The Dell Group

Creative Solutions for your compliance burdens

THE ADVISOR

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Your Free Newsletter of Management Information

SPECIALIZING IN SAFETY, ENVIRONMENTAL AND HUMAN RESOURCES TOPICS

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Based Safety

The Advisor is prepared by The Dell Group, Inc. to inform its clients and friends of developments in leadbased paint hazard evaluation and control, safety management, environmental compliance, and new developments in the environmental remediation field. The newsletter is available free of charge to interested parties. The articles appearing in this newsletter do not constitute legal or other advice or opinion. The views expressed in this newsletter are not necessarily those of The Dell Group, Inc. The application of various laws and regulations to your business operations may depend on many specific facts. Questions regarding your operation relative to the topics discussed in this newsletter should be directed to a qualified professional. For more information, call us at (800) 259-8930 or info@dellgroup.com

TRAINING REQUIRED FOR NEW CHEMICAL LABELS & SHEETS

OSHA revised its Hazard Communication Standard (HCS) to align with the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS) and published it in the Federal Register in March 2012 (77 FR 17574). Two significant changes contained in the revised standard require the use of new labeling elements and a standardized format for Safety Data Sheets (SDSs), formerly known as, Material Safety Data Sheets (MSDSs). The new label elements and SDS requirements will improve worker understanding of the hazards associated with the chemicals in their workplace. To help companies comply with the revised standard, OSHA is phasing in the specific requirements over several years (December 1, 2013 to June 1, 2016).

The first compliance date of the revised HCS is December 1, 2013. By that time employers must have trained their workers on the new label elements and the SDS format. This training is needed early in the transition process since workers are already beginning to see the new labels and SDSs on the chemicals in their workplace. To ensure employees have the information they need to better protect themselves from chemical hazards in the workplace during the transition period, it is critical that employees understand the new label and SDS formats.

The list below contains the minimum required topics for the training that must be completed by December 1, 2013:

- 1. TRAINING ON LABEL ELEMENTS MUST INCLUDE INFORMATION ON:
 - A. <u>Type of information the employee</u> <u>would expect to see on the new</u> <u>labels</u>, including the
 - Product identifier: how the hazardous chemical is identified. This can be (but is not limited to) the chemical name, code number or batch number. The manufacturer, importer or distributor can decide the appropriate product identifier. The same product identifier must be both on the label and in Section 1 of the SDS (Identification).
- Signal word: used to indicate the • relative level of severity of hazard and alert the reader to a potential hazard on the label. There are only two signal words, "Danger" and "Warning." Within a specific hazard class, "Danger" is used for the more severe hazards and "Warning" is used for the less severe hazards. There will only be one signal word on the label no matter how many hazards a chemical may have. If one of the hazards warrants a "Danger" signal word and another warrants the signal word "Warning," then only "Danger" should appear on the label.

"Caution" is no longer to be used.

- Pictogram: OSHA's required pictograms must be in the shape of a square set at a point and include a black hazard symbol on a white background with a red frame sufficiently wide enough to be clearly visible. A square red frame set at a point without a hazard symbol is not a pictogram and is not permitted on the label. OSHA has designated eight pictograms under this standard for application to a hazard category.
- Hazard statement(s): describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard. For example: "Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin." All of the applicable hazard statements must appear on the label. Hazard statements may be combined where appropriate to reduce redundancies and improve readability. The hazard statements are specific to the hazard classification categories, and chemical users should always see the same statement for the same hazards, no matter what the chemical is or who produces it.
- Precautionary statement(s): means a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.
- Name, address and phone number of the chemical manufacturer, distributor, or importer

- B. <u>How an employee might use the labels</u> <u>in the workplace.</u> For example,
 - Explain how information on the label can be used to ensure proper storage of hazardous chemicals.
 - Explain how the information on the label might be used to quickly locate information on first aid when needed by employees or emergency personnel.
- C. <u>General understanding of how the</u> <u>elements work together on a label.</u> For example,
 - Explain that where a chemical has multiple hazards, different pictograms are used to identify the various hazards. The employee should expect to see the appropriate pictogram for the corresponding hazard class.
 - Explain that when there are similar precautionary statements, the one providing the most protective information will be included on the label.
- 2. TRAINING ON THE FORMAT OF THE SDS MUST INCLUDE INFORMATION ON:
 - A. <u>Standardized 16-section format,</u> <u>including the type of information found</u> <u>in the various sections,</u> for example,
 - The employee should be instructed that with the new format, Section 8 (Exposure Controls/Personal Protection) will always contain information about exposure limits, engineering controls and ways to

protect yourself, including personal protective equipment.

