NYEMASTER

NYEMASTER GOODE PG

PREVENTING CATASTROPHIC EVENTS AT YOU GRAIN FACILIT

11 Who's MINDINGMAKE Aljets

Direct Number: (515) 283-3124 | Facsimile: (515) 283-3108 | E-Mail: mda@nyemaster.com 700 א ייייטוד, דער פי ל זיי ו פי ל א ביר פי בי א ביר א ביר פי בי א ביר בי בי ווי Des Moines, Ames and Cedar Rapids

www.nyemaster.com





Explosion Statistics

Years	Explosions	Injuries	Deaths
1976-1989	281	480	155
1990-1999	130	119	15
2000-2010	89	77	7
2011	3	1	7
2012	7	6	0

United States Department of Labor, www.OSHA.gov: "Grain Elevator Explosion Chart" and www.fireworld.com

In 2012, 6 of the 7 explosions occurred in the Midwest states.

Catastrophic Events:

No Company is Immune

No Matter How Large or Small

Two Areas of Focus

I. Protecting Grain Companies and Grain Cooperatives

Prevent the Catastrophic Event

- Proper Housekeeping at the Facility
- Preventive Maintenance of Equipment
- Proper Training of Employees

Who Brings the Lawsuit?

Injured Employee of Grain Co./Coop.

2. Independent Worker on site

3. Insurance Company Which Insures
The Grain Company/Cooperative

Insurance Coverage

Grain Companies – Cooperatives

- Replacement Cost Policy not ACV
- Loss of Business Income
- Insurance Coverage for Co-Employees
- Liability Coverage

Elements Of A Dust Explosion

A dust explosion can occur if the following five elements are met:

- Grain dust must be present
- Oxygen must be present in a concentration to sustain rapid combustion
- The grain dust must be well mixed with the oxygen at a concentration above the lower explosive limit
- An ignition source must be present
- Ignition must occur in a confined space

The Goal For Prevention:

- To remove the ignition source through proper maintenance of equipment.
- To remove the "fuel" i.e. the grain dust, through proper housekeeping measures.

OSHA Housekeeping Requirements

"The Grain Handling Standard"

CFR 1910.272: "The employer shall develop and implement a written housekeeping program that establishes the frequency and methods determined best to reduce accumulations of fugitive grain dust on ledges, floors, equipment and other exposed surfaces."

- Essential that the program is in place and followed.
- Maintain a log sheet to ensure completion.

"If it's not documented, assume it's not getting done."

OSHA Housekeeping Requirements

CFR 1910.272: "The employer shall immediately remove any fugitive grain dust accumulations whenever the accumulations exceed 1/8 inch (.32 cm) at priority housekeeping areas pursuant to the housekeeping program. . ."

- Priority Housekeeping Areas Shall Include at least the following:
- Floor Area Within 35 Feet of Inside Bucket Elevators
- Floors of Enclosed Areas Containing Grinding Equipment
- Floors of Enclosed Areas Containing Grain Dryers Located Inside Facility

My Experience with Explosions Attributed to Housekeeping Issues

- Lack Of Safety Culture and General Lack Of Accountability By Management
- No Written Housekeeping Program in Place
- Log Sheets Are Not Maintained
- Housekeeping Performed
 "when there's time"
- Out Of Sight, Out Of Mind

The Housekeeping Program is not Difficult to Develop –

The Difficulty is in Consistently Enforcing It.

My Personal Observations

- Boot Pits Full of Dust Particularly in Older Facilities
- Blowdown Of Dust Into Boot Pit Areas/ Not Promptly Removed
- Dust Leaking From Equipment/Ducting
- Conveying Equipment with Layers of Dust on Top – Recipe for Disaster
- Gallery Out Of Sight No Attention



What's Wrong with this Picture?



Iowa Fire Marshal's Report of Incident

- "When I interviewed employees of the elevator, they indicated that there was so much dust that the boot pits looked as though the dust was flowing like water."
- "Two contractors I interviewed who did work at the facility over the years, indicated they recently refused to service the equipment because, in their words, that place was an accident just waiting to happen."











