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Crops
Program

Specialty
Crops
Inspection
Division

AIM
Inspection
Series

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Safety Manual
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INTRODUCTION

This manual is provided to Specialty Crops Inspection (SCI) Division inspection personnel to promote uniformity in safety procedures. Good safety habits are essential for all types of inspection. If needed, contact your immediate supervisor for any situation not addressed in this manual.

This manual contains links to various internal and external sources of information. For inspection personnel without internet or intranet access, please contact your immediate supervisor to obtain hard copies of documents as needed.

GUIDE FOR ELECTRONIC USAGE

The AIM system of instructional manuals is available electronically in Adobe Acrobat Portable Document Format (PDF) at the following intranet address:

<https://usdagcc.sharepoint.com/sites/ams/AMS-SCI/AIM/SitePages/Home.aspx>

When accessed electronically, AIM materials have hyperlinks and hypertext (visible as underlined [blue text](#)) available to the PDF user. Clicking on a hyperlink takes the reader to a web site with information relating to the subject. Hypertext links the reader to a different page within the current manual, or a different manual, with information relating to the subject. For example, the hypertext in the Table of Contents allows a reader to go directly to the section of interest in the manual by clicking on the section title.

PDF offers a variety of tools depending on the Adobe version the reader has. The newer the version, the more tools available. PDF documents are easily searchable for content within a document or within multiple documents. To learn about the variety of PDF search options:

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- A series of options will become available,
- Click on the “Access Search Features” link and follow the instructions for the type of search you are interested in.

GENERAL SAFETY

The SCI Division safety policy will:

- Provide safe, sanitary, and healthy working conditions;
- Provide for the safe operation and maintenance of property and equipment;
- Provide necessary safety devices and tools;
- Prevent or reduce injuries and occupational illnesses of Division employees; and
- Provide training for employees on safety awareness.

Safety means being free from danger, injury or damage caused by an unsafe act, an unsafe condition, or a combination of the two. Virtually all accidents are the result of these conditions. An effective safety training program addresses an employee's mental attitude and physical characteristics along with the work environment.

Safety is the responsibility of each individual. However, supervisors are responsible for ensuring that employees receive proper safety information and training. Employees must comply with safety rules, observe prescribed safe working practices, strive to prevent accidents, and report any accidents to his/her supervisor immediately.

Safety is critical. The cost of accidents cannot be measured in dollars and cents. The injured employee suffers the pain of injury far beyond compensation.

New Employees

When new inspectors are hired, they will receive the following:

- A Bump hat with instructions for use;
- Ear plugs - issued as needed for the assignment;
- Written policy regarding dress code; and
- This Safety Manual.

On the Job Training

Employees will receive on-the-job training in safety awareness, which includes:

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- Identification of hazardous substances in the workplace, their storage location, proper use, counteragent, and the recommended safety tips;
- Identification of equipment hazards and protective devices;
- Proper and safe methods of job performance;
- Information on how to report accidents;
- Methods to promote safety awareness;
- A tour of the work site; and
- Importance of following industry safety practices when in-plant.

Assignment of New Duties or Duty Station

Employees will receive on-the-job training in safety awareness which includes:

- Identification of hazardous substances, their location, proper use, and counter measures;
- Identification of equipment and protective devices; and
- Proper and safe methods of job performance.

Safety Training Program

The safety training program shall consist of the following:

Initial Training – The employee is trained in safety procedures at the beginning of each different work assignment. Training includes informing the employee of hazards, protective measures and safety procedures associated with job tasks. Supervisors will document this on the [SC-701 – Receipt of Safety Program/Training](#) (intranet link). Additionally, the Supervisor will document specific safety training and personal protective equipment provided on the [SC-700 - Employee Safety and Health Record](#) (intranet link) at the initial hire and anytime the employee has a change in work hazards.

On-going Training – This training is regularly conducted in workshops, on-the-job, and occasionally at seminars,

Grading Facility Safety – The employee is made aware of safety hazards in a particular workplace and learns to incorporate safe working habits into the daily work routine. Further safety training is provided as required due to changes in hazards, procedures, or location.

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If an employee is involved in an accident at work, he or she may be provided counseling by the immediate supervisor or the designated Safety Officer upon returning to work.

General Training

Depending on the work environment, some employees may require the following three types of safety training.

