



Safety News

Dedicated to ensuring the safest and healthiest working environment for our members

Fall 2019 | Issue 17

UA General Officers

Mark McManus
General President
Patrick H. Kellett
General Secretary-Treasurer
Michael A. Pleasant
Assistant General President

General Executive Board Members

Patrick M. Dolan, Jr., *District 1*
Kenneth J. Broadbent, *District 2*
Daniel C. Hendrix, *District 3*
Steven S. Breitlow, *District 4*
Stanley M. Smith, *District 5*
Steven Morrison, *District 6*,
Director of Canadian Affairs

Executive Officers

James P. Moss
Executive Vice President
Mark Buss
Administrative Assistant to the General President
Christopher A. Haslinger
Administrative Assistant to the General President
Bradley M. Karbowski
Administrative Assistant to the General President
Terence N. Snooks
Administrative Assistant to the General President Canada

United Association Directors

David L. Barnett
Pipeline and Gas Distribution
Thomas G. Bigley
Plumbing Services
Virgil "Ed" Boone
Trade Jurisdiction
Robert J. Lamb
Information Technology
Brett C. McCoy
Metal Trades
Michael P. Mulvancy
Energy and Infrastructure
James G. Pavesic
Education and Training
James E. Tucker
Organizing and Recruitment

Our Vision

The United Association and its local unions will apply its best practices and resources to build the best educated and safest workforce in all sectors of the piping industry.

Message from Cheryl Ambrose Health, Safety and Environmental Administrator



The only way to begin this issue of Safety News is with a heartfelt "Thank You" to the United Association and the International Training Fund for all of the support during my recent absence. The many well wishes meant a great deal during my

time away. While I was very disappointed to miss Instructor Training Program (ITP) this year, it is great to be back and I am looking forward to another busy fall season here at the UA.

During my absence from this year's ITP, I want to thank everyone who had a hand in making sure the classes were successful. There were so many people who helped behind the scenes to make it all come together, not the least of whom are the instructors and ITF staff. I want to extend a special thank you to Sister Rita Neiderhiser with Local 669 for stepping in on short notice and taking on additional duties to help steer the safety courses and related activities in my absence. Thank You, Rita!

In this issue, we marked a milestone at ITP with the retirement of Brother Jim Smith from teaching as an OSHA Master Instructor. Jim taught his last OSHA course at the 2019 ITP. Jim is the longest serving OSHA master instructor at the UA and he will certainly be missed in the OSHA courses. Take a trip down memory lane with us in the tribute article to Brother Jim.

In this issue

OSHA Master Instructor Retires..... p2
 NFPA 70E® Train-the-Trainer/2019 ITP .. p3
 OSHA Outreach Training Tips..... p4
 OSHA Master and Secondary Master Instructors p5
 Asbestos: A Hazard of Today p6
 Fall Protection Stop Use and Recall Notices p7
 OSHA's Latest Top 10 Violations List..... p8
 OSHA News..... p9

OSHA continues to refine and revise the requirements for the Outreach Training Program and this topic generates the most questions from locals and their instructors. The article on tips for successful OSHA training contains important information that every OSHA Outreach Trainer needs to know after becoming authorized to teach the 10- and 30-hour OSHA courses.

The new NFPA 70E® Train-the-Trainer course debuted at the 2019 ITP. Be sure to check out the blog spot written by NFPA instructor Derek Vigstol where he talks about the highlights of his first ITP week and the success of the new electrical safety course for UA instructors.

Asbestos continues to be a concern in the building trades even with recent action by the EPA. This is often an overlooked hazard that many believe has gone away because it was "banned." Nothing could be further from the truth and it is often an unfamiliar hazard to many of our new members. An article in the Summer 2019 issue of Safety News outlined recent changes at the EPA on asbestos. In this issue, we have a regulatory update from M.K. Fletcher, Safety and Health Specialist with the AFL-CIO, who has her finger on the pulse of this important safety and health concern.