Obtain an Accurate Housekeeping Assessment of Your Facility - Inspections Done by:

- Insurance Company Representatives
- Paid Safety Consultants
- Objective Internal Employee Audits

Consider <u>unannounced</u> inspections. OSHA doesn't tell you they're coming!

Company Follow-up On Inspection Recommendations

Does anyone pay any attention to these?

- Was the assessment accurate?
- Was management made aware of the assessment?
- Whose job is it to ensure the recommendations are carried out?
- Are safety deficiencies being handled promptly?

Substantial Damage Can Be Caused by Secondary Explosions









"A little dust can't cause much damage"



"We do a pretty good job of keeping the place clean."

"Being the healthiest horse in the glue factory."

Preventive Maintenance and Inspection of Equipment

OSHA - CFR 1910.272:

The employer shall implement written preventive maintenance procedures consisting of:

- (i) regularly scheduled inspections of at least the mechanical and safety control equipment associated with:
 - Grain stream processing equipment
 - Bucket Elevators
 - Grain Dryers
 - Dust Collection Equipment
 - Safety/Monitoring Equipment

Preventive Maintenance and Inspection of Equipment

The employer shall implement written preventive maintenance procedures consisting of:

(ii) Lubrication and other appropriate maintenance in accordance with manufacturer's recommendations, or as determined necessary by prior operating records.

This is worth repeating...

The employer shall implement written preventive maintenance procedures consisting of:

(ii) Lubrication and other appropriate maintenance in accordance with manufacturer's recommendations, or as determined necessary by prior operating records.

Who from the grain company has evaluated the prior operations records?

Preventive Maintenance and Inspection of Equipment

Records Must be Maintained By The Facility:

"A preventive maintenance schedule must be put in place and complied with by personnel, containing the date of the inspection, the name of the person who performed the inspection and the equipment specified."

My Personal Observations on Maintenance Programs

- No Written Preventive Maintenance Program In Place
- If The Program Is In Place Not Followed Consistently
- Equipment Manuals Either Not Kept or Not Utilized
- Manufacturer's Specifications/Recommendations Simply Ignored

My Personal Observations – Poorly Maintained Equipment

 Bearings Are Not Consistently Lubricated

- Bearings Not Timely Replaced
- Rub Sensors Basically Worn Away
- Grooves Worn Into Head Pulley Covers

 Sensor Wires Cut Or Rusted Away At The Bearings

Hazard Monitoring Equipment Simply
 Shut Off – False Alarms

 Conveying Belts Spliced Multiple Times and Beyond Safe Running Capability

Red Green Method of Preventive Maintenance



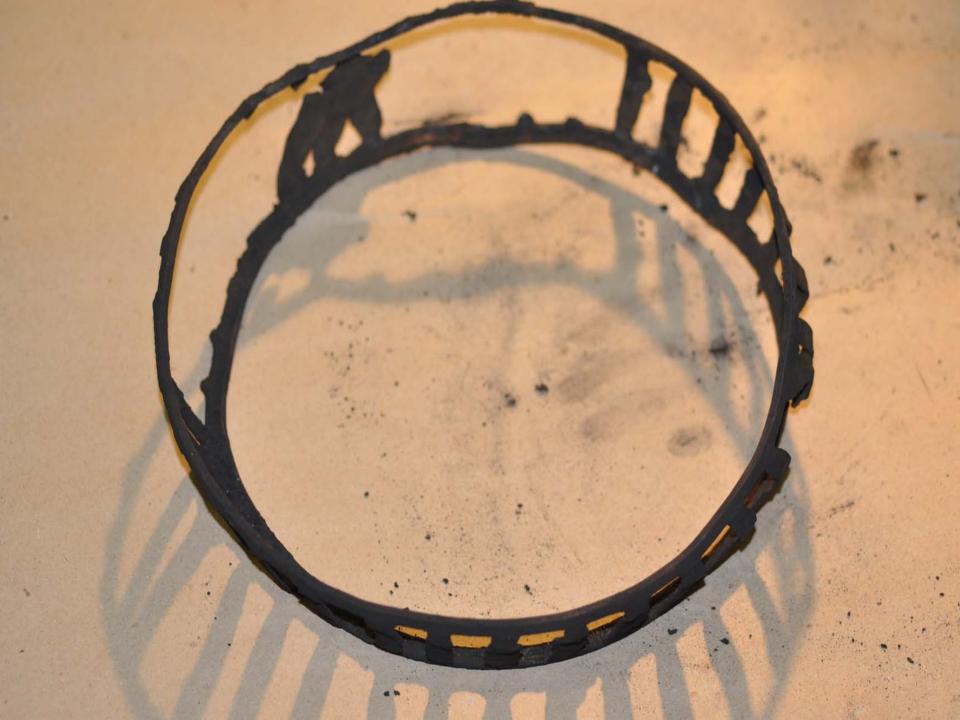
Courtesy of PMI, Inc.