Office Safety – Addresses hazards associated with working in an office.

Laboratory Safety – Addresses hazards potentially encountered with chemicals and laboratory analyses.

Plant/Warehouse Safety – Covers industry safety practices.

When Inspection May Jeopardize Health and Safety of the Inspector

Each inspector must take ownership of their own safety and consider that their activities can affect the safety of their coworkers. It will seldom be necessary to refuse to inspect for health and safety reasons. There should be ample justification for refusing to inspect lots when the inspection will jeopardize the health or safety of the inspector; the conditions must be reported to your supervisor and the applicant, as well as documented.

Report All Unsafe Conditions to Your Supervisor

Any employee who believes that an unsafe or unhealthy working condition exists has the right and is encouraged to report this working condition to their supervisor and/or their Program Safety Coordinator (PSC) and request a review of the work condition. This should be accomplished using the [SC-702 - Notice of Unsafe Worksite](#) (intranet link).

Proper Use of Safety Equipment, Personnel Equipment (PPE), and Other Devices Provided for Protection

If there is a hazard at the work site, the applicant will usually provide protective equipment. The inspector shall adhere to any special requirements for using personal protective equipment or safety devices at the inspection site. If you have any questions about PPE, contact your supervisor.

Risk of Foot Injury

Many assignments can put the inspector at risk for foot injuries. These include, but not limited to, falling containers, pallet jacks, wet and slippery walking surfaces, and protruding nails and splinters that can pierce footwear. Fresh commodity inspectors are required to wear approved [American National Standards Institute \(ANSI\) and/or American Society of Testing Materials \(ASTM\)](#) approved safety shoes or boots when performing inspections. If, for some reason an

inspector is unable to wear approved ANSI/ASTM safety shoes they must have medical documentation on file stating the reason(s) why they are not able to wear them. This documentation shall be in the safety file of the office, as well as the inspector's personal file maintained in the office.

Remember that the ANSI and ASTM standards only refer to the toe protection, soles and metatarsal guards that are built-in the boot by the manufacturer.

Hazards in Rail Yards

Special care should be used in rail yards. Never step on railroad tracks; always step over them. Never crawl under the rail cars or walk between cars that are uncoupled and only a few feet apart. Do not cross tracks close to the last car and always look both ways before doing so.

Use Care When Walking Between Conveyance and Platforms

Be careful when walking behind a truck or trailer that is a few feet away from the platform or car. There is danger of being crushed by a truck rolling or backing unexpectedly. Make your presence known.

Beware of Teetering Stacks

When entering a carrier, warehouse, or cooler, where a product is stacked high on the floor or on racks, be aware of leaning or teetering stacks. A container falling from a pallet on an overhead rack can cause serious injury. Be extremely careful when product is being removed from overhead racks in the area that you are working in. Be sure to stand several feet from the actual operation.

Do Not Climb on Top of Storage Racks to Obtain Samples

Do not climb on storage racks or pallet stack to obtain samples. In addition, do not handle a pallet, or ride a pallet, especially into the air, in order to obtain samples. It is the responsibility of the applicant to make the lot accessible for inspection. If the applicant is unwilling to make the lot accessible, the inspection must be refused or restricted to the product that is accessible.

Do Not Climb on Top of Carriers

It is not permitted to climb on top of carriers such as railcars or truck trailers. The condition of the carrier can be determined without climbing on top of the carrier.

Be Aware When Breaking Various Pallet Wrapping (Straps, Plastic Wrap, Plastic Netting)

Be aware of various pallet wrapping debris when moving around or near pallets. Straps that are wrapped tightly around a pallet can spring back when cut or broken. To avoid the possibility of injury, the inspector should stand at arm's length when cutting or breaking the strap or hold both

ends when breaking the band/strap. Other various wrapping can leave a tripping or falling danger after the inspector cuts the material to get access to the cartons on the pallet. Remove all debris after cutting to avoid possibility of injury.

Opening Carrier Doors

When opening hinged doors, the inspector should stand behind the door and open it cautiously in order to avoid falling pieces of ice or containers. Sliding doors on rail cars have been known to fall off, so always stand to one side when opening or closing to prevent them from hitting you if they should fall off.

Precaution Against Being Locked in a Carrier

Inspectors should always take precautions to prevent them from being locked in a carrier. Leave your equipment bag or an article of clothing in the doorway area so it might be seen by anyone intending to close the door.

