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Ladders stacked at Tomco Electric in Bend.

On the cover: Mike Shugert installs electrical wiring at a Bend jobsite.

# RESOURCE

#### **Oregon Health and Safety Resource**

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# Taking jobsite safety and health seriously

By Michael Wood



I don't often focus this column explicitly on enforcement issues, but I'd like to touch on the issue of an employer's control over the worksite and the people working there.

Every so often, I get some version of the following question: "What do I need to do to make sure that my records and policies are good enough to keep OSHA from citing me?"

My answer is usually that if you ask the wrong question, you'll get the wrong answer. The best way to "OSHA proof" or "Oregon OSHA proof" your workplace really is to do your best to eliminate hazards and ensure that your workplace and the people in it comply with the applicable rules. When you ask what documentation is needed to avoid a citation if there is a problem in the workplace, you are – frankly – anticipating failure, not success.

The notion behind the "unpreventable employee misconduct" defense is that an employer cannot and should not be responsible for the actions of an individual employee whose conduct in violation of the employer's expectations could not be anticipated and addressed. It's the last part that is the difference between "unpreventable employee misconduct" and the garden-variety type of misconduct.

If you have a rule on the books that you know is routinely violated, you can anticipate that it will be much more difficult to beat a citation – especially if the only time you take corrective or disciplinary action is when Oregon OSHA finds a problem. We simply don't find "But I've disciplined my employees every time you've cited me" to be a very compelling argument (and you'd be surprised how often we hear it, in one form or another). Given how much more frequently you're on your jobsite than we are ever likely to be, it's just difficult for us to believe that the only time problems occur is when we happen to be watching.

It's this issue that causes the "unpreventable employee misconduct" defense to stumble. It's not so much that employers don't have the

right work rules in place (although a rule that simply says "follow all the applicable safety and health rules" won't get you there); more often, it's that there is little to no effort by the employer and supervisors to determine whether the rules are being followed – and to address the problems that they do discover.

The reality we're looking for is often found in the unwritten rules. I've used this illustration before, but it still makes the point as clearly as any I've found. Over the years, I've had quite a few private and public consultants in two states tell me some version of the following: "I was walking around the jobsite with the owner, and we came around a corner and there was one of his employees, working without the proper PPE. When I pointed it out to him, he said, 'I know. He's a problem. I tell him and tell him, but he just won't wear the safety gear. But what can I do? He's one of my best employees.""

One key to making safety a reality on the worksite, of course, is to create an environment where employees who routinely ignore your instructions and engage in blatant insubordination understand that they are not your "best" employees. And creating that environment means the employer has to understand it first.

If you want to beat a citation using the employee misconduct defense, start by making sure that your employees know the rules. Make sure that they have everything they need (including time) to follow those rules. And then make sure that they understand that you'll be checking, and that you expect them to take those rules very seriously, and that there will be consequences if they don't. If you can manage that, you'll have the defense if you need it. But you probably won't because any violations will truly be isolated and unpredictable events.



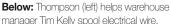


# Managing small business safety - Continued





Left: Shugert (left) talks with Tomco owner Colby Thompson. Middle: Thompson looks over rough-in work on a service box. Right: Thompson in the maintenance yard with Kelly.





"My approach was give me a checklist, let me do these things, and we'll be ready," he said. "It took me six months to get that it's a cultural shift and doesn't happen that easily."

Thompson has been working for about a year and a half with his team to earn the SHARP designation – an Oregon OSHA program that encourages employers to work with their employees to find and correct hazards, implement effective programs, and continuously improve to become self-sufficient.

Currently, about 75 employer locations in Oregon participate in SHARP, in addition to more than 90 facilities that have graduated from the program.

"Before this process, they didn't really have a solid system for managing safety," said Kevin Kilroy, an Oregon OSHA safety consultant. "Depending on where you're at with your safety and health program, you may have to change some ways you do business. We need to see these changes in action. You have to make your program part of the way you do business."

Thompson said he now understands that SHARP required more than a checklist. It started with a top-down approach.

"I took that to heart. I made it a goal to spend one day in the field with my crew



For instance, during a recent fairgrounds project, a number of vendors were packing up to leave an enclosed exhibition space. At the same time, Tomco employees were using a manlift.

"No one thought about carbon monoxide," said Thompson. "It troubled me that there was that much activity and no one thought about it. I went out and bought a carbon monoxide detector and put it in the basket."

