



► **MJS SAFETY TRAINING ANNOUNCEMENT**

**MJS SAFETY LLC** is proud to announce the addition of NCCER and O.Q.S.G. to our OQ Services. **MJS SAFETY LLC** is an "Authorized Assessment Center" for Proctoring Final Assessments and completing Performance Evaluations for O.Q.S.G. and NCCER – as well as other OQ disciplines such as MEA-EnergyU, Veriforce & EnergyWorldNet. [call to schedule](#) [read more...](#)

► **Schedule of classes October 2018:** • *TRAINING CENTER - 1760 BROAD ST, UNIT H, MILLIKEN, CO 80543* • [read more...](#)

**OSHA / CONSTRUCTION NEWS SUMMARY**

► **OSHA Recordkeeping Often Has Little to do with Reality**

***A better way of keeping score***

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**TRANSPORTATION NEWS SUMMARY**

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► **TOP 10 STATES for Brake and Tire Violations, and Where they Overlap** [read more...](#)

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► **Officers Issue 57,405 Citations, 87,907 Warnings During Operation Safe Driver Week**



Commercial motor vehicle enforcement officers patrolling U.S. and Canadian highways issued more than 57,000 citations and nearly 88,000 warnings for unsafe driving behaviors during 2018 Operation Safe Driver Week, the Commercial Vehicle Safety Alliance reported Sept. 19. [read more...](#)

► **Top 6 ELD Exemptions**

The ELD rule applies to most motor carriers and drivers currently required to maintain Records of Duty Status (RODS) per Part 395, 49 CFR 395.8(a). [read more...](#)



## ► MSHA Issues Report of Investigation on Miner Burned when Lighting Kiln



The Mine Safety and Health Administration (MSHA) released its [Report of Investigation](#) on the 4th metal/non-metal fatality of 2018, which occurred at an Alabaster Plant in Alabama [read more...](#)



## ► No Time To Gamble:

### *A used equipment inspection checklist*

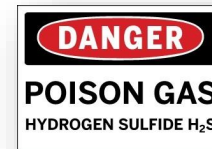
It doesn't take long to evaluate a used car or truck, but inspecting a piece of used equipment — whether it's a beater or nearly new — requires several hours to a half a day. [read more...](#)



## MONTHLY SAFETY & HEALTH TIP NEWS SUMMARY

## ► Accepted Practices for Hydrogen Sulfide Training Programs

Hydrogen sulfide stinks. Some describe its stench as reminiscent of “rotten eggs.” However, this odor is not the gas's only characteristic. The odorless H<sub>2</sub>S is flammable and poisonous. [read more...](#)



# MJS SAFETY TRAINING ANNOUNCEMENT

**MJS SAFETY LLC** is proud to announce the addition of NCCER and O.Q.S.G. to our OQ Services.

**MJS SAFETY LLC** is an "Authorized Assessment Center" for Proctoring and Testing for ENERGY worldnet, Inc., as well as OQ Performance Evaluation Services.

**MJS SAFETY LLC** continues to offer Proctor and Testing Services, as well as Operator Qualification [OQ] Performance Evaluations under the "EnergyU" system – a service of Midwest ENERGY Association – as well as Veriforce.

**MJS SAFETY LLC** has "Authorized" Performance Evaluators on staff that can perform this service for specific "Covered Tasks."

**MJS SAFETY LLC** is also available to assist with the Knowledge Based Training for these tasks. Knowledge-based training is designed to help personnel successfully pass the OQ Knowledge Based Testing as well as the Performance Evaluation process.

The Operator Qualification Rule – commonly referred to as the "OQ Rule" addressed in Title 49 of the Code of Federal [US DOT] regulations, mandates that individuals who perform "Covered Tasks" on covered pipeline facilities be qualified through the Operator Qualification Process.

The intent of the OQ rule is to ensure protection of both pipeline personnel and the public at large. Providing individuals with the necessary knowledge and skills is an essential element of any Operator and Contractor OQ plan.

Acceptable requirements for qualification are determined by the operator. The quality and validity of data related to OQ training, testing, and performance is critical to meet these requirements.

If we can be of assistance with these types of services for your company, please [call to schedule](#).

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- ~OSHA 10 Hour General Industry
- ~OSHA 30 Hour General Industry
- ~NUCA Confined Space
- ~Hydrogen Sulfide [H<sub>2</sub>S] - Awareness
- ~Respirator: Medical Evaluation & Fit Testing
- ~Hazard Communication – GHS Training
- ~Teens & Trucks Safety
- ~1st Aid/CPR Course- Medic 1<sup>st</sup> Aid
- ~HAZWOPER 8, 24 & 40 Hour
- ~PEC'S Intro to Pipeline
- ~Confined Space Rescuer Training
- ~PEC Core Compliance
- ~OSHA 10 Hour Construction
- ~OSHA 30 Hour Construction
- ~NUCA Competent Person for Excavation & Trenching
- ~Hands-on Fire Extinguisher training
- ~DOT Hazmat Training
- ~MSHA Sand & Gravel Training [Part 46 only]
- ~Fall Protection for the Competent Person
- ~Defensive Driving Safety for large and small vehicles
- ~Instructor Development for Medic 1<sup>st</sup> Aid/CPR
- ~Bloodborne Pathogens Compliance Training
- ~Respiratory Protection Training

► **MJS SAFETY offers these courses as well as custom classes to fit the needs of your company**

**Schedule of classes Oct 2018:** • *TRAINING CENTER - 1760 BROAD ST, UNIT H, MILLIKEN, CO 80543*

- **PEC Safeland Basic Orientation:** October 8, 18, 30; 8 – 4:30
- **First Aid/CPR/AED/BLOODBORNE PATHOGENS:** October 26; 8 – noon  
(We offer MEDIC FIRST AID)
- **TEEX H2S Operator Training – Awareness (ANSI Z390-2017 Course):** October 26; 12:30 – 4:30
- **OSHA 10 HOUR GENERAL INDUSTRY TRAINING:** October 24, 25
- **Excavation & Trenching Competent Person - NUCA Class:** October 10, 11

[ **For any last minute schedule updates, go to [www.mjssafety.com](http://www.mjssafety.com)** ]