Pallet Jacks

No inspector, at any time, should be handling an applicant's pallet jack. Sometimes it may seem easier to move product yourself to make it more accessible. The applicant is responsible to make the product accessible for inspection, and for safety reasons you are not to use any type of hand jack in the course of your duties.

Dock Side Inspections

Never walk along pier string pieces or stand under slings loading or unloading cargo. Do not enter cargo holds of ships. Always be sure a line or cable remains slack when stepping over it.

Working in Cold Storage/Coolers

When working in cold storage, coolers or other warehouses, arrangements should always be made with the applicant or warehouse staff before entering any of the rooms so that the inspector can get out of the warehouse when the inspection is completed. Do not operate a cold storage elevator. Always use extreme caution when entering or leaving coolers. Warehouse curtains may be old and/or discolored in a manner that will block any vision of items, people or machinery coming from the other side. When walking through curtains, proceed through on the left or right side or use the door provided for entering and exiting. Never enter through the middle of the curtains.

Use Caution When Handling Packages

When lifting packages, you should be on secure footing at all times. Beware of loose planks, protruding nails, or bolts, or uneven or icy surfaces. When lifting heavy packages up from the floor or down from a stack, do the lifting primarily with your arms and legs, not with your back.

A back can easily be injured while lifting a heavy object if you are off balance, or if you are in a twisted position. Be sure to have your feet well placed to prevent slipping that may cause strain or necessitate you to drop the package on your feet to regain balance. It is the policy of most firms engaged in the heavy industries such as steel manufacturing, etc., to caution their employees to keep their feet close together when lifting, thus giving better protection against rupture. When removing a package from a stack, be sure the packages are stacked so that the pile will not fall. In handling packages, always be on the lookout for splinters and protruding nails, a serious infection can develop from a very slight scratch or cut. When working carriers in which the packages are frozen to the floor, or are tightly wedged or glued in the layers, the inspector should be extremely careful how much strain is put on the package since it might come loose or break causing the inspector to injure themselves. If packages are glued in such a way that the inspector is unable to obtain their samples below the third layer, they should restrict their inspection unless the applicant is willing to provide help with obtaining samples below the third layer.

Safe Use of Inspection Equipment

When an inspector uses their knife to examine product, they should cut the specimen with the edge of the knife moving away from them. When cutting to remove waste, keep your thumb from the point that the blade will exit the specimen. Use extreme caution when using knives, especially when cutting watermelons with a machete. Such knives should always be in a sheath when not being used. Care should also be used when cutting tape with box cutters to open cases and/or plastic film from pallets.

First Aid

Each office should be equipped with a first aid kit and supplies. Check the inventory of first aid kits periodically to maintain adequate and updated supplies. When any injury occurs while at an inspection site, the person in charge of that property should be notified immediately and first aid administered. Furthermore, all accidents occurring on their premises must be reported in order to comply with Workmen's Compensation and insurance laws. Seek immediate medical attention first with all injuries, regardless of how serious or minor. All injuries, regardless of how serious or minor, must be reported to your Officer-In-Charge (OIC) and should be documented on a [CA-1 form](#). In addition to becoming the official record of the injury, this form also triggers any necessary paperwork for compensation (if warranted) from the Office of Workers Compensation. Regardless of whether the employee completes the CA-1 form, the supervisor should document any injuries in the Agency's [First Report Tool](#) (intranet link).

Listening to Music

When employees are in a non-office setting (like the production area of a plant, or a warehouse, etc.) they should not be listening to music. Listening to music may produce a safety hazard by masking environmental sounds that need to be heard, especially in areas where attention to moving equipment, heavy machinery, vehicle traffic and safety warning signals may be

compromised. Ear buds are prohibited in processing/manufacturing environments, due to both safety and GMP restrictions.

Safety Reviews

Once a year, the supervisor (OIC, AOIC, or SAS) should complete a safety review of the field office, sub-offices, and inspection points using AMS Safety Checklists. Checklist 1 – AMS Facility Self Inspection Checklist is for the field offices. Checklist 2 – Plant Inspection Checklist is for plant facilities where we have ACGs assigned in plant on a continuous basis. This can be done in conjunction with a supervisory review. When you complete the checklist, you will receive a confirmation of completion email. This will be the proof of completion.