Thompson said there's no question the organization is changing its focus around safety. His electricians are coming to safety committee meetings with solutions, not just questions.





**Left:** Shugert completes wiring at a car dealership site in Bend. **Right:** Kelly manages the warehouse at Tomco, reminding crews to check equipment.

"There is a lot more planning, thought, and being aware," Thompson said. "We offered an arc flash training to our staff and they were hungry to learn about that particular subject. Immediately, they started to talk to us about buying the right equipment. We're seeing employees follow through."

Frequent meetings, open communication, and enthusiasm from management about SHARP have all helped to energize employees.

"When I sat down with Kevin, I said, 'A couple months and we'll be there,'" Thompson said. "He said, 'Maybe, it's possible.' Here we are a year and a half later. What I've learned is that it's constant evolvement. You are constantly working on it."

"Don't get hung up on how long the process may take because ultimately, it's the journey," said Kilroy. "Tomco is way better off today than they were before, and they aren't SHARP yet. SHARP is about the journey, not the end. That's where the improvement takes place."

Kilroy said many of the companies he helps want to work with general contractors who expect a solid safety record. That commitment goes beyond earning recognition – it's a new way of doing business that Thompson has embraced.

"It is our future and it will pay off for us," he said.

## Things to consider if you are a company interested in achieving SHARP:

- **1.** Understand that a SHARP employer views compliance with the OSHA standards as the foundation upon which work is done.
- **2.** The time commitment may be months to over a year, depending on the maturity of a company's safety program.
- **3.** Realize the process must start top down, with management buy-in a key component.
- **4.** Understand that employees must have meaningful and active involvement in the day-to-day operations of safety and health programs.
- **5.** SHARP employers become an example and resource for other companies looking for best practices. Do not be surprised if other companies ask for information on how a high level of safety and health was achieved.

More information about SHARP and how to get involved can be found on Oregon OSHA's website:

#### www.orosha.org/subjects/sharp.html

Companies who participate in SHARP or are considering getting involved in the program can also contact members of the SHARP Alliance. The nonprofit organization is made up of representatives from companies who promote safety and health management and cooperation among companies and government:

www.sharpalliance.org.

# Small business and obstacles to workplace safety

By Ellis Brasch



Among the advantages of owning and running a small business – let's say one that employs 14.6 people, the statistical average for an Oregon firm – is the owner's relative freedom to decide how the business will prosper.

What role should workplace safety play in the owner's decisions? In a perfect world, the business owner would assess the

hazards at the workplace then develop policies and procedures to prevent the hazards. Business owners in high-hazard industries – such as construction – would emphasize workplace safety more than a small business designing website applications.

Small business owners in high-hazard industries should emphasize workplace safety in their business decisions and many do. But that's not always the case. Why? Attitudes of employers (and employees) about safety are an important reason. Often, such attitudes are shaped by beliefs that may seem reasonable at first, but don't always hold up under scrutiny – and those attitudes can become obstacles to safer workplaces. How do we know when attitudes become obstacles to safety? Sometimes it's just a matter of listening to what people say. Obstacles to workplace safety are often expressed in offhand comments such as the following:

# "Being safe on the job is just a matter of applying common sense ..."

and employee participation.

The inference is that common sense is a kind of acquired knowledge and that workers who use common sense on the job will not get in harm's way. The problem is that common sense has about as much substance as hot air in a balloon. The phrase has a sort of glib sensibility about it and it rolls off the tongue nicely, but applying common sense will not make workplaces safe. What will make a workplace safe is an **effective safety and health program**. All effective safety and health programs include management leadership, hazard identification and control, training,

# "It's too expensive — It takes too long to install ..."

Time and money are precious resources, especially for small-business owners who must manage all aspects of their business. But narrow profit margins and scarce resources are also reasons cited by some small-business owners for cutting corners when it comes to safety. It's not that these employers aren't concerned about safety; rather, they underestimate the costs of failing to invest in safety.

Preventing injuries begins to make sense when one considers the cost of an average workers' compensation claim: \$23,000 for the private sector (in 2010). And employers who want to keep their workers' compensation costs down will need to be even more vigilant about loss control. That's because, under the new rating plan from the National Council on Compensation Insurance (NCCI), employers' primary losses – the most expensive costs in a claim – are doubling from the current cap of \$5,000 to \$10,000 in 2013, and going up to \$15,000 by 2015.

