“Our Customers Know the Difference®”

NGFA Safety Management/Loss Control Seminar
Denver, CO
Overview of Quality Management/Loss Control Practices for Grain Handling Facilities
Donnie Wood
Executive Director, Loss Control
What is Loss Control?
Definition

- **Loss control** is a risk management technique that seeks to reduce the possibility that a **loss** will occur and reduce the severity of those that do occur.
What is OSHA?
Definition

• Occupational Safety and Health Administration (OSHA) is a federal organization (part of the Department of Labor) that ensures safe and healthy working conditions for Americans by enforcing standards and providing workplace safety training.
Definition

• **Loss control** is a risk management technique that seeks to **reduce the possibility** that a **loss** will occur and reduce the severity of those that do occur.

• **Occupational Safety and Health Administration (OSHA)** is a federal organization (part of the Department of Labor) that **ensures** safe and healthy working conditions for Americans by enforcing standards and providing workplace safety training.
Loss Control Program

• A **loss control** program helps policyholders reduce claims, and insurance companies reduce **losses** through safety and risk management information and services.

• Business Partners
  - Insured
  - Insurer
Understand Risks - Costs

Direct Costs

Indirect Costs
- 2 to 20 times the direct costs
- Hidden

Like this iceberg, hidden costs of accidents are not visible on the surface, but are there just the same!

National Grain and Feed Association
What does Loss Control do?
What does Loss Control do?

• Evaluate
  ➢ Work Procedures
  ➢ Work Practices
  ➢ Working Conditions
    o Facilities
    o Vehicles
    o Mobile Equipment
    o Etc.

• Provide suggestions and recommendations to reduce the possibility that a loss will occur and reduce the severity of those that do occur.
What does Loss Control do?

• Four parts of the Loss Control Survey
  o Management interview
  o Facility review
  o Exit interview
  o Follow-up confirmation letter
Management Interview

• Employment Application/Employee Files
How do you find employees?

• Advertise
• Word of mouth
• Good buddy system
• Friends
• Recruitment
• Unsolicited application

What do you do with the information?
Job Applications

• Keep a separate file for each position:
  • Laborer
  • Salesman
  • Driver
  • Manager
  • Etc.

• Keep a copy of all ads you have placed
• Keep a copy of all applications/resumes received
• Document your procedures
Employee Files

- Main Employee File
- Employee Confidential File
- Employee Benefits/Insurance File
- Employee Payroll File
- Other HR Files
  - I-9
    - Active
    - Terminated
- Employee Workers Compensation File (only if needed)
- DOT Driver Qualification File
- Safety Training Record
Main Employee Files (Best Management Practices)

- Application Form and/or resume
- Offer/transfer/demotion/layoff letter
- Educational transcripts
- Job description - signed
- Orientation checklist
- Nondisclosure/Non Privacy agreement if needed
- Acknowledgement of handbook
- Acknowledgement of new policies
- Performance appraisals
- Official performance documentation
- Copies of certificates, licenses and diplomas
- Training documentation (non-safety related)
- Termination checklist
- Termination documentation
- Notification of All Employee Drug and Alcohol Testing Program
Employee Confidential File (HIPAA)

Medical information or information about an employee’s physical condition must be kept strictly confidential, in a separate filing system with access limited to those with job-related need to know.

Does not include DOT Driver Qualification Info

• **Physical capacity profiles**
• Medical leave (not work comp related)
• Doctor’s notes (not work comp related)
• Drug and alcohol testing results (not work comp related)
• Test documents used by the employer to make employment decisions (non-medical)
• Notes from the employee’s interview
Employee Benefit/Insurance File (HIPAA)

- Group benefit enrollment forms
- Profit sharing, 401(k) enrollment, change forms
- Insurance claim forms
- COBRA
Employee Payroll File

• W-4 Form
• Salary review
• Payroll documentation and rates of pay
Employee Worker’s Compensation File

Only if needed

- Accident investigations
- Worker’s Compensation Claim Forms
- Insurance correspondence on that particular case
- Medical leave information
- Doctor’s notes
- Documentation of Communication with Employee, Doctor and Claims Adjuster
- Return to Work

It is recommend that work comp claims/accidents be filed by accident date and by year, separating out each year.
I-9 Files

• Binder 1 = Active Employees
  • All Full Time, Part Time, Seasonal
  • File in a clear sheet protector (no hole punches) alphabetically

• Binder 2 = Terminated Employees
  • Sticky Note (with 2 dates showing when it can be destroyed)
DOT Driver Qualification File