REPORTING INJURIES

Employees should notify their supervisor as soon as possible when they are injured on the job. When an injury occurs on the job (after the employee is treated for the injury), the supervisor should enter the pertinent information into the [First Report Tool](#) (intranet link). Additionally, the supervisor should provide the employee with a [CA-1 \(Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation\)](#) form. If the employee completes the form, the supervisor should complete the supervisor portion and submit it to their Region's OWCP Coordinator.

ACCIDENTS IN GOVERNMENT OWNED VEHICLES (GOV)

Concerning the instructions provided herein, a GOV is a Government vehicle assigned to an office; a rental car that an employee pays for with their Government travel card, while on official travel; or your Privately Owned Vehicle (POV) when you are being reimbursed mileage by the Government.

First and foremost, if/when an employee is in an accident, they MUST notify the supervisor as soon as possible. If the employee is not injured in any way, then they MUST attempt to contact their supervisor at the scene of the accident. Once the supervisor is aware of an accident, he/she must, within two hours, report the incident to their supervisor and enter the information into the [First Report Tool](#) (intranet link). If the supervisor is unable to enter the information into the First Report Tool within two hours, they should notify Lynn Colby or Kacy Kiljanski. If anyone involved in the accident (employees and/or 3rd parties) is injured and transported to the hospital via ambulance, and/or the property damage (all property involved in the accident, not just the GOV) potentially exceeds \$10,000, the supervisor MUST contact the AMS Safety and Occupational Health Manager, Mark Kemp, via telephone call to (202) 720-0061 or (202) 236-9610, or via email to mark.l.kemp@usda.gov, within 2 hours.

All GOVs contain an [Accident Reporting Kit](#) (intranet link). In the kit is a document entitled What Do I Do in Case of a Vehicle Accident or Incident. Please review the document in its entirety. Two points of particular importance are:

- **Notify the Police whenever necessary.** Anytime you are in an accident with the GOV, it is necessary to contact the police. Make sure the police knows that the accident involves a GOV. If the police refuse to come to the scene of the accident, request a police report (PR) number (or case number) for insurance purposes, and include that information in the First Report Tool. If the police will not issue a PR/case number, be sure to include that the police refused to provide a PR/case number in the First Report Tool.
- **Consider taking photographs of involved vehicles and the accident scene if you are able to do so without risking your safety or the safety of others.** Photographs are an essential part of the documentation of an accident. If you are able to do so, be sure to take complete pictures of all vehicles (not only the GOV) and any other property that might have been involved.

The supervisor **MUST** upload all applicable documents to the First Report Tool within three days. Documents that are required for all Accidents/Incidents are:

- AD-112: Report of Unserviceable, Lost, Stolen, Damaged or Destroyed Property
- SF-91: Motor Vehicle Accident Report
- Pictures of all vehicles, in color, to show damages
- Police report (realizing that this may be delayed, but as soon as it is issued)
- Estimates for repair – For leased vehicles, work with your GSA Field Service Representative
- Final repair bill(s)

The above forms are included in the Accident Reporting Kit.

Employees should be aware that failure to properly report accidents may result in disciplinary action being taken against the employee and/or the supervisor.

HAZARD COMMUNICATION PROGRAM

Employers must establish a training and information program for employees exposed to hazardous chemicals at the time of initial assignment, and whenever a new hazard is introduced into their work area. This applies to inspectors who work in-plant as well as those in the field office. See the General Procedures Manual, Other in-Plant Inspection Duties for plant-specific safety materials that should be available for in-plant inspectors to review.

Hazard Communication Training must meet requirements outlined in the [SCP Occupational Safety and Health Program](#) (intranet link).

A Written Hazard Communication Program contains the following essentials:

General Information

In order to comply with the Hazard Communication Standard (HCS) (29 CFR section 1910.1200 this written program has been established for the Specialty Crops Inspection Division (*field office name*) Office. Copies of this written program have been distributed to each employee and will be available for review by any employee in the following location: (*identify name and location of HCS materials; for example: "in the HAZCOM/SDS binder mounted in the lab next to the hood."*)

(*Title of responsible person*) will have overall responsibility for coordinating the Hazard Communication Program and making it available.

In general, each employee will be informed of the substance of the HCS, the hazardous properties of the chemicals that they work with, and measures to take to protect themselves from these chemicals.