► **NEED ANY OF THESE CLASSES IN SPANISH? CONTACT [carriejordan@mjssafety.com](mailto:carriejordan@mjssafety.com) TO SCHEDULE TODAY** ◀

**GO TO [mjssafety.com](http://mjssafety.com) FOR UP-TO-DATE CLASS LISTINGS**  
To sign up for one of these classes, or inquire about scheduling a different class  
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**— FEATURED TRAINING PROGRAMS —**

- Safeland Basic Orientation
- Hydrogen Sulfide Awareness
- First Aid/CPR
- OSHA 10 Hour for General Industry or Construction
- Confined Space for Construction

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**Unable to attend a class?**

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AggregateManager  
CDC  
EquipmentWorld  
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## OSHA Recordkeeping Often Has Little to do with Reality

### A better way of keeping score

Dan Petersen, one of the **great thinkers** in the history of **occupational safety**, in a 2005 book, **“Measurement of Safety Performance,”** tore apart the **traditional barometers** of safety performance, the **OSHA total case incident rate**, total lost-workday cases, **fatalities** and other measures. All are **based on cases per 100 full-time employees**. The national **total incident rate** was **2.9 injury and illness cases per 100 full-time employees** in 2016.

#### Petersen cited four flaws in using these numbers:

- *In smaller units the rates have little statistical validity and measures luck, not performance;*
- *The rates do not tell you if you are improving your safety systems;*
- *The measures are not diagnostic. They don't suggest why an organization is performing better or worse.*
- *The measures do not tell you what you need to do to fix what's wrong with your safety program.*

**Said Petersen: “You’re not going to gain anything by just measuring your failures.”**

#### Struggling for consensus

For decades now – **starting years** before Petersen wrote his **2005 book** – many safety and **health pros** have acknowledged the **limitations** of these time-worn **performance measures** – **lagging indicators**. Pros have **brainstormed**, held roundtables and formed **task forces** trying to develop more **accurate** and **credible** key **performance indicators**.

In **2018**, no **alternatives** have been **widely adopted**. Many pros **support** reporting leading indicators – **activities** that **do influence** the quality of **safety performance**, such as audits, **risk assessments** and hazards **mitigated**. But use of these measures is **mostly confined** to large **corporations** with sophisticated **safety** and **health programs**.

This lack of **alternatives** to the flawed **OSHA measures** hinders **safety pros** in **communicating** performance **results** to **senior leaders**, and to the **public**. Many **Fortune 500 companies** publish safety **scorecards** using the familiar **OSHA metrics** in their **annual reports**. But as has been pointed out, **few members** of the public have any **idea** what **total incident rates** or **lost-workday** rates mean.

**And now there is a hot debate:** should **OSHA** publicize these **performance measures** for **individual worksites** on its **website**? What to do? How should the **public**, company management and **workers** best be **apprised** of the level of **safety performance** of an **organization**?

#### “Give me raw numbers”

“I would **rather** see **OSHA** provide **raw numbers**: ‘Company X had 1,256 injuries last year; 204 of those injuries were severe enough to cause the injured worker to either miss work or work on medical restrictions; and three of the workers died,’” says **safety pro** Phil LaDuke.

Peter Sandman, now **retired** and for **decades** one the country’s **leading risk communication** experts, advocates **picking two** or **three metrics** that will give employees, **prospective employees**, shareholders, **policy-makers** and others the best **quick handle** on a company’s or **industry’s** **safety record**.

#### SEC-like reports

**Another idea:** safety performance reporting that is more in **line** with the **Securities and Exchange Commission (SEC)** reporting required of all **public companies**. That’s **safety pro** James Leemann’s line of **thinking**. He proposes **quarterly** and **year-end safety** and **health reports** that would include:

- **A Business & Safety and Health Section** containing a discussion of the company’s business(s) (What does the company do?) along with a discussion of the company’s safety and health program.
- **Safety & Health Data, Statistics, and Trends** are the detailed presentation of raw S&H data, statistics, trends, etc.
- **Risk Factors** pages list everything that could possibly go wrong with the company from a safety and health perspective. Risk factors must be included in the year-end report, but they are not required for the quarterly reports, if there haven’t been any material changes to the risk factors.
- **Management Discussion and Analysis (MD&A)** pages contain a narrative about what the company is doing to address identified safety and health risks; the material changes in the income statement; and the statement of cash flows that could or would be affected by addressing these risks.

**Says Leemann:** “This would **force management** to be **directly engaged** on at least a **quarterly** basis to thoroughly **review** what is going on in their **firm** from a **safety** and **health perspective**. And **management** would have to **squarely** look at the financial **aspects** of **addressing** the risks causing **injuries**.”

**He adds:** “Adhering to the **SEC format**, the same **penalties** should apply to a **false submission** on a **Quarterly** or **Year-End 10Q** or **10K report**. If you want to get **management’s attention**, jump into their **personal** or **corporate wallet**.”



## Here's the penalty chart:

Tier	Individual	Entity
Tier 1— Any Violation	\$7,500	\$80,000
Tier 2— A Violation Involving Fraud, Deceit, Manipulation or Deliberate or Reckless Disregard of Regulatory Requirement	\$80,000	\$400,000
Tier 3— A Violation that Also Involves a Substantial Risk of Loss to Others or Gain to the Violator	\$160,000	\$775,000

## Accentuate the positives

Dr. E. Scott Geller, author of numerous safety books and longtime safety consultant, takes another tact:

"I believe answers to the following questions need to be recorded and tracked to put safety in a more proactive, success-seeking mode:

1. How many safety suggestions were submitted last month, and what percentage of these suggestions led to a safety-improvement change in environmental, policy, or management factors?
2. What is the percentage of injury-protection vs. injury-prevention behaviors observed per department in the organization?
3. What safety-related system factors were uncovered from the behavior-focused, peer-to-peer observation and coaching process?

4. What percentage of the workforce are trained behavior-based safety coaches, and how many employees are coached for occupational safety and health per month?
5. How many close calls are reported per month and analyzed systematically to uncover system factors that need to be modified for improved injury prevention?
6. What system/culture improvements have occurred as a function of close-call analyses?