- B. <u>How the information on the label is</u> related to the SDS, for example,
- Explain that the precautionary statements would be the same on the label and on the SDS.

With all training, OSHA requires employers to present information in a manner and language that their employees can understand. If employers customarily need to communicate work instructions or other workplace information to employees in a language other than English, they will also need to provide safety and health training to employees in the same manner. Similarly, if the employee's vocabulary is limited, the training must account for that limitation. By the same token, if employees are not literate, telling them to read training materials will not satisfy the employer's training obligation.

OSHA's Hazard Communication website has the following QuickCards and OSHA Briefs to assist employers with the required training.

- Pictogram QuickCard (English/Spanish)
- Safety Data Sheet QuickCard (English/Spanish)
- <u>Safety Data Sheet OSHA Brief</u>

(Pictured: Label QuickCard)

SAMPLE LABEL		
CODE Product Product Name Product Identified	Hazard Pictodrams	
Company Name		
Keep container tightly closed. Store in a cool, well-ventilated place that is locked.	Signal Word Danger	
Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors.	Highly flammable liquid and vapor. Hazard May cause liver and kidney damage. Statements	
Wear protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Dispose of in accordance with local, regional, national, international regulations as specified.	Precautionary Statements Supplemental Information	
In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO ₂) fire extinguisher to extinguish.	Directions for Use	
First Aid If exposed call Poison Center. If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.	Fill weight: Lot Number: Gross weight: Fill Date: Expiration Date:	

THE FLU-FIGHTERS – IN YOUR FOOD

Scientists in the growing field of nutritional immunology are unveiling new evidence of complex role nutrition plays in fighting off infectious diseases like influenza. Experts say a diet rich in nutrients such as vitamin A and zinc can help the body to fight off disease, heal injuries, and survive illness when it does strike. There is still much to learn, but scientists do know that creation of certain vitamins and minerals can improve the body's ability to fight off infections.

To create immune cells to fight off a specific infection, the body has to rapidly draw nutrients from the bloodstream. "If you don't have an adequate intake of vitamins and minerals, you won't be able to produce the number of immune cells you need and the immune cells you do produce may be compromised," says Dr. Anuraj Shankar, a researcher at the Harvard School of Public Health.

Experts caution against loading up on supplements to add vitamins and minerals to the diet. While a multivitamin is a good addition to any well balanced diet, individual supplements and vitamin pills may not be as well absorbed by the body as well as nutrients in foods. Scientists have long known that some vitamins, minerals and other nutrients can play a key role in the immune system by acting as antioxidants. These antioxidants protect and repair cells from oxidative stress, the damage caused by molecules known as free radicals. But nutrients work in ways beyond acting as antioxidants. Nutritional experts agree that the best way to get the right balance of nutrients is a balanced diet that includes plenty of fresh fruits, vegetables, lean proteins, and dietary fiber.

A survey by the CDC in 2007 showed that the majority of adults consume less than the government's recommended five servings of fruits and vegetables daily. A Harvard study showed that people who averaged eight or more servings of fruits and vegetables daily were 30% less likely to have a heart attack or stroke than those who had only 1.5 servings daily. Experts say to boost immunity it is also important to avoid processed foods and to minimize trans fats, and unhealthy saturated fats that come from animal products and vegetable oils like palm and coconut. Instead, people should eat foods rich in unsaturated fats such as olive oil.

<u>Key Vitamins and Minerals to Boost Immunity: Vitamin D</u> – found in fortified milk and orange juice; salmon, tuna: <u>Selenium</u> – found in Brazil nuts, turkey, canned tuna in oil: <u>Vitamin A</u> – found in liver, spinach, carrots, pumpkins and other yellow fruits and vegetables: <u>Zinc</u> – found in oysters, Alaska King Crab, pork shoulder: <u>Vitamin C</u> – found in red peppers, broccoli, oranges and other citrus: <u>Vitamin B-6</u> – found in potatoes, bananas, and garbanzo beans.

