



Matthew H. Mead
Governor

State of Wyoming

Department of Workforce Services

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John Cox
Director
Lisa M. Osvold
Deputy Director

OSHA Commission Meeting Minutes

Date: September 30, 2016

Time: 9:00 a.m.

Location: Wyoming Oil & Gas Conservation Commission, 2211 King Blvd, Casper WY, on September 30, 2016.

1. **Call to order:** OSHA Commission Vice Chair Don Alston called the meeting to order at 9:11 a.m. The meeting has been publicized via newspapers, was open to the public and recorded.
2. **Introduction of the OSHA Commission Members:** The following Commission members were present: Chair Dennis Shepard (via telephone), Vice Chair Don Alston, Chuck Dobkins, Doug Thomas (via telephone), Monte Paddleford (via telephone), Mandi Safford (via telephone).
3. **Introduction/Update of the OSHA Staff and guests present:** Dan Bulkley (OSHA Deputy Administrator), Ken Masters (OSHA Operations Manager), Christian Graham (Compliance Program Manager – via telephone), Jody Paessler (Operations Administrative Support – via telephone), Mackenzie Williams (Attorney General’s office), Francisco Gonzales (Gonzales Roofing), Ken Lantta (KDL Consulting)
4. **Old Business:**

Approval of Previous Meeting Minutes for additions or corrections:

- i. Special OSHA Commission Meeting Minutes 6-8-16 (previously approved at June 24 meeting).
- ii. OSHA Commission Meeting Minutes 6-24-16 – correction of spelling of Mr. Ken Lanttas’ last name noted. Motion to approve; seconded; vote carries motion.



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Development for Wyoming’s Future.



5. New Business:

- a. **Final Orders** (Casefiles that have not been closed through normal informal conference processes and/or employer is ignoring request to resolve open items in casefile.) Case summaries were sent to Commission members prior to meeting for review. Some employers had resolved either penalties or abatements prior to the meeting and so had been pulled from the final group for consideration. Francisco Gonzales was present at the meeting and informed the commission that he would be paying the balance of his penalty (\$1,800.00) to the Natrona County Treasurer – Commission agreed to remove Gonzalez Roofing from Final Order consideration. Motion to approve the remaining Final Orders as presented; seconded; vote carries motion.
- b. **Administratively Close Cases** – (Case file where a final order has been developed, but no further action is practical to resolve open items in the casefile.) **None to bring to the Commission at this time.**
- c. **Case Files To Reopen** – (Case file being reopened due to employers willingness to resolve items relating to the case file to show good faith.) **None to bring to the Commission at this time.**
- d. **Files Being Negotiated by AG Office** – (Case files where the AG Office is working with the employers Attorney to resolve issued relating to the file.)

Double D – at the AG’s office for negotiation. Dan Bulkley addressed Commission – stated that in his communication with Mick Finn of that office that he is only being told that they are working the case but with no detail or documentation as to progress other than verbal. Vice Chair Alston expressed concern about a seeming lack of responsiveness from the AG’s office in support of the OSHA program. Mr. Alston invited suggestions from the Commission as to how to address the lack of progress. Chair Shepard remarked if the AG’s office can show reasonable progress then he would be satisfied. Lacking that, he suggested sending a letter from the department to John Cox documenting the concern of the Commission regarding lack of responsiveness from the AG’s office. Vice Chair Alston requested staff to draft a letter out of cycle. Chair Shepard asked Mr. Williams for his input. Mr. Williams stated that he is a representative for the Commission from the AG’s office and isn’t privy to the prosecutorial side of the office so is unable to provide any sort of update for this particular matter.



- e. **Contested Cases** – Case files where either party has chosen to request the Office of Administrative Hearing to hold a hearing and make a recommendation to the OSHA Commission for their consideration.
 - i. Basic Energy, (Inspection) – has been forwarded to OAH
 - ii. CUDD Energy Case 14-025, Jason D William (Whistleblower) – has been forwarded to OAH
 - iii. Safeway, (Inspection) – has been forwarded to OAH
 - iv. Sinclair Refining Company v. Tonya Jackson, (Whistleblower) – Staff reported that this case is in pre-hearing and that there are preliminary meetings scheduled in October to address moving forward with this case. OAH hearing schedule for March 14, 15, 16, 2017. Mandi Safford removed herself from any action regarding this case due to her working for Sinclair Refining Company.