This Doesn't Happen Overnight







"It's difficult to maintain the bearing"





Housekeeping/Maintenance Schedules

- Create Your Own
 - Who Knows Your Facility Better Than You?

Obtain From Your Insurance Company

Obtain From Outside Consultant

Examples of MaintenanceSchedules

Grain Elevator SAFETY CHECKLIST

The best protection against elevator fires and explosions is a regular program of maintenance, inspection and housekeeping.

TECS	FIECTRICAL
LEGS Leg belt in good condition Leg belt properly aligned Drive belts in good condition Cups in good repair Lagging in good condition Leg housing dust tight Explosion vent operable Head, boot, idler bearings lubricated Drive oil level OK Motion detection system operable Connecting spouts dust tight Dust control systems operable MOTORS AND BEARINGS	ELECTRICAL ☐ Dust tight globes in place ☐ Drop cords of approved type ☐ Drop cords approved for Class II dusty locations ☐ Surge capacitor fused/grounded ☐ Motors free of dust buildup ☐ Main disconnect switch off each night ☐ Self closing door on electric room FIRE PROTECTION ☐ Alarm system operable ☐ Alarm thermostat circuit tested ☐ Fire extinguishers in working condition ☐ Fire extinguishers in place ☐ Adequate number of fire extinguishers
☐ Bearings clean ☐ Bearings lubricated ☐ Gear box oil levels OK	☐ Fire extinguishers properly marked ☐ Employees trained in use of fire extinguishers ☐ Sprinkler system operable ☐ Local fire department orientation
Motors clean Motors properly secured Drive belts/shafts aligned Guards in place Hot motor/bearing sensor systems OK Motors electrically bonded HOUSEKEEPING Head-drive level clean Distributor level clean Scale, cleaner areas clean Bort area clean Workfloor level clean Tunnel area clean Tunnel area clean Walls, spouting, ledges clean Manlift/freight elevators clean Tools, shovels, ladders, power cords in place Dust control systems clean D	EMPLOYEE TRAINING IN: Bearing maintenance schedule Emergency action plan Leg choke procedures Welding and cutting procedures Personal protective equipment Railroad procedures Confined space entry SIGNS POSTED No smoking Manlift capacity For use of employees only (controls) Hoist operation rules Leg choke procedures Magnet Welding and cutting procedures
EXTERIOR Area near building free of combustibles	2
☐ Trash area safe distance away ☐ Outside access ladder in good condition ☐ Lightning protection satisfactory ☐ Building foundation closed ☐ Access roads/driveways clear	Inspected by Date

Monthly Plant Inspection

Inspected by:	
Date of Inspection:	
Has last month's inspection been reviewed with uncorrected items listed in table below? Signature of employee performing:	
Has top management person at this location reviewed the completed report? Signature of top management:	

Item # - Hazard Classification Class A - Immediately Class B - within I week Class C - within 30 days	Description Items carried over from previous inspection.	Date Corrected
	·	
	,	

Sample Monthly Equipment Inspection and Lubrication Schedule

Month	

Plant Area	Equipment	Date	Completed By
Basement	Receiving Conveyor		
	Receiving Leg		
	Hammermill Feeder		
	Hammermill		
	Rollermill		
	Grinding Conveyor		
	Grinding Leg		
	Mixer		
	Surge Conveyor		
	Mixing Leg		
	PelletCooler		-
	Crumble Rolls		
	Pellet Conveyor		
	Pellet Chip Grinder		
	Pellet Leg		
	Molasses Pump		
	Fat Pump		
	Condensate Pump		<u>_</u>
Work Floor	Ingredient Feeder Screws		
	Premix Dump Hopper		
	Pellet Mill Feeder		
	Pellet Mill Conditioner		
	Pellet Mill		
	Bagging Conveyor		
	Bagging Scale		

Special Emphasis:

Hazard Monitoring and Alarms

"Those false alarms sure are irritating!"

