This assessment report is a point-in-time summary of practices and conditions of the Kansas State University Feed Mill and may not reflect all regulatory issues or EH&S risks that may exist in this area.

The College of Agriculture is partnering with the Kansas Department of Labor (KDOL) on working toward acceptance in their “Safety & Health Award for Public Employees (SHAPE) Program”, an occupational health and safety voluntary improvement and recognition program supported by the Occupational Safety and Health Administration (OSHA).
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Executive Overview

Health, safety, and environmental assessments are valuable tools in the discovery process of understanding risk and its potential impact on faculty, staff, students, and the College of Agriculture. Findings may lead to opportunities for the faculty, staff, and student workers to reduce accidents and environmental incidents and find better ways to reuse or recycle materials that would otherwise be wasted.

On April 25, 2017, the Feed Mill staff participated with the EH&S Office in conducting a focused EH&S inspection at the Feed Mill. This report provides an overview of health, safety, and environmental practices and conditions, observations of successful practices, and opportunities for improvement.

The PI and the Operations Manager developed a well throughout and documented safety-training program in CANVAS. Moreover, they have implemented a self-inspections program that readily prepares the students for work following graduation.

Purpose

The purpose of the assessment was to:

- Gather information and describe the health, safety, and environmental processes, practices, programs, and potential EH&S risks,
- Confirm that management systems are in place,
- Provide management independent verification that the area under review is in conformance with the Dean’s Statement of Health, Safety, and Environmental Protection Commitment, and
- Identify opportunities to continually enhance health and safety performance in the workplace through the Kansas Department of Labor (KDOL) Safety and Health Award for Public Employees (SHAPE) program. Our program EH&S Road Map, like KDOL’s SHAPE Program and OSHA’s Voluntary Protection Program, is made up of a system to discover, prioritize and manage EH&S risks, as detailed below:

The assessment will lay the foundation for the learning and quality improvement effort around reducing accidents and environmental incidents at each area under review. This assessment was not a comprehensive regulatory review.
Scope

The assessment involved a focused review of personnel work practices and environmental conditions of the Feed Mill and the management of EH&S programs in the Grain Science/Animal Science Departments.

Assessment Approach

Overview

During the assessment, the EH&S Office utilized a baseline approach to establish an understanding of the administrative and operational practices associated with managing EH&S risks in the Grain Science/Animal Science Departments. In future assessments, accident records analysis and hazard assessment reviews will be undertaken.

Period of Review

The EH&S Office along with Grain Science staff conducted a focused EH&S assessment on April 25, 2017, the Feed Mill.

<table>
<thead>
<tr>
<th>EH&amp;S Office</th>
<th>Feed Mill</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sandy Hoffman</td>
<td>Charles Stark, PhD</td>
</tr>
<tr>
<td>John H. Gamble</td>
<td>Chance Fiedler</td>
</tr>
<tr>
<td>Luke Tabares</td>
<td>Dustin Busick</td>
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</tbody>
</table>

Execution Strategy for Implementing Program Assessments

Under the direction of the Dean, the Environmental Health and Safety Office (EH&S) conducts program assessments in laboratories, field operations, and support areas with the scrutiny and rigor of a third party performance audit conducted by a regulatory agency.

This outcome driven process is a collaborative one with the staff. It focuses on developing a sustainable management system around the risks inherent in the Feed Mill operations.

Program Benefits

The health, safety, and environmental program assessment process developed by the EH&S Office is not available at the University level. It is designed to be a value-add deliverable for faculty, staff, and students by:

- Reducing the likelihood of accidents, injuries, and environmental incidents with a focus on the human element and the physical condition of the area, not just paperwork compliance,
- Reinforcing responsibility, accountability, and program ownership,
- Improving compliance status through training and self-assessments, and
- Promoting environmental health and safety stewardship with internal as well as external stakeholders, such as the Kansas Department of Labor (KDOL).