## Where's the will?

As you see, there is **no dearth** of ideas for improving performance metrics. What's **missing** is the will to change recordkeeping practices that go back almost 50 years. It's a tall order. **OSHA rates** are all many executives know about safety; they're comfortable with these numbers and see no reason for a major overhaul.

A dramatic restructuring of recordkeeping would require **OSHA** rulemaking, industry-wide acceptance, a massive education effort, and overcoming the safety and health profession's fragmented practices and innate conservatism.

There are better ways to score performance, but there's **no real will** or urgency to do it on a national level. Sadly, this may reflect the widespread lack of urgency many companies give safety in general.

## 2018-2019 Flu Season...What's new this flu season?

CDC recommends annual influenza vaccination for everyone 6 months and older with any licensed, age-appropriate flu vaccine (IIV, RIV4, or LAIV4) with no preference expressed for any one vaccine over another.

### A few things are new this season:

- Flu vaccines have been updated to better match circulating viruses [the B/Victoria component was changed and the influenza A(H3N2) component was updated].
- For the 2018-2019 season, the nasal spray flu vaccine (live attenuated influenza vaccine or "LAIV") is again a recommended option for influenza vaccination of persons for whom it is otherwise appropriate. The nasal spray is approved for use in non-pregnant individuals, 2 years through 49 years of age. There is a precaution against the use of LAIV for people with certain underlying medical conditions. All LAIV will be quadrivalent (four-component).
- Most regular-dose egg-based flu shots will be quadrivalent.
- All recombinant vaccine will be quadrivalent. (No trivalent recombinant vaccine will be available this season.)
- Cell-grown flu vaccine will be quadrivalent. For this vaccine, the influenza A(H3N2) and both influenza B reference viruses will be cell-derived, and the influenza A(H1N1) will be egg-derived. All these reference viruses will be grown in cells to produce the components of Flucelvax.
- No intradermal flu vaccine will be available.
- The age recommendation for "Fluarix Quadrivalent" was changed from 3 years old and older to 6 months and older after the annual recommendations were published last season to be consistent with Food and Drug Administration (FDA)-approved labeling.
- The age recommendation for Afluria Quadrivalent was changed from 18 years old and older to 5 years old and older after the annual recommendations were published last season to be consistent with Food and Drug Administration (FDA)-approved labeling.

### What flu vaccines are recommended this season?

### What viruses will the 2018-2019 flu vaccines protect against?

### When should I get vaccinated?

► Answers to these, and many more questions about the [upcoming 2018-2019 flu season](#) are available. ◀



# CVSA Releases 2018 International Roadcheck Results



As part of the **Commercial Vehicle Safety Alliance's (CVSA) International Roadcheck inspection and enforcement initiative**, June 5-7, 2018, commercial motor vehicle enforcement personnel throughout Canada and the United States **conducted 67,502 roadside inspections** on large trucks and buses.

From **all inspections**, inspectors **identified 11,897 vehicles with out-of-service conditions** and **2,664 drivers with out-of-service conditions**. Of the North American Standard (NAS) **Level I Inspections** conducted, **21.6 percent of commercial motor vehicles** were placed **out of service**. Of all **NAS Level I, II and III Inspections**, **3.9 percent of drivers inspected** were placed **out of service**.

During an **inspection**, if an inspector **identifies critical** inspection items on a **vehicle with specific** violations, he or she will **render the vehicle out of service**, which means **mechanical defects** must be corrected in **order** for the vehicle to be **permitted to proceed**. A driver found to be in **violation** of the **conditions** in the **out-of-service criteria**, will be placed **out of service** until the **condition** can be **rectified**.

**International Roadcheck** is a **three-day enforcement** event when **CVSA-certified inspectors** conduct **large-scale, high-visibility roadside** inspections of commercial trucks and **buses** and their **drivers**. These **inspections** occurred at **inspection sites**, weigh stations and **roving patrol** locations along **roadways** throughout the **72-hour enforcement** initiative.

Each year, **special emphasis** is placed on a **certain category** of violations. This year's **focus** was on **hours-of-service** compliance. Since the **electronic logging device (ELD)** mandate went into **effect** on **Dec. 18, 2017**, throughout the United States, with **CVSA's NAS Out-of-Service Criteria** effective April 1, 2018, this year's **International Roadcheck**, held two months after **out-of-service** enforcement began, served as the perfect opportunity to **highlight** the importance of **hours-of-service regulations** and **compliance**.

**Hours-of-service violations** represented **43.7 percent** of all driver **out-of-service conditions**; however, of the **total number** of inspections conducted during **International Roadcheck**, less than **2 percent** of drivers were placed out of service for **hours-of-service violations**.

**CVSA** pulled and **analyzed data** from the three days of **International Roadcheck** from the U.S. **Federal Motor Carrier Safety Administration's (FMCSA) Motor Carrier Management Information System (MCMIS)** and pooled that data with **data collected** and submitted by **CVSA's** Canadian jurisdictions to report **overall statistics** from Canada and the **United States** for **2018 International Roadcheck**.

- A total of 67,502 Level I, II and III Inspections were conducted.
- 21.6 percent of commercial motor vehicles that received Level I Inspections were placed out of service; 3.9 percent of drivers who received a Level I, II or III Inspection were placed out of service.



- There were 15,981 vehicle out-of-service conditions; 3,035 driver out-of-service conditions; and 211 hazardous materials/dangerous goods (HM/DG) out-of-service conditions.

- The majority of inspections (45,400) were NAS Level I Inspections. A Level I Inspection is a 37-step procedure that includes examination of driver operating requirements and vehicle mechanical fitness. Other inspections conducted included the NAS Level II Walk-Around Inspection (11,458) and the NAS Level III Driver-Only Inspection (10,644).

- The top vehicle out-of-service conditions were for brake systems (4,536), tires and wheels (3,058) and brake adjustment (2,612). The top driver out-of-service conditions were for hours of service (1,326), wrong class license (648) and false record of duty status (308).

- 736 motorcoaches were inspected.

- 60,321 inspections were conducted in the United States; 7,181 inspections were conducted in Canada.

#### Of all vehicle violations, vehicle-related results are as follows:

- 21.6 percent (9,819) of vehicles that had a Level I Inspection conducted (45,400) were placed out of service for vehicle-related violations.