- f. **ATS adoptions progress** – (New rules and rules changes that require a vote by the commission to approve the new rules or changes for adoption.)
 - i. Federal Program Change Memo for CPL-02-00-160, OSHA Instructions CPL 02-00-160 Field Operations Manual (FOM Directive. Date of Directive 08/02/16. Staff explained intention of Change Memo. Motion to approve recommendation to adopt; seconded; vote carries motion.
 - ii. Standard Log Entry Memo for 29 CFR Part -1902, 1903. Interim Final Rule on Maximum Penalty Increases. Staff explained intention and effect of the Log Entry Memo. Chair Shepard asked that all communications be utilized in ensuring that employers are aware of the upcoming increase in penalties. The Commission requested that at the December meeting, a summary of the various communication methods in place be reported. Motion to adopt; seconded; vote carries motion.

NOTE: At this point Commissioner Thomas asked to be excused from the remainder of the meeting – Vice Chair Alston granted request – remaining members still constitute a quorum.

- g. **Rules adoption progress** – (Information relating to rules that are being adopted.)
 - i. Oil and Gas rules stakeholders’ meetings held August 23, 24, 30, 31, and September 1, in Casper, Gillette, Riverton, Rock Springs, and Cheyenne



respectively. Ken Masters reported that the meetings went well and were fairly well attended and reiterated that these are preliminary stakeholders' meetings to share with the industry the direction being considered for combining the now separate documents for Oil & Gas Rules into one with chapters for each separate area of rules.

- ii. 1910-General Industry, 1926-Construction, and 1928 Agriculture and OSHA Chapter 3 of Practices and Procedures rules to be adopted by reference. Motion to approve; seconded; vote carries motion.
- iii. Emergency Rules in place for New OSHA Penalties values. (Marcia)
- iv. OSHA Chapter 1 Workplace Contracts was repealed and replaced in the Workers' Compensation rules. Motion to accept the recommendation to repeal Chapter 1 and move to Workers' Compensation rule set; seconded; vote carries motion.
- v. 1980 - Whistleblower Retaliation, rules to be adopted by reference. Motion to approve; seconded; vote carries motion.
- vi. Proposed changes to Oil & Gas Well Drilling, Oil & Gas Well Servicing, Oil & Gas Special Servicing, Anchor Testers and Synops will consolidate the separate rules into one document separated into chapters specific to each industry area. Motion to proceed with proposed changes; seconded; vote carries motion.

h. Open Public Comments/Concerns – Ken Lantta, KDL Consulting had comments regarding the Governor's Initiative for Rules Reduction. His view is that the spirit of the Initiative was to try to make rules less burdensome on employers, employees and citizens. He noted that the moving of rules from the Secretary of State's web page by reference to the Federal OSHA site does not reduce rules, but rather just relocates them. Vice Chair Alston thanked Mr. Lantta for his comments but also noted that the State OSHA Plan must adhere to the Federal Rules and cannot reduce or change those rules.

i. Consultation update – Consultation program update attached.

Chair Dennis Shepard asked that responsibilities in regard to the H2A program be documented in some way to clarify how and in what circumstance OSHA might be asked to assist with the program.



- j. Compliance update-** Christian Graham started his update by reporting that the search continues to fill the vacancy in Gillette and that our newest hire – Jerry Vassar (in the Jackson office) started his position in July.

Additional program report attached.

k. Operations update- Ken Masters

FY17 Consultation and Compliance Grants submitted and initially approved by Region VIII. Over matches splits are:

1. Consultation: Total Budget set at \$663,042, with 66% Federal/34% State;
2. Compliance: Total Budget set at \$2,108,441, with 26% Federal/74% State.

Ken reported that the actual Federal obligation to these programs is not being met. For Consultation, the funding split should be 90% Federal/10% State and for Compliance it should be 50% Federal/50% State. He stated that through the grant process, we have communicated the disparity in matching and have asked for the additional monies that they are obligated to provide to support the programs.

