

Respirator Protection - Do You Have A Plan?

The Respiratory Protection Program, in accordance with the requirements of OSHA 29 CFR 1910.134 (8 CCR §5144), lays out standard operating procedures to ensure the protection of all employees from respiratory hazards through proper selection and use of respirators. Respirators are to be used only where engineering control of respirator hazards is not feasible, while engineering controls are being installed, or in emergencies.

Applicability: A written respiratory protection program with worksite-specific procedures is required in any workplace where respirators are necessary to protect the health of the employee or whenever respirators are *required* by the employer.

An effective respirator program should include the following:

1. Procedures for selecting respirators for use in the workplace;
2. Medical evaluations of employees required to use respirators;
3. Fit testing procedures for tight-fitting respirators;
4. Procedures for proper use of respirators in routine and reasonably foreseeable emergency situations;
5. Procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators;
6. Procedures to ensure adequate air quality, quantity, and flow of breathing air for atmosphere-supplying respirators;
7. Training of employees in the respiratory hazards to which they are potentially exposed during routine and emergency situation;
8. Training of employees in the proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance; and
9. Procedures for regularly evaluating the effectiveness of the program.

What is a respirator?

A respirator is a protective device that covers the nose and mouth or the entire face or head to guard the wearer against hazardous atmospheres. Respirators may be:

1. Tight-fitting - half masks, which cover the mouth and nose, or full facepieces that cover the face from the hairline to below the chin; or
2. Loose-fitting, such as hoods or helmets that cover the head completely.



Figure 1



Figure 2

In addition, there are two major classes of respirators: air-purifying and atmosphere-supplying. **Air-purifying respirators** use filters or sorbents to remove harmful substances from the air. They range from simple disposable masks to sophisticated, powered air-purifying respirators. Air-purifying respirators do not supply oxygen and may not be used in oxygen-deficient atmospheres or in ones that are immediately dangerous to life or health (IDLH). Air-purifying respirators are further categorized by the following:

1. Particulate Respirators which capture particles in the air but do not protect against gases or vapors;
2. Combination Respirators are normally used in atmospheres that contain hazards of both particulates and gases; and
3. Gas & Vapor Respirators (See Figure 1) use chemical filters (called cartridges or canisters) to remove dangerous gases or vapors in the air.

Atmosphere-supplying respirators are designed to provide breathable air from a clean air source other than the surrounding contaminated work atmosphere. They range from supplied-air respirators and self-contained breathing apparatus (SCBAs), to complete air-supplied suits. Atmosphere-supplying respirators can be classified as:

1. Air-Supplied Respirators that are normally used when there are extended work periods required in atmospheres that *are not* immediately dangerous to life and health (IDLH). These respirators make use of a hose to deliver clean, safe air from a stationary source of compressed air;
2. Combination Respirators are normally used when there are extended work periods required in atmospheres that *are or may be* immediately dangerous to life and health (IDLH). The combination respirators have an auxiliary self-contained air supply that can be used if the primary supply fails; and
3. Self Contained Breathing Apparatus (SCBA) (See Figure 2) that are normally used when there is a short-time need to enter and escape from atmospheres which *are or may be* immediately dangerous to life and health (IDLH).

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RISK GROUP UPDATE

PSM/RMP COMPLIANCE SAFETY AUDIT REQUIREMENTS

PURPOSE

The following regulations require a facility to conduct a compliance audit every three years:

- State and Federal OSHA Process Safety Management regulations; and
- EPA Risk Management Program (40 CFR Part 68).

The intent of this audit is to self-evaluate the effectiveness of the risk management and safety programs by identifying deficiencies and ensuring corrective actions. Many facilities completed their risk management and safety programs for compliance with the EPA June 21, 1999 deadline; therefore, they completed compliance audits prior to June 2002 and now it is time to think about the next compliance audit to ensure that these programs are being implemented as documented.