GERMS & HOW TO AVOID THEM!

Don't touch the first floor elevator button- if you can let someone else push it or use your elbow. The first floor button harbors the most germs because more people touch it than any other button.

Shopping cart handles are prime culprits in the spread of germs. Most supermarkets now offer germ-killing towelette dispensers to wipe the handles and never, ever put fresh produce in the cart seat where diaper-aged children often sit.

Watch those handrails, they are loaded with germs. Don't touch them if you can manage.

Use the first toilet, research shows that most people use the middle stall in public restrooms. More use means they're the dirtiest and have the most germs. Also the bathroom floor can carry more germs then the toilet seat, so do not put anything on it.

Office coffee pots are dripping with disease- the office coffee pot and mug may have been cleaned with a sponge dripping with germs. Hang on to your mug and use a dishwasher when it's time to clean it.

Kitchen woes- beware of kitchen sponges, dishcloths, sinks, cutting boards.

Your desk is dirtier than the toilet- the typical office desk area has 400 times the amount of bacteria that the average toilet seat. Use a disinfectant wipe to clean the desktop, computer keyboard and phone.

Avoid hand shaking and kissing during the flu season. Incredibly 95% of people say they wash their hands after using the bathroom, but only 67% really do it. Worse, only 33% bother to use soap and only 16% wash their hands long enough to remove germs.

WASH YOUR HANDS FREQUENTLY!! The most important step in preventing disease is to wash your hands frequently. Scrub your hands with warm water and soap for at least 15 to 20 seconds after using the bathroom, eating, working or playing outdoors, or coughing, sneezing or blowing your nose. Anything less than 15 seconds just won't do the job.

Quotable

"And as you sit on the hillside, or lie prone under the trees of the forest, or sprawl wet-legged on the shingly beach of a mountain stream, the great door, that does not look like a door, opens." - Stephan Graham

NEW WORKERS AT RISK FOR HEAT-RELATED ILLNESS

Record-breaking heat the past two years has caused more heat-related injuries and fatalities in outdoor workers. With the peak of summer heat beginning, OSHA Director Dr. David Michaels and NOAA's National Weather Service Director Dr. Louis Uccellini are reminding employers that heat-related illnesses can be prevented. "Each year, thousands of workers across the country suffer from serious heat-related illnesses," said Michaels. "This can easily be prevented with water, rest, and shade. If outdoor workers take these precautions, it can mean the difference between life and death."

In 2011, 4,420 workers experienced heat illnesses and 61 workers died according to the Bureau of Labor Statistics data. To help prevent heat related deaths and illness among workers, NOAA will continue to include the following language in its excessive heat warnings that are sent across the country: "Take extra precautions if you work or spend time outside. When possible, reschedule activities to early morning or evening. Know the signs and symptoms of heat exhaustion and heat stroke. Wear light-weight and loose fitting clothing when possible and drink plenty of water."

OSHA is investigating two recent heat fatalities involving workers who were new to the job. OSHA's Michaels emphasized that OSHA has found that, generally, the workers who are most at risk for heat-related illnesses are those who are new to outdoor jobs – especially temporary workers.

Seasonal workers are considered "new" even if they have been working every season for several years. Gradually increasing the workload and giving workers time to acclimate allows them to build tolerance to the heat. This is most important for workers who are new to working outdoors in the heat, who have been away from working in the heat for a week or more, or at the beginning of a heat wave. Once a worker is acclimated to heat, the risk is lower. Employers should take steps to protect workers and help them acclimate.

OSHA is using technology to help employers protect outdoor workers from heat illness. OSHA's <u>Heat Safety Tool smartphone app</u> can help users monitor dangerous heat levels throughout the summer. To reduce risk during outdoor work, OSHA recommends scheduling frequent rest breaks in shaded or air-conditioned environments. Anyone overcome by heat should be moved to a cool and shaded location. Heat stroke is an emergency – Call 911. For more information and resources, see <u>OSHA's Heat Campaign</u> Web page (and <u>en español</u>).