- Driver Qualification Check List
- Driver application
- Certificate of compliance
- Statement to previous employer
- Safety performance history records request
- Fair credit reporting act
- Certification of violations
- Annual review
- Statement of on-duty hours
- Drug and alcohols testing acknowledgement form
- Pre-employment Screening Program (PSP)
- Initial MVR
- MVR for past three years
- Request for information from previous employers
- Request for drug and alcohol testing from previous employers

- Driver rebuttal of safety performance history
- Copy of CDL
- Copy of medical card
- MVR on file has current medical certification status information
- Medical variance (if applicable)
- Skill performance evaluation certificate (if applicable)
- Note relating to verification of medical examiner listing on the National Registry
- Record and certificate of road test (all drivers with tank vehicle endorsement)
- Annual certification of violations
- Pre-employment drug screen
- Drug consortium information
Safety Training Files

• Employee File

• Subject File
Management Interview

• Employment Application/Employee Files
• Drug and Alcohol Testing Program
Drug and Alcohol Testing Program

• Two Types of Drug and Alcohol Testing Programs
  • DOT
  • Non-DOT
• Third Party Administrator/Consortium
• DOT
  • Pre-employment
  • Random
  • Reasonable Suspicion (proper documentation)
  • Post Accident
    o Ticketed
    o Medical Services Away from the Scene
    o Vehicle is towed
    o Loss of Life (at fault or not at fault)
Drug and Alcohol Testing Program

• Two Types of Drug and Alcohol Testing Programs
  • DOT
  • Non-DOT
• Third Party Administrator/Consortium
• NON - DOT (your call)
  • Pre-employment
  • Random
  • Reasonable Suspicion (proper documentation)
  • Post Accident
Management Interview

- Employment Application/Employee Files
- Drug and Alcohol Testing Program
- Written Job Descriptions
Management Interview

• Written Job Descriptions
  • Job Summary
  • Duties and Responsibilities
  • Qualifications
  • Supervisory Responsibilities
  • Education and/or Experience Requirements
  • Licensing Requirements
  • Communication Skills
  • Mathematical Skills
  • Reasoning Ability
  • Technical Skills
  • Physical Demands
  • Work Environment
  • Disclaimer
Management Interview

• Employment Application/Employee Files
• Drug and Alcohol Testing Program
• Written Job Descriptions
• Agility Testing
Management Interview

• Agility Testing
  • Functional capacity evaluation
  • Physical Ability Testing
• Eliminates 20 to 40% of Workers Compensation Claims
• Pre-Employment
• ADA
Management Interview

- Employment Application/Employee Files
- Drug and Alcohol Testing Program
- Written Job Descriptions
- Agility Testing
- Safety Committee/Self Inspection Program
Management Interview

• Safety Committee/Self Inspection Program
  • Employee Ownership in Safety Program
  • Workplace self-inspections
  • Accident investigations
  • Developing safe work practices
  • Developing written safety programs
  • Facilitating safety training
Management Interview

• Employment Application/Employee Files
• Drug and Alcohol Testing Program
• Written Job Descriptions
• Agility Testing
• Safety Committee/Self Inspection Program
• Safety Meetings
Management Interview

• Safety Meetings
  • Frequency
  • Topics
  • Documentation
Management Interview

• Employment Application/Employee Files
• Drug and Alcohol Testing Program
• Written Job Descriptions
• Agility Testing
• Safety Committee/Self Inspection Program
• Safety Meetings
• Safety Programs
Management Interview

• Written Safety Programs
  • Emergency Action Plan
  • Confined Space/Bin Entry
  • Hazardous Communication Plan
  • Lockout/Tagout
  • Hot Work Program
• Personal Protective Equipment
  • Eye & Face
  • Hand
  • Feed
  • Respiratory
• Forklift Training
• Electrical Hazards
• Contractors
  • Certificates of Insurance
Management Interview

• Employment Application/Employee Files
• Drug and Alcohol Testing Program
• Written Job Descriptions
• Agility Testing
• Safety Committee/Self Inspection Program
• Safety Meetings
• Safety Program
• Housekeeping and Maintenance Programs
Management Interview

• Housekeeping and Maintenance Programs
  • Electrical Backup
  • Electrical/Lightning Power Surges
  • OSHA Grain Handling Program - Written Documentation
Management Interview

- Employment Application/Employee Files
- Drug and Alcohol Testing Program
- Written Job Descriptions
- Agility Testing
- Safety Committee/Self Inspection Program
- Safety Meetings
- Safety Program
- Housekeeping and Maintenance Programs
- DOT
Management Interview