- The top three out-of-service vehicle violations were for brake systems (28.4 percent), tires and wheels (19.1 percent) and brake adjustment (16.3 percent).

- Of the vehicles carrying HM/DG that had a Level I or II Inspection conducted, the vehicle out-of-service rate was 13.1 percent.

- Of all HM/DG out-of-service vehicle violations, the top three were for loading (25.6 percent), other HM (21.3 percent) and shipping papers (19.9 percent).

- Brake adjustment and brake system violations combined to represent 44.7 percent (7,148) of all out-of-service vehicle violations.

- 9.4 percent of the motorcoaches that received a Level I Inspection were placed out of service for vehicle violations.

#### Of all driver violations, driver-related results are as follows:

- 3.9 percent (2,664) of drivers who received a Level I, II or III Inspection were placed out of service for driver-related violations.

- Of the drivers operating vehicles carrying HM/DG who were inspected, 1.7 percent were placed out of service for driver violations.

- 1.4 percent of the motorcoach/bus drivers who received a Level I, II or III Inspection were placed out of service for driver violations.

- Of all driver out-of-service conditions, the top three were for hours of service (43.7 percent), wrong class license (21.4 percent) and false record of duty status (10.1 percent).

- There were 729 safety belt violations.

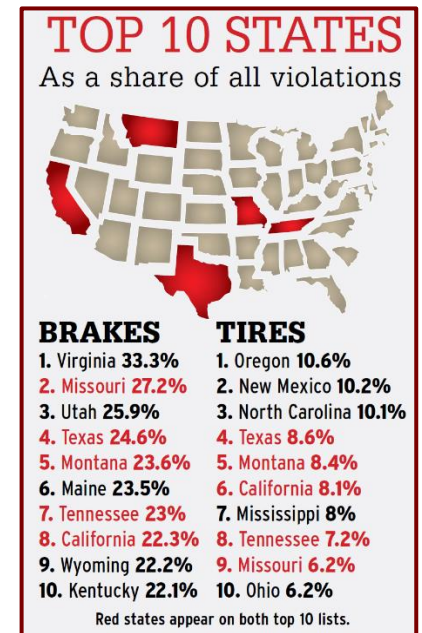
The specific out-of-service (OOS) percentage distributions (numbers indicate a percentage of the total out-of-service violations by category) from 2018 International Roadcheck are shown below:

2018 International Roadcheck					
Vehicle OOS Violations Category	Percentage of Vehicle OOS Conditions	Driver OOS Violation Category	Percentage of Driver OOS Conditions	HM/DG OOS Violation Category	Percentage of HM/DG OOS Conditions
Brake Systems	28.4%	Hours of Service	43.7%	Loading/Securement	25.6%
Tires/Wheels	19.1%	Wrong Class License	21.4%	Other HM/DG	21.3%
Brake Adjustment	16.3%	False Record of Duty Status	10.1%	Shipping Papers	19.9%
Cargo Securement	13%	Other	9.4%	Placards	18%
Lighting	12%	Suspended License	8.2%	Markings	12.8%
Suspension	4.2%	Violating License Restriction	4%	Package Integrity	2.4%
Steering	2.2%	Drugs/Alcohol	2.7%		
Other	1.5%	Expired License	0.5%		
Driveline/Driveshaft	1%				
Frame	1%				
Coupling Devices	0.7%				
Exhaust	0.3%				
Fuel	0.2%				

Once violations of the regulations have been identified and documented on a roadside inspection report, roadside enforcement personnel use the [CVSA NAS Out-of-Service Criteria](#) as the pass-fail criteria for inspections.

If no violations of the critical vehicle inspection items are found during an eligible inspection, a CVSA decal will be applied as a visual indicator that the vehicle successfully passed inspection conducted by a CVSA-certified inspector. The NAS Level I Inspection and NAS Level V Vehicle-Only Inspections are the only inspections eligible for issuance of a CVSA decal.

Now in its 31st year, International Roadcheck is sponsored by CVSA, North America's leading commercial motor vehicle safety enforcement organization, with participation by FMCSA, the Canadian Council of Motor Transport Administrators and Mexico's Secretariat of Communications and Transportation.



## TOP 10 STATES for Brake and Tire Violations, and Where they Overlap

Tennessee is one of five states scoring top-10 rankings for the intensity of its truck enforcement focus on bedrock equipment safety such as tires and brakes, whose failure can be catastrophic.

Unique among these and other states with an above-average focus on vehicle-related violations, which contribute points to the Vehicle Maintenance BASIC category of measurement in the CSA program, Tennessee comes in dead last with its low percentage of violations for light-related infractions.

There's a good side to that, suggests Capt. Brandon Douglas. Tires and brakes, safety-sensitive items, are "what we should be focused on, making sure trucks are traveling down the road safely."



# FMCSA Drops Exemption Process for Insulin-Treated Diabetic Drivers



The **Federal Motor Carrier Safety Administration** has issued a **final rule** that will allow **certificated medical examiners** to decide whether **truck drivers** with **stable diabetes** are qualified to drive, **eliminating** a requirement that the drivers seek an **exemption** from the **agency** before being **allowed** to get **behind the wheel**.

Previously, drivers with **insulin-treated diabetes mellitus** were **prohibited** from **driving commercial vehicles** in **interstate commerce** unless they **obtained** an **exemption** from **FMCSA**, a process that can keep drivers **out of the cab** for up to **six months**.

The action **removes major** administrative and **financial burdens** for **diabetic drivers** while maintaining a **high level of safety**, the agency said in a **Sept. 18 announcement**.

**Diabetes** is a **disease** in which the **body's ability** to produce or **respond** to the **hormone insulin** is **impaired**, resulting in **abnormal metabolism** of **carbohydrates** and elevated levels of **glucose-surge** in the blood and **urine**.

The **final rule**, several years in the making, will allow **medical examiners** to issue a driver with **diabetes** a **one-year medical certification**. To **do so**, the **treating clinician** — the **health care professional** who manages, and **prescribes insulin** for, the **treatment** of the individual's **diabetes** — provides an **assessment form** to the certified **medical examiner** indicating that the individual **maintains** a **stable insulin regimen** and **proper control** of his or her **diabetes**.