Quotable_

"We all look at nature too much, and live with her too little" - Oscar Wilde

OSHA UPDATE

OSHA announces new National Emphasis Program for occupational exposure to isocyanates

OSHA has announced a new <u>National Emphasis Program</u> (NEP) to protect workers from the serious health effects from occupational exposure to isocyanates. OSHA develops national emphasis programs to focus outreach efforts and inspections on specific hazards in an industry for a three-year period. Through this NEP, OSHA will focus on workplaces in general, construction and maritime industries that use isocyanate compounds in an effort to reduce occupational illnesses and deaths.

"Workers exposed to isocyanates can suffer debilitating health problems for months or even years after exposure," said OSHA's Assistant Secretary of Labor, Dr. David Michaels. "Through this program, OSHA will strengthen protections for workers exposed to isocyanates."

Isocyanates are chemicals that can cause occupational asthma, irritation of the skin, eyes, nose and throat, and cancer. Deaths have occurred due to both asthma and hypersensitivity pneumonitis from isocyanates exposure. Respiratory illnesses also can be caused by isocyanates exposure to the skin. Isocyanates are used in materials including paints, varnishes, auto body repair, and building insulation. Jobs that involve exposure to isocyanates include spray-on polyurethane manufacturing, products such as mattresses and car seats and protective coatings for truck beds, boats, and decks.

OSHA's Web page on <u>Isocyanates</u> provides additional information on recognizing potential hazards, as well as, OSHA standards that address isocyanates in the general, construction and maritime industries.

EPA Update

EPA Offers \$8.5 Million to Great Lakes Shoreline Cities for Green Infrastructure

The Environmental Protection Agency has invited the 22 largest Great Lakes shoreline cities to apply for Great Lakes Restoration Initiative funding for green infrastructure projects that will improve Great Lakes water quality. "These Great Lakes Restoration Initiative grants will be used for green infrastructure projects to reduce urban runoff and sewer overflows that foul beaches and impair Great Lakes water quality," said Great Lakes National Program Manager Susan Hedman.

Eligible cities can use the grants to cover up to 50 percent of the cost of rain gardens, bio-swales, green roofs, porous pavement, greenways, constructed wetlands, stormwater tree trenches and other green infrastructure measures installed on public property.

More information about the Great Lakes Restoration Initiative is available at <u>www.glri.us</u>

Urban Waterway Revitalization Expand Efforts in Western Lake Erie Basin

EPA, in partnership with the Department of Agriculture and the Army Corps of Engineers, announced that the Western Lake Erie Basin is one of 11 new locations selected for revitalization efforts by the Urban Waters Federal Partnership. First launched in 2011, the Urban Waters Federal Partnership works to reconnect urban residents with their waterways and open spaces.

Americans use urban waterways as sources of drinking water and for a variety of activities including boating, fishing and swimming. Revitalizing these urban waterways will reconnect citizens to open spaces and have a positive economic impact on local businesses, tourism and property values, as well as spur private investment and job creation in communities.

Launched in 2011, the Urban Waters Federal Partnership closely aligns with and advances the work of other efforts such as the Partnership for Sustainable Communities by revitalizing communities, creating jobs and improving the quality of life in cities and towns. The partnership also supports The President's Great Outdoors Initiative aimed at making the federal government a better partner with communities that are working to provide safe, healthy, and accessible outdoor places.

Final Rule on Solvent-Contaminated Industrial Wipes

After more than a decade of debate, on July 22, 2013 EPA Administrator, Gina McCarthy, signed a final RCRA rule for solvent-contaminated industrial wipes. The final rule states that industrial wipes contaminated with solvents that are listed hazardous waste or that may exhibit one or more characteristics of hazardous waste may be conditionally excluded from regulation as a hazardous waste. The wipes must not contain any free liquids as determined by the Paint Filter Liquids Test (EPA Methods Test 9095B).

Solvent-contaminated industrial wipes that are sent (either on-site or off-site) for cleaning or reuse are excluded from the definition of solid waste. While the wipes are not considered solid waste, any solvents recovered from the cleaning or reclamation would have to be managed as a waste depending on whether it is a listed hazardous waste or exhibits one or more characteristics of hazardous waste. Those wipes that are sent for disposal are excluded from the definition of hazardous waste and may be disposed in a municipal solid waste landfill. The wipes may be accumulated on the site of the generator for up to 180 days in a closed container before being sent for cleaning, reuse or disposal.