The Dean’s Office supports and encourages ongoing self-inspections. If PIs, managers, and staff perform these self-assessments on an ongoing basis they can enhance safety and environmental awareness and verify compliance status.
Drive to Zero Goal

Health, safety, and environmental protection is a priority in everything we do. It is the common thread woven throughout the College. The Dean communicated that message in his Statement of Commitment. Our goal is zero accidents and incidents. This means that everyone must do their part to prevent them. Our “Drive to Zero” illustration provides a road map of our approach to workplace health, safety, and environmental protection. Each level of the illustration offers a purpose to reach our performance goal and our commitment to continual improvement.

Foundation - It is the responsibility of every employee to promote a culture of health, safety, and environmental protection. Doing so requires us to provide the proper tools, training, and reinforcement to make EH&S a reality. By laying a solid foundation where we all understand that EH&S is our first priority, not just a slogan, we will be able to build an effective, team-based safety culture.

Preparation - Before work begins, we must understand:
- The environment we are working in,
- The job requirements, e.g., PPE, training, and
- The hazards associated with the job.

Execution - During the execution of any task, it is the responsibility of each employee to be aware of their surroundings and perform their task safely, with the proper PPE, tools, and skills. Ask yourself the following:
- Are we following safe work procedures?
- Are we having conversations when we identify risks?
- Is management conducting workplace assessments to verify that our EH&S programs are meeting expectations?

Results - The Drive to Zero is fully possible when we follow the stages outlined in the health, safety, and environmental pyramid:
- First, create a solid foundation of safety,
- Next, review each job to understand the risks and take the necessary actions,
- Then, execute our work in a safe manner and be aware of our colleagues and surroundings at all times, and
- Finally, inspect what we expect and the desired results will be attainable.

Roles & Responsibilities

Staff and Student Workers

Staff and student workers that work in laboratories, field operations, and support areas are responsible for knowing and following health, safety, and environmental procedures during the course of their work. They should plan and conduct each operation in accordance with the work areas EH&S management plans, including use of PPE and engineering controls. If accidents, incident, or near misses occur, they are responsible for reporting them to their supervisor.

Departmental Managers/Supervisors

Departmental managers/ supervisors that work in laboratories, field operations, and support areas are responsible for training their employees and students in proper procedure, administrating EH&S management plans, and for seeing that safe work practices are followed. This individual is responsible for maintaining their work environment in a safe and orderly manner, and resolving all EH&S concerns under their control and influence. They are responsible for completing periodic, EH&S self-assessments within the Department and maintaining documents and records necessary for the management of the safety program. If accidents, incident, or near misses occur with one or more of their employees, they are responsible for completing and submitting the first report of injury that includes an investigation to determine the cause of the accident, incident, or near miss, the various contributing factors, and to determine and communicate what can be done to prevent recurrence.
**Principal Investigators**

The principal investigator is responsible for training their employees and students in proper procedure, ensuring the implementation of EH&S management plans and for seeing that safe work practices are followed. This individual is responsible for maintaining their work environment in a safe and orderly manner, and resolving all EH&S concerns under their control and influence. They are responsible for verifying the completion of periodic, EH&S self-assessments within the Department. If accidents, incidents, or near misses occur with one or more of their employees, they are responsible for ensuring the completion and submittal of the first report of injury based on a root cause investigation, and to verify the implementation of actions to prevent recurrence.

**Department Head**

The Department Head is responsible for appointing the Departmental EH&S Coordinator and keeping the EH&S Office informed of personnel changes. The Department head is encouraged to be engaged in the oversight and administration of the EH&S program, and support efforts to manage and reduce EH&S risks in their Department.

**Departmental EH&S Coordinator**

It is the responsibility of the EH&S Coordinator to facilitate the completion of periodic, EH&S self-assessments within the Department. The EH&S Coordinator is responsible for tracking to completion the findings noted in the self-assessment report and the program assessment conducted by the EH&S Office. They are also responsible for facilitating the delivery of EH&S training within the Department, and overseeing the accident/incident reduction program. As College of Agriculture EH&S programs are developed, the Departmental EH&S Coordinator is responsible for facilitating the rollout in the Department.