# "It takes a full-time safety person to find and understand the rules ..."

For some small-business owners, the path to compliance is a journey into uncharted territory prefaced by a signpost that reads, "Here be dragons." Finding safety and health information on the Web isn't difficult, but finding safety requirements that apply

to *your* workplace is still challenging. And then, there's the task of understanding the requirements and keeping current on new rules.

But these aren't reasons to give up. Employers who don't have the resources to employ a full-time safety professional do have the option of borrowing one. A consultant from their workers' compensation insurance carrier can evaluate their workplace for hazards and help them comply with the relevant safety and health rules. Oregon OSHA also has consultants who can help. There's no charge for the services but the employer must request them.

# "Taking risks is part of the job — Don't rock the boat ..."

Employees who take risks at the expense of safety aren't likely to be disciplined by an employer who thinks that taking risks is part of the job. When employers don't require their employees to follow job-related safety procedures, their employees will continue business as usual. Fear also becomes a barrier to safety when employees avoid reporting about real workplace hazards because doing so might "upset the boss" and get them fired. Employers who aren't committed to maintaining a safe workplace should not be surprised that their employees aren't either.

On the other hand, when employees believe their employers are committed to safety and take the issue seriously, they will do so, too.

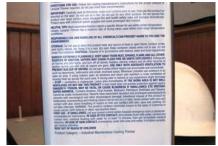


#### SAFFTY NOTES - Continued









**Left:** Scorching on the ceiling. **Left Center:** Scorching on the wall.

Right Center: A pictogram on the hot water heater explains the hazards.

Right: Warnings on the label of the can of lacquer thinner.

He poured little puddles of thinner around the floor from the onegallon container, leaving the bathroom door, and a window and door just outside of the restroom, open for ventilation. Then, he began spreading the thinner around on the floor with a broom.

Connected to the bathroom was a small room where the gaspowered water heater was located. When the vapors from the lacquer thinner reached the pilot light, there was an explosion.

The victim ran outside while he was still on fire. Workers at a car lot next door, who were outside washing cars, hosed him down. The local fire department responded, put out the fire in the bathroom, and transported the worker to the hospital. He was hospitalized with second-degree burns over 30 percent of his body.

#### **Conclusion**

- This accident could have been prevented if the employer had followed the basic elements of a hazard communication program.
- The signs on the water heater clearly warned against using flammable liquids in the area. The lacquer thinner container also clearly warned against using the thinner near any ignition source.

#### **Applicable standards**

Hazard communication, 1910.1200(H)(1) -

The employer did not provide employees with information and training on the hazardous chemicals in their work areas at the time of their initial assignment and whenever a new physical or health hazard was introduced into the work areas.

Flammable and combustible liquids, 1910.106(e)(2)(iv)(C) - Class I flammable liquids were used where there were open flames or other sources of ignition within the possible path of vapor travel.

# Oregon OSHA partners with Mexican Consulate during Labor Rights Week

Oregon OSHA representatives partnered with federal OSHA and the Mexican Consulate to help educate Spanish-speaking workers during Labor Rights Week, Aug. 26-31, 2012. Federal OSHA inspector Abby Burnett teamed up with Oregon OSHA's Alba Johnston for a training at the Portland Workers' Center, where laborers learned about heat stress, falls, and more.

"The workers did a very good job identifying hazards in the pictures we presented," said Johnston. "They were asking specific questions about the types of fall protection, the options they have when equipment is provided but is not in good condition, how

Oregon OSHA could help them to improve their work conditions, how to fill out a complaint, and if it would be confidential."

Oregon OSHA's Paulo Pinto and Tomás Schwabe helped with other events throughout the week focusing on topics such as accident prevention and construction hazards.

Left: Oregon OSHA's
Alba Johnston talks about
hazard recognition at the
Workers' Center.

**Right:** Spanish-speaking laborers learn about workplace hazards.







Above: Marissa Parr next to her father, displays her second Worker Memorial Scholarship. Top Right: Oregon OSHA Administrator Michael Wood presents the scholarship award to Parr.

# Students honored with Workers' Memorial Scholarships

Losing a parent or having a parent suffer a debilitating injury can significantly affect a student's ability to pursue dreams through higher education. Oregon OSHA is honoring seven Oregon students with Workers' Memorial Scholarship awards for the 2012-2013 academic year.

#### The recipients are:

#### Kelly Dewey, Hermiston

After graduating from Hermiston High School this year, Dewey is planning to attend Blue Mountain Community College and work toward a degree in elementary education. Her father was killed four years ago in an explosion while doing truck repair. Dewey received a \$750 award.

