

FARM SAFETY

By Ronald Williams

Voluntary consultations are available that help prepare for an OSHA LEP inspection

How to be ready for a Local Emphasis Program (LEP) inspection

Occupational Safety and Health Administration (OSHA) has launched a Local Emphasis Program, or LEP, that focuses on New York dairy farms.

The program's goal is to enhance and ensure safer working conditions for farmers and their employees.

As a dairy farmer, you naturally have questions about the LEP as well as concerns about your employees' well-being.

OSHA has already conducted a robust outreach and education effort with the New York Farm Bureau, Cornell University, Northeast Dairy Producers Association and the New York Center for Agricultural Health and Medicine.

This article is intended to supplement those efforts and answer your most common questions and provide you useful information and resources that will assist in achieving a safer work environment for you and your employees.

What is the LEP?

The LEP will combine outreach to dairy farms of all sizes with inspections limited to farms with 11 or more employees. The hazards outlined in the LEP can be present on dairy farms regardless of size, so we encourage you to educate yourselves as to the hazards and corrective measures and to abate any hazards that you identify. A copy of the LEP can be found at: http://www.osha.gov/dep/leps/RegionII/reg2_fy2014_1403dairy.pdf.

What are the hazards?

The LEP focuses on following 12 hazards commonly found in dairy farm operations -

- Manure storage facilities and collection structures (Drowning, asphyxiation, struck by hazards)
- Dairy bull and cow behavior / worker positioning (Struck by hazards)
- Electrical systems (Electrical hazards)
- Skid-steer loader operation (Struck by hazards)

- Tractor operation (Struck by and roll over hazards)

- Guarding of power take-offs (PTOs) (Caught in hazards)

- Guarding of other power transmission and functional components (Caught in hazards)

- Hazardous energy control while performing service and maintenance on equipment (Caught in, struck by hazards)

- Hazardous chemical communication (Contact and airborne hazards)

- Confined spaces (Drowning, asphyxiation, struck by hazards)

- Horizontal bunker silos (Fall, struck by hazards)

- Noise (Hearing hazard)

The LEP identifies reference documents to help you identify and correct the potential hazards. Once you are familiar with the hazards and how to correct them, start correcting those hazards with an emphasis on those encountered most often by your employees.

Common hazards involve absent or inadequate safeguards involving PTO guarding, incorrect animal handling, unsafe powered equipment operation, exposed electrical issues, chemical exposure without hazard communication training and lack of hazardous energy control while performing maintenance.

For some of these hazards, correction can be as simple as ensuring the guards are on where they need to be. Other hazards may require training to take place first. These can include training for haz-

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FYI

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the Roll-Over Protection System program, worker safety trainings, and health screenings, dairy farmers can find the help they need to do a better job.

Concentrating on larger farms with more than 10 non-family employees, NYCAMH has completed 75 on-farm consultations and 220 worker trainings, in English and Spanish, for 2,058 workers. NYCAMH on-farm consultants and trainers are located around the state to build resource capacity within local communities.

“The farms we have worked with have made great progress. On one farm workers requested safety glasses for the parlor, and on another they asked for respirators. Two things I never thought I would hear,” Fiske said.

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ard chemical communication and animal handling. While OSHA does not require that such training be documented, it helps for you to do so as you will be able to keep track of who has been trained and who still needs the training.

There will be hazards that may need more extensive abatement. The best first step in this type of situation is to keep employees out of the areas where the hazards are present until adequate abatement can be implemented.

For issues such as horizontal bunk silos and confined spaces, you will need to review the worksite to identify the spaces and determine the hazards that they pose to workers. Then, train your employees on what those hazards are, where they exist and, most important, how they can protect themselves against those hazards. This is crucial to ensure that employees stay safe.

Once training is completed, post signage to alert employees of the hazard and to keep them out of the area of the hazard. Finally, develop engineering and work practice controls to ensure employees are no longer exposed to the hazard.

Remember, you don't have to go it alone, there are many resources to assist you.

Resources

The LEP has resources listed that you can access online: [http://](http://www.osha.gov/dep/leps/RegionII/reg2_fy2014_1403dairy.pdf)

Farm managers and owners are adapting quickly.

“One owner, while reviewing Material Safety Data Sheets found that a new footbath chemical required new uses of personal protective equipment (PPE),” he said.

The use of PPE such as glasses, gloves and respirators is becoming more commonplace and NYCAMH is trying to help fill the need by offering affordable, high quality equipment.

“We're unable to keep pto shields in stock because of the demands from dairy farms” said Melissa Horsman of NYCAMH.

Horsman is the voice you'll hear when ordering replacement shields or PPE from the catalog. Since January she has shipped over 300 replacement power take-off shields.

If respirators are required to be worn, OSHA will also require that workers be fit-tested before using them. NYCAMH, with all other Occupational Health Clinics in New York, offers respirator fit-testing. □

www.osha.gov/dep/leps/RegionII/reg2_fy2014_1403dairy.pdf.

You can attend a live outreach session that reviews the LEP or view it online at <https://www.farmcrediteast.com/>. For information on live outreach sessions, contact Ron Williams at (315)451-0808.

The New York State Department of Labor's Onsite Consultation Program will come to your farm upon your request and assist you in identifying and supplying suggestions on how to correct the hazards. This service is free and available upon request. To obtain this service, please contact them at:

Syracuse (315)479-3350

Buffalo (716)847-7166

Albany (518)457-2810.

Finally, you can also contact your local OSHA area office to get answers to questions you may have about the LEP or dairy farm hazards. The contact numbers are:

Syracuse (315)451-0808

Buffalo (716)551-3053

Albany (518)464-4338

The bottom line

Like you, we want all your workers to complete each workday healthy and whole. Knowledge, of hazards and corrective measures, is one of the most valuable tools you and your workers can carry with you each day. This LEP seeks to provide you with the knowledge and awareness to make your farms safer work environments for you and your employees. That's the bottom line.

And, if you have any questions, just ask us. □