• DOT
  • Driver Files
  • Vehicle Maintenance Files
    • Vehicle Maintenance File Check List
    • Driver’s Vehicle Inspection Report (Only required to report a problem)
    • Vehicle Service Due Status Report
    • Inspection, Repair & Maintenance Record
    • Vehicle Maintenance and Repair Record (Shop Ticket)
    • Attach Copy of Vehicle Title
    • Attach Copy of Current Vehicle Registration Papers
    • Attach Copy of Certificate of Compliance of Spec. Tank
Facility Review
Facility Review

- Security
  - Chemical Storage
  - Ammonium Nitrate Storage
  - Fuel Storage
  - Propane Storage
  - Anhydrous Ammonia Storage
  - Grain Storage
Facility Review

• Security
  • Chemical Storage
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Facility Review

- Security
- Housekeeping
Facility Review

• Housekeeping
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- Housekeeping
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• Security
• Housekeeping
• Maintenance
Facility Review

• Maintenance
Facility Review

• Maintenance
Facility Review

• Maintenance
Facility Review

• Maintenance
Facility Review

• Maintenance
  • Concrete Facilities
  • Metal Facilities
Facility Review

• Maintenance
  • Concrete Facilities
What we are looking for....

• Outside
  • Bulges
  • Egging of walls / flat spots
  • Cracks (especially around openings)
  • Side draw (especially those added)
  • Patches
  • Uneven roof overhang
PRONOUNCED BULGE IN SILO
NUMEROUS BULGES WITH “H” AND “Y” CRACKS IN SILO WALLS.
VERTICAL WALL CRACKS
Bin Distortion
POTENTIAL SAFETY PROBLEM
BEAM POCKETS
BEAM POCKETS
MAKESHIFT GRAIN PLUG
Facility Review

• Maintenance
  • Metal Facilities
Facility Review

- Maintenance
  - Metal Facilities
NOTE:
INTERLOCKED GATES COULD HAVE PREVENTED THIS FAILURE.
What we are looking for....

• Outside
  • Bulges
  • Egging of walls / flat spots
  • Missing bolts / loose bolts
  • Cracks or tears (especially around openings)
  • Side draw (especially those added)
  • Patches on sheeting
  • Rusting
  • Access ladder & platform connections

  – Excess movement at base
  – Severe cracking of concrete stem wall
  – Uneven roof overhang
  – Re-corrugation
  – Anchor bolts (when outside)
  – Using bin to stabilize other grain handling equipment
  – Un-level foundation or foundation settling
Facility Review

- Maintenance
  - Concrete Facilities
  - Metal Facilities
Facility Review

- Maintenance
  - Metal Facilities
Facility Review

• Maintenance
  • Metal Facilities
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  • Metal Facilities
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Facility Review

• Maintenance
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Facility Review

- Security
  - Chemical Storage
  - Ammonium Nitrate Storage
  - Fuel Storage
  - Propane Storage
  - Anhydrous Ammonia Storage
  - Grain Storage
- Housekeeping
- Maintenance
- Elevator Structural Review
- Bins/Tank Structural Review
Exit Interview

• Discuss findings of the survey and recommendations
Who is Responsible for Safety?
Who makes up the Management Team?

• Board of Directors
• General Manager / CEO / Owner
• CFO / COO
• Department Heads/Supervisors
• Branch Manager
Who is really responsible for employee safety?

• Board of Directors
• Upper Management
  • CEO / CFO / COO
• Middle Management
  • Department Heads
  • Supervisors / Branch Managers
• Safety Director
• Employee
How should the responsibility for your Safety Program be structured?

- Board of Directors
- General Manager / CEO / Owner
- Upper Management (CFO, COO, VP, Etc.)
- Middle Management (Branch Manager, Department Managers, Supervisors, Etc.)
- Employees

What about the Safety Director?
One Safety Study Says:
“Workers are responsible for 15% of workplace accidents, faulty systems and processes cause the other 85% ....and management is responsible for the systems and processes”
“It’s not the nature of the work that’s the issue in reducing accidents...... It’s the management systems and processes, or the lack of those systems and processes.”
How do we improve?

Hire better quality employees

- Pay more
- Screen prospective employees
- Don’t use the “mirror test”
- Use physical capacity testing
One Safety Study Says:

“Workers are responsible for **15%** of workplace accidents, **faulty systems and processes** cause the other **85%** ....and **management** is responsible for the systems and processes”
What are your Company’s Systems & Processes?

• Do you have systems & processes in place?
• What should they address?
  • Employee Hiring and Practices
  • Lockout/Tagout
  • Bin Entry
  • Confined Space Entry
  • GHS/Hazard Communication
  • Hot Work
  • Forklift Training
  • Written Housekeeping
  • Written Maintenance
What are your Company’s Systems & Processes?