The final rule represents a common-sense approach for managing solvent-contaminated industrial wipes. The final rule has not yet been published in the Federal Register, but a pre-publication copy of the rule is attached. While the general summary of the rule is provided above, there are several details regarding the rule that must be reviewed. If you have any questions or would like additional information, please contact us.

CITATIONS AND PENALTIES

Scrap recycling plant fined by OSHA for repeat safety violations

Midland Davis Corp. was fined \$64,680 for 19 safety violations found at its Moline, Ill., scrap metal recycling center. Citations included two repeat violations for failing to conduct periodic inspections on lock-out procedures and failing to train and evaluate each lift truck operator. A repeat violation exists when an employer previously has been cited for the same or a similar violation of a standard, regulation, rule or order at any other facility in federal enforcement states within the last five years.

Glass plant cited for lockout/tag out violations following amputation

OSHA cited Ardagh Glass Inc. for one willful and one serious safety violation after a worker suffered a finger amputation and crushed hand while removing a glass mold from a bottle-shaping machine at the company's facility in Warner Robins, Ga. OSHA initiated an inspection in response to the incident under its National Emphasis Program on Amputations. Proposed penalties total \$77,000.

The willful violation involves failing to develop and utilize lockout/tagout procedures when workers are performing service and setup operations on equipment. A willful violation is one committed with intentional, knowing or voluntary disregard for the law's requirements, or with plain indifference to worker safety and health.

Texas employer cited for failing to monitor asbestos exposure and correct cited hazard

National Electric Coil Co. LP in Brownsville, Texas, has been cited by OSHA with eight safety violations after failing to monitor asbestos exposure and provide adequate procedures to control hazardous energy sources. OSHA's Corpus Christi Area Office inspected the facility in January after receiving a complaint. The company was fined \$120,000.

Cited violations include failing to perform initial monitoring prior to workers being exposed to asbestos, select appropriate respirators, provide appropriate work clothing or protective equipment, provide an asbestos exposure assessment system and utilize wet methods for cleaning asbestos materials.

Quotable

"Sponges grow in the ocean. That just kills me. I wonder how much deeper the ocean would be if that didn't happen." - Steven Wright

BITS & PIECES

HOW TO RUN A FAST MEETING

- 1. <u>DON'T HAVE A MEETING AT ALL</u>. Instead, try to settle issues over email or phone or informal one-on-one chats.
- 2. <u>PREPARE A CLEAR AGENDA</u>. When a meeting is essential, outline ahead of time exactly what's getting discussed and what decisions have to be made.
- 3. <u>INVITE AS FEW PEOPLE AS POSSIBLE</u>. Worse than getting CC'd on an email you don't need to see is getting invited to a meeting you don't need to attend.
- 4. <u>DITCH THE CHAIRS</u>. Keep attendees thinking on their feet (literally) by making your meeting standing-only. It'll keep things high energy, short, and to the point.
- 5. <u>START ON TIME</u>. It's impossible to have a quick meeting when people straggle in 10 minutes late. Consider an incentive system that rewards promptness—say, buying enough snacks for early birds or letting people speak in the order they arrive and then ending on time. Tardy folk don't get their turn.
- 6. <u>SET A TIMER</u>. Start and end your meetings according to a stopwatch that everyone in the room can see. Meetings at Google feature a 4-foot ticking clock projected onto a wall.

HOW TO ACE A PRESS INTERVIEW

- 1. Know what you're talking about and to whom you're saying it. Jot down a few key points you want to make on note cards.
- 2. Give some thought to what you don't want to mention, as well. Set boundaries and watch out for topic drift.
- 3. Remember, the person you're talking to is not your friend and will use anything you say—especially the asides.
- 4. Prepare mentally for the pressure, but don't try to be perfect. A little stuttering is OK. It shows you're human.
- 5. Be succinct. Limit your responses to three sentences or less for print media and a single sentence for television.
- 6. In a television roundtable, you might set to respond to one question during the entire show. Make it count.
- 7. Don't talk over another guest. A little interplay is good, but too much pegs you as a bully. No one can hear you anyway.
- 8. Avoid these terms: frankly, truthfully, Web 2.0, proactive, impactful, paradigm, synergy, no-brainer, empower, Web 3.