As always, the health and safety of our members—and their co-workers—is first and foremost for the UA. That's our underlying message in every issue of this newsletter. It is a cornerstone of Built on Excellence, making it a core value of our organization. That's why we offer reminders such as those you find in this newsletter to help our members stay safe. We continue to strive to bring you information that you will find relevant, useful and even inspiring. ■

OSHA Master Instructor James J. Smith Retires After Teaching 22 Years

UA Career Spans 58 Years



The 2019 Instructor Training Program marked the final year as an instructor for 58-year UA member and OSHA Master Instructor James J. "Jim" Smith. He taught his last OSHA course this past August in Ann Arbor, Michigan after 22 years as an OSHA Master instructor for the UA.

Brother Smith's journey in the United Association began in 1961 when he became a plumber apprentice at Plumbers & Steamfitters Local Union

387, located in Jim's hometown of Davenport, Iowa. He excelled throughout his apprenticeship, winning the local and Iowa State Apprentice Contests in 1965 and going on to compete that year in the National Apprentice Contest at Purdue University.

Brother Smith completed his apprenticeship in 1966 and became a journeyman plumber. He continued to advance quickly in his UA career, also becoming the Training Coordinator for Local 387 in 1966, a position he held until 1996. In 1998, Local 387 merged with Local 25 in Rock Island, Illinois.

Brother Smith's passion for teaching carried over to the UA's Instructor Training Program where he began teaching in 1992, continuing through 1997 in the Advanced Training for Coordinators course. Shortly after the creation by OSHA of the Outreach Training Program, Brother Jim became one of the UA's first OSHA Master Instructors in 1998, when he began teaching the OSHA 500, 502 and 510 courses until his retirement in 2019.

1965 National Apprentice Contest at Purdue University (Photo courtesy of the United Association Archives and Records Office)



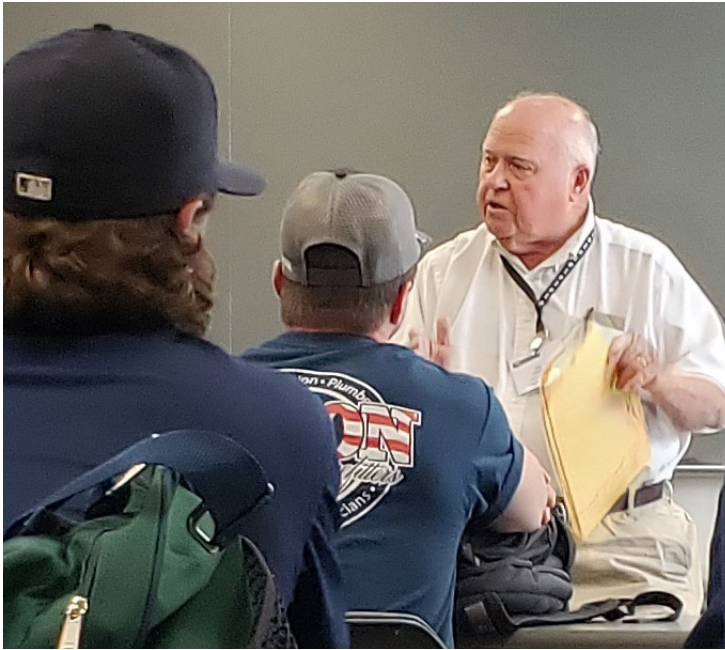
James Smith, Local 387, Davenport, Iowa, checks the instructions for the Drawing Project with Judge Richard P. Thompson, Purdue staff. The drawing project tested skill in making a mechanical drawing and an isometric piping drawing, in addition to listing material from a drawing of a typical water supply installation.

Cathy Merkel, UA Registrar, remembers when Jim began teaching for the UA. "The UA and its instructors have benefited greatly from Jim's teaching and his friendship. I am thankful for all he has done for UA Training. Jim has been an amazing instructor, mentor and friend to an endless number of UA students, instructors and the UA training department. We wish him the best."

