

The Dell Group

Creative Solutions For Your Compliance Burdens

THE ADVISOR

Volume Twenty, Issue One
WINTER 2019

Your Free Newsletter of
Management Information

SPECIALIZING IN SAFETY, ENVIRONMENTAL AND
HUMAN RESOURCES TOPICS

P.O. BOX 1390, MENTOR, OH 44061-1390
440.266.0403 / 800.259.8930 / FAX 440.266.0413
dellgroup.com / info@dellgroup.com

INSIDE THIS ISSUE:

WINTER AND COLD STRESS HAZARDS.....	1
EPA E-MANIFEST PROGRAM.....	7
OSHA CLARIFIES ANTI-RETALIATION RULES.....	8
THE IMPORTANCE OF TRENCH SAFETY.....	9
WALKING-WORKING SURFACES AWARENESS.....	10
OSHA UPDATE.....	11
CITATIONS & PENALTIES.....	12
LEAD EXPERTS TRAINING SCHEDULE 1 st HALF 2019.....	14

OUR SERVICES INCLUDE

- OSHA Programs: Emergency Action, Respirator, PPE, HazCom, Fall Protection
- Customized Safety Programs • DOT HazMat Training • Air and Noise Sampling
- OSHA Training: Lift Truck, HazCom, PPE, Lockout/Tagout, Confined Space, Emergency Evacuation, Fire Prevention, Spill Response, Lead Abatement Training, Electrical Shock & Arc Flash Protection, Bloodborne Pathogens, Excavation, Fall Protection, Scaffolding
 - Respirator Training and Fit Tests • Lead, Arsenic, Cadmium
- Consulting: Mock OSHA/EPA/DOT Audits • Environmental Permitting and Reporting
 - Lead Paint Risk Assessments and Clearance Reports • Lead Abatement Consulting
 - ISO 14001 EMS Training and Consulting
- Management Training: Supervisory Skills, Modern Safety Management Skills, Behavior Based Safety

The Advisor is prepared by The Dell Group, Inc. to inform its clients and friends of developments in lead-based 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

WINTER AND COLD STRESS HAZARDS

What is cold stress?

What constitutes cold stress and its effects can vary across different areas of the country. In regions that are not used to winter weather, near freezing temperatures are considered factors for "cold stress." Increased wind speed also causes heat to leave the body more rapidly (wind chill effect). Wetness or dampness, even from body sweat, also facilitates heat loss from the body. Cold stress occurs by driving down the skin temperature, and eventually the internal body temperature. When the body is unable to warm itself, serious cold-related illnesses and injuries may occur, and permanent tissue damage and death may result. Types of cold stress include: trench foot, frostbite, and hypothermia.

For more information, see OSHA's [Cold Stress Safety and Health Guide](#).

How can cold stress be prevented?

Although OSHA does not have a specific standard that covers working in cold environments, under the [Occupational Safety and Health Act \(OSH Act\) of 1970](#), employers have a duty to protect workers from recognized hazards, including cold stress hazards, that are causing or likely to cause death or serious physical harm in the workplace.

Employers should train workers. Training should include:

- o How to recognize the environmental and workplace conditions that can lead to cold stress.
- o The symptoms of cold stress, how to prevent cold stress, and what to do to help those who are affected.
- o How to select proper clothing for cold, wet, and windy conditions.

Employers should:

- o Monitor workers physical condition.
- o Schedule frequent short breaks in warm dry areas, to allow the body to warm up.
- o Schedule work during the warmest part of the day.
- o Use the buddy system (work in pairs).
- o Provide warm, sweet beverages. Avoid drinks with alcohol.
- o Provide engineering controls such as radiant heaters.

Outdoor work requires proper preparation, especially in severe winter weather conditions. Although OSHA does not have a specific standard that covers working in cold environments, employers have a responsibility to provide workers with employment and a place of employment

which are free from recognized hazards, including winter weather related hazards, which are causing or are likely to cause death or serious physical harm to them ([Section 5\(a\)\(1\) of the Occupational Safety and Health Act of 1970](#)). Employers should, therefore, train workers on the hazards of the job and safety measures to use, such as engineering controls and safe work practices, that will protect workers' safety and health.