The **certified medical examiner** is then responsible for **determining** if the individual meets **FMCSA's** physical **qualification standards** and can safely operate a **commercial motor vehicle**.

"This final action **delivers economic savings** to affected drivers and our agency, and **streamlines processes** by **eliminating unnecessary regulatory burdens** and redundancy," **FMCSA** Administrator Ray Martinez said in a statement. "**It's a win-win for all parties involved.**"

The agency estimates **eliminating the exemption process** will save the nearly **5,000 individuals** with **diabetes** that currently have **exemptions** more than **\$5 million per year** compared to what they would **endure** under the **exemption program**. The **final rule** also will save **new exemption applicants** and their associated **motor carriers** approximately **\$215,000 annually** in opportunity and **compliance costs** related to the exemption program's **waiting period**, **FMCSA** said.

As an agency, **FMCSA** said it will **save more** than **\$1 million per year** over the next **three years** in costs associated with **administering** the **diabetes exemption program**.

A **Final Rule** which was published Sept. 19<sup>th</sup> in the **Federal Register** allows **certified medical examiners** to grant truckers with **insulin-treated diabetes** a **Medical Examiner's Certificate** that's good for one year. The **rule** will take **effect Nov. 19**. Since 2003, **drivers** with **insulin-treated diabetes** have had to **apply** for an **exemption** through **FMCSA** to be allowed to **drive interstate**.

The **agency** said it will **accept petitions** to reconsider the **rule** for 30 days after **publication**.

Although **treatment** for **diabetics** has **vastly improved** over the years, there are **potential problems** for drivers **not in control** of their **condition**.

Of **particular concern** for **drivers** are the **immediate symptoms** of **severe hypoglycemia** — a condition in which **insulin treatment** may cause **blood glucose** to drop to a **dangerously low** concentration. A person **experiencing hypoglycemia** may have **one** or more of these **symptoms**, according to **medical experts**:

- Double or blurry vision
- Shaking or trembling
- Tiredness or weakness
- Unclear thinking
- Fainting
- Seizures or coma

The **final rule** concludes a **plan first outlined** in a **2015 proposed** rule that **received** more than **1,200 written comments**, most in **support** of the **idea**.

Many of those **supporters** said a **final version** of the **rule** could take the **agency** out of the **process** and place it in the **hands** of a **professional** responsible for **prescribing insulin** for the driver's **diabetes** and also provide **documentation** to a **medical examiner** that the **driver's condition** is **stable** and **well-controlled**.

## Officers Issue 57,405 Citations, 87,907 Warnings During Operation Safe Driver Week



Commercial motor vehicle enforcement officers patrolling

U.S. and Canadian highways issued more than 57,000 citations and nearly 88,000 warnings for unsafe driving behaviors during 2018 Operation Safe Driver Week, the Commercial Vehicle Safety Alliance reported Sept. 19.

During the July 15-21 safety initiative, 51,000 law enforcement officers made contact with more than 113,000 commercial motor vehicle and passenger vehicle drivers. The campaign was conducted to call attention to driver behaviors, the main cause of crashes, and combat those behaviors through heightened traffic safety enforcement and educational research, CVSA said.

A total of 42,144 commercial motor vehicle contacts were made with 10,709 citations issued, and 71,187 passenger vehicle contacts were made with 46,696 citations issued. Commercial vehicle drivers were given 29,908 warnings, while 57,999 warnings were given to passenger vehicle drivers.

### Top 5 Commercial Motor Vehicle Driver Citations

Citation	Number
State and Local Law Violations	6,008
Speeding	1,908
Failure to Use Seat Belt	1,169
Failure to Obey Traffic Control Device	754
Using a Handheld Phone	262

### Top 5 Passenger Vehicle Driver Citations

Citation	Number
State and Local Law Violations	21,511
Speeding	16,909
Failure to Use Seat Belt	3,103
Inattentive and/or Careless Driving	1,655
Failure to Obey Traffic Control Device	739

According to the National Highway Traffic Safety Administration, in 2016, 18% of drivers involved in a fatal crash were speeding, the No. 2 violation cited during the weeklong operation.

NHTSA research found that of the total number of people killed in motor vehicle crashes in 2016, 48% were not wearing a seat belt. Seat belts could have saved an estimated 2,456 people if they had been wearing one. Safety belt usage by commercial truck and bus drivers was at 86% in 2016, according to Federal Motor Carrier Safety Administration survey data.

A total of 211 passenger vehicle driver citations during Operation Safe Driver Week were for texting; while only 20 texting citations were issued to CMV drivers. A total of 127 passenger vehicle drivers and 262 CMV drivers were cited for using a handheld phone.

According to NHTSA, in 2016, 3,450 people were killed in motor vehicle crashes involving distracted drivers. NHTSA also estimated that 10% of crashes involved the use of a phone. And according to the Centers for Disease Control and Prevention, each day in the United States approximately nine people are killed and more than 1,000 injured in crashes reported to involve a distracted driver.

As in prior years, FMCSA directed federal safety investigators to focus during the weeklong effort on carriers with recent crash involvement and high percentiles in the driver-based Behavior Analysis and Safety Improvement Category.

# Top 6 ELD Exemptions

The ELD rule applies to most **motor carriers** and drivers **currently required** to maintain **Records of Duty Status (RODS)** per **Part 395, 49 CFR 395.8(a)**. The rule applies to **commercial buses** as well as trucks, and to **Canada- and Mexico-domiciled** drivers. The **FMCSA** will, however, **allow permit carriers** using **AOBRDs** before December 18, 2017, to **install and use AOBRD software** until **December 16, 2019**, providing the carrier is **ELD ready**.