- Bin Entry
What are your Company’s Systems & Processes?

• Bin Entry

Figure 8: Number of annual fall cases recorded between 2004 and 2014.
What are your Company’s Systems & Processes?

• Bin Entry

Figure 4: Age distribution of 2014 agricultural confined space victims by number of cases recorded.
When workers enter storage bins, employers must (among other things):

- Turn off and **lock out** all powered equipment associated with the bin, including augers used to help move the grain, so that the grain is not being emptied or moving out or into the bin.

- Prohibit walking down grain and similar practices where an employee walks on grain to make it flow.

- Provide all employees a body harness with a lifeline, or a boatswains chair, and ensure that it is secured prior to the employee entering the bin.
When workers enter storage bins, employers must (among other things):

• Provide an observer stationed outside the bin or silo being entered by an employee. **Ensure the observer is equipped to provide assistance** and that their only task is to continuously track the employee in the bin.

• **Prohibit workers** from entry into bins or silos underneath a bridging condition, or where a build-up of grain products on the sides could fall and bury them.

• **Test the air** within a bin or silo prior to entry for the presence of combustible and toxic gases, and to determine if there is sufficient oxygen.

• **Ensure a permit is issued for each instance a worker enters a bin or silo, certifying that the precautions listed above have been implemented.**
What are your Coop’s Systems & Processes?

• Do you have systems & processes in place?
• What should they address?
  • Lockout/Tagout
  • Bin entry
  • Hiring practices
  • New employee orientation
  • Others
• Are they followed?
• Are they just words on a piece of paper?
Develop Safe Work Procedures

• Both reactive and proactive
• Examine every function performed at your Cooperative
  • Filling NH3 tanks
  • Dumping trucks
  • Driving
  • L.P. deliveries
  • Application procedures
  • Forklift operations
  • Lifting procedures
  • All functions
• Change the procedures that will make that function safer
  • Ask, No, insist that your employees follow the new procedures
• Train new employees on the procedures
• Hold employees responsible for their own safety

Let’s take a specific look at what YOU can do to improve losses!
Management..... demonstrates loss reduction commitment by...

• Reviewing safety issues at Mgmt. – Staff Meetings
• Conducting “New Worker Orientation”
• **Enforce** safety guidelines
• Repeat safety messages in company newsletters
• Require supervisors to investigate mishaps
• Hold Supervisors **accountable** for their subordinate workers
• Accruing costs of injuries to the responsible departments.
**Supervisors**—Held Responsible for Reducing Losses

- Having mishaps effect performance, pay and career
- Presenting monthly safety meetings
- Investigating mishaps...
  - Preparing a report of what happened
  - Examining what happened and making corrections as needed (not pointing blame)
  - Report directed & maintained in company file
- Alerting workers to work dangers
- **Disciplinary reports** to Management when workers fail to comply with company safety policies!
Total Costs of Accidents are Far Greater Than We Imagine!

Loss costs reimbursed by insurance

Loss costs **not** reimbursed by insurance

New employee hiring, additional payroll and benefits, employee training, lost time of productivity and loss of profitability are **reasons** that add to the above costs.
A $1000 insured loss costing you $4000 of ‘soft dollar’ costs would take these additional sales to recover:

- 10 transports—80,000 gal. of fuel ($0.05/gal net profit)
- 200 tons of feed ($20/Ton Profit)
- 100 tons of fertilizer— ($40/ton profit)
- 2,666 acres crop application ($1.50 per acre profit)
- 20,000 bu grain to handle ($0.20/bu profit)

These are strong business reasons to be concerned about employee injuries……
Loss costs not reimbursed by insurance

New employee hiring, additional payroll and benefits, employee training, lost time of productivity and loss of profitability are reasons that add to the above costs.
A $1000 $16,000 insured loss costing you $4000 $64,000 of ‘soft dollar’ costs would take these additional sales to recover:

- 10 160 transports—80,000 1,280,000 gal. of fuel ($0.05/gal net profit)
- 200 3,200 tons of feed ($20/Ton Profit)
- 100 16,000 tons of fertilizer— ($40/Ton Profit)
- 2,666 42,656 acres crop application ($1.50 per Acre Profit)
- 20,000 320,000 bu grain to handle ($0.20/bu profit)

These are REALLY strong business reasons to be concerned about employee injuries……
What are your Company’s Systems & Processes?

• Bin Entry

U.S. Grain Entrapments

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OSHA Fines

• On November 23, 2009, OSHA fined Tempel Grain Elevators, LLP more than **$1.5 million** following the May 29, 2009 death of a teenage worker at the company's Haswell, Colorado grain storage operation. The youth suffocated after being engulfed by grain in one of the facility’s bins. The company also exposed three other teenage workers to the cited hazards.