Employers Should Train Workers

Cold Stress

- How to recognize the symptoms of cold stress, prevent cold stress injuries and illnesses
- The importance of self-monitoring and monitoring coworkers for symptoms
- First aid and how to call for additional medical assistance in an emergency
- How to select proper clothing for cold, wet, and windy conditions
- Other winter weather related hazards that workers may be exposed to, for example, slippery roads and surfaces, windy conditions, and downed power lines
 - How to recognize these hazards
 - How workers will be protected: engineering controls, safe work practices and proper selection of equipment, including personal protective equipment

Employers Should Provide Engineering Controls

Engineering controls can be effective in reducing the risk of cold stress. For example, radiant heaters may be used to warm workplaces like outdoor security stations. If possible, employers should shield work areas from drafts or wind to reduce wind chill.

Employers should use engineering controls to protect workers from other winter weather related hazards, for example, aerial lifts or ladders can be used for safely applying de-icing materials to roofs, to protect workers from the hazard of falling through skylights.

Employers Should Implement Safe Work Practices

Safe work practices that employers can implement to protect workers from injuries, illnesses and fatalities include:

- Providing workers with the proper tools and equipment to do their jobs
- Developing work plans that identify potential hazards and the safety measures that will be used to protect workers
- Scheduling maintenance and repair jobs for warmer months
- Scheduling jobs that expose workers to the cold weather in the warmer part of the day
- Avoiding exposure to extremely cold temperatures when possible
- Limiting the amount of time spent outdoors on extremely cold days
- Using relief workers to assign extra workers for long, demanding jobs
- Providing warm areas for use during break periods

- Providing warm liquids (no alcohol) to workers
- Monitoring workers who are at risk of cold stress
- Monitoring the weather conditions during a winter storm, having a reliable means of communicating with workers and being able to stop work or evacuate when necessary
- Acclimatizing new workers and those returning after time away from work by gradually increasing their workload, and allowing more frequent breaks in warm areas, as they build up a tolerance for working in the cold environment
- Having a means of communicating with workers, especially in remote areas
- Knowing how the community warns the public about severe weather: outdoor sirens, radio, and television
 - o The National Oceanic and Atmospheric Administration (NOAA) provides multiple ways to stay informed about winter storms. If you are notified of a winter storm watch, advisory or warning, follow instructions from your local authorities: [NOAA Weather Radio](#)

Employers Should Consider Protective Clothing that Provides Warmth

Employers must provide personal protective equipment (PPE), for example, fall protection, when required by OSHA standards to protect workers' safety, and health. However, in limited cases specified in the standard ([29 CFR 1910.132](#)), there are exceptions to the requirement for employers to provide PPE to workers. For instance, there is no OSHA requirement for employers to provide workers with *ordinary* clothing, skin creams, or other items, used solely for protection from weather, such as winter coats, jackets, gloves, parkas, rubber boots, hats, raincoats, ordinary sunglasses, and sunscreen ([29 CFR 1910.132\(h\)\(4\)](#)). Regardless of this, many employers provide their workers with winter weather gear such as winter coats/jackets and gloves.

Learn more about PPE requirements and how to design an effective PPE program: [Personal Protective Equipment](#)(OSHA Safety and Health Topics Page).

Dressing Properly for the Cold

Dressing properly is extremely important to preventing cold stress. When cold environments or temperatures cannot be avoided, the following would help protect workers from cold stress:

- Wear at least three layers of loose fitting clothing. Layering provides better insulation.
 - o An inner layer of wool, silk or synthetic (polypropylene) to keep moisture away from the body. Thermal wear, wool, silk or polypropylene, inner layers of clothing that will hold more body heat than cotton.

- A middle layer of wool or synthetic to provide insulation even when wet.
- An outer wind and rain protection layer that allows some ventilation to prevent overheating.
- Tight clothing reduces blood circulation. Warm blood needs to be circulated to the extremities. Insulated coat/jacket (water resistant if necessary)
- Knit mask to cover face and mouth (if needed)
- Hat that will cover your ears as well. A hat will help keep your whole body warmer. Hats reduce the amount of body heat that escapes from your head.
- Insulated gloves (water resistant if necessary), to protect the hands
- Insulated and waterproof boots to protect the feet

Winter Driving

Although employers cannot control roadway conditions, they can promote safe driving behavior by ensuring workers: recognize the hazards of winter weather driving, for example, driving on snow/ice covered roads; are properly trained for driving in winter weather conditions; and are licensed (as applicable) for the vehicles they operate. For information about driving safely during the winter, visit OSHA's [Safe Winter Driving](#) page.

