



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT
DEPARTMENT OF LABOR STANDARDS

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March 10, 2021

Mr. Michael McAllister
Director of Human Capital
Belmont Public Schools
19 Moore Street
Belmont, MA 02478

DLS WSHP File # 21s-4412

INSPECTION REPORT

Pursuant to M.G.L. c. 149, §§ 6, 6½, and 454 CMR 25.00, the Department of Labor Standards (DLS) is charged with the responsibility to investigate occupational hazards in the workplace, to recommend controls to reduce or prevent work-related injuries and illnesses, and to provide assistance to counties, municipalities and state agencies to comply with applicable workplace safety and health laws, regulations, and recognized industry standards.

Two Town of Belmont custodial and maintenance employees were disinfecting school and municipal buildings in response to the COVID-19 pandemic on March 9, 2020. This was an on-going work assignment until removed from this work in late June 2020 after seeking medical evaluations due to the onset of symptoms related to repeated use of chemicals. Employees experienced symptoms following the use of two separate unapproved chemical liquids in a Clorox Total 360 Electrostatic Sprayer. On November 6, 2020, a DLS Field Inspector, Mr. James Leonard, conducted an inspection to evaluate the incident to determine if measures could be taken to prevent a reoccurrence. The site inspection was conducted at Belmont Town Hall, 455 Concord Avenue in Belmont, MA. The scope of the inspection was focused on conditions, practices and equipment directly involved in the incident although other hazards were also identified and are included within this report.

DLS identified conditions that place employees at risk of work-related injury or illness. As permitted by M.G.L. c. 149, §§ 6, 6½, and 454 CMR 25.00, DLS issues this Inspection Report to the Respondent to correct those conditions in accordance with Massachusetts General Laws and Federal Regulations, including the Occupational Safety and Health Act of 1970, Section 5(a)(1), 29 CFR 1910. Recommendations also may be provided to prevent work-related injuries at this site and are based on nationally recognized standards. The Respondent is advised to apply the following corrective actions and recommendations as appropriate to all work locations.

WALL EXPERIMENT STATION • 37 SHATTUCK STREET • LAWRENCE, MA 01843

PHONE: (508) 616-0461 • FAX: (978) 687-0013

www.mass.gov/dols

SUMMARY

On Monday, March 9, 2020, two Town of Belmont custodial and maintenance employees began the disinfection of school buildings for COVID-19. The employees were provided with a Clorox Total 360 electrostatic sprayer and a Geneon Mist Pro Portable Sprayer (mist/fogger). The Clorox Total 360 electrostatic sprayer is an upright, wheeled cord and plug unit that was purchased for disinfecting classrooms and offices. The portable battery powered Geneon Mist Pro was purchased for harder to reach locations such as stairwells. The employees were also provided with personal protective equipment (PPE) which included gloves, chemical goggles, and a white cone dust mask (#RS-810). This work was conducted during the second shift to ensure buildings were relatively vacant throughout the 6:00 p.m. to 2:30 a.m. shift.

The employees began this work at the Winthrop L. Chenery Middle School located at 95 Washington Street in Belmont, MA. Eventually, the work expanded to include other municipal buildings (Library, Fire Department, & Police Department) as well as town owned vehicles (Police, Fire, etc.). The employees each used the electrostatic sprayer and the mist/fogger as they worked together disinfecting the school buildings. On Tuesday, March 10th, the work moved from the WL Chenery Middle School to the Belmont High School at 221 Concord Ave in Belmont, MA. During the disinfecting of the high school, the Geneon Mist Pro stopped functioning and both employees were then assigned to use the Clorox Total 360 Electrostatic Sprayer. One employee would operate the unit as the other employee would assist in the movement of the machine and management of its extension cord. Disinfection of the buildings continued using only the Clorox Total 360 electrostatic sprayer as the mister/fogger was no longer operational.

According to a July 13, 2020, Accident – Intake Form submitted and signed by the workers supervisor and Town of Belmont Facilities Manager, Mr. Michael Flood, the workers ran out of Clorox Total 360 Disinfectant/Cleaner on Tuesday, March 10, 2020. As a substitute, Hyperfect 256 was then used with the Clorox Total 360 electrostatic sprayer for approximately two months until the delivery of a 55-gallon container of VitalOxide arrived as another substitute to be used with this equipment. The employees continued disinfecting using the VitalOxide until approximately late June 2020.

