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SAFETY PAYS: Big Steps in Feed Safety

The name of a Mankato, Minn.-based feed company — Big Gain, Inc. — denotes a confidence that its feed products can result in healthy weight gains in livestock, leading to positive economic results for producers.

But in today's food safety environment, the name "Big Gain" could signify something else: a company taking big steps to implement processes that help ensure the quality and safety of its feed products, including its handling of medications.

Big Gain distributes feed into Minnesota, Wisconsin, Iowa and Illinois. It employs 200 people, operating three shifts around the clock. Numerous employees in different shifts are handling multiple trace products and medications that go into the feed. What is Big Gain doing to avoid mistakes that can be costly to their reputation and their bottom line?

A dedicated scoop for each medication helps reduce potential cross-contamination.

"We always have been diligent about our medications," said Andy Farley, maintenance manager and a member of the plant's feed safety team. "But over the last few years, with changes due to FDA's Food Safety Modernization Act, we've completely separated medications from all of our other ingredients — isolating them using separate bags, tubs, scales and even separate rooms for weighing them out."

Caging the meds

Big Gain warehouses all of its meds within a separate medication cage, locked and protected by a 10-foot fence inside the pre-mix room. A surveillance camera helps prevent intentional adulteration. Farley explained that the cage assists with inventory management, keeping all medications in one area. "It's a controlled environment," according to Warehouse Manager Justin Doering. "Only the premix operator has access to that cage and can sign medications in and out of that room."

In addition, at the beginning of each shift, the pre-mix operator weighs the starting inventory of medications. At the end of each shift, all remaining meds are weighed, making sure the usage amount squares with the ending inventory.

Dedicated scoops/multiple scales

To help avoid cross-contamination, the medication cage is equipped with three separate scales used only for medications. The two employees who work in the pre-mix room on each shift each have their own set of three scales which are equipped with large digital readouts. Each medication also has its own designated and labeled scoop and hook. Not only is the employee in pre-mix measuring out medications in a controlled environment, but the mixer operator also uses a separate scale to verify any medication and amount before it is dumped into the mixer.

Clamping the bags

Clamping of open sacks ensure no spillage or cross-contamination of product.

Using clamps on every open sack of ingredients and storing them on racks helps avoid spillage of product. "It's a simple practice but it definitely keeps the work environment clean and prevents cross contamination," stated Doering.

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MINNESOTA - The Ag Cooperative Safety Directors of Minnesota (ACSDMN) met March 4, 2019. Cody Jackson, vice president of JTI Services, presented "Improve Electrical Safety and Predictive Maintenance." He stressed that one way to minimize safety issues is to predict problems before there is a failure by utilizing tools such as infrared thermography and ultrasound. Phil Haataja, COO at Electric Power & Safety Company, discussed arc flash and electrical safety. Shannon Bode, CFS environmental health and safety manager, shared CFS's experience with the Federal Motor Carrier Safety Administration (FMCSA) compliance review process. The next meeting is Sept. 11, 2019.

Safety Pays... *Continued from page 1*

Cameras are watching

A surveillance camera pointed toward the scales and digital readouts provides a video archive should there ever be a question about whether or not the correct medication or amount was used in a feed. "We're operating 24 hours a day, three different shifts a day," Doering explained. "If there's ever a question we can go back and look at the video and make sure we got it correct."

A camera is pointed towards these scales and large digital readouts, creating a visual record of medications and amounts for each feed order.

Plastic bags and isolation

When multiple trace products and meds are weighed for each feed order, the products are poured into plastic bag-lined cylinders. The ingredients are isolated in the plastic bags right up to the point where they are poured into the finished feed, which helps reduce contamination. Also, if a feed order is cancelled before manufacturing, the ingredients are still isolated and can be used for another order.

Collecting the dust

For the safety of pre-mix operators, Big Gain requires dust masks and personal protection equipment when weighing medications, and has also installed a custom-built dust collection system to help remove dust.

Emphasis on training

"We have standard operating procedure for each position and every task," stated Farley. "The operations manager helps train and match the trainee to a mentor who will help pass them through the process." Several of the feed team members have also taken additional classes including HACCP (Hazard Analysis Critical Control Points) training.

Document and document some more

Feed ingredients and amounts are documented via Big Gain's automated batching system and also through hand-written logs, and must be verified by the pre-mix operator, mixer operator and one of the production managers.