2013 & 2014 Lead Training Schedule LEAD EXPERTS

Type, Length and Price	Location	Course Month / Dates
Contractor Initial - 40 Hour \$795 Per Trainee	Toledo Cleveland Columbus	Nov $4 - 8$ Mar $3 - 7$ Jun $2 - 6$ Sep $16 - 20$ Oct $7 - 11$ Dec $2 - 6$ Feb $10 - 14$ Apr $14 - 18$ Jun $23 - 27$ Sep $30 - Oct 4$ Mar $31 - Apr 4$
Contractor Refresher - 8 Hour \$195 Per Trainee	Toledo Cleveland Columbus	Oct 31 Dec 10 Feb 25 May 6 Oct 22 Nov 26 Dec 17 Jan 14 Feb 19 Mar 25 Apr 22 May 20 Jun 17 Apr 8
<u>Worker Initial</u> \$595 Per Trainee		The Contractor Initial and Refresher courses shown above satisfy Ohio Department of Health's requirements for Worker Classes.
Worker Refresher \$195 Per Trainee		A Worker enrolling in these classes will be charged the <i>lower</i> fee shown in this section. Please call if you have <u>any</u> questions.
Inspector Initial - 24 Hour \$475 Per Trainee	Toledo Cleveland Columbus	Jan 6 – 8 Apr 28 - 30 Nov 18 – 20 Jan 27 – 29 Mar 10 – 12 May 12 – 14 Oct 14 – 16 Feb 17 - 19
Inspector Refresher - 8 Hour \$195 Per Trainee	Toledo Cleveland Columbus	**Risk Assessor Refresher classes shown below satisfy the Inspector Refresher requirements of the Ohio Department of Health**
<u>Risk Assessor Initial - 16 Hour</u> \$320 Per Trainee	Toledo Cleveland Columbus	Jan 9 - 10 May 1 - 2 Nov 21 - 22 Jan 30 - 31 Mar 13 - 14 May 15 - 16 Oct 17 - 18 Feb 20 - 21
<u>Risk Assessor Refresher - 8 Hr</u> \$195 Per Trainee	Toledo Cleveland Columbus	Oct 30 Dec 9 Feb 24 May 5 Oct 21 Nov 25 Dec 16 Jan 13 Feb 18 Mar 24 Apr 21 May 19 Jun 16 Apr 7
Renovation, Repair and Painting Certification Initial - 8 Hour \$189 Per Trainee	Toledo Cleveland Akron	Nov 12 Jan 16 Mar 27 May 7 Sep 26 Oct 28 Nov 14 Dec 12 Jan 23 Feb 27 Mar 19 Apr 11 May 28 Jun 19 Oct 24 Feb 6 Apr 24 Jun 12 Feb 27 Mar 19 Apr 11 May 28 Jun 19
<u>Renovation, Repair and Painting</u> <u>Refresher (Grandfather) - 4 Hr</u> \$95.00 per Trainee	Toledo Cleveland Akron	Jan 17 May 8 Sep 27 Nov 15 Jan 24 Mar 20 May 29 Oct 25 Feb 7 Jun 13

If You Have Any Special Needs Or Need a Reasonable Accommodation, Please Contact Us Immediately

<u>RRP CLASSES ARE ADDED AS CLASSES FILL UP – CALL OFFICE FOR ADDITIONAL DATES!</u> EPA RRP accredited classes for certification under Section 402 of TSCA

YOU ARE NOT ENROLLED IN <u>ANY</u> CLASS UNTIL YOU RECEIVE WRITTEN CONFIRMATION FROM US. <u>Certificates will not be issued if you are late to class.</u> Certificates are held until paid in full.

Licensing courses approved by the Ohio Depart. of Health, ODH Requires Refreshers Taken During Second Year of License Period

On Site Classes Available, Closed Enrollment - Your Location / Your Students - Priced per Day, Call for More Information

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