#### Diane Maldonado Dominguez, Wilsonville

A 2012 graduate of Wilsonville High School, Maldonado Dominguez is attending Portland State University, with aspirations to become a medical doctor and use her bilingual skills abroad. In 2006, her father lost both arms in an agriculture accident. Maldonado Dominguez received a \$1,000 award.

#### **Brittany Ford, Gresham**

Ford is a senior at Oregon State University studying to become a registered dietician and is an avid runner. A 2009 graduate of Gresham Barlow High School, Ford lost her father when a machine crushed him two weeks after her seventh birthday. This is Ford's fourth Workers' Memorial Scholarship. She received \$1,500.

#### **Steven Hanners, Brookings**

A recent graduate of Brookings-Harbor High School, Hanners hopes to become a pharmacist and attend Southwestern Oregon Community College this fall. Hanners' father, a volunteer firefighter with Coos Bay Fire, was killed in the line of duty in 2002. He received a \$750 award.



#### Marissa Parr, Jefferson

Parr hopes to earn a law degree and is currently studying anthropology and classics at Willamette University. Her father is wheelchair bound after an accident in 1991. This is Parr's second scholarship and she received a \$1,000 award.

#### Andrea Webb, Eugene

The working mother of a 3-year-old, Webb is attending the University of Oregon and wants to be a physician's assistant. Webb's father died shortly before her second birthday in a workplace accident. A second time award winner, Webb received a \$1.000 award.

#### Ashley Yackamouih, Riddle

Yackamouih is attending Oregon State University this fall after two years of education at Umpqua Community College. She is studying to become a physical therapist. In 2006, Yackamouih lost her father to a logging accident. She received a \$1,000 award.

Award recommendations are made by Oregon OSHA's Safe Employment Education and Training Advisory Committee, an advisory group with members from business, organized labor, and government. Oregon OSHA presents the awards annually to help in the postsecondary education of spouses or children of permanently and totally disabled or fatally injured workers. The 1991 Legislature established the Workers' Memorial Scholarship at the request of the Oregon AFL-CIO, with support from Associated Oregon Industries.

Applicants must be Oregon residents receiving fatality benefits, a dependent or spouse of a fatally injured worker, or the dependent or spouse of an Oregon worker who has incurred a permanent total disability and whose claim for workers' compensation benefits has been accepted.

Interest earned on a DCBS fund derived from Oregon OSHA civil fines and penalties funds the awards.

# VPP site Life Technologies named one of 'America's safest companies' by EHS Magazine



Left: Matt Johns and Jennifer Olson-Morzenti examine chemical properties and hazards of dyes developed at Life Technologies.

Environmental Health and Safety (EHS) Today magazine named Eugene's Life Technologies as one of eight companies to earn its "America's safest companies" designation. Life Technologies, the only Oregon site to receive the award, has been a participant in Oregon OSHA's Voluntary Protection Program (VPP) since July 2008. The company performs research and development and manufacturing of chemicals and biological reagents.

Life Technologies' Jennifer Olson-Morzenti was featured in the **June 2010 issue of Resource** and the company participates annually in Oregon OSHA's Safety Break for Oregon.

Janelle Halesworth, the company's EHS manager, attended the Chicago award ceremony in September.

"This recognition reflects a deeply ingrained safety culture throughout the company's operations," Halesworth said. "The strength and success of our environmental health and safety program lies within our robust culture of safety innovation and continuous improvement."

Sandy Smith, editor in chief of EHS Today Magazine said of the recipients, "They are transformational safety leaders. They might not call what they do transformational, but we do. They have no interest in being average or in having just compliance with federal regulations as a goal. They strive to be world-class."

# Redmond hosts Central Oregon safety conference

"Spotlight on change in safety and health" was the focus of the Central Oregon Occupational Safety and Health Conference, held Sept. 19-20 at the Eagle Crest Resort in Redmond.

Attendees honored Don Kraus, plant manager at Portland General Electric's Pelton Round Butte Project, with the 2012 Juniper Award. One of Kraus' noteworthy accomplishments included leading a



Oregon OSHA's Cory Stengel (left) presents Don Kraus with the 2012 Juniper Award.

partnership with the local fire department and other businesses to obtain a confined space trailer. The trailer houses equipment that is shared throughout the Madras community to ensure confined space entries are done as safely as possible.