**EH&S Office**

The EH&S Office supports core research and the teaching mission of the Kansas State University, College of Agriculture. EH&S conducts a comprehensive health, safety, and environmental assessments to verify that work within laboratories and field operations is occurring safely and in compliance with applicable laws, guidelines, and University procedures. To assist the faculty, staff, and student workers in managing their EH&S responsibilities within these area, the College of Agriculture has developed the following: EH&S work practices guidance documents and self-inspection checklists. These documents are designed to assist the users maintain a safe and healthy work environment for they are in the best position to know the hazards inherent in their work and implement appropriate controls.

Work products delivered by the EH&S Office are guided in large part through specific, time-bounded objectives with assessments comprising a large percentage of the current outcome driven objectives & targets.

The EH&S Office is responsible for conducting periodic program assessments within the College of Agriculture. This includes:

- Scheduling assessments based on risk profiles,
- Coordinating assessments with the Department EH&S Coordinator and available faculty and staff,
- Completing the on-site assessment, and
- Tracking to resolution the findings of the program assessment.
Regulatory Applicability

Laboratories, greenhouses, farms, and field sites in the College of Agriculture are subject to the following standards of practice in the conduct of business:
- K-State’s College of Agriculture health, safety, and environmental Statement of Commitment
- Occupational Health and Safety standards as administered by the Kansas Department of Labor (KDOL) and the Occupational Health and Safety Administration (OSHA)
- Environmental standards as administered by the Kansas Department of Health and Environment (KDHE) and the Environmental Protection Agency (EPA)

Program Strengths

The PI, Departmental EH&S Coordinator, and the Operations Manager were supportive of the assessment process, cognizant of good work practices, e.g., development of JSAs, and were open to opportunities for improvement in their respective areas of responsibility. The Operations Manager’s previous experience with KDOL’s SHARP program is visibly evident in how safety is being managed in the Feed Mill.

Opportunities for Improvement

Managing Risk

The EH&S Office used a standardized General Safety Inspection Checklist to conduct the assessments. For this aspect of the review, a more focused program administration assessment was conducted. The reason this was undertaken was to assess how the programs were being managed in order to verify the sustainability of the risk management process.

There was no evidence that:
- Only qualified personnel were being used in electrical safety work, such as switching breakers on/off when a malfunction is encountered. (29CFR 1910.399).

The EH&S Office will assist the Operations Manager develop management systems for the following program areas:

<table>
<thead>
<tr>
<th>EH&amp;S Office Program Development Assistance</th>
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<tbody>
<tr>
<td>Respiratory protection</td>
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<tr>
<td>Hearing conservation</td>
</tr>
<tr>
<td>Electrical safety</td>
</tr>
<tr>
<td>Forklift operation</td>
</tr>
</tbody>
</table>

Accident, Incidents, and Near Misses

It is vitally important to understand that each person in our workplace family has a critical role in protecting his or her own safety and health, as well as that of others. Each person needs to adhere to the highest standards for worker safety, health, and environmental protection within our campus and statewide community. When accidents, incident, or near misses occur, they must be reported to management so we can understand the underlying cause and the contributing factors of the injury, illness, or near miss in order to prevent recurrence.
The EH&S Office is working with Human Capital to gain access to the injury reports for the College of Agriculture. When access is acquired, the EH&S Office will begin generating an “Injury Trend Analysis” report. This report will focus on identifying unsafe behaviors and hazardous conditions that could lead to injuries and illnesses. Included in this analysis will be:

- OSHA recordkeeping guidelines,
- Causal factor(s), and
- Risk mitigation options.

As this program analysis develops, the EH&S Office will provide the internal stakeholders a summary of the estimated direct and indirect costs for accidents that could directly impact research funding. To get a head start on estimating what the cost impact could be for an accident, visit OSHA’s Safety Pays Program.

**Picture Log**

To better illustrate the opportunities for reducing risk to faculty, staff, and student workers and the environment, the assessment team captured point-in-time pictures of practices and conditions observed in the Feed Mill. Given the number of solution options available to management, it was the intent of the assessment team to note and describe only observations, not recommendations for abatement.

