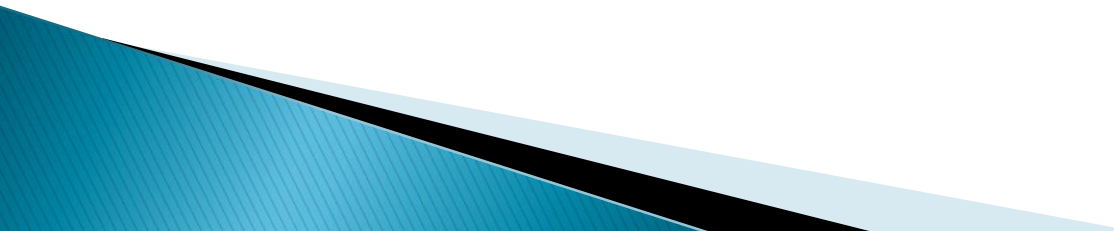


OSHA's Impact on Dairy/Cheese Industry

- ▶ Larry Aleksandrach
 - ▶ March 5, 2018
- 

National Office Enforcement Activity

- ▶ Enforcement Activity End of Fiscal Year 2017 (October 1, 2016– September 30, 2017):
- ▶ National: 41,262 Inspections Conducted
- ▶ OSHA “In Compliance Inspections”
- ▶ National: 26.3%
- ▶ Violations per “Not in Compliance Inspections”:
- ▶ National: 2.33
- ▶ Penalty issued per Serious Citations:
- ▶ National: \$5,099



OSHA's NEP Program FY 2017

- ▶ OSHA's National Emphasis Program (FY 2017)
Region 2

Ammonia refrigeration facilities

- Dairies
- Cheese Manufacturing
- Apple Storage
- Ice Manufacturing
- Cold Storage Warehousing
- Ice Cream Manufacturing

OSHA's Top Cited Violations FY 2017

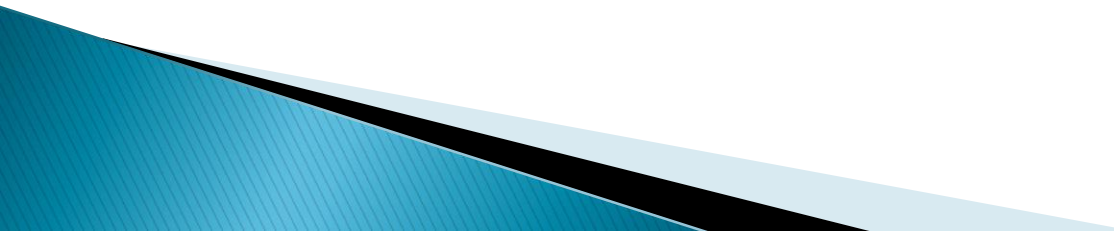
- ▶ OSHA's Top Ten Most Frequently Cited Standards (FY 2017)
- ▶ 1. **Fall Protection**, 1926.501, 6,072 violations
- ▶ 2. **Hazard Communication**, 1910.1200, 4,176 violations
- ▶ 3. **Scaffolding**, 1926.451, 3,288 violations
- ▶ 4. **Respiratory Protection**, 1910.134, 3,097 violations
- ▶ 5. **Lockout/Tagout**, 1910.147, 2,877 violations

OSHA's Top 10 Cited Violations FY 2017

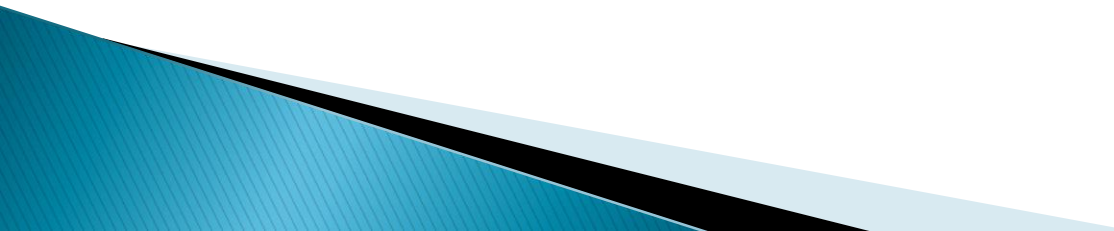
- ▶ 6. **Ladders**, 1926.1053, 2,241 violations
- ▶
- ▶ 7. **Powered Industrial Trucks**, 1910.178, 2,162 violations
- ▶
- ▶ 8. **Machine Guarding**, 1910.212, 1,933 violations
- ▶
- ▶ 9. **Fall Protection -- Training Requirements**, 1926.503, 1,523 violations
- ▶
- ▶ 10. **Electrical Wiring Methods**, 1910.305, 1,405 violations

EPA Visits

Ammonia Refrigeration

- ▶ Risk Management Program (RMP)
 - ▶ General Duty inspections by OSHA and EPA
(Region 2 Edison)
 - ▶ Technical assistance–bad facilities–
pumpdown
- 

OSHA Penalties

- ▶ Tripled in five years
 - ▶ Always an informal settlement hearing
 - ▶ Almost always depositions
 - ▶ Settle for a fraction of original fine
 - ▶ Try to drop all penalties to “other” category
- 

OSHA and NFPA 70E

- ▶ NFPA 70 E
- ▶ Arc Flash
 - Study complete?
 - Labels on equipment complete ?
 - Proper PPE and inspected?
 - Proper training complete?