Conference keynote speaker Jake French, the 26-year-old author of "Life Happens. Live It," suffered an accident three years ago that left him quadriplegic. French presented "Don't Wait Until You're Broken to Fix It," which encouraged attendees to shift their perspective and focus through communication and understanding.

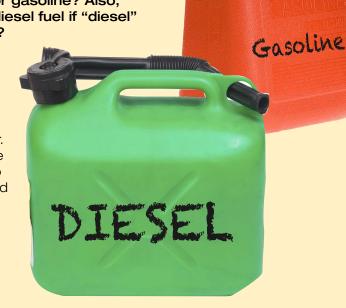
Other conference topics covered hazard identification, driving safety, and safety committee tips and tools. One attendee said, "Sessions took a positive and pro-active approach to safety and health challenges."



Do I need to put a label on a five-gallon container that is UL-listed, DOT-approved, and used for gasoline? Also, can the same container be used for diesel fuel if "diesel" is written on the can for identification?



Oregon OSHA's hazard communication standard (1910.1200) has a requirement that all containers of hazardous chemicals be properly labeled. To label your gasoline container, write "gasoline" on the container. If you use the container for diesel fuel, write "diesel" on the container. The purpose is to eliminate any confusion regarding what kind of chemical is in a container.





#### For more information and to register:

www.regonline.com/construction summit13

**Registration opens in November** 

**Tuesday, January 29, 2013** 

The Riverhouse Resort and Convention Center • Bend, Oregon



# GOING THE DISTANCE - Meet a leading Oregon health and safety professional



# What is your background and safety philosophy?

I began my career in 1986 working for an environmental consulting firm. I conducted groundwater and soil field studies at a wide variety of industrial sites and worked on two superfund sites. During this time I also did undergraduate work in geology and occupational safety and health. I was a regional safety coordinator for a large environmental consulting firm, overseeing safety for five field offices, from 1994 to 2002. In 2002, I accepted a position with a utility company in the upper Midwest as a safety professional for two coal-fired power plants. I have been in my current position with Covanta Marion as the environmental/ safety specialist since 2008. At Covanta, we convert waste into energy.

My safety philosophy is that every employee has the right to go home unhurt every day. As a safety professional my job is to ensure that every employee has the knowledge, skills, ability, and tools needed to do their job safely.

#### GOING THE DISTANCE - Continued



**Left:** Troy Maxfield goes through a checklist in the control room with Tanner.

**Middle:** Tanner talks with a crane operator and an electrician.

**Right:** Mike Keck, a maintenance mechanic, reviews a job safety analysis report with Tanner.

**Bottom right:** Lights in the control center.



You work for a company that has earned Voluntary Protection Program (VPP) recognition. Can you share some day-to-day examples of things you do to maintain the high standards of the program?

The management and hourly staff conduct plant walk downs several times a day to identify unsafe conditions, unsafe behaviors, safe behaviors, and areas for improvement. Employees are engaged one on one during this time to correct unsafe behaviors and we encourage safe ones. A job observation card or a work order to correct an unsafe condition may be generated. Safety work orders are given the highest priority to complete.

Each employee is encouraged to submit near-miss reports and/or safety suggestions. The employees know that every one of their reports will be reviewed with them and acted upon.

We conduct weekly tailgate safety meetings and monthly safety training meetings. Both hourly and salaried supervisors lead the tailgate meetings and, more often than not, monthly training is lead by an hourly employee who possesses specific program knowledge (e.g., an electrician will conduct electrical safety training).





#### GOING THE DISTANCE - Continued





**Left:** Garbage from the region is deposited and combusted to create energy.

**Right:** David Dunn (left), Mike Keck, and Tanner on the tipping floor. You are a designated "Special Government Employee" who assists with safety and health audits at other companies. What was required of you to earn that title?

In order to become a Special Government Employee (SGE) an application and curriculum vitae is submitted to federal OSHA. OSHA will review your qualifications and, based on this review, you may be chosen to participate. A candidate must then enroll in a three-day intensive training class. Participants are trained in the various VPP program elements and given several examples of what constitutes an action taken to show the commitment level for each element and sub-element. These

elements include management leadership and employee involvement, worksite analysis, hazard prevention and control, and safety and health training. The candidates participate in role-playing for different scenarios and complete an evaluation for each element/sub-element. At the conclusion of the training, each participant must take an oath of office.