Both Farley and Doering credit the company's owners, Kurt Klaustermier and Tim Hinton, and management in supporting efforts to advance the company's food safety and quality process. "The feed business is very competitive," Doering stated. "You have to have your customers' confidence in the quality of the product or they'll move on. In terms of the protection of your company, it pays to take care of your medications, traceability and quality. It saves you money in the long term."

Plastic bag-lined cylinders isolate ingredients until they are poured into finished feed.

Retaining Documents – A General Guide

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Knowing how long to retain certain documents required under OSHA can be confusing. While some OSHA regulations require a specific retention period, others do not. It is often advisable to retain certain documents even if retention is not technically required.

In some cases (e.g., post-accident investigations, insurance audits, consultant reports, employee personnel information), the employer has no duty to produce documents since there is no requirement to do so. In fact, any documents produced can be utilized to issue citations, and so the employer should not produce documents unless required by law.

Following are OSHA standards for some common work activities that require or may require an employer to create, retain and produce certain documents during an inspection:

Control of hazardous energy—lockout/tagout (LOTO)

29 CFR 1910.147—Requires employer to develop procedures to protect employees who service or maintain machines against unexpected energization or startup of equipment or release of stored energy.

29 CFR 1910.147(c)(7)—The employer must train its "authorized" employees how to perform LOTO with these procedures, as well as "affected" employees who may be exposed to the equipment.

29 CFR 1910.147(f)(2)—Requires the on-site employer and outside employer to inform each other of their respective lockout/tagout procedures.
Document retention: Requires employer to certify that periodic inspections have been performed at least annually. **Advised:** Retain employee LOTO training records for duration of employment.

Hazard communication (employee right to know)

29 CFR 1910.1200—Requires employer to develop a written hazard communication program to protect employees against any hazardous chemical which presents a physical or health hazard; conduct an assessment to determine which hazardous chemicals may be present; inform employees of the presence of the hazardous chemicals; train employees on how to read a Safety Data Sheet (SDS) for each hazardous chemical.
Document retention: Employers must retain SDSs for the duration of employment plus 30 years for all employees exposed to the chemical in question, unless there is some other record of the identity of the substance or chemical, and where and when it was used; must have a copy of all SDSs for chemicals currently in use.
Advised: Retain employee hazard communication training records for the duration of employment.

Fire extinguishers

29 CFR 1910.157—Requires the employer to provide fire extinguishers and mount, locate and identify them so that they are readily accessible to employees.
Document retention advised: If employer permits the employees to use the fire extinguishers, the educational program and training should be in writing and maintained for the length of employment.

Permit-required confined spaces

29 CFR 1910.146—Requires employer to identify all confined spaces within the workplace that employees or outside contractors may be required to enter and which contain a serious safety or health hazard. The employer must develop a written program and procedures for employees who enter the confined spaces. Only trained and authorized employees can enter the space.

29 CFR 1910.146(c)(8)—Requires host-employer to provide certain information to other contractors who will have their employees enter the space.
Document retention: Employers must retain each canceled entry permit for at least one year and review them within one year after each entry.
Advised: Retain employee confined space training records for the duration of employment.

Powered industrial trucks

29 CFR 1910.178 – Requires employer to develop a written program to train all employees who will be required and authorized to operate powered industrial trucks (including forklifts, manlifts, etc.); employees must be retrained and recertified every three years, at minimum, or after an accident or "near miss" which resulted from an unsafe act.
Document retention: Standard does not specify how long training certifications must be retained after the initial certification or the certification required every three years or after a "near miss". **Advised:** Retain the training certifications for the duration of employment for each employee.

Disciplinary records

No regulation requires employer to maintain written records of employee discipline for violations of the employer's safety and health policies.
Document retention advised: Employers wanting to assert the "unavoidable employee misconduct" defense to avoid liability for OSHA citations are highly recommended to maintain written records of discipline (nature of violation, date, names of both violating employee and disciplining supervisor). This documentation can be useful if the employer must defend an employment discrimination or wrongful termination action by being able to prove that the action was based on a legitimate non-discriminatory reason, that is violation of safety and health policies.

OSHA regulations other than those listed above may have document retention requirements. If an employer is subject to any of these regulations they must be reviewed and appropriate document retention procedures must be developed.

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Even when an OSHA standard does not specify how long certain records must be retained, it is advisable to consider retaining such records for a significant length of time. For example, many OSHA standards require employee training, but do not necessarily require documentation of training or retention of training documents. Nonetheless, it is advisable to prepare and retain training documents for the duration of employment because training documents are often indispensable in asserting certain defenses to citations.