Employers should set and enforce driver safety policies. Employers should also implement an effective maintenance program for all vehicles and mechanized equipment that workers are required to operate. Crashes can be avoided. Learn more at: [Motor Vehicle Safety](#) (OSHA Safety and Health Topic's Page).

Stranded in a Vehicle

If you are stranded in a vehicle, stay in the vehicle. Call for emergency assistance if needed, response time may be slow in severe winter weather conditions. Notify your supervisor of your situation. Do not leave the vehicle to search for assistance unless help is visible within 100 yards. You may become disoriented and get lost in blowing and drifting snow. Display a trouble sign by hanging a brightly colored cloth on the vehicle's radio antenna and raising the hood. Turn on the vehicle's engine for about 10 minutes each hour and run the heat to keep warm. Also, turn on the vehicle's dome light when the vehicle is running as an additional signal. Beware of carbon monoxide poisoning. Keep the exhaust pipe clear of snow, and open a downwind window slightly for ventilation.

An emergency kit with the following items is recommended in vehicles:

- Cellphone or two-way radio
- Windshield ice scraper
- Snow brush
- Flashlight with extra batteries
- Shovel
- Tow chain
- Traction aids (bag of sand or cat litter)
- Emergency flares
- Jumper cables
- Blankets, change of clothes

Watch for signs of *frostbite* and *hypothermia*. Do minor exercises to maintain good blood circulation in your body. Clap hands and move arms and legs occasionally. Try not to stay in one position for too long. Stay awake, you will be less vulnerable to cold-related health problems. Use blankets, newspapers, maps, and even the removable car mats for added insulation. Avoid overexertion since cold weather puts an added strain on the heart. Unaccustomed exercise such as shoveling snow or pushing a vehicle can bring on a heart attack or make other medical conditions worse.

Shoveling Snow

Shoveling snow can be a strenuous activity, particularly because cold weather can be taxing on the body. There is a potential for exhaustion, dehydration, back injuries, or heart attacks. During snow removal in addition to following the tips for avoiding cold stress, such as taking frequent breaks in warm areas, there are other precautions workers can take to avoid injuries. Workers should warm-up before the activity, scoop small amounts of snow at a time and where possible, push the snow instead of lifting it. The use of proper lifting technique is necessary to avoid back and other injuries when shoveling snow: keep the back straight, lift with the legs and do not turn or twist the body.

Using Powered Equipment like Snow Blowers

It is important to make sure that powered equipment, such as snow blowers are properly grounded to protect workers from electric shocks or electrocutions. When performing maintenance or cleaning, make sure the equipment is properly guarded and is disconnected from power sources.

Snow blowers commonly cause lacerations or amputations when operators attempt to clear jams with the equipment turned on. Never attempt to clear a jam by hand. First, turn the snow blower

off and wait for all moving parts to stop, and then use a long stick to clear wet snow or debris from the machine. Keep your hands and feet away from moving parts. Refuel a snow blower prior to starting the machine; do not add fuel when the equipment is running or when the engine is hot.

Clearing Snow from Roofs and Working at Heights

Employers must evaluate snow removal tasks for hazards and plan how to do the work safely. Workers should be aware of the potential for unexpected hazards due to the weather conditions, for example, layers of ice can form as the environmental temperature drops, making surfaces even more slippery. A surface that is weighed down by snow must be inspected by a competent person to determine if it is structurally safe for workers to access it, because it may be at risk of collapsing. Snow covered rooftops can hide hazards such as skylights that workers can fall through. Electrical hazards may also exist from overhead power lines or snow removal equipment.

Employers can protect workers from these hazardous work conditions, for example, by using snow removal methods that do not involve workers going on roofs, when and where possible. Employers should determine the right type of equipment (ladders, aerial lifts, etc.) and personal protective equipment (personal fall arrest systems, non-slip safety boots, etc.) for the job and ensure that workers are trained on how to properly use them. For more information, see [OSHA's Hazard Alert: Falls and Other Hazards to Workers Removing Snow from Rooftops and Other Elevated Surfaces](#).