OVERVIEW

A compliance safety audit should ensure that effective risk management systems are in place and working. For example, the audit can verify that the training program is complete and that employees are being trained. The audit, through its systematic analysis of compliance with the standard, can identify problems and assist a facility in directing attention to weaknesses in its risk management and safety programs.

An audit has two parts. First, the auditor(s) must understand the risk management system in place, including the two regulations mentioned above (PSM and RMP), to address each provision of the standard and determine the adequacy of the facility's risk management system, as it is intended to function. The auditor(s) must also be able to verify that each section is actually implemented. This requires that the facility maintain meticulous records of all risk management activity.

An audit requires an objective examination of risk management systems. To achieve this, an audit should be a distinct activity conducted by a designated team or individual.

PROCEDURES

Below is a list of Audit Requirements:

- A Compliance Safety Audit must be completed at least every three years.
- The Compliance Safety Audit must include verification that the procedures and practices that have been developed to comply with the risk management regulations are adequate and are being followed.
- The Compliance Safety Audit shall be conducted by at least one person knowledgeable in the processes.

Below is a list of Documentation Requirements:

- The Compliance Safety Audit must be certified.
- A written report of the findings of the audit shall be developed.
- The employer shall promptly determine and document an appropriate response to each of the findings of the Compliance Safety Audit.
- The facility shall document that deficiencies have been corrected.
- The two most recent Compliance Safety Audit reports shall be retained by the employer.

The Compliance Safety Audits shall be made available to employees and their designated representatives.

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Do you have questions about an article appearing in Tracer ES&Times? Call us

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FORMS

Both OSHA and EPA have made available detailed forms that facilities can use to conduct the audit.

DOCUMENT MANAGEMENT

A Compliance Safety Audit Report of Findings should be developed from the information gathered during the Compliance Safety Audit. This information should be reviewed and updated to ensure that an appropriate response is documented for each finding, and that each deficiency is corrected. When all items have been appropriately addressed, the Compliance Safety Audit Report of Findings is retained with the Compliance Safety Audit.

If there is a disagreement with an audit finding, the problem will be resolved by the next level of management. In addition, if an audit finding has been reported and management feels no action is necessary, this decision and its basis should be documented in the Compliance Safety Audit report.



CALARP PROGRAM - ONLY FACILITIES

Don't forget, if you are a "State Only" facility, there is also a compliance element to the CalARP Program Level 2. This requirement is identical to the OSHA and EPA requirements listed above, except that the forms require less detail.

If you have further questions, contact Lee Pyle or Jake Tilley as Tracer ES&T has conducted many PSM / RMP compliance audits. ✓

Dear Tracer ES&T:

My facility stores up to 2,000 gallons of diesel fuel on-site. Since we are just a small facility, is there any way to be excluded from some or all of the requirements for a Spill Prevention, Control, and Countermeasure Plan (SPCC) Plan?

~Thanks, Too Much Oil

Dear Too Much Oil,

At this time, your facility must comply with all of the SPCC requirements as defined in the Code of Federal Regulations, Title 40, Part 112 (40 CFR 112). However, the United States Environmental Protection Agency (EPA) is currently reviewing options to streamline the SPCC compliance requirements for smaller facilities. One possibility is that a tiered approach may be implemented that would:

- a) eliminate the need for a written SPCC plan for facilities storing less than 5,000 gallons of oil; and
- b) eliminate the need for a registered Professional Engineer to certify the SPCC plan for facilities storing between 5,000 and 10,000 gallons of oil.

The EPA is collecting public comments until November 19, 2004 so any changes to the regulation will not occur until 2005 at the earliest. For more information, please visit <http://www.epa.gov/oilspill/>. ✓

(Respirator Protection, Continued from page 1)

Are emergency escape respirators applicable to the program?

An escape-only respirator, according to OSHA 29 CFR 1910.134 (8 CCR §5144), is defined as any respirator intended to be used only for emergency exit. Therefore, the escape respirators must comply with the respiratory protection standard.

