

CBC 2016

Ensuring the Safety of Non-Employees in the Brewery

Learning Objectives

- Describe your role as a host employer
- Identify regulations and best practices that apply to third party safety management
- Explain high-hazard scenarios that will involve careful communication & planning with third parties
- Identify a strategy for communication, coordination, orientation, & management of third parties at your brewery

Identification of Hazards

What's a third party?

- Anyone who is not on the brewery's payroll and is in the brewery!
 - Delivery personnel
 - Truckers
 - Contractors
 - Suppliers
 - Maintenance & Service
 - Inspectors
 - Regulators
 - Volunteers

- Tour groups

THE FERRI GROUP



What could they get into?

- Chemicals
- Process equipment
 - Lockout/Tagout
- Forklifts
 - Other material handling equipment
- Confined spaces
- Completed product...

What happened at ABInBev?

- \$150,000 fines to OSHA (Jersey City & Bronx)
 - 2 willful, 8 serious, \$162, 500
- No training for forklift drivers
 - Willful: \$121K, and defective trucks were in service
- Blocked exit routes
- Damaged storage tanks
- Inadequate HAZCOM training
- Cited in December 2014, contested Dec 2015

What happened at ABInBev?

- Self-audits focused on PITs, training, material handling, HAZCOM, egress
- Safety Committees: labor, mgmt, & safety
- Mgmt responsible for implementing SC
- Provide SC info to OSHA upon request
- Consent to interim monitoring inspections by OSHA
- And...

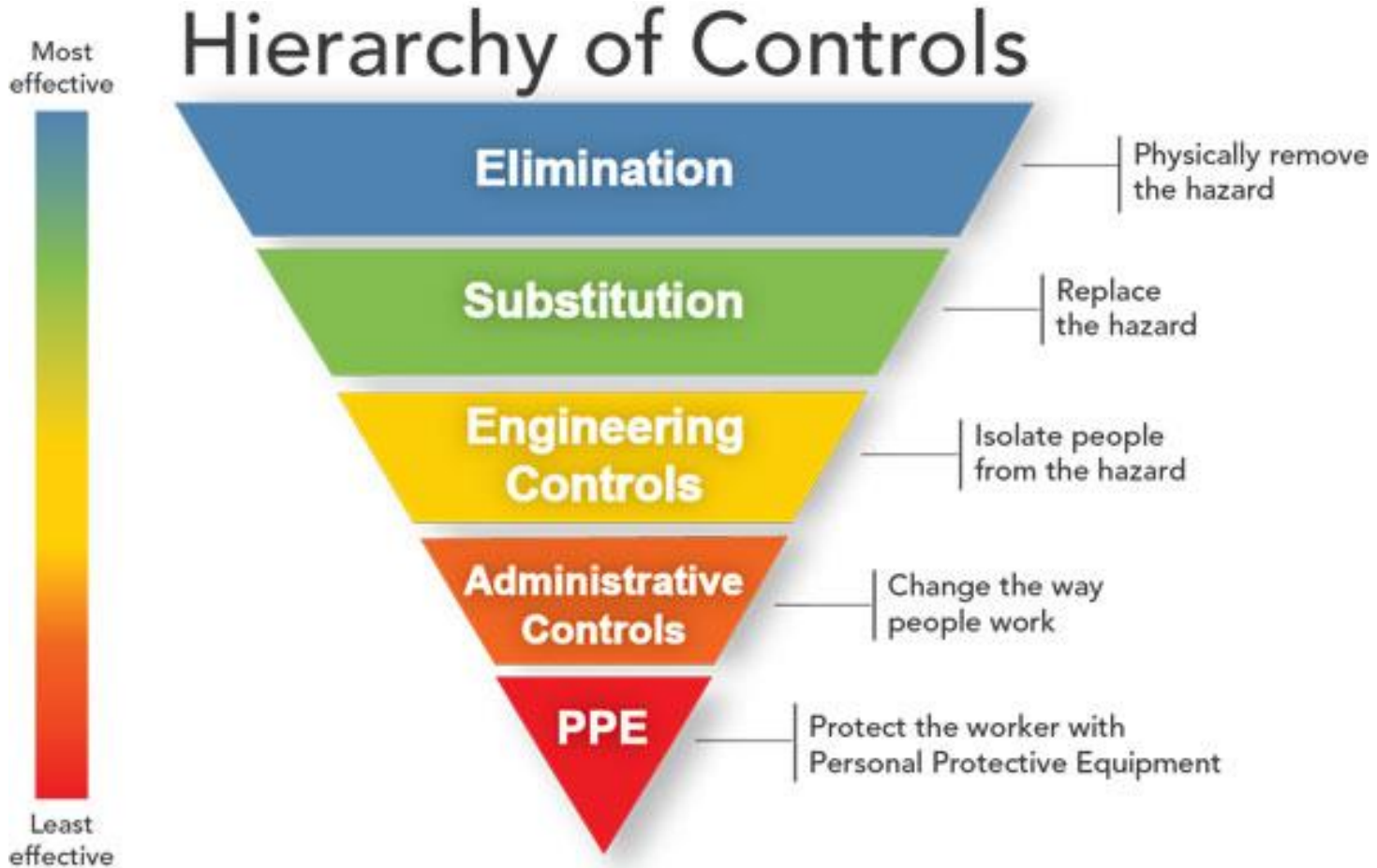
What happened at ABInBev?