Throughout this work both employees reported ongoing and worsening symptoms believed to be associated with the application of the unapproved cleaning chemicals with the Clorox Total 360 disinfecting unit. The July 13, 2020, Accident – Intake Form, described the employee's injury as respiratory and documented that the employees reused their assigned paper face masks for two weeks until experiencing these symptoms. The employees were sent for medical evaluations suffering symptoms consistent with a chemical inhalant exposure and as a result, were reassigned and removed from this work assignment.

Mr. Stephen Dorrance, the former Director of Facilities, did concede that they ran out of the Clorox Total 360 Disinfectant/Cleaner and substituted a 55-gallon drum of VitalOxide to be used with the electrostatic sprayer. Mr. Dorrance explained that the Safety Data Sheet (SDSs) for Vital Oxide indicated it was not hazardous and he believed that it was less

injurious than the Clorox Total 360 product. Mr. Dorrance further stated that according to the SDS PPE such as gloves and protective eyewear is recommended and not required. Mr. Dorrance also detailed that early in the pandemic N95 respirators were not widely available and the Fire Department provided KN95 respirators for use. More recently, Moosh KN95 Disposable Respiratory Masks were acquired. Mr. Dorrance went on to explain that based on employee demands, additional PPE such as elastomeric Honeywell Model No. 7700-30L half face mask and Honeywell 76008A M/L full face respirators fitted with Honeywell Part No. 75SCP100L Multi-Purpose Cartridge with P100 Filters were later provided to each employee along with Ansel Solvex 37-175 Nitrile Gloves.

Based on the high demand for cleaning products at the time, the Clorox product was unavailable, and Mr. Dorrance approved the use of VitalOxide as a replacement for use within the electrostatic sprayer. Mr. Dorrance further explained that the Clorox bottles are sealed containers designed to connect directly to the unit. He stated that the sealed caps were removed and VitalOxide was then dispensed directly into the containers. The caps were then reinstalled, and the unit was then attached back to the bottle for use. Mr. Dorrance further explained that he accepts responsibility for substituting the chemical and not updating the container labels to reflect this change. Although Mr. Dorrance did not mention the use of Hyperfect 256, the July 13, 2020 Report of Incident does document the use of this cleaning chemical.

CONDITIONS REQUIRING CORRECTIVE ACTION

Item No. 01

Correction Due Date: April 9, 2021

Condition: The employer did not furnish employment and a place of employment which were free from recognized hazards that were likely to cause death or serious physical harm to employees:

The former Director of Facilities approved and directed the Facilities Manager to tamper with the nonrefillable containers for their reuse with the nonapproved cleaning chemicals and the Clorox Total 360 Electrostatic sprayer. This action resulted in repeated chemical exposures to employees performing this work.

The label on the Clorox Pro Clorox Total 360 Disinfectant Cleaner states under *Storage and Disposal, Container Disposal* “Nonrefillable container. Do not reuse or refill this container.” A Warning Label on the Clorox Total 360 Electrostatic Sprayer also states, “Only use Clorox approved products through the Clorox Total 360 Sprayer.”

The user manual under section heading *Chemicals* states “The Clorox Total 360 Sprayer can only be used with products that **have been approved by Clorox**. Be aware that **many chemical liquids can be harmful if they are not used properly**.” Language on this page also states that “Tampering with Clorox approved products, product containers and the Clorox Total 360 Electrostatic Sprayer in any form will void customer warranty.”

In addition, the September 17, 2020, Training Attendance Confirmation for the Clorox Total 360 Sprayer provided by the Town of Belmont, documents that employees received training on this equipment over 6 months following initial use on March 9, 2020. Training records were not available for the former Director of Facilities or the Facilities Manager.



The Clorox 360 Sprayer – The orange arrow points to the location of a warning label.



A zoomed in photo of the warning label which states “Only use Clorox-approved products through the Clorox Total 360 Sprayer.”

Massachusetts General Law: M.G.L. c. 149, §§ 6 and 6½

Recognized Industry Standards: Section 5(a)(1) OSHA General Duty Clause

Corrective Action Required: Employees should not be permitted to supervise activities until they have been trained to a level required by their job function and responsibility.