In a March 8, 1999 OSHA letter of interpretation (<http://www.osha.gov>), OSHA further clarifies the program requirements for “escape-only respirators”:

“OSHA's current policy states that the employer does not have to provide a medical evaluation for employees whose only respirator use would be the use of escape-only respirators. The ELSA [Emergency Life Support Apparatus] is a NIOSH-approved escape-only respirator which provides less than 30 minutes of breathing air. Please note that the employer would still be responsible for compliance with all other provisions of the respirator standard, as applicable, such as the written program and training requirements.”

Recent Update – Qualitative Fit Test Protocol

OSHA has recently updated Appendix A of the Respiratory Protection Program standard (29 CFR 1910.134) to include a new Qualitative Fit Test Procedure called “Controlled Negative Pressure REDON” protocol. This new protocol requires three different test exercises – normal breathing, bending over, and head shaking, along with two respirator re-donnings to check for leakage.

Any facilities with respirators on-site are required to have a Respiratory Protection Program in place. Photos credits: <http://www.ehso.com/RespProtectionTypesAir.htm> and <http://www.ehso.com/RespProtectionTypesSupl.htm>. Please contact Jeanna Emmons at Tracer ES&T (760-744-9611 ext. 112) for further information. ✓

News Flash - New Team Members

Ms. Anna Levy is a staff engineer at Tracer ES&T. Her main area of concentration is risk analysis. She has a B.S. in Chemical Engineering from the University of California, San Diego. Prior to joining Tracer ES&T, Ms. Levy worked as a Fire Protection Consultant, responsible for the maintenance and operation of a hazardous materials database, and preparation of Fire Protection and Life Safety reports for clients in various industries. Ms. Levy was also responsible for hazardous materials inventory submittals for Lowe’s Home Improvement Warehouse new store openings. Ms. Levy also worked on the supercritical water oxidation (SCWO) program at General Atomics, as a Site Operations Engineer.

Mr. John Fox is an Environmental Specialist at Tracer ES&T. His main area of concentration is environmental compliance. Mr. Fox is currently the lead scientist for Tracer ES&T’s Coast Live Oak and Black-Flowered Figwort restoration project for Plains Exploration and Production Company in Santa Barbara County. He also has participated in the preparation of Hazardous Materials Business Plans, Spill Prevention, Control, and Countermeasure Plans, and Environmental Site Assessments for real property transactions. Mr. Fox joined the Tracer team shortly after earning his B.S. in Ecology & Evolution and Environmental Studies from the University of California, Santa Barbara. During his college career, he completed a dune restoration internship and assisted in the rehabilitation of endangered species. ✓



Our Tracer ES&T Booth at the 2004 RETA National Convention in Reno, NV last month. Pictured here top row left to right are: Desmond O’Sullivan, Bob DeVillez, Graham Cadena, Jake Tilley, and Brandon Olson. Bottom row left to right are: Jeanna Emmons, Lee Pyle, and Anna Levy.

Recent Changes in Southern California Air Quality Rules

Air quality in California is regulated by the California Air Resources Board at the state level and by 35 air districts at the local level. The following summarizes the Southern California air quality rules that changed in 2004. Tracer ES&T offers a comprehensive set of permitting services including New Source Review, RECLAIM, Title V, and air toxic risk assessments. If you need assistance with air quality permits, please contact Mr. Greg Hauser at (760) 744-9611 x106.

Antelope Valley Air Quality Management District (AVAQMD)

- Rule 1125 - Metal Container, Closure, and Coil Coating Operations (*Rescinded 2/17/2004*)
- Rule 1126 - Magnet Wire Coating Operations (*Rescinded 2/17/2004*)
- Rule 1141 - Control Of Volatile Organic Compound Emissions From Resin Manufacturing (*Rescinded 3/16/04*)
- Rule 1141.2 - Surfactant Manufacturing (*Rescinded 3/16/04*)

Imperial County Air Pollution Control District (ICAPCD)