- “Ensure the adequate training of all leased, temporary, and/or subcontractors’ employees”



Identification of Controls

Safety 101



BA Quality Pyramid



Tour Groups

- Tour route options based on production, equipment, and type of group
- Limit group size
- Minimum footwear and PPE
 - Eye protection
 - Hearing protection



Tour Groups



**What controls
are in place?**



THE FERRI GROUP

3rd Party Safety in History...

Ammonia leak strikes Coors plant again

GOLDEN, Colo. (AP)—Ammonia leaked today at the Adolph Coors Co. brewery, forcing evacuation of part of the plant, and about 40 people were taken to hospitals. It was the second ammonia leak at the brewery in 10 days.

Up to 700 employees were evacuated from the brewery's packaging annex about 8:30 a.m. after a forklift hit a 4-inch pipe carrying ammonia, which is used by Coors as a refrigerant, said Sgt. Gary Grainger of the Jefferson County Sheriff's Department.

The break, in the annex basement, spewed ammonia gas that spread to other parts of the building.

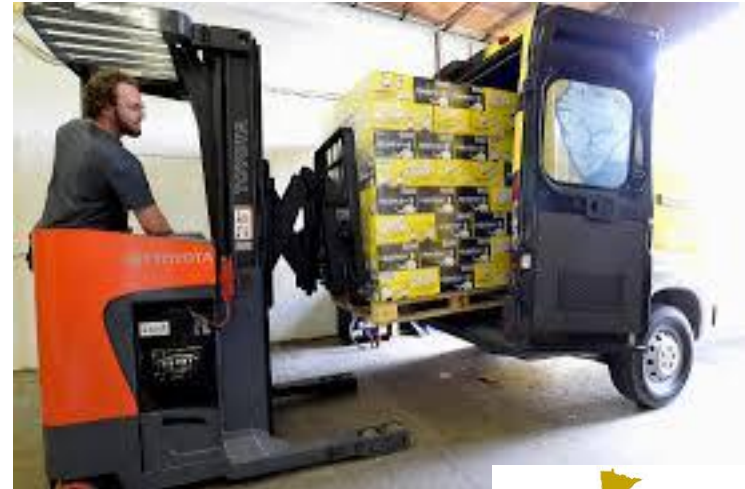
On July 3, thirty-five people were taken to hospitals and 950 people were evacuated from the Coors brewery complex after ammonia fumes got into the ventilation system. Twenty people were treated at a nearby fire station.

- July 1991
- July 12, 2010
 - 10 Serious OSHA citations, \$62K



Delivery Personnel & Truckers

- Set delivery hours
 - If no set hours, pager or other communication system
- Designate delivery personnel to load//unload



Suppliers & Vendors

- Will (or should) they work independently?
- Check-in/out
- Designate a point person at the brewery

Inspectors & Regulators

- Unplanned, unannounced
- Orientation
- Ensure proper PPE

Volunteers

- Is a waiver enough?
 - That's your call...
- Orientation
 - You're doing something already, include safety!

General Third Party Controls

- Sign-in sheet
 - Safety, security
 - Marketing
- Orientation
- Posted rules & information
- Always with a brewery staff member
 - Or means for communication

The Brewery as the Host Employer

Contractors//Service//Maintenance

- You've hired these professionals
- *Hopefully there is a written contract in place...*
- Short-term work
- Long-term work
- Unscheduled, intermittent work
- Scheduled, intermittent work

What are they doing?

- Impact to brewery personnel
- Impact to customers
- Location of work
 - 6' or higher
 - Above sensitive equipment or processes
 - Confined spaces*



Engineering Controls

- Isolation
 - Physical barrier between contractor's work and brewery personnel and/or operations
- Ventilation
 - Gases
 - Particulates
- Prevention of dropped objects
 - Toeboards
 - Netting, grating, etc.