Hazardous Chemical Inventory List

(*Title of responsible person*) will be responsible for compiling and maintaining a list of all hazardous chemicals used at this site. The list will be updated as necessary. The list is found at the following location: (*identify name and location of Hazardous Chemical Inventory List*)

Safety Data Sheets (SDS)

(*Title of responsible person*) is responsible for obtaining and maintaining the SDS for this site. All incoming SDS will be reviewed for accuracy, completeness, and new and significant safety and health information. Employees will be informed of any new information.

Copies of SDS for all hazardous chemicals to which employees of this site are exposed will be maintained in the: (*identify name and location of SDS materials*).

If a SDS is not available to employees in their work area, or if a new chemical is in use that doesn't have an SDS, immediately contact (*Title of responsible person*).

Container Labeling

Each container of a hazardous chemical at this site will be properly labeled. (*Title of responsible person*) is responsible for verifying that all containers received or in use are labeled with the following information:

- Identity of the hazardous chemical;
- Appropriate hazard warnings;

- Name and address of the chemical manufacturer.

Training

Each employee who works with or is potentially exposed to hazardous chemicals will receive initial training on the Occupational Safety and Health Administration Hazard Communication Standard, and the safe use of those hazardous chemicals. Additional training will be provided for employees whenever a new hazard is introduced into their work area.

(Title of responsible person) is responsible for conducting the necessary employee training.

The training will emphasize the following:

- The requirements of the HCP, Chapter 3 of the [AMS Handbook 4790](#) (intranet link), and this written program;
- All locations in the work area where hazardous chemicals are present;
- The location of the written hazard communication program, including the Inventory of Hazardous Chemicals and the location of SDS;
- A description of the physical and health hazards of the chemicals used;
- Methods and observation techniques used to detect the presence or release of hazardous chemical;
- How to lessen or prevent exposure to hazardous chemicals through use of controls, work practices, and personal protective equipment;
- How to read and understand labels;
- How to read and review SDS to obtain necessary hazard information; and
- Contingency plans for medical and chemical accident response.

Following each training session, the employee is required to sign and date a training record (such as that shown in [APPENDIX I – Certification of Employee HAZCOM Training](#)) to verify that they attended the training, received appropriate written materials, and understood the policies of the Hazard Communication Program.

Before any new employee can begin work requiring the use of or potential exposure to hazardous chemicals, training as indicated above must be completed.

Multi-Employee Worksites

When employees of other employers are exposed to chemicals used or stored by AMS, the other employer will be provided a copy of the SDS information of precautionary measures to be taken, and the chemical labeling system used.

(Title of responsible person) will be responsible for providing the above information.

Program Review

This written program will be reviewed by *(name, title of responsible person)*, and updated as necessary.

SAFETY TIPS

Each employee has an obligation to perform their duties in a manner that will not endanger themselves or fellow employees. All employees shall strive to use safe work habits, which are developed through repetition. Here are some tips to put into practice:

Safe Work Habit Tips

- Be alert for hazards at work sites;
- Wear appropriate attire; such as closed toe shoes, bump cap, safety glasses/goggles, pocket-less lab coats. Wear a fluorescent vest when working in a high traffic area, if recommended by management.
- Don't take chances, don't take short cuts, and avoid horseplay;
- Develop a safety conscience; and
- Maintain your emotional control at all times.

Safe Lifting Techniques

Improper lifting is a major cause of accidents and can lead to a variety of injuries. Proper lifting techniques are as follows:

- A. Use a safety back support if necessary;
- B. Size up the load;
- C. Make sure it is clear of obstacles;
- D. Bend knees outward;

- E. Straddle the load;
- F. Get a firm grip;
- G. Keep back straight and upright;
- H. Lift gradually by straightening your legs;
- I. Keep load close to your body; and
- J. To set the load down, keep it close to your body, and lower it by gradually bending your knees while keeping your back straight and upright.

Safe Housekeeping

Good cleaning and housekeeping contribute to the safety of all workers. Here are some key housekeeping pointers:

- Keep stairway, aisles and work areas clear of any obstacles;
- Remove all standing water and other liquids from traffic areas; and
- Remove any broken glass or sharp articles with gloves and shovel.