Local Union 25 Business Manager Matt Leinen shared several fond memories of Brother Jim Smith through his UA career, including his love for airplanes. He shared best wishes for Jim by saying, "Throughout the course of his nearly 60-year career, Jim Smith has demonstrated his commitment to training. Jim has helped shape the lives and careers of so many men and women, not only at Local 25 but also the United Association. He earned the respect of our members with his dedication, honesty and fairness. I personally would not be where I am today in my career without his guidance. Everyone at Local 25 wishes Jim a long and healthy retirement."

Health, Safety and Environmental Administrator Cheryl Ambrose, extending best wishes on behalf of the United Association and the International Training Fund shared, "We want to extend our sincerest gratitude to Brother Jim Smith for his many years of dedicated service and passion for the training and advancement of countless UA brothers and sisters. We could always depend on Jim to be there when training was needed, and he is one of the main reasons the OSHA Outreach Training Program at the UA has been so successful

for over 20 years. We will genuinely miss Jim's smile, quick wit and charm, and wish him all the very best life has to offer in his retirement."



Brother Jim Smith instructing his final OSHA 510 Standards course at the 2019 Instructor Training Program.

Brother Jim will continue to keep busy with his hobby of building airplanes and restoring antique airplanes and cars. Over the years, it was not unusual for Jim and his wife Beverly to hop in his plane and fly to training classes around the country. As many may remember, Brother Smith's wife Beverly often accompanied him to his training classes. It is with deep sadness that we share that Beverly passed away this year on July 7th. We extend our sincerest condolences to Brother Jim and the entire Smith family. We will miss having Beverly at ITP as much as we will miss Jim.

Brother Jim will continue to reside in Iowa near his two daughters, pursuing his hobbies and enjoying time with his five grandchildren, not far from where his UA journey all began in 1961. He shared this about his retirement, "I have thoroughly enjoyed the opportunities the United Association has given me through my apprenticeship with local and state contests and then the national contest at Purdue in 1965, following later as Advanced Training Coordinator instructor, and the last 22 years instructing OSHA classes. What a run! My future plans are open, and I am sure they will include helping others as has been my experience with the past."

Congratulations on your retirement, Brother Jim! We wish you all the best. ■

NFPA 70E® Train-the-Trainer and 2019 ITP

Blog Spot from An Instructor's Perspective

Submitted by: Derek Vigstol, Senior Electrical Content Specialist, National Fire Protection Association (NFPA)

It isn't every day that an opportunity presents itself to be able to shape or redefine the idea of what electrical safety is to an entire workforce. So, when I was asked about providing a train-the-trainer level course at the Instructor Training Program (ITP) put on collaboratively by the UA and MCAA in August, my ears perked up and I was all in. Being a teacher/coach at heart meant I was going to have a lot of fun with this project and it also meant that I would most likely become very involved in developing the content and training material since this is a massive step in the right direction for the relationship between NFPA, the UA, and MCAA. To say I was going to have fun was a major understatement.

Given the opportunity to do something like this meant we needed to do the best possible job in the creation and delivery of this program because it was no longer just a single class. No, we were about to help shape the perception of what electrical safety means to the UA and MCAA. Part of the agreement was that we have two instructors for ITP. After all, it gets to be a very long week and having a little help in front of the classroom is always welcome. NFPA sought the assistance of someone we knew had already been on the front lines of changing the perception of electrical safety for electricians. Many of the issues that would come up in class would be the same despite the different trades. John Kjome out of IBEW Local 292 in Minneapolis, MN was just the guy for the job.

Having worked with John in the past, although we never taught together, I knew this class was going to be special. He and I were going to enjoy every minute in front of the class and hopefully that would transfer to the students and provide a learning environment that kept people engaged throughout. Then we ran the pilot course at the UA Education and Conference Center located at their headquarters in Annapolis, MD. It was amazing, possibly the most fun I have had teaching ever. The facility was awesome, the location was great, but most importantly, the students were what made the class so special. The group was made up of a mix of UA training folks and MCAA contractor safety staff. The level of engagement and hunger for knowledge was top notch, but they also knew enough to push back on John and I in order to improve on what was delivered. We walked away with some excellent suggestions to make a great program better and I couldn't wait for ITP.