Ken also reported some restructuring is occurring, mostly in Compliance, to increase efficiencies in case file processing (i.e., bringing Final Orders before the Commission, closing case files). Ken informed the Commission that the agency now has a contract in place for collections.

- l. Training** – Covered in Consultation report.

- m. Alliances update-** Covered in Consultation report.

- n. Summit update** – Dan reported that planning for next year’s summit has begun. He has asked the DWS representative to get clarification from the executive level regarding the award system. The change in the award structure at the most recent summit had some employers upset so he is asking that it be looked at moving forward. RFP’s for venue have been sent out. There has been a change in the minimum number for a venue to accommodate so this should make more facilities able to make proposals. Chairman Shepard inquired as to whether some of the burden of planning and executing would be delegated to others to reduce the load on OSHA staff. Dan replied that the issue has been discussed at the executive



level and that the amount of support provided by Consultation will be reduced by a percentage equal to the reduction in staff and budget.

- o. Meetings attended-** Dan reported that he has been attending and participating in the Employer Information Seminars being held around the State. Employer reaction has been positive.

- p. Other Business** – Dan provided copies of the 2016 Special Report for state plans. It is an impact and funding report for those plans. He reported that he is now a member of the OSHAPA board and will be a part of looking at the disparity in federal funding and compensation and how it affects the state plans. Dan also provided copies of the most recent FAME report and Wyoming OSHA’s response to the findings.

Dan also reported on a newspaper article relating to a fatality investigation in Opal. There were two previous inspections of the same employer that were still open.

Chairman Shepard proposed that perhaps a letter from Governor Mead to Mr. Perez appealing for the federal program to fund the state programs at the level to which they have committed. Dan replied that if that is the will of the Commission, a letter could be drafted to that effect.

Chairman Shepard inquired about engaging the legislature when they meet in January. Dan reported that Representative Burkhart approached him at the Oil & Gas meeting in Cheyenne and voiced support for the program. Vice Chair Alston suggested putting an action plan in place to more consistently engage the legislature and have a more consistent voice with regard to the agency’s dilemma.

- q. Set Next Meeting date and time:** Next meeting set for Dec 16, 2016 at 9:00 a.m. in Cheyenne at the Laramie County Library, Willow Room.

- r. Adjourn Meeting-** Vice Chair adjourned meeting.





Fwd: Commission Meeting-Consultation Update

2 messages

Karen Godman <karen.godman1@wyo.gov>
To: Jody Paessler <jody.paessler@wyo.gov>

Thu, Sep 29, 2016 at 5:01 PM

Jody!!

Please make sure this is shared, thanks!

Thanks,

Karen

----- Forwarded message -----

From: Karen Godman <karen.godman1@wyo.gov>
Date: Thu, Sep 29, 2016 at 3:12 PM
Subject: Commission Meeting-Consultation Update
To: Daniel Bulkley <daniel.bulkley@wyo.gov>, Kenneth Masters <ken.masters@wyo.gov>

Hi Dan,

First & foremost, thank you for presenting Consultation Information.

All the numbers are pulled for 10/01/2015 to today (09/29/2016). FFY 2016 time frame is from 10/01/²⁰¹⁵~~2016~~ to 9/30/2016. As you know, the Program underwent a huge change when 9 Consultants were pulled and moved to WCSR leaving 3 Consultants and a Manager that also works part time as a Consultant. With the reduction in resources, the Program has not offered Formal training but provides informal training during every visit. Information is shared for formal training opportunities through Community Colleges and Alliances on our website and verbally.

I am incredibly proud to report the Consultation Program has met & exceeded all performance measures to which we committed. Please find the Consultation Update Summary below:

Consultation Update: Visits

CAPP Goals for FFY 2016 were to complete 304 visits.