Ladder Safety

If you need to use a ladder during the course of inspection duties, here are some safety reminders:

- A. Use correct size ladder for the designated job
- B. Inspect ladder and rungs for potential hazards;
- C. Place ladder at the correct angle;
- D. Secure ladder top and bottom before beginning work;
- E. Have someone “spot” the person climbing in case of problems.
- F. Face the ladder while climbing and keep your body near the middle of the step;
- G. Ascend and descend using both hands, always maintaining a 3-point contact on the ladder; and

- H. Do not over-reach while working on a ladder.
- I. If you need to move to a different spot, then climb down the ladder, move it to the correct spot and then climb back up. Even if the ladder has wheels on the bottom, follow the previous instruction. DO NOT attempt to move the ladder while you are on it or allow someone else to do so.
- J. If ladder is fitted with wheels, ensure wheel locks are engaged or chocked to prevent unintended movement while in use.

Special Safety Equipment and Footwear

These include:

- Safety shoes with soles that improve traction on the walking surface; and
- Safety vests for high visibility in areas with forklift/other vehicular traffic.

Hearing Safety

Noise from processing plants is generally loud enough to interfere with communication and disrupt concentration. It can also damage your hearing and threaten your safety. To protect hearing loss, use ear protectors such as plugs or muffs that are properly designed for your ears, and are well fitted and clean. For more detailed information about preventing Hearing Safety Conservation, please consult the [SCP Occupational Safety and Health Program](#) (intranet link).

Powered Forklifts and Truck Safety

Powered industrial vehicles constantly operate around and near pedestrians in aisles and warehouses. Apply these safety rules:

- Stay clear of traffic path or aisle;
- Stop, look, and listen at all blind corners and doorways;
- If available, check mirrors for clear visibility before crossing aisles;
- Listen for vehicle horns;
- Do not stand on forklift blades or pallet; if lifting is required, use enclosed cage for securing samples from warehouse/storage facility; and
- When working in high traffic areas, wear high visibility vests, if available.

For specific information on tank trucks, review the section of this manual on [tanker safety](#).

Preventing Slips, Trips, Falls, and Repetitive Motion Injuries

For detailed information about preventing Slips, Trips and Falls and Repetitive Motion Injuries, please consult the [SCP Occupational Safety and Health Program](#) (intranet link).

PLANT SAFETY RULES

In addition to the instructions on safety contained in this manual, each plant inspector should follow the safety and health rules established for employees of the plant in which he or she is working. Many of the plant “house rules” may be requirements of OSHA standards. OSHA will not cite the plant for failure of a USDA employee to follow these rules. However, the USDA Inspector should set a good example for plant employees by observing the rules and performing inspection and grading tasks in a safe manner.

Many plants designate and post certain areas where their employees must wear safety equipment such as “ear plugs,” “eye protection” or “hard hats.” These items are available to USDA inspectors, except that our “bump caps” are not “hard hats.” For situations such as in warehouses where plant managers have designated that “hard hats” are to be worn, an inspector may do one of three things:

- Wear the “bump cap” in lieu of a “hard hat,”
- Wear a “hard hat” if plant management requests the inspector to do so and provides the hat, or
- In writing, request a regular hard hat from the OIC. Indicate the areas of the plant that are designated “hard hat” areas, and the frequency and/or duration of time the inspector is required to spend in the designated area to perform inspection duties.

OPTIONAL PLANT SAFETY MANUAL

The optional [Plant Safety Manual](#) (intranet link) is a Word document designed to aid inspection personnel by making detailed, facility-specific safety information available all in one location. It is prepared by SCI Division staff at the plant, and available as an optional tool at the discretion of the OIC.

TANKER SAFETY

These instructions contain safety guidelines to follow to avoid accidents when performing tanker inspection activities, such as sanitation inspections, obtaining official samples, and applying tanker seals. Safe conditions and safety awareness must work together to assure the physical well-being and health of the employee.

As in other safety areas, supervisors and inspectors-in-charge must take a lead role in emphasizing the need to take safety precautions and be alert for hazards. An unsafe condition (hazard) must be reported to the proper person and documented on the sanitation score sheet along with a time specified for correction or documented on the [SC-703 - Hazardous Worksite Report](#) (intranet link). Ideas for a safer workplace and other safety related comments may be recorded on the Hazardous Worksite Report. The OIC shall also be notified. If an unsafe condition is not corrected within the specified time frame, the OIC will prepare a letter to management so that appropriate action is taken.

