E-mail: HYPERLINK “mailto:ela4@cornell.edu” ela4@cornell.edu.

For more about OSHA, see its website: www.osha.gov