OSHA 29 CFR 1910.272: Inside Bucket Elevator Legs – The Employer shall:

- (i) Mount Bearings Externally to the Leg Casings, or
- (ii) Provide Vibration Monitoring, Temperature Monitoring Or Other Means To Monitor The Condition Of Bearings Mounted Inside Or Partially Inside The Leg Casing.

NFPA 61 – Standard for the Prevention of Fires and Dust Explosions in Agricultural and Food Processing Facilities

 Bearing Monitoring systems are Recommended for Head, Tail and (Knee) Pulley Bearings on Elevator Legs





Employee Training

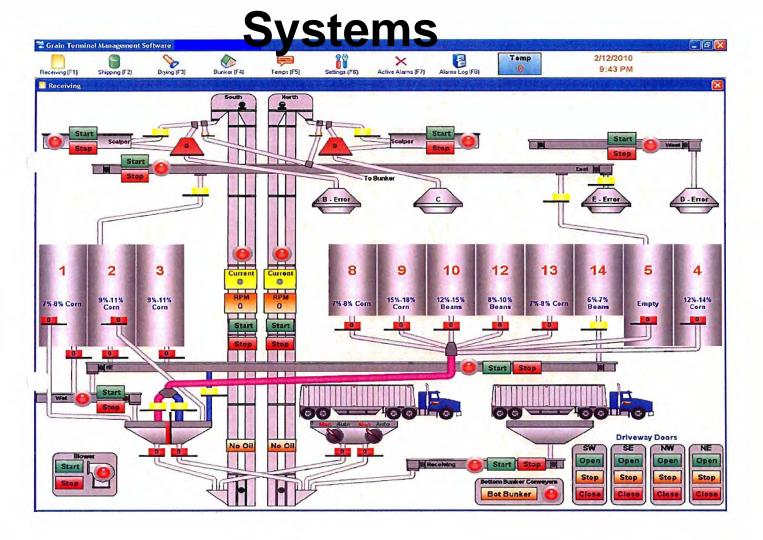
Required by OSHA and NFPA 61 (Appendix D – Employee Health and Safety)

"The employer shall provide training to employees at least annually and when changes in job assignment will expose employees to new hazards."

Critical: "... employees prior to starting work, shall be trained in at least the following ..."

- Safety Precautions Associated With Facility
- Recognition And Preventive Measures For Hazards Related To Dust Accumulations
- Common Ignition Sources
- Specific Procedures And Safety Practices Applicable To Their Job Tasks For . . . Housekeeping Procedures, Hot Work Procedures, Preventive Maintenance Procedures

PLC



- Housekeeping
- Preventive Maintenance
- Employee Training

Play by the Rules or The Penalties Can Be Stiff!

What are the Potential Ramifications?

- Loss of Life
- Personal injuries
- Extensive property damage
- Loss of business income
- Fines and penalties
- Litigation For Years

This is Not A Good Day







Management Representatives

 Ensure Written Policies In Place For Housekeeping Procedures and Preventive Maintenance of Equipment

 Demand Compliance With The Policies by Regularly Reviewing Housekeeping and Maintenance Log Sheets

Management Representatives

- Develop and Implement an Employee Training Program for at Least the Following:
 - Recognition and Preventive Measures for Hazards Related to Dust Accumulations
 - Common Ignition Sources
 - Specific Procedures and Safety Practices Applicable to Their Job Tasks for . . . Housekeeping Procedures, Hot Work Procedures, Preventive Maintenance Procedures

CONCLUSION

DISCLAIMER

The information presented here does not constitute legal advice, does not establish an attorney-client relationship, and does not create any duty of the firm to any reader. An attorney-client relationship with Nyemaster Goode may be established only by an engagement letter signed by a Nyemaster Goode attorney.