**So who, exactly, is exempt from the ELD mandate? Below are the top six exemptions.**

## Vehicles Manufactured Before 2000

*An electronic logging device (ELD) unit requires an engine control module (ECM). However, most engines manufactured before 2000 lack an ECM. Therefore, if a commercial motor vehicle's engine was manufactured in 2000 or earlier, that vehicle is exempt from being required to use an ELD.*

*This exemption previously listed the cutoff year to be for the vehicle. However, it's the engine that counts, and engines can be swapped. This exemption now applies to the engine's model year, regardless of the vehicle's registration date. Vehicles with engine models in 2000 or later require ELDs, even if the vehicle itself was manufactured before 2000.*

*Learn more: [The Pre-2000 Model Year Exemption Applies to Engines, Not the VIN](#)*

## Driveaway-towaway Drivers

*Driveaway-towaway drivers delivering a commercial motor vehicle as part of a shipment don't own the vehicle and therefore are not required to equip it with an ELD.*

## Drivers Who Maintain RODS for 8 Days or Less

*Drivers who maintain Record of Duty Status (RODS) for 8 days or fewer in a 30-day rolling period don't need an ELD. They need to maintain paper logs, but the ELD itself isn't legally required.*

*This includes short-haul drivers who occasionally take longer trips. However, drivers who break the short-haul exception more than 8 times in a 30-day period will need an ELD for the rest of that cycle.*

*This ELD exemption means that short-haul drivers who make longer trips infrequently don't have to upgrade.*

## 100 Air-mile Radius

*Some commercial drivers license (CDL) drivers fall under the short-haul exemption. These drivers report to work and either transport their loads to a specific location or completes a daily delivery. They then return their truck and go home.*

*To qualify, drivers must:*

- Operate within a 100 air-mile radius of their normal work reporting location
- Start and end the day at the same location
- Be released from work within 12 hours
- Have at least 10 hours off duty between each 12-hour shift
- Not drive more than 11 hours

## 150 Air-mile Radius

*Some non-CDL drivers fall under the short-haul exemption, too.*

*To qualify, they must:*

- Operate within a 150 air-mile radius of the location where they report to and are released from work
- Return to the normal reporting location at the end of each duty tour

*Additionally, they must not:*

- Drive any vehicle that requires a CDL.
- Drive after 14 hours of coming on duty on 5 days of any period of 7 consecutive days
- Drive after 16 hours of coming on duty on 2 days of any period of 7 consecutive days

## Farm Vehicles

*Certain farm vehicles, and the carriers who operate them, are exempt from having to have an ELD. This is not a blanket exemption for all agricultural vehicles and equipment. It applies to the private transport of commodities such as livestock, machinery or supplies being transported by the farm's owner or operator, or a family member or employee.*

*Learn more: [Agricultural commodity](#) per the FMCSA*



# MSHA Issues Report of Investigation on Miner Burned when Lighting Kiln



The Mine Safety and Health Administration (MSHA) released its [Report of Investigation](#) on the 4th metal/non-metal fatality of 2018, which occurred at an Alabaster Plant in Alabama. On May 9, 2018 a 27-year old Kiln System Technician with 32 weeks of experience, received severe burns while igniting natural gas to pre-heat a rotary kiln. The technician used a standard road flare attached to the end of an angle iron rod to manually light the kiln while his supervisor adjusted the gas valve. The first attempt to light the kiln failed. During the second attempt, fire blew out of the kiln access door (blowback) injuring the technician. He was transported by helicopter to an emergency burn center, where he succumbed to his injuries on May 28, 2018.



## Investigators conducted a root cause analysis and identified the following root causes:

- Root Cause:** The operator's procedures for kiln lighting did not address purging after flame failure and did not specify a maximum time the secondary gas valve could remain open while attempting to light the kiln. This resulted in natural gas accumulating in the kiln chamber.  
**Corrective Action:** The mine operator implemented new procedures that require purging after flame failure. The new procedures also specify the maximum time the secondary gas valve can remain open when attempting to light the kiln. The length of time the gas valve is open is not to exceed 15 seconds. All affected miners have been trained in these new procedures.
- Root Cause:** The mine operator did not ensure the victim was properly trained in the task of lighting kilns.  
**Corrective Action:** All affected miners have been task trained in new kiln lighting procedures.
- Root Cause:** Proper PPE and clothing were not required to be used while lighting the kiln.  
**Corrective Action:** Proper PPE and clothing have been provided and are required to be worn when lighting the kiln. This PPE includes an arc flash protective suit with hood and leg extensions, heat resistant gloves, safety glasses, and steel-toed boots.
- Root Cause:** The mine operator's procedures required miners to be positioned in front of an open kiln access door while lighting the kiln.  
**Corrective Action:** The mine operator developed procedures that require the miner to insert a rod with lit flare through a tube that extends into the chamber. The rod is clamped in place, and the miner moves to a safe location before gas is applied. The kiln access door remains closed.

## No Time To Gamble:

### A used equipment inspection checklist

It doesn't take long to evaluate a used car or truck, but inspecting a piece of used equipment — whether it's a beater or nearly new — requires several hours to a half a day. Anything you miss and have to repair or replace later will cost thousands, if not tens of thousands, of dollars.

So make a list. Be thorough. Take your time and carry a clipboard. After you've assessed the deficiencies, figure out each problem and what it would cost to fix, and adjust your bid accordingly.

While the general inspection points won't apply to every machine — for instance, undercarriage inspection points on a wheeled machine — this will give you a good overview of what's critical. Many operational checks will require two people: one to operate the machine and the other to observe how it performs. We also outline what's key to examine in each of the major machine types.

Also keep in mind that you can hire professionals to do this for you. Even if that seems expensive, it likely will save you money in the long run. Here's what to look for:



### 1. VISUAL INSPECTIONS

#### Engine compartment

- With the machine cold, pull the dipsticks and check lube oil, coolant, and hydraulic fluid levels.
- Open the radiator cap and look for traces of oil in the coolant (if present, it will be floating on top in small drops).
- Inspect hoses for leaks and condition. Check metal fuel and oil lines to make sure they're not bent or kinked and to ensure connection points are tight.
- Pull the air filter and note its condition.
- Inspect radiators for bent or damaged fins. Radiators should be free of debris, and connection points leak — or drip — free.
- Note any paint discoloration or bubbling on the engine cowlings or covers. This may indicate an overheating problem.
- Look for leaks around gaskets, hydraulic pump, hoses, and fittings.



Cylinders should be free of nicks or dings. Oil on the chrome may indicate a reseat is needed.