In describing the opportunities for improvement, either a regulatory citation or a prudent safe work practice or condition was referenced followed by actions to mitigate the risk and steps taken to prevent recurrence.
<table>
<thead>
<tr>
<th>ROOM #/ID</th>
<th>PICTURES</th>
<th>OPPORTUNITIES FOR IMPROVEMENT</th>
<th>DESCRIBE ACTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>First floor</td>
<td><img src="image1.jpg" alt="First floor picture" /></td>
<td>Contrary to 29 CFR 1910.22(a)(3), the walking working surface had floor object protrusions creating a trip hazard. <strong>1910.22(a)(3)</strong>, the walking-working surfaces are maintained free of hazards such as sharp or protruding objects, loose boards, corrosion, leaks, spills, snow, and ice.</td>
<td></td>
</tr>
<tr>
<td>First Floor</td>
<td><img src="image2.jpg" alt="First Floor picture" /></td>
<td>Contrary to 29 CFR 1910.147(c)(4)(ii)(B), there was no evidence that a procedure was developed, documented, or trained for controlling potentially hazardous energy. <strong>1910.147(c)(4)(ii)(B)</strong>, specific procedural steps for shutting down, isolating, blocking and securing machines or equipment to control hazardous energy.</td>
<td></td>
</tr>
<tr>
<td>Basement</td>
<td><img src="image3.jpg" alt="Basement picture" /></td>
<td>Contrary to ANSI A12614.1 2007 and 29 CFR 1910.23(a)(9), the missing drain cover resulted in a floor hole opening. <strong>1910.23(a)(9)</strong>, Every floor hole into which persons cannot accidentally walk (on account of fixed machinery, equipment, or walls) shall be protected by a cover that leaves no openings more than 1 inch wide. The cover shall be securely held in place to prevent tools or materials from falling through.</td>
<td></td>
</tr>
<tr>
<td>Basement</td>
<td><img src="image4.jpg" alt="Basement picture" /></td>
<td>Contrary to prudent safe working conditions, the sprinkler head had a build-up of dust.</td>
<td></td>
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<tr>
<td>ROOM #/ID</td>
<td>PICTURES</td>
<td>OPPORTUNITIES FOR IMPROVEMENT</td>
<td>DESCRIBE ACTIONS</td>
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</tbody>
</table>
| Basement  | ![Basement Image](image1) | Contrary to 29 CFR 1910.22(c) and 1910.145(a)(1), an uneven surface was not marked with a warning identification to alert personnel of the potential trip hazard.  
1910.22(c), access and egress, the employer must provide, and ensure each employee uses, a safe means of access and egress to and from walking-working surfaces. |  |
| Bio Room 2| ![Bio Room 2 Image](image2) | Contrary to ANSI A12614.1 2007 and 29 CFR 1910.23(a)(9), the missing drain cover resulted in a floor hole opening.  
1910.23(a)(9), Every floor hole into which persons cannot accidentally walk (on account of fixed machinery, equipment, or walls) shall be protected by a cover that leaves no openings more than 1 inch wide. The cover shall be securely held in place to prevent tools or materials from falling through. |  |
| Bio Room 2| ![Bio Room 2 Image](image3) | Contrary to 29 CFR 1910.212(a)(3)(ii), the equipment observed in an unsafe working condition, the guard was loose.  
1910.212(a)(3)(ii), The point of operation of machines whose operation exposes an employee to injury, shall be guarded. The guarding device shall be in conformity with any appropriate standards therefor, or, in the absence of applicable specific standards, shall be so designed and constructed as to prevent the operator from having any part of his body in the danger zone during the operating cycle. |  |
<p>| Bio Room 2| <img src="image4" alt="Bio Room 2 Image" /> | Contrary to OSHA 1910.179 and OSHA Quick Tips #328, there was no evidence of periodic inspections of the hoist to include load testing as specified by the manufacturer. |  |</p>
<table>
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<tr>
<th>ROOM #/ID</th>
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<tbody>
<tr>
<td>Bio Room 2</td>
<td><img src="image1.jpg" alt="Image" /></td>
<td>Contrary to 29 CFR 1910.305(g)(2)(iii), the drop cord did not have a stress relief device. <em>1910.305(g)(2)(iii)</em>, Flexible cords and cables shall be connected to devices and fittings so that strain relief is provided that will prevent pull from being directly transmitted to joints or terminal screws.</td>
<td></td>
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<tr>
<td>Bio Room 2</td>
<td><img src="image2.jpg" alt="Image" /></td>
<td>Contrary to 29 CFR 1910.219(c)(4)(i), the shaft extends more than one-half the diameter of the shaft. <em>1910.219(c)(4)(i)</em>. Projecting shaft ends shall present a smooth edge and end and shall not project more than one-half the diameter of the shaft unless guarded by nonrotating caps or safety sleeves.</td>
<td></td>
</tr>
<tr>
<td>Storage Room</td>
<td><img src="image3.jpg" alt="Image" /></td>
<td>Contrary to ANSI MH 16.1-2012,1.4.2, the storage racks did not have a maximum load capacity rating posted on each steel storage rack section, nor were individual pallet weights posted on the rack cross beams. KDOL issued a citation for observing this condition in the BIVAP shop on May 25, 2016.</td>
<td></td>
</tr>
<tr>
<td>Storage Room</td>
<td><img src="image4.jpg" alt="Image" /></td>
<td>Contrary to 29 CFR 1910.212(a)(3)(ii), the bagging system was observed in a potential unsafe working condition, it should be evaluated with the manufacturer for appropriate guarding or warning signage requirements. <em>1910.212(a)(3)(ii)</em>, the point of operation of machines whose operation exposes an employee to injury, shall be guarded. The guarding device shall be in conformity with any appropriate standards therefor, or, in the absence of applicable specific standards, shall be so designed and constructed as to prevent the operator from having any part of his body in the danger zone during the operating cycle.</td>
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<tr>
<td>Outside Area</td>
<td></td>
<td>A prudent safe work practice when building stairs, the builders should follow 29 CFR 1910.24 for code compliance.</td>
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<tr>
<td>Outside Storage Area</td>
<td></td>
<td>Contrary to 29 CFR 1910.1200(f)(6), the chemical container was not labeled appropriately. For labeling requirements refer to 29 CFR 1910.1200(f)(1)(i) through (vi).</td>
<td></td>
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<tr>
<td>Outside Area</td>
<td></td>