Among feasible methods of abatement to correct this hazard are: Supervisory staff shall attend training for the Clorox Total 360 electrostatic sprayer to ensure they understand how to properly operate and are aware of the hazards associated with this equipment. Supervisor or equivalent training should also be provided to ensure they understand and are committed to their responsibilities as supervisors to enforce and demonstrate safe work practices through their own actions in the workplace. Additional measures such as the development of a *Safety and Health Management System* (see page 17 of this report) and /or development of a safety council comprised of a selection from all members of the workforce (managers, supervisors, employees, etc.) should also be considered.

Proof of Corrective Action: Submit to DLS proof of training such as a training attendance sheet or written certificate certified by the instructor following the successful completion of this necessary training. Training attendees should sign in and out (in their own hand) at each training session to authenticate that they indeed were in attendance. Employer-only authentication may not validate training if the employee denies having attended.

Item No. 02

Correction Due Date: April 9, 2021

Condition: The employer did not verify that the required workplace hazard assessment was performed through a written certification that identifies the workplace evaluated, the person certifying that the evaluation had been performed, the date(s) of the hazard assessment, and, which identifies the document as a certification of hazard assessment.

Massachusetts General Law: M.G.L. c. 149, §§ 6 and 6½

Recognized Industry Standards: OSHA, 29 CFR 1910.132(d)(2)

Corrective Action Required: The employer shall complete the workplace hazard assessment for this task through a written certification.

Among feasible methods of abatement to correct this hazard are: The PPE selection chart provided in the link below may be used to certify the assessment of this task is complete.

<https://www.mass.gov/doc/ppe-selection-chart-generic/download>

Proof of Corrective Action: Submit to DLS a copy of the written certification that a workplace hazard assessment was performed for the disinfection of municipal buildings and vehicles in response to the COVID-19 emergency.

Item No. 03

Correction Due Date: April 9, 2021

Condition: The employer did not provide training to each employee who is required to use PPE. Supervisory staff shall also attend this training to ensure they are knowledgeable on who is required to use PPE; when and what PPE is necessary; how to don, doff, adjust and wear PPE; as well as limitations and proper care, maintenance and useful life.

Each affected employee shall demonstrate an understanding of the training specified in paragraph (f)(1) of this section, and the ability to use PPE properly, **before being allowed to perform work requiring the use of PPE.**

Massachusetts General Law: M.G.L. c. 149, §§ 6 and 6½

Recognized Industry Standards: OSHA, 29 CFR 1910.132(f)(1(i-v))

Corrective Action Required: The employer shall ensure each employee is trained to know (i) When PPE is necessary, (ii) What PPE is necessary, (iii) How to properly don, doff, adjust, and wear PPE, (iv) the limitations of PPE, (v) the proper care, maintenance, useful life and disposal of PPE.

Proof of Corrective Action: Submit to DLS proof of training such as a training attendance sheet or written certificate certified by the instructor following the successful completion of this necessary training. Training attendees should sign in and out (in their own hand) at each training session to authenticate that they indeed were in attendance. Employer-only authentication may not validate training if the employee denies having attended.

Item No. 04

Correction Due Date: April 9, 2021

Condition: The employer, in a workplace where respirators are necessary to protect the health of the employees or whenever respirators are required by the employer, did not establish and implement a written respiratory protection program with worksite-specific procedures

The employer did not establish and implement a written respiratory protection program for employees required to wear N95 or elastomeric respirators when using a Clorox Total 360 Electrostatic Sprayer. *Section 8., Exposure Control/Personal Protection of the Clorox Commercial Solutions Clorox Total 360 Disinfectant Cleaner Safety Data Sheet (SDS) states “For prolonged use, use NIOSH approved respiratory protection when using through the Clorox Total 360 Electrostatic Sprayer, N95 respirator.”*

Massachusetts General Law: M.G.L. c. 149, §§ 6 and 6½

Recognized Industry Standards: OSHA, 29 CFR 1910.134(c)(1)

Corrective Action Required: The employer must submit a fully compliant, written respiratory program with worksite-specific procedures.

Proof of Corrective Action: Submit to DLS a copy of the written respiratory protection that includes the requirements of 29 CFR 1910.134(c)(1)(i-ix).

A link is provided below to the Commonwealth of Massachusetts Department of Labor Standards OSHA Consultation Program, Respirator Program template to assist with the development of this program.