- Rule 403 - General Limitations on the Discharge of Air Contaminants (*Amended 5/18/04*)
- Rule 405 - Sulfur Compounds Emissions Standards, Limitations, and Prohibitions (*Amended 5/18/04*)
- Rule 414 - Storage of Reactive Organic Compound Liquids (*Amended 5/18/04*)
- Rule 415 - Transfer and Storage of Gasoline (*Amended 5/18/04*)
- Rule 425 - Aerospace Coating Operations (*Amended 5/18/04*)

Kern County Air Pollution Control District (KCAPCD)

- Rule 201.1 - Permits to Operate for Sources Subject to Title V of the Federal Clean Air Act Amendments of 1990 (*Amended 3/11/04*)
- Rule 202 - Permit Exemptions (*Amended 1/8/04*)
- Rule 416.1 - Wood-Burning Heaters and Wood-Burning Fireplaces (*Adopted 7/4/04*)

Mojave Desert Air Quality Management District (MDAQMD)

- Rule 301 - Permit Fees (*Amended 8/23/04*)

San Diego County Air Pollution Control District (SDAPCD)

- Rule 40 - Permit and Other Fees (*Amended 6/23/04*)
- Regulation XIV - Title V Operating Permits (Amendments of 8/13/03 became effective 2/27/04)

San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD)

- Rule 3190 - Conservation Management Practices Plan Fee (*Adopted 5/20/04 and Re-Adopted 8/19/04*)
- Rule 4002 - National Emission Standards for Hazardous Air Pollutants (*Amended 5/20/04*)
- Rule 4103 - Open Burnings (*Amended 9/16/04*)
- Rule 4550 - Conservation Management Practices (*Adopted 5/20/04 and Re-Adopted 8/19/04*)
- Rule 4604 - Can and Coil Coating Operations (*Amended 1/15/04*)
- Rule 8011 - Administrative Requirements (*Amended 8/19/04*)
- Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earth Moving Activities (*Amended 8/19/04*)
- Rule 8031 - Bulk Materials (*Amended 8/19/04*)
- Rule 8041 - Carry Out and Trackout (*Amended 8/19/04*)
- Rule 8051 - Open Areas (*Amended 8/19/04*)
- Rule 8061 - Paved and Unpaved Roads (*Amended 8/19/04*)
- Rule 8071 - Unpaved Vehicle/Equipment Traffic Areas (*Amended 9/16/04*)
- Rule 8081 - Agricultural Sources (*Amended 9/16/04*)

San Luis Obispo County Air Pollution Control District (SLOAPCD)

- Rule 302 - Schedule of Fees (*Amended 9/22/04*)
- Rule 501 - General Burning Provisions (*Amended 3/24/04*)

(Recent Changes in Southern California Air Quality Rules, Continued on page 6)

(Recent Changes in Southern California Air Quality Rules, Continued from page 5)

Santa Barbara County Air Pollution Control District (SBCAPCD)

- No changes

South Coast Air Quality Management District (SCAQMD)