<td>Contrary to 29 CFR 1910.212(a)(3)(ii), the equipment observed in an unsafe working condition, the guard was missing. <strong>1910.212(a)(3)(ii).</strong> The point of operation of machines whose operation exposes an employee to injury, shall be guarded. The guarding device shall be in conformity with any appropriate standards therefor, or, in the absence of applicable specific standards, shall be so designed and constructed as to prevent the operator from having any part of his body in the danger zone during the operating cycle.</td>
<td></td>
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<tr>
<td>Outside Area</td>
<td></td>
<td>Contrary to safe work practices, the man lift basket should not be used unless approved authorization is received from the manufacturer of the forklift.</td>
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<tr>
<td>ROOM #/ID</td>
<td>PICTURES</td>
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<tr>
<td>First Floor</td>
<td><img src="image1.png" alt="Image" /></td>
<td>Contrary to 29 CFR 1910.334(a)(2)(ii), the electrical cord was damaged and in service. 1910.334(a)(2)(ii), if there is a defect or evidence of damage that might expose an employee to injury, the defective or damaged item shall be removed from service, and no employee may use it until repairs and tests necessary to render the equipment safe have been made.</td>
<td></td>
</tr>
<tr>
<td>First Floor Electric Room</td>
<td><img src="image2.png" alt="Image" /></td>
<td>Contrary to 29 CFR 1910.303(g)(1)(i) Table S-1, the electrical panels were blocked. These impediments did not allow for sufficient work clearance. 1910.303(g)(1)(i), the depth of the working space in the direction of access to live parts may not be less than indicated in Table S-1. Distances shall be measured from the live parts if they are exposed or from the enclosure front or opening if they are enclosed.</td>
<td></td>
</tr>
<tr>
<td>Second Floor</td>
<td><img src="image3.png" alt="Image" /></td>
<td>Contrary to 29 CFR 1910.22(c) and 1910.145(a)(1), an uneven surface was not marked with a warning identification to alert personnel of the potential trip hazard. 1910.22(c), access and egress. The employer must provide, and ensure each employee uses, a safe means of access and egress to and from walking-working surfaces.</td>
<td></td>
</tr>
<tr>
<td>Second Floor Electrical Room 201</td>
<td><img src="image4.png" alt="Image" /></td>
<td>Contrary to 29 CFR 1910.303(g)(1)(i) Table S-1, the transformer was blocked. These impediments did not allow for sufficient work clearance. 1910.303(g)(1)(i), the depth of the working space in the direction of access to live parts may not be less than indicated in Table S-1. Distances shall be measured from the live parts if they are exposed or from the enclosure front or opening if they are enclosed.</td>
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<tr>
<td>Second Floor Electrical Room 201</td>
<td><img src="https://via.placeholder.com/150" alt="Picture" /></td>
<td>Contrary to 29 CFR 1910.303(g)(1)(i) Table S-1, the electrical panels were blocked. These impediments did not allow for sufficient work clearance. 1910.303(g)(1)(i), the depth of the working space in the direction of access to live parts may not be less than indicated in Table S-1. Distances shall be measured from the live parts if they are exposed or from the enclosure front or opening if they are enclosed.</td>
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</tr>
<tr>
<td>Fourth Floor Feeders Room</td>
<td><img src="https://via.placeholder.com/150" alt="Picture" /></td>
<td>Contrary to 29 CFR 1910.212(a)(3)(ii), the equipment observed in an unsafe working condition, the guard was missing. 1910.212(a)(3)(ii), the point of operation of machines whose operation exposes an employee to injury, shall be guarded. The guarding device shall be in conformity with any appropriate standards therefor, or, in the absence of applicable specific standards, shall be so designed and constructed as to prevent the operator from having any part of his body in the danger zone during the operating cycle.</td>
<td></td>
</tr>
<tr>
<td>Fourth Floor Feeders Room</td>
<td><img src="https://via.placeholder.com/150" alt="Picture" /></td>
<td>Contrary to 29 CFR 1910.303(g)(iv)(B)(C)) and NEC, the electrical cord was run through a hole placed in the cabinet. 1910.303(g)(iv)(B)(C), flex cords may not be used: (B) Where run through holes in walls, ceilings, or floors; (C) Where run through doorways, windows, or similar openings.</td>
<td></td>
</tr>
<tr>
<td>Fourth Floor Feeders Room</td>
<td><img src="https://via.placeholder.com/150" alt="Picture" /></td>
<td>Contrary to 29 CFR 1910.303(b)(1), the processing equipment box was missing knockouts, resulting in potential exposure to live electrical components. In addition, the cord end was damaged. 1910.303(b)(1), electric equipment shall be free from recognized hazards that are likely to cause death or serious physical harm to employees.</td>
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<td></td>
<td>Contrary to 29 CFR 1910.303(b)(1) and (b)(viii), electrical wires were exposed. 1910.303(b)(1), electric equipment shall be free from recognized hazards that are likely to cause death or serious physical harm to employees. 1910.303(b)(1)(viii), Other factors that contribute to the practical safeguarding of persons using or likely to come in contact with the equipment.</td>
<td></td>
</tr>
<tr>
<td>Loading Dock</td>
<td></td>
<td>Contrary to 29 CFR 1910.28(b)(1), the loading dock was not protected on the non-working side of the platform. The working side does not need to guarded; however, the employer must ensure that employees who may be exposed to fall hazards are trained to recognize and avoid the hazards associated with work on the loading dock. Question 5, OSHA Letter of Interpretation: <a href="https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&amp;p_id=22508">https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&amp;p_id=22508</a></td>
<td></td>
</tr>
<tr>
<td>Receiving Area</td>
<td></td>
<td>Contrary to 29 CFR 1910.28(b)(1), the employees are exposed to a fall hazard greater than 4 ft. from the lower level. 1910.28(b)(1), Unprotected sides and edges. 1910.28(b)(1)(i), the employer must ensure that each employee on a walking-working surface with an unprotected side or edge that is 4 feet (1.2 m) or more above a lower level is protected from falling by one or more of the following: 1910.28(b)(1)(i)(A) Guardrail systems; 1910.28(b)(1)(i)(B) Safety net systems; 1910.28(b)(1)(i)(C) Personal fall protection systems, such as personal fall arrest, travel restraint, or positioning systems.</td>
<td></td>
</tr>
<tr>
<td>Mixing Area</td>
<td></td>
<td>Contrary to safe work practices, the employee did not exhibit good body mechanics while lifting 50 lb. bags of ingredients for mixing which could cause a severe injury.</td>
<td></td>
</tr>
</tbody>
</table>