Quotable

“Nothing is more dangerous than an idea when it’s the only one you have.” – Emile Chartier

“Democracy is the art and science of running the circus from the monkey cage .”
– H.L. Mencken

“He who seeks rest finds boredom. He who seeks work finds rest.” – Dylan Thomas

“Be fearful when others are greedy; be greedy when others are fearful.” – Warren Buffett

EPA E-MANIFEST PROGRAM

The Environmental Protection Agency (EPA) established a national system for tracking hazardous waste shipments electronically, known as e-Manifest. Beginning June 30, 2018, all receiving facilities must submit manifests to EPA. Treatment, Storage and Disposal Facilities (TSDFs), are “highly encouraged” to submit manifest data electronically. EPA will begin to phase in required electronic submissions after three years of the programs start date.

Based on the processing costs for each manifest, electronic submission will be the most cost effective. EPA set submission prices through September 2019:

Manifest Submission Type	Fee per Manifest
Mailed in Paper Manifest	\$15.00
Scanned Image (PDF) Upload	\$10.00
Data (API) + Image (PDF) Upload	\$6.50
Electronic Manifest (API + Digital signature)	\$5.00

Benefits of the e-Manifest system include:

- Annual State and industry savings of \$75 – \$90 million and 300,000 – 700,000 hours;
- Accurate and timely information on shipments;
- Rapid notification of discrepancies or other problems related to a particular shipment;
- Unified reporting location for States and federal EPA, and
- Monitoring and compliance of waste shipments.

For additional information, and registration instructions, visit the [EPA's e-Manifest website](#).

Quotable

“The good life as I conceive it, is a happy life. I do not mean that if you are good you will be happy; I mean that if you are happy you will be good.” – Bertrand Russell

“Because things are not what they seem, they will not stay how they are.” – Bertlot Brecht

OSHA CLARIFIES ANTI-RETALIATION RULES

[In an October 2018 memorandum](#), OSHA has clarified provisions of the anguished 2016 Improve Tracking of Workplace Injuries and Illnesses rule (29 CFR 1904.35(b)(1)(iv)). The rule prohibits employers from discharging or discriminating against an employee for reporting a work-related injury or illness.

Publication of the rule was delayed following a call to provide additional guidance and a legal challenge by industrial and trade organizations. Groups claimed provisions unlawfully ban important safety incentive programs and post-accident drug testing.

Not mentioned in the rule itself, the (29 CFR 1904.35(b)(1)(iv) preamble outlines circumstances where the agency would consider post-accident drug testing retaliatory. Other mentioned possible violations included, blanket post-incident testing, and some safety incentive programs as being deterrents for proper injury and illness reporting.

Safety Incentive Programs - According to the memorandum, safety policies where employee's incentives were tied to the number of recordable injuries, are not always prohibited. The memo includes steps employers may take to counterbalance unintentional deterrents of a rate-based incentive program. Among examples given to balance deterrents are incentive programs which reward employees who identify unsafe conditions.

Post-Accident Drug Testing - OSHA also clarified that testing is often generally permissible, giving the following circumstances: random testing, testing unrelated to injury reporting, testing required by workers compensation laws, and testing required by DOT or federal law. Testing to determine the root cause of an injury illness or near miss, should be conducted for any employee who could have contributed to the incident, not just employees who reported injuries.

Key Points for Employers

- Employers can and should continue to use post-accident drug screening;
- OSHA requires a "reasonable basis" for employers to perform a post-accident drug test;
- Review your company's post-accident drug testing policy to ensure compliance;
- Remove blanket rules for post-accident testing;
- Review your state laws for superseding post-accident testing requirements;
- Provide post-accident reasonable suspicion training for your supervisors, and
- Review and update your injury reporting process for employee ease of use.

THE IMPORTANCE OF TRENCH SAFETY

Following a trench collapse, a Pennsylvania construction company faces criminal charges resulting from an employee's death. Susquehanna Supply Company has been charged with willfully committing an OSHA violation. OSHA placed the company in the Severe Violator Enforcement Program, and issued \$140,000 in fines.