- Rule 222 - Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II (*Amended 3/5/04*)
- Rule 301 - Permitting and Associated Fees (*Amended 7/9/04*)
- Rule 303 - Hearing Board Fees (*Amended 7/9/04*)
- Rule 304 - Equipment, Materials, and Ambient Air Analyses (*Amended 7/9/04*)
- Rule 304.1 - Analyses Fees (*Amended 7/9/04*)
- Rule 306 - Plan Fees (*Amended 7/9/04*)
- Rule 307 - Fees for Air Toxics Emissions Inventory (*Amended 7/9/04*)
- Rule 307.1 - Alternative Fees for Air Toxics Emissions Inventory (*Amended 7/9/04*)
- Rule 308 - On-Road Motor Vehicle Mitigation Option Fees (*Amended 7/9/04*)
- Rule 309 - Fees for Regulation XVI (*Amended 7/9/04*)
- Rule 311 - Air Quality Investment Program (AQIP) Fees (*Amended 7/9/04*)
- Rule 403 - Fugitive Dust (*Amended 4/2/04*)
- Rule 403.1 - Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources (*Amended 4/2/04*)
- Rule 461 - Gasoline Dispensing and Transfer (*Amended 1/9/04*)
- Regulation IX - Standards of Performance for New Stationary Sources (*Amended 5/7/04*)
- Regulation X - National Emission Standards for Hazardous Air Pollutants (*Amended 5/7/04*)
- Rule 1113 - Architectural Coatings (*Amended 7/9/04*)
- Rule 1121 - Control of Nitrogen Oxides from Residential Type, Natural Gas-Fired Heaters (*Amended 9/3/04*)
- Rule 1122 - Solvent Degreasers (*Amended 10/1/04*)
- Rule 1127 - Emission Reductions from Livestock Waste (*Adopted 8/6/04*)
- Rule 1132 - Further Control of VOC Emissions from High Emitting Spray Booth Facilities (*Amended 3/5/04 and 5/7/04*)
- Rule 1148.1 - Oil and Gas Production Wells (*Adopted 3/5/04*)
- Rule 1162 - Polyester Resin Operations (*Amended 7/9/04*)
- Rule 1186 - PM₁₀ Emissions from Paved and Unpaved Roads, and Livestock Operations (*Amended 4/2/04*)
- Rule 1186.1 - Less Polluting Sweepers (*Amended 6/4/04*)
- Rule 1196 - Clean On-Road Heavy-Duty Public Fleet Vehicles (*Amended 6/4/04*)
- Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Compression Ignition Engines (*Adopted 4/2/04*)
- Rule 2007 - Trading Requirements (*Amended 9/3/04*)
- Rule 2015 - Backstop Provisions (*Amended 6/4/04*)
- Rule 2202 - On-Road Motor Vehicle Mitigation Options (*Amended 2/6/04*)

Ventura County Air Pollution Control District (VCAPCD)

- Rule 2 - Definitions (*Amended 4/13/04*)
- Rule 5 - Effective Date (*Amended 4/13/04*)
- Rule 10 - Permits Required (*Amended 4/13/04*)
- Rule 23 - Exemptions from Permits (*Amended 10/12/04*)
- Rule 30 - Permit Renewal (*Amended 4/13/04*)
- Rule 42 - Permit Fees (*Amended 4/13/04*)
- Rule 46 - Air Toxics "Hot Spots" Program Fees (*Amended 4/13/04*)
- Rule 50 - Opacity (*Amended 4/13/04*)
- Rule 51 - Nuisance (*Amended 4/13/04*)
- Rule 52 - Particulate Matter - Concentration (Grain Loading) (*Amended 4/13/04*)
- Rule 68 - Carbon Monoxide (*Amended 4/13/04*)
- Rule 74.25 - Restaurant Cooking Operations (*Adopted 10/12/04*)
- Rule 102 - Source Tests (*Amended 4/13/04*) √

MULTI-HAZARD MITIGATION PLAN

What is a Multi-Hazard Mitigation Plan?

The Disaster Mitigation Act of 2000 included provisions for the availability of hazard mitigation funding for state, local, and tribal governments. A Multi-Hazard Mitigation Plan (MHMP) is required for all jurisdictions wishing to apply for federal mitigation plan funding. Jurisdictions can use the allocated funding for 'FEMA approved' projects developed in the plan (see below) in an effort to reduce the jurisdiction's vulnerability to potential disasters. Currently, eligibility for disaster restoration funding is not contingent upon completion of an approved MHMP.

Who is eligible to participate in the Hazard Mitigation Grant Program?

The list of eligible participants in the Hazard Mitigation Grant Program includes, but is not limited to, the following special districts or governmental jurisdictions:

- Cities and Counties
- School, police, and fire districts
- Municipal water districts
- Hospitals

What is the deadline for submittal of plans?