Last Chance: Is Your Feed Facility Ready?

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The final FDA-mandated compliance deadline for the implementation of the Preventive Controls portion of the Food Safety Modernization Act (FSMA) for very small animal food facilities is Sept. 17, 2019.

Last September, small facilities were required to meet the Current Good Manufacturing Practice (CGMP) and Preventive Controls requirements. While very small facilities were also required to meet the CGMP portion by last September, they had until this September to meet the Preventive Controls portion.

Preventive controls address possible issues before a problem occurs, and help facilities develop procedures to follow in the event something does happen. To be compliant, facilities must create and implement a food/feed safety plan that includes a hazard analysis, and if necessary, risk-based preventive controls. The plan also needs to be prepared by a Preventive Controls Qualified Individual (PCQI).

A PCQI is someone who has completed training in risk-based preventive controls or is otherwise qualified through job experience. This individual confirms that the preventive controls will control the identified hazards and reviews records. Currently, there is no FDA-endorsed certification program for PCQI. However, there are best practices programs available through trade organizations. Meeting the qualification component should not hinder the process, and the plan needs to be adequate for the facility.

Food/Feed Safety Plan Requirements:

1. **Hazard analysis**
   Hazards, whether known or reasonably foreseeable, must be identified. Hazards could be present naturally, unintentionally introduced, or intentionally introduced. If analysis reveals one or more hazards that require a preventive control, the facility must have and implement preventive controls for those hazards.
2. **Preventive controls**
   Determining types of preventive controls will depend on the facility and product(s) and must be implemented to ensure that the hazards will be prevented or significantly minimized. The rule includes the following preventive controls:
   - Process—Procedures that ensure control during certain processing operations.
   - Sanitation—Procedures to ensure the facility is maintained in a sanitary condition to prevent or minimize hazards.
   - Others—Controls that are necessary to ensure a hazard requiring a preventive control will be prevented or significantly minimized.
3. **Oversight/management of preventive controls**
   After determining a preventive control for a hazard, the facility must ensure its effectiveness by:
   - Monitoring—Procedures ensure preventive controls are consistently performed.
   - Corrections—Timely steps taken to identify and correct a minor problem that occurs during production.
   - Corrective actions—Identifying and correcting a problem by implementing a preventive control, reducing the likelihood the problem will reoccur, safety evaluation and distribution prevention. Corrective actions must be documented.
   - Verification—Determining whether a preventive control is operating as intended and establishing the plan's validity. Includes reviewing records to ensure that monitoring and corrective actions are being conducted. Verification activities must be documented.
   - Recall plan—Every facility with a hazard requiring a preventive control must have a recall plan.

Resources are available to help you ready your facility to be compliant with this final part of the rule, including the FDA Food Safety Plan Builder at *https://www.accessdata.fda.gov/scripts/foodSafetyPlanBuilder/.*

For complete details on all rules and regulations listed, or for more information, please consult the U.S. Food and Drug Administration (FDA), third parties offering compliance assistance, your insurance agent, or your Main Street America risk consultant.

Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Product for Animals (80 FR 56173).

21 CFR part 507, subpart B&C

Hazard Analysis and Risk-Based Preventive Controls for Product for Animals Guidance for Industry DRAFT GUIDANCE 245 Ifsh.iit.edu

Avoiding the Dreaded Dryer Fire

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Grain dryers will probably get a hard workout this fall. Last year, similar circumstances subjected dryers to long stretches of operation. Unfortunately, a few were victims to fire. Grain dryers are a valuable asset to your company's bottom line and losing one to a fire during the busiest time of year can be a huge setback.

Pre-harvest cleaning and inspection

It is critical that capable, experienced employees and/or professionals do a thorough pre-harvest dryer cleaning and inspection. All foreign material inside and out of the dryer needs to be removed. Clean under the roof, the grain exchangers, hopper divider floor, unloading auger or belts, and any other place where grain and fines can accumulate. Clean out any animal and bird nests.