OSHA statistics shows 33 workers died in 2016 due to trench collapses, exceeding the total from 2014 and 2015 combined. These alarming trends lead OSHA to [make Trench safety a priority](#) in 2018 through September of 2019.

Susquehanna reported to the agency that a worker died in a trench collapse July 7, 2015. OSHA investigators found the employee had been working inside an unprotected fifteen-foot-deep trench, when the dirt walls collapsed. Trenches five feet (1.5 meters) deep or more require a protective system unless the excavation is made entirely in stable rock, according to OSHA's regulations. The employee was in the trench because it could not be reached by an excavator.

In April 2018, following a criminal trial and plea agreement, Susquehanna Supply Company acknowledged it was guilty of willfully committing an OSHA violation, which resulted in an employee's death. The court fined the Susquehanna Supply a \$250,000 fine.

Trench collapse accidents are rarely survivable; however, they are preventable. Here are some tips for protecting construction workers who perform trench work:

- Following every storm or other hazard-increasing event, and before each shift, have a competent person inspect trenches;
- Train employees to spot signs of imminent trench collapse; bulging, toppling, and tension cracks;
- Use protective methods such as benching, shielding, shoring, and sloping for all trenches between 5 feet and 20 feet deep;
- Keep materials, equipment, and excavated soil more than two feet from trench edges, and
- Assure each employee has a method to safely exit the trench, accessible within 25 feet of all approved work.

OSHA requires all trenches, 5 feet deep or more, have one of the following protective systems in place: sloping or benching trench walls; shoring the trench with pneumatic or hydraulic jacks and trench plates; or shielding the trench using a trench box.

WALKING-WORKING SURFACES AWARENESS

OSHA's Walking-Working Surfaces & Personal Protective Equipment final rule, took effect January 2017, modernizing general industry rules, in step with those already in place for the construction industry.

Deadline	Requirement	Subpart D Section
May 17, 2017	Deadline by which employers must train employees on fall and equipment hazards.	1910.30(a) and (b)
November 20, 2017	Testing & certification of anchorages.	1910.27(b)(1)
November 19, 2018	Deadline by which employers must equip existing fixed ladders (over 24') with one of the following solutions: cage, well, ladder safety system, or personal fall arrest system.	1910.28(b)(9)(i)(A)
November 19, 2018	After this date, employers must begin equipping new & renovated fixed ladders (over 24') with a ladder safety system or personal fall arrest system.	1910.28(b)(9)(i)(B)
November 18, 2036	Deadline by which all fixed ladders (over 24') must be equipped with ladder safety system or personal fall arrest system in place of cages and wells.	1910.28(b)(9)(i)(D)

Workplace injuries bring extensive costs for the worker and the company. It's worth the time to walk through your facility looking for potential fall hazards. The performance-based final rule, allows employers more freedom to purchase the equipment they want. A variety of solutions are available.

Training – Your trainer should be a qualified person, what OSHA defines, as having a recognized degree, certificate, or professional standing within a given field. Employers must train all employees on: the company's fall protection procedures; recognizing fall hazards; procedures to minimize fall hazards; personal fall protection; maintenance; assembly; inspection, and instillation. It's also the employer's responsibility to retrain workers as needed.

For further information visit OSHA's [Walking-Working Surfaces & Personal Fall Protection Final Rule FAQ](#) page.

OSHA UPDATE

OSHA has proposed a rule to amend certain parts of its beryllium standard for general industry. Beryllium is a lightweight metal used in electronics and manufacturing which can pose serious health risks. OSHA issued a final rule in 2016 to combat chronic beryllium disease and lung cancer in workers. The Amendment, published in the [December Federal Register](#), would revise provisions regarding recordkeeping, personal protective clothing and equipment, written control exposure plans, disposal and recycling, medical surveillance, and hazard communication.

Key Amendments Proposed

- Reduces the permissible exposure limit (PEL) for beryllium to 0.2 micrograms per cubic meter of air, averaged over 8-hours;
- Establishes a new short term exposure limit for beryllium of 2.0 micrograms per cubic meter of air, over a 15-minute sampling period;
- Requires employers to use engineering and work practice controls (such as ventilation or enclosure) to limit worker exposure to beryllium; provide respirators when controls cannot adequately limit exposure; limit worker access to high-exposure areas; develop a written exposure control plan; train workers on beryllium hazards, and
- Requires employers to make available medical exams to monitor exposed workers and provides medical removal protection benefits to workers identified with a beryllium-related disease.