Initial Hazard Mitigation Grant Program guidelines required state, local, and tribal governments to have a FEMA approved plan in place by November 2003. This deadline was extended to November 2004, and recently has been extended to May 1st, 2005. Local jurisdictions may choose to submit their plan to FEMA as an annex to an approved state or county's plan. As a result, jurisdictions can prepare and submit a plan at anytime through their state Office of Emergency Services (OES), provided the state OES has submitted their plan to FEMA before the above deadline.

Although a local jurisdiction can submit a plan at anytime to their state OES, deadline for availability of funds will be set on a disaster-by-disaster basis. In other words, following the declaration of a presidential disaster (e.g., Californian wild-

fires, Florida hurricanes, etc.), the state OES will set a deadline for approval of Multi-Hazard Mitigation Plans from jurisdictions who wish to become eligible for receipt of funding from that disaster. The regulations do not state that a plan has to be approved by the date on which a disaster is declared, but a jurisdiction which does not have a FEMA approved plan by the state deadline will not be able to receive HMGP funding until after the next disaster declaration.

What constitutes an 'approved' plan?

The Hazard Mitigation Plan process begins with a determination of the natural hazards that could reasonably affect the facility. The next step is to determine the possible impact of each potential disaster identified, which includes a combination of determining the extent of each hazard in addition to determining which assets are potentially affected.

The estimation of losses resulting from each potential hazard requires assessing the financial ramifications associated with the damage, replacement, and displacement costs of assets highlighted through the evaluation of the impact of each disaster. The estimation of loss for each potential hazard established gives a factual basis for developing a mitigation strategy.

A mitigation plan must be developed to document the results of the above risk assessment process and outline the jurisdiction's intended course of action to address its findings. The development of a plan will begin by proposing potential mitigation actions to address the findings of the risk assessment. Alternate mitigation actions must be developed and considered for an approved mitigation plan.

Public participation is required for an approved MHMP. The regulation requires making the plan available for public comment during the drafting phase (risk assessment) and prior to plan approval. Following

completion of the risk assessment, and prior to developing the mitigation plan, the public must be notified of the initial results. This can be achieved by presenting the results at a public/board meeting, through media outlets, or similar forms of communication. Following completion of the draft plan, the public should again be solicited for comment prior to submitting the plan for state and federal approval.

Following completion of the plan, it must first be reviewed by the state OES and then, following state approval, forwarded to FEMA for their review. A jurisdiction is not eligible for Hazard Mitigation Grant funding until their plan receives approval from FEMA. State and federal review officers utilize a 'crosswalk', the minimum standards of which must be met or exceeded in order to receive plan approval. The crosswalk is available to jurisdictions for use in preparation of their plan, which gives planning teams a means to ensure their mitigation strategy will be approved.

What are the benefits for completing a plan?

The primary benefit of committing the financial and personnel resources required to complete a MHMP will be the eligibility for funding to reduce the vulnerability and improve the safety of a jurisdiction's assets. However, should a jurisdiction find that following the completion of the MHMP process no mitigation projects exist, facility management, employees, and the surrounding communities will have the benefit of knowing that, as can be reasonably anticipated, facility assets are protected from the possible effects of potential natural disasters.

Where can I find more information on completing a plan?

Further information on FEMA's Hazard Mitigation Grant Program can be obtained by visiting <http://www.fema.gov/fima/planning10.shtm>, www.oes.ca.gov (select 'Hazard Mitigation'), or by contacting Jake Tilley, Jeanna Emmons,

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*Happy
Thanksgiving
from
all of us at
Tracer ES&T!!!*



Tracer ES&T Anniversaries

Some of the Tracer ES&T staff have been together through several name changes: Tracer Technologies, Team Environmental Services, and now, Tracer ES&T. Our staff is the foundation for this company and we appreciate their effort and dedication.

14 Years	Greg Hauser	(11/19/90)
12 Years	Jennie Koo	(11/2/92)
3 Years	Desmond O'Sullivan	(9/24/01)
New-Hire	Anna Levy	(9/20/04)
New-Hire	John Fox	(9/20/04)