## Frame, boom stick

- Look for hairline cracks in the metal. Ensure the welds are all solid and intact. Bushings should be intact and grease present. Inspect the hoses and fittings for leaks, kinks, wear, or damage.
- Keep in mind, if the machine has been used to run a hammer, that has likely put a great deal of stress on the boom and stick and their linkages.

## ROPS/FOPS

- Look for cracks, bent, or damaged metal. Note any cracks or damage to windshield. Inspect door seals to make sure they're crack- or damage-free and airtight.
- Grab handles, access ladders, and diamond plate/skid resistant surfaces should be intact and solidly mounted.

## Hydraulic cylinders

- Look for leaks, excessive oil coming past the cylinder wiper, or pitting/scarring on the cylinder chrome. A film of dirt or dust may indicate the wiper needs replacing.

## Latches and locks

- These are small items, but can be a nuisance and something that may need to be repaired. Test each one including cab, battery box, fuel fill, engine hood or cowling, DEF access, cooling panel access.

## Buckets and blades

- Look for excessive or uneven wear or damage on bucket teeth and cutting edges. Check supporting linkages and cylinders for wear or damage.
- Check to see if cutting edges are reversible or both edges are worn down.
- Check that the bucket and/or blade sits level on the ground.



Look for wear on buckets and teeth. Reversible cutting edges are a plus.

## Tires



Tires are expensive. Make sure you know replacement costs.

- Check tread depth and inspect each tire for cuts and gashes.
- Measure air pressure.
- Inspect the sidewalls for cuts and bulges, which may indicate damage to the liner or steel belt and imminent failure.
- Tires should be matched and worn evenly.
- If the machine has been sitting for a while, look for dry rot, which will show up as faded color, brittleness, and/or small cracks in the tread or sidewalls.



Bearings and bushings should have grease on them. While operating, look for any signs of flex or play.

## Linkages

- Examine the machine for wear on all the pins and bushings throughout the linkage on the boom. Everything that has a grease zerk should have grease on it.

## Steel undercarriage

- Look for wear on the sprockets, rollers, and track pads. "Sharp teeth" on the sprocket tell you it's near the end of its useful life.
- Look at the rail pins and bushings. As the pins and bushings wear internally, each track segment lengthens and becomes looser. To take up the slack, the front idler is moved forward in a bracket on the rails between the idler and the rear drive sprocket. There will come a point, however, when no further adjustments can be made. Some owners take a link out. While this makes the track look tighter, it also creates a tremendous amount of internal wear.
- The best way to see if an undercarriage is worn out is to measure it using a track measuring group, which costs about \$250 and is available from most dealers. With this you can measure the grouser height, rails, links and carrier roller, and guide roller tread diameter and bushings.



Undercarriage measurement is a complex procedure. Consider getting a kit from an equipment dealer.

## Rubber tracks

- Inspect rubber tracks for worn track pads, cuts or gouges.
- Look for wear or steel showing through on drive links.
- Check track for proper tension, which indicates good maintenance.

## 2. OPERATIONAL INSPECTIONS

### Engine

- Turn the machine on and allow it to reach operating temperature while listening for any loud or unusual noises from the engine and/or cooling system, knocking, or rough idle. Some exhaust smoke at startup is normal, but exhaust should clear quickly. White smoke indicates incomplete fuel burn and possibly leaky or malfunctioning injectors or restricted air intake. Black or blue smoke indicates that oil is getting by the cylinder rings or low compression.

## Hydraulic cycles

- Using a stopwatch, time how long it takes to fully retract the arm cylinder and fully extend the bucket cylinder, then raise and lower the boom, timing each up and down motion. To test the arm cylinder, with the bucket cylinder fully extended, time how long it takes to move the arm from the full-out position to the full-in position. Then time how long it takes to return to the full arm-out position again. Compare your times with manufacturer published times.
- To test the track running speed, tie a ribbon on one of the track shoes on the side being tested, jack up the side where the track is being tested, then time how long it takes to do three track rotations at maximum speed. Apply the test to both tracks, forward and reverse. Also tram the machine to make sure it travels in a straight line — if it veers one way or the other, you could have a weak pump.
- Check for drifting — also called creeping — by raising the boom with a full load in the bucket, then turning the machine off. Wipe the oil off the boom cylinder rod and mark the measuring start point. After five minutes, measure again to see how much it has drifted down.
- Each time the operator cycles the machine, check for any movement in the bushings.
- Look at each bushing independently, instructing the operator to take the bucket completely off the ground. Loose pins and bushings are a key sign of how the machine has been treated.
- Run the machine and hydraulics up to operating temperature, shut off and look under the machine for any fluids dripping leaks on the ground or horizontal surfaces in the engine compartment.



Access ladders should be secure and in good working order.

## Emissions controls

- With the engine running, make sure there are no warning lights on the dash indicating problems with the emissions controls, such as a DPF needing regeneration or an SCR system that is lacking in DEF fluid. If the previous owner is available, inquire about DPF maintenance schedules.

## 3. MACHINE-SPECIFIC ITEMS

### Skid steers

- Look for evidence of over-the-tire tracks, which may cause wear spots on tires.
- Driveline wear can be different with different skid steer brands. Check the chains. Loose is not a problem, but if you hear clatter, it could mean it has been loose for a while and may have damaged the sprockets. That could require an expensive repair.



Under load, raise bucket to gauge how well it holds its position without drifting.

### Wheel loaders

- The king pin/articulation joint carries all the load on a wheel loader and should be tight and flex free. Make sure all the grease fittings are intact and the top and bottom pins are vertically aligned. When you're operating the bucket, have your inspection partner observe the top and bottom pins of the center pivot and note if there's excessive up and down movement, which could indicate wear.

### Excavators

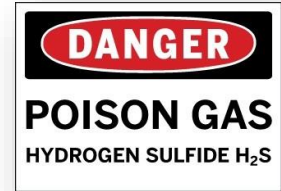
- If you can see any movement in a swing bearing, it's probably too much. Beyond the visual inspection, use a magnetic dial indicator to take a measurement at four quarter-turn positions; an average of these four measurements will tell you what shape the machine's swing bearing is in. Without this measurement, you're guessing at the amount of wear in the swing bearing, and this is a costly repair item.
- Inspect final drives for leaks.

### Dozers

- If the dozer has a power-angle-tilt (PAT) blade, make sure it has full movement and the control cylinders are in good shape.
- Inspect final drives for leaks.