* As of today the Program completed 392 total visits; 204 Safety Visits, 144 Health & Safety Visits and 44 Health Visits

Consultation Hazards Identified

No specific number goal

* As of today the Program has addressed 1,572 hazards, 48 Imminent Hazards, 1,318 Serious Hazard, 24 Regulatory Hazards and 182 Other Hazards

Consultation Training Provided-Informal

No specific number goal

* As of today the Program has provided informal onsite training to 1,705 employees

Prestige Programs

EVTAP Goal was 15 employers enrolled

*As of today there are 18 employers enrolled

SHARP Goal was 34 employers enrolled

*As of today there are 37 employers enrolled

Interventions

Intervention goal was 25

*As of today there are 110

of Employees removed from hazards by participating with Consultation Program

Goal of 1,184

***As of today there are 13,789**

Alliance Update

We continue to support our Alliances and work to have representation at meetings when requested.

WOGISA: Crane Supervisor Training next week in Gillette (Oct 4, 2016 Gillette Tech Center-8-5), Rock Springs(Western Wyoming Community College 8-5) and Riverton (Central Wyoming Community College 8-5). Consultation will have representation at all of these training courses.

WCSA: Meeting 9/28/2016 at OSHA Office Training Room. Alliance discussed Susan B. Harwood opportunities and this year Grant recipient (National Jewish Hospital, in Denver). Alliance in coordination with Haseden Construction is looking to provide and fund a free class for CPR & First Aid in October and November. Also, potential to provide other training opportunities was discussed. 2017 Safety Summit awards, topics and ideas.

WRSA: Not been requested or invited for input

TSC: Meeting 9/19/2016 at Regional Training Center in Casper. Meredith Towle (Epidemiologist) attended. Discussed website, WYDOT Studies, Best Practices, Highway Updates, 2017 Safety Summit awards, topics and ideas.

Please find attached reports pulled from OIS to include: CAPP Tracking Report, MARC & Consultation Evaluation. Thank you for sharing this information, I will get on the call as soon as I return from Capitol/Herschler Meeting.

Thanks,

Karen

Karen J. Godman MS, CPM

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E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

3 attachments

 **4Q MARC 10012015 to 09292016.xls**
76K

 **Consultation Annual Project Plan (CAPP) Tracking Report 10012015 to 09302016.xls**
135K

 **Consultation Evaluation 10012015 to 09292016.xls**
34K

Daniel Bulkley <daniel.bulkley@wyo.gov>
To: Jody Paessler <jody.paessler@wyo.gov>

Sat, Oct 1, 2016 at 7:03 AM

Jody,

Here is the information I present at our OSHA Commission for Karen if this helps.

Dan

[Quoted text hidden]

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[Quoted text hidden]

3 attachments

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34K

Consultant Name	# of Visits	Service Type - Health	Service Type - Safety	Service Type - Both	# of Initial Visits	# of Follow-up Visits	# of T&E Visits	Scope - Full	Scope - Limited	# of Hazards	# of Serious Hazards	# of Imminent Hazards	# of Regulatory Hazards	# of Other Hazards	# of Employees Trained Informal Onsite	# of Workers at Risk
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Brad Westby	14		14		13	1			13	5	4			1	24	31
Jenny Bruntmyer	33	19	14		33			19	14	58	38		12	8	89	391
Deed Aivazian	32	3	3	26	32			26	6	119	97		17	5	158	1,200
Thomas Trujillo	26		19	7	26			7	19	39	39				272	272
Jason Forbes	58	11	9	38	58			49	9	231	187		1	42	148	6,407
Richard Wenc	50		37	13	50			14	36	195	180		7	8	161	558
Dam Powell	29		23	6	29			6	23	73	64			9	23	1,278
Sam Chopping	37	3	12	22	37			24	13	384	353		5	26	420	514
Mary Dolence	25		25		25			4	21	91	68		23		53	158
Sharen Godman	42	6	19	17	41	1		15	26	109	68		3	38	203	997
Raig Swierczek	8		4	4	8			8		33	33				16	690
Dianne Palmer	20		18	2	20			19	1	64	62			2	44	354
Ene Nieto	18	2	7	9	18			10	8	171	125		3	43	94	942
Totals	392	44	204	144	390	2		201	189	1,572	1,318	48	24	182	1,705	13,786

Grand Totals	392	44	204	144	390	2		201	189	1,572	1,318	48	24	182	1,705	13,786
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Metric 4A-Serious Hazards Not Corrected in a Timely Manner.