<https://www.mass.gov/doc/respiratory-program>

Condition: The employer did not select and provide an appropriate respirator based on the respiratory hazard(s) to which the worker is exposed and workplace and user factors that affect respirator performance and reliability.

The employer provided a white cone dust mask part # RS-81, which according to the manufacturer spec sheet is a nuisance dust mask. The Safety Data Sheet (SDS) for Clorox Commercial Solutions Clorox Total 360 Disinfectant Cleaner states that “a NIOSH approved N95 respirator is required for prolonged use.”

In addition, during the site investigation the former Director of Facilities and Facilities Manager provided a selection of PPE currently in use by staff assigned to the Clorox Total 360 electrostatic sprayer. This included the MOOSH, KN95 Respiratory Masks manufactured by Fujian Kang Chen Daily Necessities. This respirator does not include the appropriate NIOSH markings and is not a NIOSH approved respirator.

On April 3, 2020, the FDA issued an Emergency Use Authorizations (EUA) for non-NIOSH-approved disposable filtering facepiece respirators manufactured in China **for use by healthcare personnel in a health care setting**. Non-NIOSH respirators authorized by this EUA are included on the FDA, Personal Protective Equipment EUA webpage, under Appendix A: Authorized Imported, Non-NIOSH Approved Respirators Manufactured in China (Updated: October 15, 2020). **The Fujian Kang Chen KN95 Respirator Masks are not included on this list.**

Massachusetts General Law: M.G.L. c. 149, §§ 6 and 6½

Recognized Industry Standards: OSHA, 29 CFR 1910.134(d)(1)(i-v)

Corrective Action Required: Provide appropriate respiratory protection based on the manufacturer instructions included with the Clorox Total 360 electrostatic sprayer and SDS for the Clorox Commercial Solutions Clorox Total 360 Disinfectant Cleaner.

Discontinue use of Non-NIOSH KN95 respirators where NIOSH approved N95 respiratory protection is required, such as for use with the Clorox Total 360 electrostatic sprayer.

Proof of Corrective Action: **Submit to DLS evidence (ex. photo, invoice, etc.) of respiratory protection selected and include the manufacturer, model, type, cartridges selected for the protection of employee health as required by task.**

Item No. 06

Correction Due Date: April 9, 2021

Condition: The employer did not provide a medical evaluation to determine the employee's ability to use a respirator before the employee was fit tested or required to use the respirator in the workplace.

The employer did not provide medical evaluations for the required use of N95 or elastomeric respirators to be worn when disinfecting for COVID-19 with a Clorox Total 360 Electrostatic Sprayer.

Massachusetts General Law: M.G.L. c. 149, §§ 6 and 6½

Recognized Industry Standards: OSHA, 29 CFR 1910.134(c)(1)(ii)

Corrective Action Required: Provide employees with medical evaluations for the required use of N95 and elastomeric respirators in the workplace.

Proof of Corrective Action: Provide a copy of the written approval regarding the employee's ability to use the respirator. The information provided shall contain no personal medical information and simply state if the employee is approved for respirator use.

Item No. 07

Correction Due Date: April 9, 2021

Condition: The employer failed to ensure that employees using a tight-fitting facepiece respirator pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT).

The employer did not provide fit-testing for the required use of N95 or elastomeric respirators to be worn when disinfecting for COVID-19 with a Clorox Total 360 Electrostatic Sprayer.

Massachusetts General Law: M.G.L. c. 149, §§ 6 and 6½

Recognized Industry Standards: OSHA, 29 CFR 1910.134(f)(1)

Corrective Action Required: Ensure employees using a tight-fitting facepiece respirator are fit tested prior to initial use of the respirator, whenever a different respirator facepiece (size, style, model or make) is used, and at least annually thereafter.

Proof of Corrective Action: Provide a copy of the record for the qualitative and/or quantitative fit tests administered to each employee required to wear respiratory protection which includes the name or identification of the employee tested; type of fit test performed; specific make, model, style, and size of respirator tested; date of test; and fit test results.

Item No. 08

Correction Due Date: April 9, 2021

Condition: The employer did not provide for the cleaning and disinfecting, storage, inspection, and repair of respirators used by employees.