Compliance Schedule

May 20, 2017	Final rule took effect
December 12, 2018	General industry enforcement
March 11, 2019	Provisions for changing rooms & showers
March 10, 2020	Engineering Control provisions

OSHA is currently enforcing the permissible exposure limit of 0.2 micrograms of beryllium per cubic meter of air, and the short-term exposure limit of 2 micrograms per cubic meter of air for general industry, construction and shipyards.

Quotable

“If what you have done yesterday still looks big to you, you haven’t done much today.”
– Mikhail Gorbachev

CITATIONS & PENALTIES

Norwalk, OH Manufacturer Cited for Machine Guarding Violations after Employee Injury

After an employee's arm was crushed while removing product build-up from a machine, American Excelsior Company, was cited for failing to develop or implement energy control procedures to prevent unintentional machine start-up during maintenance, and not training employees in energy control procedures. The company received citations previously for similar violations. OSHA issued penalties of \$213,411 and placed them in the Severe Violator Enforcement Program.

UPS Cited for Blocking Exits

OSHA has cited United Parcel Service (UPS) for repeatedly putting workers at risk by obstructing exit routes at its Sharonville, distribution center. Inspectors determined that UPS failed to maintain exit routes at multiple facility locations. Management allowed packages to accumulate in aisles, an unloader device limited the access route, and some access routes were reduced to just seven inches. The company faces \$208,603 in penalties.

New Jersey Manufacturer Cited after Worker Suffers Amputation

Mister Cookie Face, LLC, was cited for machine safety hazards after a sanitation worker suffered an amputation when a machine activated while the employee attempted to unjam it. The company faces \$103,476 in penalties for failing to lockout machines during servicing, ensure workers used personal protective equipment, and prevent worker exposures to bloodborne pathogens.

Company Cited for Exposing Workers to Hazards from Operating Damaged Forklift

OSHA investigated Rural King Supply Inc., after receiving complaints that the company allowed workers to operate a damaged forklift at its Xenia facility, despite workers' reports of faulty brakes. The farm supply company was cited for failing to take a forklift out of service and perform needed repairs. OSHA proposed penalties of \$258,672.

OSHA Resolves Whistleblower Lawsuit with Environmental Services Company

Steubenville-based Environmental Management Specialists (EMS) has entered a settlement agreement with OSHA. OSHA found that EMS fired a field technician after he filed complaints that employees were exposed to confined space and respiratory hazards. EMS will pay the technician \$21,000 in back wages and remove all references to his termination from his record.

Virginia Cites Contractor for Exposing Workers to Silica Hazards

Virginia Occupational Safety and Health issued five citations and \$304,130 in penalties to Lanford Brothers Company for exposing workers to respirable crystalline silica hazards while using jackhammers to remove concrete from bridge piers. Inspectors determined that the company did not provide adequate eye and respiratory protection, failed to assess each worker for exposure to respirable crystalline silica, and permitted workers to use jackhammers and concrete saws without proper control methods.

Managers Indicted for Obstructing OSHA Investigation Following Workplace Death

A federal grand jury has indicted two managers at Extrudex Aluminum, for conspiracy to obstruct justice, during a 2012 workplace fatality investigation. An employee suffered fatal injuries when a rack containing hot aluminum parts tipped over and pinned him. The indictment alleges that Brian Carder, general manager, and Paul Love, safety coordinator and human resources director, devised a plan to provide false statements to the OSHA investigator. Carder and Love failed to comply with OSHA's requests to produce all emails regarding specific safety concerns. The men allegedly threatened employees' job security if they didn't recant previous emails. The indictment charges Carder and Love with one count each of conspiracy to obstruct justice, obstruction of justice, and obstruction of proceedings. Love also faces one count of making false statements to law enforcement.

Ohio Tool Manufacturer Cited After Employee Suffers Amputation

ArtiFlex Manufacturing was cited for exposing workers to amputation hazards after an employee's finger was partially amputated. Inspectors determined that the company failed to guard pinch points on a conveyor belt, a violation the company was also cited for in 2016. ArtiFlex faces penalties of \$213,411, and has been placed in OSHA's Severe Violator Enforcement Program. Read the news release for more information.