15
<table>
<thead>
<tr>
<th>ROOM #/ID</th>
<th>PICTURES</th>
<th>OPPORTUNITIES FOR IMPROVEMENT</th>
<th>DESCRIBE ACTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Contrary to prudent safety work conditions, the electrical outlet and the light switch were not protected with dust resistive covers.</td>
<td></td>
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<td></td>
<td></td>
<td>Contrary to 29 CFR 1910.157(c)(1), there were obstructions to accessing the fire extinguisher that subject an employee to a potential hazard that may cause an injury. As a prudent safe practice, items should be stored at least 3 feet from fire extinguishers. 1910.157(c)(1), the employer shall provide portable fire extinguishers and shall mount, locate and identify them so that they are readily accessible to employees without subjecting the employees to possible injury.</td>
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<td></td>
<td></td>
<td>Contrary OSHA 1903.1, General Duty Clause, employees are exposed to impact hazards due to deterioration of the building. The General Duty Clause from the OSHA Act of 1970 requires that in addition to compliance with hazard-specific standards all employers provide a work environment “free from recognized hazards that are causing or are likely to cause death or serious physical harm.”</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Contrary to 29 CFR 1910.305(b)(1)(ii), the electrical junction box was missing knockouts, resulting in potential exposure to live electrical components. 1910.305(b)(1)(ii), Unused openings in cabinets, boxes, and fittings shall be effectively closed.</td>
<td></td>
</tr>
</tbody>
</table>
Contrary to prudent safe work conditions, it was unclear as to where the drainage from the scupper drain was being collected or discharged.
Corrective and Preventive Action