Disposable dust masks were reused even where visibly dirty or saturated with cleaning chemicals. The employer did not provide instruction on proper storage or when to discard respiratory protection. Elastomeric facepieces were also provided without instruction on the maintenance and care.

Massachusetts General Law: M.G.L. c. 149, §§ 6 and 6½

Recognized Industry Standards: OSHA, 29 CFR 1910.134(h) All inclusive

Corrective Action Required: Provide for the cleaning and disinfecting, storage, inspection, and repair of respirators used by employees.

Proof of Corrective Action: Provide a copy of the respirator cleaning procedures and/or a copy of the invoice for the purchase of cleaning and disinfecting chemicals for respiratory protection. Provide photos of the proper storage of respiratory protection and evidence that respirators are inspected as required (ex. check list, employee sign-off sheet, etc.).

Item No. 9

Correction Due Date: April 9, 2021

Condition: The employer failed to provide effective training prior to an employee's use of a respirator in the workplace.

The employer provided KN95, half mask and full-face elastomeric respirators and did not provide training as required.

Massachusetts General Law: M.G.L. c. 149, §§ 6 and 6½

Recognized Industry Standards: OSHA, 29 CFR 1910.134(k)(1)(vi)

Corrective Action Required: Provide a comprehensive training to employees who are required to wear respirators that is understandable and where the employee can demonstrate knowledge in accordance with 1910.134(k)(1) – 1910.134(k)(6)

Proof of Corrective Action: Submit to DLS documentation such as a training attendance sheet or written certificate certified by the instructor as having successfully completed the necessary training. Training attendees should sign in and out (in their own hand) at each training session to authenticate that they indeed were in attendance. Employer-only authentication may not validate training if the employee denies having attended.

Condition: The employer had not developed or implemented a written hazard communication program. The empty Clorox containers were reused and filled with an unapproved cleaning liquid without regard for proper labeling of secondary containers or the potential for employee exposure due to their unapproved use with this equipment.

Massachusetts General Law: M.G.L. c. 149, §§ 6 and 6½

Recognized Industry Standards: OSHA, 29 CFR 1910.1200(e)(1)

Corrective Action Required: Provide information to employees about the hazardous chemicals present in the workplace by means of a written hazard communication program, labels and other forms of warning, safety data sheets, and information and training.

The elements of a hazard communication program will also include the following:

- a. A written plan specific to your establishment for complying with the OSHA hazard communication standard. Such a plan supplied by an outside source (e.g., consultant, company headquarters, employer association, or insurance carrier) is acceptable if it meets all requirements of 29 CFR 1910.1200(e).
- b. A list, or lists by working area, of all hazardous materials present in the establishment (including those that may be produced during a preventable, yet foreseeable event).
- c. A file containing a safety data sheet (SDS) for each material listed as hazardous.
- d. A labeling system to ensure that all containers of hazardous chemicals, except those used immediately by a single employee, are marked with the name of the chemical, a hazard warning, and the name and address of the manufacturer or other responsible party (e.g., importer or supplier).
- e. A training program for employees, presented at the time of initial assignment and updated whenever a new hazard is introduced to the work area, on the requirements of the standard, the hazards in the work area, the ways of detecting or monitoring those hazards, the ways of protecting themselves from those hazards, and the details of the employer's hazard communication program, including where to view and how to obtain copies of the documentation.

Commonly overlooked items of the program include training employees on hazards of non-routine tasks and informing outside contractors of hazardous chemicals they are likely to encounter in the facility.

Proof of Corrective Action: Use provided Hazard Communication Program template or use one of your own which includes all the components of our template to complete a

compliant program. Submit to DLS a copy of the written program and documentation of employee training. A Hazard Communication Sample Program is available on the MA DLS Workplace Safety & Health Program website at:

<https://www.mass.gov/doc/hazard-communication-sample-program>.

RECOMMENDATIONS

In addition to the hazards listed above, the following recommendations are provided to strengthen your safety and health programs.