The hazards encountered in performing tanker inspections can be attributed to multiple factors, including negligence of the employee, condition of the tanker, or inclement weather. Supervisors and applicants should work together to develop a safety program that is applicable to tanker inspections. Wherever possible, there should be a covered and enclosed tanker loading/unloading area. Catwalks in the loading/unloading area and ramps leading to the hatch cover shall be equipped with handrails and non-skid walkways. If available, a **CAUTION: DO NOT MOVE** sign should be positioned on the driver's door handle or a large banner that contains similar information placed over the driver's windshield while the tanker is being filled and processed and should not be removed until all employees are clear.

Always exercise caution when inspecting tankers for sanitation and obtaining an official sample. Remember unsafe acts can be eliminated by being aware of the importance of accident prevention and following safe work practices.

Remember - The use of **caution** and **common sense** can prevent accidents.

USDA personnel should never enter the tanker. Entry into a closed tanker requires a Confined Space Permit (29 CFR 1910.146), information on which may be found at the following internet address: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.146>. It is the responsibility of the industry to provide this permit, which is required by the Occupational Safety and Health Administration (OSHA). When a tanker is presented for inspection, **USDA personnel shall allow plant personnel to break the seals and open lids etc.,** before performing inspection activities.

Tanker inspection hazards and precautionary measures to prevent accidents include:

Negligence of the Employee

- Slipping or falling from tanker ladders because hands are not free to firmly grasp ladders when climbing them. If you are in a situation where you must climb the tanker ladder, you must be attached to the tanker with a safety harness and lanyard.

Preventative precautions include:

- Ask a person on the ground to hand you items.

- Use a shoulder strap, belt pouch, or your pocket to hold materials.
- Use gloves to protect your hands from hot metal surfaces, cuts, or metal fragments.
- Protect fingers when lifting or lowering the hatch cover.
- Injuries associated with vehicles being moved while the employee is on or in the vicinity of the tanker.

Preventative precautions include:

- Encourage loading and unloading in low traffic areas.
- Where available, use and display caution signs to alert drivers that an inspection is in progress.
- Require tanker wheels to be locked (i.e. driver setting the parking brake).
- If the driver remains in the cab with the engine running, ensure that they are not in the driver's seat of the vehicle.
- Prior to entering the area, ensure that the driver is aware that you are in the area.
- Exercise caution when walking between or around tankers and be aware of other moving vehicles. Employees should not stand directly behind the tankers.
- Be aware of driver blind spots. Always wear brightly colored safety vests any time you are in the area of any motorized vehicles. Including but not limited to cars, forklifts, and semi-trucks.
- Withhold distribution of all documents until inspection is completed and the tanker is properly sealed.
- Injuries caused by overhead falling objects.

Preventative precautions include:

- Wear your bump hat.
- Observe and check all overhead brackets, equipment, and fixtures for proper support.

Condition of Tanker

- Injuries caused by unsafe conditions on the outer surface of the tanker and surrounding area.

Preventative precautions include:

- Have grease, oil, road grime, ice, dried food product, and other hazardous elements cleaned from ladders and surrounding area.
 - Wear gloves to secure a firm grip.
- Safety hazards caused by fumes or corrosive liquids left inside tankers.

Preventative precautions include:

- Be aware of the possibility of liquids, fumes, or steam from the tanker.
 - Stand to the side of the tanker when plant personnel are opening the rear or side outlet.
 - Plant personnel should vent the rear and/or side outlet(s) and the top hatch. USDA personnel are only there to witness the opening.
- Injuries caused by unsafe ladders, rails, and unsecured walkways, rough top platforms, and inadequate lighting.

Preventative precautions include:

- Ask plant personnel to hold an unsecured ladder or obtain a step stool if the first step of the ladder is too high.
 - Under SCI Division supervision, use plant personnel to seal top hatches and vents.
 - Wear knee pads or other cushioned material to protect against the rough, sharp grating on top of the tanker.
 - Inspect hoses so that they are adequately secured and free from cracks and excessive wear.
- Injuries caused by unfavorable weather conditions (lightning, hail, dust, ice, snow, or severe windstorms).

Preventative precautions include:

- Delay tanker inspection procedures until ice is removed from tanker ladders and platform.
- Avoid standing or climbing on tankers during adverse weather conditions.
- Go indoors when lightning is present.