Conduct a thorough inspection of the dryer's physical structure. Look for rips or tears in the inner or outer panels. Is there a lot of rust or excessive wear in critical areas? Ignition and flame-sensing systems need to be checked and wiring connections tight. Inspect control boxes for mouse nests or chewed wiring. Ensure the electronics are fully grounded and that rusty connections don't impede that critical part of the electrical system. Check gas line connections to make sure they're tight, spraying soapy water on them to see if bubbles appear. Check solenoids and overheating sensors to ensure they're working properly. Check with your dryer manufacturer or the manufacturer's website for a cleaning/inspection checklist.

Housekeeping is essential

Poor housekeeping is still the number one cause of dryer fires. Conduct periodic shutdowns during the busy season to perform thorough cleanings. Frequency of cleaning when drying 24/7 will depend on grain quality and condition. You can expect an increased chance of dryer fires when the crop is light and wet. Soybeans require especially close monitoring when there are a lot of pods that can hang up in the flow and catch fire.

Additional dryer concerns

When harvest gets drawn out into winter months and grain is coming in wet, keep a close eye on wet bin roof vents when fans are running. The moist air can freeze on the vents, plugging them and possibly leading to the buckling of roof panels due to pressure buildup.

If your company has replaced a smaller dryer with a new one that dries three to four times more bushels per hour, make sure employees check the bins and flats more frequently to prevent overfilling and the possible blowing out of a butler wall or bin roof.

Are your employees trained?

Often, when the dryer is running 24/7, even inexperienced employees are asked to help "babysit" the dryer. Make sure you go over shutdown procedures, how to shut off the gas and grain flow to and from the dryer, and how to dump the grain if it's required. Have important phone numbers readily available and never allow just one employee to watch the dryer overnight. Try to stagger work shifts to reduce employee fatigue. Write down, point by point, what should be done if the dryer does catch fire. Many times, even trained employees can panic, forgetting what to do if it's not written down. Let new employees know that sometimes it's hard to differentiate between heavy steam coming from the dryer during cold weather and smoke, so they need to be aware that they must rely on their sense of smell as well as sight. ◗

NEBRASKA - Erik Waiss, environmental assistance coordinator with the Nebraska Department of Environmental Quality, presented information about hazardous waste generators, repackaging chemical totes and permitting requirements at the March 5, 2019, meeting of the Ag Cooperative Safety Directors of Nebraska (ACSDNE). The next meeting will be Sept. 10, 2019.

SOUTH DAKOTA - The South Dakota Ag Cooperative Safety Directors met Jan. 23, 2019, in Sioux Falls. A representative of Thompson Electric of Sioux Falls, talked to members about the dangers of arc flash and also the Simon program. Members also discussed recent safety incidents in the ag industry and also shared technology that is assisting their companies with safety initiatives. The next meeting will be on Sept. 18, 2019. Location to be determined.

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WHICH DOCUMENTS TO SAVE...PAGE 3 A LIST TO GET YOU STARTED

Investigate Your Process.

WOODWARD NAMED AGRIBUSINESS DIRECTOR

Kendall Woodward is returning to The Main Street America Group as the company's agribusiness director. Based in Omaha, Kendall will be responsible for agribusiness premium growth and profitability results. He will oversee product development and management, producer management, underwriting, loss control, sales tasks and administration of all agribusiness products. He will also ensure compliance with quality standards and regulatory authorities and Main Street America's best practices.

Kendall has more than two decades of experience in property/casualty insurance and agribusiness. He most recently served as area vice president, claims advocacy services with Arthur J. Gallagher, Omaha. Prior to that, he served as claims operations director with Alternative Claims Services, Omaha. He also worked at Austin Mutual Agribusiness in Omaha from 2012 to 2015 as an agribusiness claims field manager and as a senior field claims representative for The Cincinnati Insurance Company, Omaha.

Kendall earned his bachelor's degree in both management and finance from Wayne State College.

"I have spent most of my career in the claims area and four years at a very large brokerage firm," said Kendall. "I come in with a fresh perspective, wanting to build on our reputation of providing great service and products to our policyholders. I, along with our agribusiness team, will work to ensure they are getting the high level of care they've come to expect from Main Street America and Austin Mutual.

Kendall is married to Marty, a special education teacher at the junior high level. The couple makes their home in Omaha. They have three daughters: the oldest attending the University of Nebraska-Omaha studying physical therapy, the second attending Metropolitan Community College, Omaha, and working toward an associate degree in social services, and the youngest a sophomore, and avid competitive diver, attending Millard West High School.

Kendall said he's happy to be back at Main Street America. "I was gone for more than four years and the same team is still here," he stated. "It's wonderful to get to work with the same great people."