To download a sample inspection checklist, [click here](#).

# Accepted Practices for Hydrogen Sulfide Training Programs



**Hydrogen sulfide stinks.** Some describe its **stench** as **reminiscent** of “rotten eggs.” However, this odor is not the **gas’s** only **characteristic**. The **odorless H<sub>2</sub>S** is flammable and **poisonous**. In a mysterious blend of **fortune** and **misfortune**, the **rotten egg odor** of **hydrogen sulfide** goes away as its concentration **heightens**. Its subsiding smell, however, does not **indicate** a reduction of its **hazards**. For this reason, **OSHA** advises not to **depend** on your sense of smell for **indicating** the continuing presence of **hydrogen sulfide gas**.

Of course, **standardization** has long provided an **alternative** to depending on one’s **instincts**. The **American National Standard ANSI/ASSP Z390.1-2017** sets forth **accepted practices** for **hydrogen sulfide training programs**.

**PLEASE NOTE** that this **document** was formerly known as **ANSI/ASSE Z390.1-2017**, but, with the **American Society of Safety Engineers** changing its name to the **American Society of Safety Professionals** in June 2018, the document’s **title** has been **updated**.

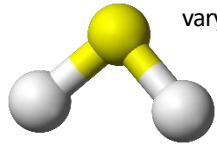
In other words, **ANSI/ASSP Z390.1-2017** and **ANSI/ASSE Z390.1-2017** are the **same thing**.

## Where Hydrogen Sulfide (H<sub>2</sub>S) Comes From

Naturally, **hydrogen sulfide** occurs in **volcanic gases** and **hot springs**, as well as in **crude petroleum** and natural gas. **H<sub>2</sub>S** results from the **bacterial breakdown** of organic matter. On a grander scale, **hydrogen sulfide** is a central participant in the **sulfur cycle**, the **biogeochemical cycle** of sulfur on Earth. As such, **H<sub>2</sub>S** arises from **basically** anywhere where **elemental sulfur** comes into contact with **organic material**, especially at **high temperatures**. It often can be found in places where **bacteria** break down **organic matter** in the absence of **oxygen**, such as **swamps**.

**Hydrogen sulfide** is found in **industrial environments** as well, resulting from **food processing**, coke ovens, kraft paper mills, **tanneries**, and petroleum refineries. In society, alongside the process of **anaerobic digestion**, hydrogen sulfide can be found in **sewers**. Because it is **heavier** than air, it tends to **accumulate** at the bottom of **poorly ventilated areas**.

## The Effects of Hydrogen Sulfide (H<sub>2</sub>S) on the Human Body



**Commonly known** as **hydrosulfuric acid**, sewer gas, and **stink damp** because of its qualities, the **health effects** of exposure to **H<sub>2</sub>S** vary **depending** on the timeframe and **intensity** by which an individual is **exposed** to the **hazardous gas**.

At lower **concentrations**, during which the odor of **rotten eggs** is prevalent (*the odor threshold is technically 0.01-1.5 ppm, but smell becomes more offensive around 3-5 ppm*), those exposed can **experience** an **irritation** of eyes, nose, **throat**, or **respiratory system**. These effects can be **delayed**.

At **moderate concentrations**, the exposed can **experience** more **severe eye** and respiratory effects, as well as **headaches**, dizziness, **nausea**, coughing, **vomiting**, and difficulty breathing. Around concentrations of **50 ppm**, slight conjunctivitis (“*gas eye*”) and **respiratory tract irritation** can take place after **one hour**. These **concentrations** are also when the **rotten eggs odor** diminishes.

At **high concentrations**, the exposed are **prone** to shock, **convulsions**, the inability to breathe, coma, and **even death**. Of course, as **concentrations** increase, these effects become **more rapid**. Around **100 ppm**, loss of smell (*olfactory fatigue*) can occur after **2-15 minutes**, and death can occur after **48 hours** of exposure. Around **500-700 ppm**, the exposed can **collapse** within 5 minutes, **serious damage** to the eyes can occur within **30 minutes**, and death can happen **within less than one hour**.

Around **1000-2000 ppm**, the exposed will face **nearly instant death**.

## The ANSI/ASSP Z390.1-2017 (ANSI/ASSP Z390.1-2017) American National Standard

There long **existed** a need to **adequately prepare** personnel for work **environments** in which the **presence** of **hydrogen sulfide** is probable. Historically, however, **H<sub>2</sub>S training** was addressed only by a **handful** of industries, and the **criteria** for these training programs varied **between sectors**.

**ANSI/ASSP Z390.1-2017** has its **origins** in the **early Nineties**. It was purposed with **offering criteria** for **hydrogen sulfide training programs** that could apply to all **industries**.

The accepted practices **set forth** by this **standard** in instructing **affected personnel** include the minimum **informational content** of the course, recommended **exercises** and **drills**, properties and **characteristics** of **H<sub>2</sub>S**, sources of **H<sub>2</sub>S** and areas of **potential exposure**, typical site-specific **safe work practices** associated with **H<sub>2</sub>S operations**, detection methods for **H<sub>2</sub>S**, engineering/mitigation controls, **safe work practices** for **sulfur dioxide (SO<sub>2</sub>)**, care of **personal protective equipment** suitable for **atmospheres** containing **H<sub>2</sub>S concentrations** above the applicable exposure limit, **rescue techniques** and first aid procedures for **victims** of **H<sub>2</sub>S exposure**, and **H<sub>2</sub>S safety instructor qualifications**.

**PLEASE NOTE** that this **American National Standard** features guidelines **designed specifically** to provide workers with the **fundamental knowledge** necessary to **protect themselves** from **hydrogen sulfide exposure**, and it **does not include** information necessary to **providing respiratory protection** for **personnel**.

**Respiratory protection** in the United States is **legally required** to comply with **OSHA Respiratory Protection 29 CFR 1910.134**.

MJS Safety offers a **Hydrogen Sulfide Training Program** each month.

See the **Schedule of Classes** on [page 4](#) of this newsletter for class dates & times in October.

**Need additional information? Call Carrie at 720-203-4948.**

**She’ll be happy to answer any questions!**