• On May 27, 2010, OSHA fined the South Dakota Wheat Growers Association of Aberdeen, South Dakota more than **$1.6 million** following the death of a worker who had suffocated after being engulfed by grain. OSHA’s investigation found that five additional workers were also at risk of being engulfed when they were sent into the bin to dig the victim out.

• On August 4, 2010, OSHA fined Cooperative Plus, Inc. in Burlington, Wisconsin **$721,000** after a worker was buried up to his chest and trapped in frozen soybeans. The worker was ultimately rescued after a four hour ordeal.
OSHA Fines

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- On August 17, OSHA fined Cooperative Plus, Inc $375,000 for safety violations at their Whitewater and Genoa City, WI facilities.

- Cooperative Plus, Inc received fines totaling $1,096,000.
Bottom Line:
Employees are responsible for their own safety

• But they:
  • Must be motivated to prevent accidents
  • Must understand the causes of accidents
  • Must know how to stop the sequence of events that causes accidents
Common Safety Motivators

• Incentive programs
• Discipline
• OSHA fines
• Insurance costs

These can have some effect but for the average employee, these are the least of their concerns!
Why do employees work?

Why do they really work?

- Money
- Family
- Children
- Home
- Buy food
- Recreation
- Pay bills
- Cars
- Sports
- Date with your spouse
- Toys

They work to live their lives the way they want to!
What’s Really At Risk?

• Injuries to employees…. Or you can have an impact on your company!....but more importantly, an injury to you may have a significant impact on their life.
FACTS:

• 15 people that went to work this morning won’t be coming home tonight, or ever.

• 11,500 will not come home in the same condition.
  • From sprained ankles, to blindness….to quadriplegic

• Human error will contribute to 90% of those accidents.

• “I knew better” is the most common comment after these accidents.
Can You Live With the Consequences?

Are you willing to risk it all for a short cut?

• Personal life
  • Family
  • Life style
  • Self worth
  • Earning capabilities
Every Accident, Every Time, It’s Predictable, It’s Preventable

• Look at your work place and procedures……are they safe?
• If not, **fix** them!
• What could happen that could cause an injury to you or one of your employees?
• If it looks like it could cause an accident, **it will**.
• When you look at a task that needs to be performed, and it crosses your mind that it might be unsafe….**IT IS!!**
SUMMARY

• Your employee’s safety is a combination of your responsibility and theirs……… but it starts at the top.

• Accidents aren’t really an accident – they happen for a reason, …fix that reason.

• Accidents come with a cost.
  • To your company
  • To you
  • To your employees

• And remember
  • There aren’t any new accidents, but there sure are a lot of new victims…… don’t be a victim and especially don’t let your employees be one either.
SUMMARY

• “Hard Rights over easy Wrongs”

The Bad Stuff has to stop Right Here!

Motivate YOURSELF!

It does not matter what happen Last Year.
What are you going to do this year?
SUMMARY

• Who is Responsible for Safety?

• Be the person that touches peoples lives.

• Be PROUD of what you do

• When the Safety Guy shows up what happens?
SUMMARY

• John Maxwell says Attitude is an Inward feeling expressed by OUTWARD behavior.

• Training must be at a level the employee understands!
SUMMARY

• Safety Rules
• Where there is a rule, there is a hazard
• Where there is a hazard, there may not be a rule
What is your Safety Action Plan?

• Reviewed your Safety Programs?
• Held a Safety Meeting?
• Formal written program?
• Return to Work Program?
• Procedure for contacting an injured employee?
• Procedure for Reviewing Accidents?
• Claims Reporting Process?
• Define supervisor's accountability and expectation for safety?
What is your Safety Action Plan?

- Enhanced Hiring Practices (MVR review, post offer drug testing, functional capacity testing, etc.)
- Hazard Identification Program? With corrective ACTIONS?
- Training for a new equipment?
Understand Risks - Costs

Direct Costs

Indirect Costs
- 2 to 20 times the direct costs
- Hidden

Like this iceberg, hidden costs of accidents are not visible on the surface, but are there just the same!

National Grain and Feed Association
Safety Leadership

• You cannot Regulate your way to a Safe Work Place
• You cannot Train your way to Safe Work Place
• You cannot Slogan your way to a Safe Work Place
• You cannot Police your way to a Safe Work Place
• You cannot Buy your way to a Safe Work Place
• You cannot Outsource your way to a Safe Work Place

“Educate People to be Safety Leaders”
Thank You!

“Our Customers Know the Difference®”