Note: This outlier includes Measure 4B Outliers (Serious Hazards NOT Corrected in a Timely Manner (> 14 days Latest Correction Due Date)).

Request #	Visit #	Instance #	Establishment Name	Hazard Actual Correction Date	Granted Correction Date	Extended Correction Due Date	Consultant ID
113924	137207	2	Robert Nation Inc.	7/11/2016	6/22/2016		Q0637

Metric 4C-Outlier

Request #	Visit #	Instance #	Establishment Name	Hazard Actual Correction Date	Granted Correction Date	Extended Correction Due Date	Consultant ID

Metric 4D-Outlier

Request #	Visit #	Instance #	Establishment Name	Hazard Actual Correction Date	Granted Correction Date	Extended Correction Due Date	Consultant ID
113924	137207	2	Robert Nation Inc.	7/11/2016	6/22/2016		Q0637
115005	138637	7	POPLAR LIVING CENTER	8/26/2016	9/1/2016	9/1/2016	C1748
118388	143306	3	WYOMING RENTS LLC	8/11/2016	8/28/2016	8/28/2016	C1748
118388	143306	6	WYOMING RENTS LLC	9/6/2016	8/28/2016		C1748
118388	143306	7	WYOMING RENTS LLC	9/6/2016	8/28/2016		C1748

	Safety	Health	Both	Total
Total Visits	204	44	144	392
Agriculture	1	0	0	1
Construction	146	6	30	182
General Industry	51	34	104	189
Manufacturing	6	4	10	20
Maritime	0	0	0	0
Emphasis Industries	81	7	13	101
Nursing & Residential Care & Hospitals	0	1	5	6
Residential Building Construction	18	0	0	18
Commercial & Institutional Bldg Construction	54	5	3	62
Highway, Street & Bridge Construction	4	0	1	5
Site Preparation (Demolition)	4	1	4	9
Power and Communication Line and Related Structures	0	0	0	0
Primary Metals Industries	0	0	0	0
PSM Covered Chemical Facilities	1	0	0	1
Shipbreaking	0	0	0	0
Emphasis Safety & Health Hazards by Request	299	16	73	388
Lead	0	0	0	0
Crystalline Silica	1	0	0	1
Combustible Dust	0	0	0	0
Hexavalent Chrome	0	0	0	0
Isocyanates	0	0	0	0
Manufacturing Amputations	0	0	2	2
Trenching	4	0	3	7
Confined Spaces	144	6	30	180
Other LEPs (Construction & Non-Construction)	150	10	38	198
Emphasis Safety & Health Hazards by Visit	201	20	57	278
Lead	0	0	0	0
Crystalline Silica	0	1	0	1
Combustible Dust	0	0	0	0
Hexavalent Chrome	0	1	0	1
Isocyanates	0	0	0	0
Manufacturing Amputations	3	2	3	8
Trenching	2	0	0	2
Confined Spaces	146	6	30	182
Other LEPs (Construction & Non-Construction)	50	10	24	84
Total SHARP Sites				0
New				0
Current				0
Renewal				0
Total Pre-SHARP Sites				0
New				0
Current				0
Total Interventions (Form 66)				110
Activities Related to Agency Measures				
a. Fatalities in construction related to falls, electrocutions, caught in or between, struck by.	18			18
b. Fatalities in non-construction related to falls, electrocution, caught in between and struck by.	1	3	5	9

c.Number of hazards abated associated with hearing loss in construction and general industry.	0	0	14	14
d.Number of hazards abated associated with illness in general industry and construction.	32	61	147	240
e.Number of hazards abated associated with workplace amputations.	11	6	51	68
f.Number of employees removed from hazards by participation in the Consultation Program.	2,564	3,320	7,905	13,789