My experience at ITP this year will most likely go down as one of the most memorable of my career. It is really going to be hard to top, but the hope is I will be back in 2020 so we will try our best to top 2019. Everything about this week in August couldn't have been better. All the normal worries that a teacher has were put to rest when we sat through the faculty orientation and learned the ins and outs of teaching at ITP. We also got to meet our sidekick for the week, Tom Carrigan out of UA Local 7 in Albany, NY. Tom was a great help for us since he had "been there, done that" when it came to ITP. After a brief learning curve to familiarize ourselves with the Washtenaw Community College campus, we were all set. Now all we needed was to get the show on the road.

Just as we discovered in the pilot program, the students really wanted to learn about electrical safety. John and I started to do our thing and the class just seemed to run itself after that. Walking the students through key concepts with respect to electrical safety and how to use NFPA 70E® as a reference guide made the time fly by. Also, with John having the experience of having done this for the electrical trade, we were able to sprinkle in tips throughout the training of where to expect push back from the people they will eventually start to train themselves. After all, the whole point of this course wasn't just to be another electrical safety course, but rather it was meant to arm the students with a deep enough knowledge of electrical safe work practices and the tools to be able to train their own folks back home. This was our mission, to spread the message of electrical safety through the mechanical and pipe trades.

When the week unfortunately had to end, John and I felt really good about what had just taken place. We had taken our students on a journey, literally. We took a field trip into the main mechanical room for the campus where they were able to actually see the labels we had been referring to all week. Also, they received more of a 3-D picture of how the entire electrical system ties together and where to go look for the information they need to accurately assess the hazard. We worked our way through a realistic example utilizing a chiller control cabinet almost identical to the one on campus and when the students were standing in front of the actual equipment; you could see the moment the dots started connecting.

The class was a buzz on campus and throughout the week at ITP. It seemed John and I had accomplished our mission to bring a truly engaging learning experience centered around electrical safety. With Tom helping us with the logistics so that John and I could focus on the training part, the class felt as though we had done the training here a thousand times before. I cannot say enough about the folks I met at ITP and everyone involved in setting this program up. To Cheryl Ambrose, a very special thank you for believing that this could be great and giving us the opportunity to deliver

on that hope. To James Pavesic and Ray Boyd, thank you for having the commitment to further the education of the UA membership and allow NFPA to be a part of it all. To Pete Chaney with the MCAA, we cannot say thank you enough for helping craft this important relationship between NFPA and the MCAA. And finally, to the students from the first, of what I hope is many, NFPA electrical safety train-the-trainer programs at ITP, thank you for making this one of the high points in my career. See you all in 2020!

Derek Vigstol is the Senior Electrical Content Specialist for the National Fire Protection Association (NFPA). He is a master electrician and a former instructor for the Minneapolis Electrical JATC in IBEW Local 292 in Minneapolis, MN.

For more information about the UA's NFPA 70E® Train-the-Trainer course and upcoming training dates, please contact Cheryl Ambrose at cambrose@uanet.org. ■

Tips for Successful OSHA Outreach Training

Submitted by: Rita Neiderheiser, Local Union 669 Technical Coordinator and OSHA Master Instructor

UA trainers are some of the busiest people I know. Most of us work forty or more hours each week. We attend local union meetings, volunteer for union activities, and mentor younger members. As trainers, we often teach multiple classes in addition to OSHA courses, prepare for classes, create and grade assignments, and answer questions as requested. Then we have our own lives away from work.

There is a wealth of information we are required to understand and execute. As OSHA Authorized Outreach Trainers for Construction, we are required to understand and adhere to OSHA's strict requirements and procedures or we are at risk of losing our OSHA trainer authorization. To help keep all that clear, here are some tips for following OSHA's training requirements and staying current as an authorized trainer.

Staying Authorized

Staying authorized is the most important thing you can do after becoming authorized to teach the OSHA 10- and 30-hour courses. Here are some things to keep in mind.