TRANSPORTATION OF SAMPLE UNITS AND SAMPLING EQUIPMENT

Secure sample units and sampling equipment when transporting to prevent them from becoming flying objects that can cause injury or death in a car accident or sudden stop. This is particularly true in the case of loose metal containers. Safety measures to prevent or minimize such possibilities are:

- Place sample units in suitable shipping containers upon completion of sampling.
- Shipping containers should be placed in the trunk of the car or secured to the rear floor or back if driving a van or SUV.
- Sampling equipment, such as, chisels, hammers, wrenches, screwdrivers, crowbars and power tools should be transported in the trunk of the car or placed inside a container secured to the rear floor or back if driving a van or SUV.

These simple precautions may save you and/or your coworkers from serious injury.

DISPOSAL OF UNUSED CHEMICALS

Field offices may accumulate chemicals that are past their expiration date or no longer being used. These chemicals can present a safety hazard to employees. They need to be disposed of safely. **All offices shall call their local Environmental Protection Agency (EPA) to determine how best to dispose of these chemicals.**

Remove all chemicals identified for disposal from the field offices. Use the following steps to identify and dispose of unused chemicals.

A. Identify analytical testing done by the office, and the chemicals required to do these tests

Use the [APPENDIX II - Chemical Inventory and Disposal Worksheet](#) to write the name of the chemical, the analytical test it is used for, and the expiration date. Initial and date each entry.

B. Identify Chemicals for Disposal

The same above linked worksheet is used for chemicals no longer needed for analytical testing, including chemicals that are past their expiration date. In the column marked **Method of Disposal**, indicate how the chemical was disposed of, the date of disposal, and initial the worksheet.

C. Filing and Posting of Chemical Inventory and Disposal Worksheet.

The original shall be kept on file in the field office. A copy of this worksheet shall be posted on the exterior of the chemical cabinet or on the wall closest to where the chemicals are stored.

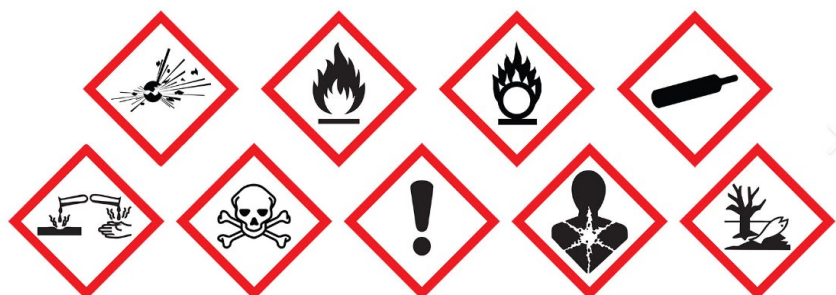
Field office audits should include a review of the field office's method of chemical disposal. The worksheet will also be reviewed during safety inspections.

REFERENCE LINKS

Version Date
(Printed for distribution)

- ☐ **Office of Worker's Compensation Programs – Forms:** _____
<https://www.dol.gov/agencies/owcp/FECA/regs/compliance/forms>
- ☐ **OSHA Permit-required confined spaces (29 CFR 1910.146):** _____
<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.146>
- ☐ **New ASTM International Standards Supersede ANSI Z41 Protective Footwear Standards:** _____
<https://newsroom.astm.org/new-astm-international-standards-supersede-ansi-z41-protective-footwear-standards>

Checked Materials have been printed from the links in this manual and included for reference.

APPENDIX I – CERTIFICATION OF EMPLOYEE HAZCOM TRAINING

I have received Hazard Communication Training as described in the Hazard Communication Program.

The training was conducted on _____.
Date

The training was conducted at _____.
Location

I am aware that the substances are labeled, and the Safety Data Sheets (SDS) are available. I understand that these SDS not only list the substances, but also provide information on protective equipment, first aid and emergency procedures.

Employee Signature

Date

I hereby certify that the above-named employee has been provided with Hazard Communication Training.

Instructor's Signature

Date

Effective Date: September 2025

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APPENDIX II – CHEMICAL INVENTORY AND DISPOSAL WORKSHEET

Chemical	Analytical Test	Expiration Date	Initials	Date	Method of Disposal	Date of Disposal	Initials

Laboratory Location: _____