Compliance Report to Commission

SAMM #	Measure	RIDS Selected	All State Plan RIDS	All Federal RIDS	National
1A	Time to Initiate Complaint Inspections - STATE formula (Average Number of Work Days to Initiate Complaint Inspections)	46	17245	8857	26,102
		5.75	6.61	4.04	5.43
		8	2609	2194	4,803
1B	Time to Initiate Complaint Inspections - FEDERAL formula (Average Number of Work Days to Initiate Complaint Inspections)	22	11,368	5,731	17,099
		2.75	4.36	2.61	3.56
		8	2,609	2,194	4,803
2A	Time to Initiate Complaint Investigations - STATE formula (Average Number of Work Days to Initiate Complaint Investigations)	100	26407	5300	31,707
		5.56	6.76	0.82	3.06
		18	3904	6451	10,355
2B	Time to Initiate Complaint Investigations - FEDERAL formula (Average Number of Work Days to Initiate Complaint Investigations)	59	11,908	1,726	13,634
		3.28	3.05	0.27	1.32
		18	3,904	6,451	10,355
3	Timely Response to Imminent Danger Complaints and Referrals (Percent of Complaints and Referrals of Imminent Danger Responded to within 1 Day)	0	157	179	336
		0.00%	98.74%	91.79%	94.92%
		0	159	195	354
4	Number of Denials where entry not obtained	0	0	5	5
		71	11958	12935	24,893
		2.29	1.68	2.00	1.834008694
5	Average Number of Violations per Inspection with Violations by Violation Type	31	7111	6462	13,573
		25	10422	2351	12,773
		0.81	1.47	0.36	0.941059456
6	Percent of Total Inspections in Public Sector	31	7111	6462	13,573
		21	1,477	11	1,488
		14.89%	13.47%	0.15%	8.09%
7	Inspections	141	10,966	7,438	18,404
		108	8,317	6,012	14,329
		33	2,649	1,426	4,075
	Total (1 to greater than 250 Employees)	\$106,895.00	\$17,907,250.52	\$32,530,066.86	\$50,437,317.38
		\$1,943.55	\$2,105.50	\$2,955.13	\$2,584.81
		55	8,505	11,008	19,513
		\$69,245.00	\$6,730,917.35	\$13,986,043.61	\$20,726,960.96

Compliance Report to Commission

8	Average Current Penalty per Serious Violation (Private Sector)	a. 1-25 Employees	\$1,648.69	\$1,370.86	\$2,085.54	\$1,783.58
			42	4,910	6,711	11,621
		b. 26-100 Employees	\$25,650.00	\$4,158,575.67	\$7,010,038.15	\$11,168,613.82
			\$2,331.82	\$2,238.20	\$3,378.33	\$2,839.72
	c. 101-250 Employees		11	1,858	2,075	3,933
			\$0.00	\$2,422,374.50	\$3,309,173.04	\$5,731,547.54
			\$0.00	\$3,578.10	\$4,435.89	\$4,027.79
			0	677	746	1,423
	d. Greater than 250 Employees		\$12,000.00	\$4,595,383.00	\$8,214,812.06	\$12,810,195.06
			\$6,000.00	\$4,335.27	\$5,555.59	\$5,051.34
			2	1,060	1,476	2,536
			24	2,033	1,103	3,136
9	Percent In Compliance	Safety	34.78%	32.01%	25.02%	29.15%
		Health	69	6,351	4,408	10,759
			4	801	366	1,167
			19.05%	41.03%	39.91%	40.68%
10	Percent of Work Related Fatalities Responded to in 1 Work Day		21	1,952	917	2,869
			4	136	216	352
			100.00%	92.52%	97.30%	95.39%
			4	147	222	369
11	Average Lapse Time	Safety	1,504	253,051	236,277	489,328
		Health	51.86	45.17	43.47	44.33523602
			29	5,602	5,435	11,037
			168	81,588	68,717	150,305
12	Penalty Retention Percent Penalty Retained		56.00	52.10	60.65	55.68914413
			3	1,566	1,133	2,699
			\$136,779.00	\$18,175,594.02	\$35,717,543.24	\$53,893,137.26
			71.62%	81.39%	66.49%	70.86%
13	Percent of Initial Inspections with Employee Walk around Representation or Employee Interview		\$190,977.00	\$22,332,701.00	\$53,722,144.01	\$76,054,845.01
			141	10,825	7,249	18,074
			100.00%	98.71%	97.46%	98.21%
			141	10,966	7,438	18,404