The EH&S Office requests a resolution to each identified risk management observation and opportunity for improvement item within 60 days from the receipt of this report, as approved by the Department Heads. The response should include actions to mitigate the risk and steps taken to prevent recurrence. The next request is for the staff to begin monthly self-inspections using the General Safety Inspection Checklist (see Appendices) as a guide in completing those assessments, and correcting those findings in a timely manner.

Of particular note is the potential systemic nature of the findings. Since this assessment was a point-in-time review of the Feed Mill, attention to identifying corrective and preventive actions in other areas of the Feed Mill would be prudent in the opinion of the EH&S Office.

Appendices

Resources

Occupational Safety and Health Standards (29 CFR 1910)
Safety and Health Regulations for Construction (29 CFR 1926)
Occupational Safety and Health Standards for Agriculture (29 CFR 1928)
Grain Handling Facilities
KSU Hazardous Communications Program
http://www.k-state.edu/safety/docs/HazCom2012.pdf
Chemical Compatibility Storage Group Chart
https://safety.vanderbilt.edu/chem/chemical-storage-groups.pdf
Chemical (Toxic and Hazardous Substances) (1910.1450 App. A)
KSU Respiratory Protection
http://www.k-state.edu/safety/occupational/respiratory-protection/
Overview of EPA’s Spill Prevention, Control and Countermeasure (SPCC) Regulation (40 CFR 112)
https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/overview-spill-prevention-control-and

Self-Inspection Checklists

Self-inspection checklists are available through the Occupational Safety and Health Administration (OSHA) Small Business Handbook. These checklists provide the user a means to identify, prioritize, and management health and safety risks in the workplace.

The EH&S Office used a General Safety Inspection Checklist to conduct the assessment. The Feed Mill staff can use this inspection tool during periodic self-assessments.