- OSHA Authorized Outreach for Construction Trainers must complete a three-day update class (OSHA 502 - Update for Construction Industry Outreach Trainers) every four years. **There is no longer a grace period for renewal if the authorization expires, so should the trainer card not be renewed prior to expiration, the whole authorization process starts from the beginning.**
- Create a calendar reminder for 6-12 months before the four-year expiration so there will be plenty of time to sign up and take the update class. It is surprising how fast four years will go by. Plan ahead to alleviate stress later.
- To reauthorize once expired, trainers must take the OSHA 500 course again (five days), and possibly the OSHA 510 (four days) if it was longer than seven years since their last OSHA 510, for a whopping total of nine days of training. Compare that to making sure a trainer takes the three days of training for the OSHA 502 prior to expiration. This is an important consideration for instructors and JATCs and should be monitored closely. UA Education and Training Department provides at least three update classes per year—Spring and Fall Regional classes and Instructor Training Program.
- Keep the trainer card in a safe place and make sure to have electronic and hard copies available as back up.
- Always check the authorization expiration date before teaching an OSHA Outreach Class. If the authorization has expired, you will not be able to issue student cards. Never teach a class if the authorization has expired.

Staying Current with OSHA Training Requirements

The OSHA Outreach Program training requirements for instructors contains a large volume of information and all of it is important. Failing to follow the requirements can jeopardize not just your authorization but the UA's outreach program as a whole.

- *OSHA Outreach Training Program Requirements* and *OSHA Construction Industry Procedures* contain all this information.
- <https://www.osha.gov/dte/outreach/OSHAOutreachTrainingProgramRequirements-2019.pdf>
- <https://www.osha.gov/dte/outreach/construction/ConstructionProcedures-2019.pdf>
- OSHA's website has the most recent editions and those are the versions to use rather than older printed copies.
- Review current editions of both documents before each class as a good refresher.
- When in doubt, ask questions. OSHA Master Instructors are available to answer questions. Trainers

can find their contact information on the UA OSHA Resource Blackboard site.

- If you need access to the OSHA Instructor Resource Blackboard site, please contact Lynn O'Brien at lynno@uanet.org in the Health, Safety and Environmental Administrator's office for assistance. ■

OSHA Master and Secondary Master Instructors



Pictured left to right: Kevin Hendrickson - Local 533 (Kansas City, MO), Jim Young - Local 495 (Cambridge, OH), Mike Baptista - Local 342 (Oakland, CA), Will Marable - Local 372 (Tuscaloosa, AL), Jim Smith (retired) - Local 25 (Rock Island, IL), Rita Neiderheiser - Road Sprinkler Fitters Local 669, Dale Walker - Local 495 (Cambridge, OH). Not pictured: Tom Carrigan - Local 7 (Albany, NY)

UPCOMING REGIONAL CLASSES

Great Lakes Regional Training Center
Washtenaw Community College, Ann Arbor, MI

OSHA 500 - Outreach Trainer for Construction

November 4 – 8, 2019

OSHA 502 - Update for Construction Industry Outreach Trainers

November 5 – 7, 2019

Contact Tyler Masengale at tmassengale@uanet.org with any questions.

Asbestos: A Hazard of Today

Submitted by: *MK Fletcher, AFL-CIO Safety and Health Specialist*

Asbestos is too often spoken about as a hazard of the past, but not only is there a long history of asbestos use in the United States, asbestos continues to be imported. Products that may contain asbestos are often found in the construction industry, including:

- gaskets and packing for equipment seals
- brake blocks, brake linings, and other vehicle friction products
- asbestos-cement products
- woven textile products
- asbestos diagrams in the chlor-alkali industry
- some adhesives and sealants
- roof and foundation coatings
- mastics

Exposure to asbestos occurs when performing tasks with current uses such as grinding gaskets or replacing brake blocks. [EPA](#) is currently doing a risk assessment to evaluate the hazards of a limited number of current asbestos uses.