Administrative Controls

- Ensure they have applicable certifications and licenses prior to start of work
- Do not loan your equipment (and vice versa)
- An abbreviated version of brewery personnel orientation
 - Dependent on location & scope of work
 - Train a designated contractor rep to train their personnel
 - *Or not...*

PPE Controls

- Ensure contractor PPE = brewery personnel
- Any extra PPE required for brewery personnel?



Confined Space

- OSHA Subpart AA
- Construction Confined Space
 - Construction work occurring in a confined space at a jobsite or host employer site
- The brewery = Host Employer

Confined Space



- Before any contractor work – ensure you've identified confined spaces at the brewery
- Notify: *in a means other than posting*

Elements of a Third Party Safety Policy

Policy Language



- Risks
 - Who's doing what
 - Where and How
- Controls
 - To minimize risks
- Training
 - Communicate the policy

Policy Language

- Introduction
 - Identify the third parties who can be expected at your brewery
 - Explain the risks

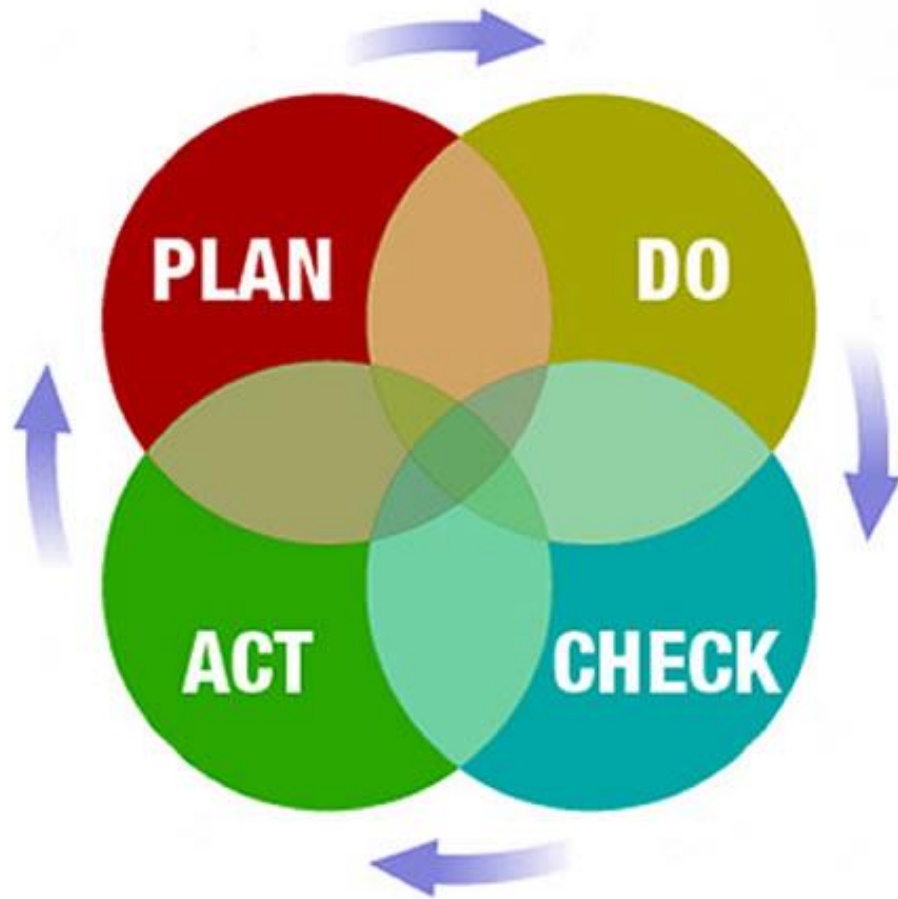
Policy Language

- Identification of Tasks, Hazards, Controls
 - Job Hazard Analysis program
 - Requirements for contractor/third party safety programs to address their risks
 - Reference other safety programs
 - LOTO
 - Confined Space
 - HAZCOM
 - Etc.

Policy Language

- Notification and Training Procedures
 - What will you require of the third parties?
 - What will you provide to the third parties?

As with any program...



Learning Objectives – Met?

- Describe your role as a host employer
- Identify regulations and best practices that apply to third party safety management
- Explain high-hazard scenarios that will involve careful communication & planning with third parties
- Identify a strategy for communication, coordination, orientation, & management of third parties at your brewery

Thank you!

- Abby Ferri, CSP
- Nordeast Minneapolis, MN
- 612-670-6793
- www.theferrigroup.co
- abbyferri@gmail.com
- @theferrigroup