# Have you learned anything from seeing other organizations' programs close up?

I am always looking for better and safer ways to do things. I was very impressed by one facility's confined space program. This particular facility requires that all entrants be present when the pre-entry atmospheric testing is being conducted and are made aware of the conditions. Another facility has a terrific employee safety concern reporting mechanism (a small note pad that can be carried in a shirt pocket). This makes it much easier for employees to write down what they find in a timely manner.



Above: Keck and Tanner talk about maintenance safety.

Top Right: Tanner, with Douglas Piesker in the control room, gets to know her coworkers on a professional and a personal level.

Bottom Right: Tanner reviews a SHE report with Chief Engineer Scott Anderson.

# How do you keep your crew engaged in safety issues?

We talk about safety daily, whether in pre-job safety briefings, tailgates, or discussions around the Safety, Health, and Environmental (SHE) communication reports. SHE communication forms are a way for employees to express safety concerns, make safety suggestions, report unsafe conditions, praise fellow workers for their safe behaviors, and really just about anything they want to convey to facility staff members. Employees also are asked to complete a job safety analysis for those tasks that they perform. I visit with the operators and maintenance personnel daily as I am doing rounds to find out what they are doing that day and if they need anything from me. I feel very comfortable saying that the employees have no hesitation sharing information — whether it is good or something that concerns them.

# What advice do you have for other safety and health managers hoping to make a difference?

Get to know your fellow employees, not just on a professional level but also on a personal level. Recognize and build on their strengths and abilities. Be a good, non judgmental listener.





## October 2012

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Safety & Health
Conference



Safety & Health

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#### **Sessions include:**

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- Communication Strategies
- Become a Safety Coach
- Continuous Improvement
- The Hazard Risk Assessment Process
- Prevent Combustible Dust Explosions
- Common Conditions of the Shoulder
- Global Harmonization System (GHS)
- · Confined Spaces
- Aerial Work Platforms
- · Lean Manufacturing
- Advanced Fall Protection
- Lockout/Tagout Program Compliance
- Safety Committee Operations
- Personal Risk Assessments
- Fleet and Driving Safety
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- Safety for Facilities Staff
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Keynote

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Fred S. Drennan, Team Safety, Inc., Ojai, CA



Skills-Based Safety Leadership: Supervisors as Leaders – Going from Good to Great

with Fred S. Drennan

Tuesday, October 16, 8:30 a.m.-4 p.m.

at the Harry & David Employment and Education Center, Medford

\$100 (includes lunch)

#### **Costs to attend conference:**

Full Conference (October 17 and 18)\$130
One day (October 17 or 18)\$ 90
Half-day (AM or PM on October 17 or 18) \$ 60
Exhibits • Awards • Wellness Walks

#### **Questions?**

Contact the Conference Section, 503-378-3272 or toll-free 888-292-5247, option 1



A joint effort of the American Society of Safety Engineers (ASSE), Southern Oregon Chapter, and the Oregon Occupational Safety Health Division (Oregon OSHA)



## November 2012

22nd Annual

# Western Pulp & Paper Workers Safety & Health Conference

Partners in Safety – Steering Toward the Future

November 27-30, 2012
Red Lion Hotel on the River – Jantzen Beach • Portland, Oregon
Keynote: It's Not Just About Me by Tony Crow

#### Topics:

- Mobile Equipment Best Practices
- Hazard Communication
- Safety 24/7
- Heavy Equipment
- Avoiding Costly Water Hammers
- Respiratory Protection
- Combustible Wood and Paper Dust
- Fall Protection
- Analyzing Trends
- Soft Tissue Injuries
- Working Around Scaffold
- Shiftwork: A Guided Discussion
- Slips, Trips, and Falls
- Hazardous Energy Control

#### Roundtables on ...

- Employee Involvement
- Wellness
- Safety 24/7
- Safety Successes
- Emergency Response Teams
- Communicating for Safety
- Managing Safety Change

FRIDAY:

General Session:

Building an Organization

that Values Safety

- Behavior-Based Safety
- Hazardous Energy
- By invitation only ~ Roundtables for Mill Managers and Safety Managers

#### Costs to attend

	Full Conference (Nov. 27-30)	\$2	240
	One Day (Tues., Wed., or Thurs.)		
•	Awards Dinner (Nov. 28)	\$	20
	Enidou general session (Nov. 30)	Ф	20

Registration opens in October

If you have questions

or would like to receive registration materials contact the Conference Section, 503-378-3272 or toll-free 888-292-5247, option 1

Visit orosha.org/conferences