Bakery Cited for Exposing Employees to Electrical and Fall Hazards

OSHA cited Miami-based Bakery Corp. for exposing employees to caught-in, fall, and electrical hazards. Inspectors found that the company failed to properly ground portable fans, train employees to operate a powered industrial truck, take defective ladders out of service, and provide eyewash equipment for employees working with corrosive chemicals. The bakery faces \$67,261 in proposed penalties.

Pallet Manufacturer Cited After Carbon Monoxide Sickens Employees

Cleary Pallet Sales faces \$216,253 in fines after 10 employees required emergency medical treatment for carbon monoxide exposure. An investigation found that employees were exposed at nearly 10 times the permissible exposure limit. The company was cited for: failing to address high carbon monoxide level warnings; ensure adequate machine guarding; not training workers on hazardous communications and forklift safety, and for allowing employees to operate defective forklifts.

2019 1st Half -- Lead Training Schedule

LEAD EXPERTS

Type, Length and Price	Location	Course Month / Dates						
<u>Contractor Initial - 40 Hour</u> \$865 Per Trainee	Toledo Cleveland Columbus	Jan 28 – Feb 1	Mar 4 – 8	May 20 – 24				
		Feb 11 – 15	Apr 22 – 26	Jun 17 – 21				
		Jan 28 – Feb 1	Mar 4 – 8	May 20 – 24				
<u>Contractor Refresher - 8 Hour</u> \$225 Per Trainee	Toledo Cleveland Akron	Jan 4	Mar 29	May 31				
		Jan 15	Feb 5	Mar 12	Apr 16	May 14	Jun 11	
		Mar 1	Apr 30	Jun 28				
<u>Worker Initial</u> \$665 Per Trainee	The Contractor Initial and Refresher courses shown above satisfy Ohio Department of Health’s requirements for Worker Classes.							
<u>Worker Refresher</u> \$225 Per Trainee	A Worker enrolling in these classes will be charged the lower fee shown in this section. Please call if you have <u>any</u> questions.							
<u>Inspector Initial - 24 Hour</u> \$515 Per Trainee	Toledo Cleveland Columbus	Feb 18 –20	Apr 1 – 3	Jun 3 – 5				
		Mar 18 – 20	May 6 – 8					
		Feb 18 – 20	Apr 1 – 3	Jun 3 – 5				
<u>Inspector Refresher - 8 Hour</u> \$225 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> \$350 Per Trainee	Toledo Cleveland Columbus	Feb 21 – 22	Apr 4 – 5	Jun 6 – 7				
		Mar 21 – 22	May 9 – 10					
		Feb 21 - 22	Apr 4 – 5	Jun 6 – 7				
<u>Risk Assessor Refresher - 8 Hr</u> \$225 Per Trainee	Toledo Cleveland Akron	Jan 3	Mar 28	May 30				
		Jan 14	Feb 4	Mar 11	Apr 15	May 13	Jun 10	
		Feb 28	Apr 29	Jun 27				
<u>Renovation, Repair and Painting Certification Initial - 8 Hour</u> \$209 Per Trainee	Toledo Cleveland Akron	Jan 7	Mar 25	May 2				
		Jan 17	Feb 7	Mar 14	Apr 18	May 16	Jun 13	
		Feb 25	Apr 8	Jun 24				
<u>Renovation, Repair and Painting Refresher (Grandfather) - 4 Hr</u> \$109 Per Trainee	Toledo Cleveland Akron	Jan 8	Mar 26	May 3				
		Jan 18	Feb 8	Mar 15	Apr 19	May 17	Jun 14	
		Feb 26	Apr 9	Jun 25				

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

EPA RRP accredited classes for certification under Section 402 of TSCA

Class dates can be changed, rescheduled or cancelled at any time due to demand. Please call the office for updates.

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

Licensing courses approved by the Ohio Depart. of Health, ODH Requires Refreshers Taken within Two Years of Previous Class

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

Lead Experts, P.O. Box 1390, Mentor, OH 44061-1390
Phone: 440-266-0403 / 800-259-8930 Fax: 440-266-0413
Info@LeadExperts.org / www.LeadExperts.org

Revised January 17, 2019