In addition to current uses of asbestos, legacy asbestos is a significant hazard in construction. Legacy asbestos was applied or installed before [EPA](#) banned asbestos for some

high exposure uses such as pipe insulation and spray-insulation. While these are legacy uses, they are not legacy exposures. As our infrastructure degrades and needs replacing, workers and the public are at risk of exposure to the previously installed asbestos. This was seen firsthand in New

York City last summer as a [steam pipe ruptured](#), spewing thick white smoke and asbestos-containing debris over multiple blocks. However, the EPA is not including legacy asbestos in their current asbestos risk assessment.

Working with asbestos-containing products or exposure to legacy asbestos puts workers and their families at risk for serious health effects. Asbestos causes mesothelioma, asbestosis,

and cancer of the lung, larynx, and ovary. Asbestos-related diseases cause over [39,000 deaths](#) in the U.S. annually and the [World Health Organization](#) has declared that there is no safe level of asbestos and the most efficient way to prevent asbestos-related disease is to ban all types of asbestos. For more information on the risk and protecting yourself, see [CPWR](#) and the [Asbestos Disease Awareness Organization](#).

In order to protect working people and their families, all uses of asbestos must be banned. Asbestos is banned in 55 countries, but not in the United States. The [Alan Reinstein Ban Asbestos Now Act of 2019](#), named after a mesothelioma victim, would save lives by banning all current uses and imports of asbestos and requiring a comprehensive study of the risk of asbestos where it was used in building construction decades ago, including millions of homes, workplaces, public buildings, and schools. Both a ban and a comprehensive risk assessment are essential to protect those who work to improve our infrastructure. ■

ABOUT THE AUTHOR:

MK Fletcher is currently the Safety and Health Specialist with the AFL-CIO. Prior to joining the AFL-CIO, Ms. Fletcher worked with CPWR – The Center for Construction Research and Training as a Research Analyst and has worked closely with the Building Trades affiliates on many health and environmental issues impacting the construction industry. She received a Master of Science in Public Health from UNC-Chapel Hill Gillings School of Global Public Health and has worked in union safety and health since 2012.



3M™ ISSUES FALL PROTECTION STOP USE AND RECALL NOTICES

Please read carefully and remove any affected equipment from service IMMEDIATELY.

3M™ DBI-SALA® Nano-Lok™ edge and Wrap Back Twin-Leg Self Retracting Lifelines

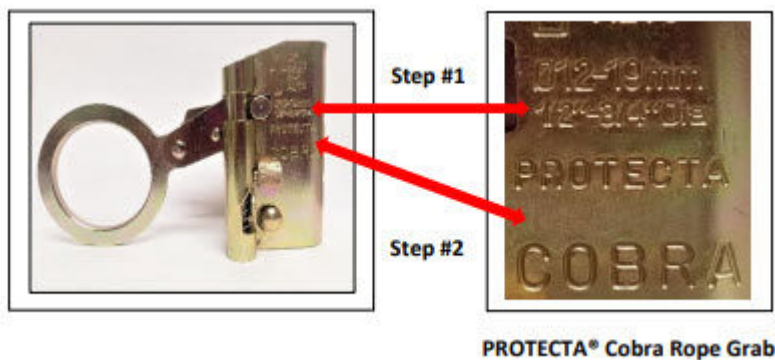
<https://www.nanolokedgerecall.com/>



Twin-Leg Nano-Lok™ *edge* and Twin-Leg Nano-Lok™ Wrap Back

3M™ PROTECTA® Cobra Rope Grab AC202D

<https://multimedia.3m.com/mws/media/1724145O/3m-protecta-cobra-rope-grab-ac202d-stop-use-product-recall-notice.pdf>



OSHA's Latest Top 10 List of Violations

List Remains the Same as FY 2018

While the order may have changed, the list stayed the same from 2018. OSHA recently shared the 2019 Top 10 List of Violations cited between October 1, 2018 and August 31, 2019. The list was introduced at the 2019 National Safety Congress and Expo by Deputy Director for OSHA's Directorate of Enforcement Programs Patrick Kapust.

Fall protection violations continue to lead the list for a combined total of 7,783 violations. That is an average of almost 30 violations per workday (five-day work week). This falls in line with fatalities from falls as the leading cause of death in construction.



The top 10 violations of FY 2019 are:

1. **Fall protection (construction)—general requirements (29 CFR 1926.501):** 6,010 violations.
The duty to provide fall protection has been OSHA's top citation for several years. Common violations under this standard included failure to provide fall protection near unprotected sides or edges and on both low-slope and steep roofs.
2. **Hazard communication (29 CFR 1910.1200):** 3,671 violations.
Hazard communication has been in the number-two spot for several years. Common deficiencies include lack of a written program, inadequate training, and failing to properly develop or maintain safety data sheets (SDSs).
3. **Scaffolds (construction)—general requirements (29 CFR 1926.451):** 2,813 violations.
Common violations include improper decking, failing to provide guardrails where required, and failure to ensure that supported scaffolds are adequately supported on a solid foundation.

4. **Lockout/tagout (29 CFR 1910.147):** 2,606 violations.
Many employers cited under this standard failed to establish an energy control procedure altogether, while others were cited for failing to provide adequate employee training, failing to conduct periodic evaluations of procedures, and failing to use lockout/tagout devices or equipment.
5. **Respiratory protection (29 CFR 1910.134):** 2,450 violations.
Failing to establish a program, failing to perform required fit testing, and failing to provide medical evaluations were among the most frequently cited issues.
6. **Ladders (construction) (29 CFR 1926.1053):** 2,345 violations.
Common violations included failure to have side rails extend 3 feet beyond a landing surface, using ladders for unintended purposes, using the top step of a step-ladder, and ladders with structural defects.
7. **Powered industrial trucks (29 CFR 1910.178):** 2,093 violations.
Violations commonly addressed deficient or damaged forklifts that were not removed from service, failing to safely operate a forklift, failing to retain certification of training, and failing to evaluate forklift drivers every three years as required.
8. **Fall protection (construction)—training requirements (29 CFR 1926.503):** 1,773 violations.
Commonly cited issues include failing to provide training to each person required to receive it, failing to certify training in writing, inadequacies in training leading to the failure of retention by the trainee, and failing to retrain in instances where the trainee failed to retain the training content.
9. **Machine guarding (29 CFR 1910.212):** 1,743 violations.
Violations included failing to guard points of operation, failing to ensure that guards are securely attached to machinery, improper guarding of fan blades, and failing to properly anchor fixed machinery.
10. **Personal protective and lifesaving equipment (construction)—eye and face protection (29 CFR 1926.102):** 1,411 violations.

New to OSHA's top 10 list in 2018, eye and face protection made the list again in FY 2019. Commonly cited issues included failing to provide eye and face protection where employees are exposed to hazards from flying objects; failing to provide eye protection with side protection; and failing to provide protection from caustic hazards, gases, and vapors.

Source: ehstoday.com

OSHA NEWS

New Director for OSHA's Directorate of Construction Selected by U.S. Department of Labor

According to a trade release dated September 16, 2019, Scott Ketcham has been selected as the new director of the Occupational Safety and Health Administration's (OSHA's) Directorate of Construction (DOC) in Washington, DC. Prior to this appointment, Mr. Ketcham had served as deputy director of DOC since February 2017.

See the full trade release at <https://www.osha.gov/news/newsreleases/trade/09162019>

OSHA Requests Information on Table 1 of the Silica Standard for Construction

In a trade release dated August 14, 2019, OSHA is requesting information and comment of Table 1 of the Respirable Crystalline Silica Standard for Construction.

"OSHA seeks information on additional engineering and work practice control methods to effectively limit exposure to silica for the equipment and tasks currently listed on Table 1. The agency is also requesting information about other construction equipment and tasks that generate silica that it should consider adding to Table 1, along with information about their associated engineering and work practice control methods.

In addition, OSHA is seeking comments about whether to revise paragraph (a)(3) of the [Respirable Crystalline Silica Standard for General Industry](#) to broaden the circumstances under which general industry and maritime employers would be permitted to comply with Table 1 of the silica standard for construction."

Full trade release available at <https://www.osha.gov/news/newsreleases/trade/08142019>