1. **Job Hazard Analysis:** A job hazard analysis is a technique that focuses on job tasks as a way to identify hazards before they occur. It focuses on the relationship between the worker, the task, the tools, and the work environment. Ideally, after you identify uncontrolled hazards, you will take steps to eliminate or reduce them to an acceptable risk level. See Job Hazard Analysis at <https://www.osha.gov/sites/default/files/publications/osh3071.pdf>
2. **Safety and Health Programs:** The main goal of safety and health programs is to prevent workplace injuries, illnesses, and deaths. The recommended practices use a proactive approach to managing workplace safety and health. These recommended practices recognize that finding and fixing hazards before they cause injury or illness is an effective approach. See Recommended Practices for Safety and Health Programs at <https://www.osha.gov/shpguidelines>
3. **General Industry Digest:** The summary of General Industry safety and health standards contained in this booklet are to aid employers, supervisors, workers, health and safety committee members, and safety and health personnel in their efforts toward achieving compliance with OSHA standards in the workplace. See General Industry Digest at <https://www.osha.gov/Publications/osh32201.pdf>

SAFETY AND HEALTH PROGRAM MANAGEMENT FOR PUBLIC EMPLOYERS

The following Recommendations are provided as part of good standard work practices. Cities and towns, counties, and the state are encouraged to develop a Safety and Health Management System which includes:

Management Leadership

- Establish a Safety & Health Policy.
- Establish management and employee accountability.
- Authorize a joint labor-management Safety Committee.
- Set goals for safety.

Control Risk

- Establish written safety procedures for job tasks.
 - Sample safety programs are available at www.mass.gov/dols/wshp.
- Provide safe and adequate equipment to perform job tasks:
 - Operations equipment
 - Safety equipment
- Inspect and maintain equipment on a preventive maintenance schedule.
- Pre-plan job tasks.
- Follow established industry standards for workplace safety.
- Conduct periodic workplace inspections and control hazards.
- Provide new hire and annual training regarding workplace safety.

Measure Performance

- Monitor injury patterns and injury costs.
 - A worksheet for determining injury patterns and injury costs is available at www.mass.gov/wshp.
- Conduct accident investigations and determine preventive strategies.
- Conduct periodic self-audits to evaluate safety conditions.
- Compare performance to annual safety goals.

ORDER TO CORRECT

A Correction Due Date has been established for each hazardous condition listed in this Written Warning in which a corrective action is required. The Respondent should notify DLS promptly in writing that appropriate corrective action has been completed within the time frame set forth in the Written Warning and Order.

A Corrective Action Response Form is attached for your convenience. Send supporting documentation, such as photographs, training records, written programs or purchase orders to:

Jim Leonard
Department of Labor Standards
37 Shattuck Street
Lawrence, MA
jim.p.leonard@mass.gov
(617) 626-6523

An extension of Correction Due Dates for a particular item may be requested in writing if the Respondent can demonstrate correction of the remaining items, demonstrate progress towards correction of the hazard, and give assurance that interim safeguards are in use to protect employees from the hazard.

CIVIL PENALTY

Failure to comply with the requirements set forth in this Written Warning and the corrective measures set forth in the associated Order to Correct within the period of time specified may result in the issuance of a civil citation with monetary penalties and other civil penalties as provided by law, pursuant to MGL c. 149, § 6.



James Leonard
Occupational Safety and Health Inspector
Department of Labor Standards

Approved by:



Staff Supervisor, Workplace Safety & Health Program

Cc: File

CORRECTIVE ACTION RESPONSE FORM

DEPARTMENT OF LABOR STANDARDS
Workplace Safety & Health Program for Public Employees

Return to:

James Leonard
Department of Labor Standards
37 Shattuck Street
Lawrence, MA
jim.p.leonard@mass.gov
(617) 626-6523

Case File Name Belmont Facilities
Case File Number: 21s-4412
DLS Inspector: James Leonard
Inspection Date: November 6, 2020

Item No. 01

Correction Due Date: April 9, 2021

Correction Date: _____

Corrective Action Taken: _____

Item No. 02

Correction Due Date: April 9, 2021

Correction Date: _____

Corrective Action Taken: _____

Item No. 03

Correction Due Date: April 9, 2021

Correction Date: _____

Corrective Action Taken: _____

Item No. 04

Correction Due Date: April 9, 2021

Correction Date: _____

Corrective Action Taken: _____

Item No. 05

Correction Due Date: April 9, 2021

Correction Date: _____

Corrective Action Taken: _____

Item No. 06

Correction Due Date: April 9, 2021

Correction Date: _____

Corrective Action Taken: _____

Item No. 07

Correction Due Date: April 9, 2021

Correction Date: _____

Corrective Action Taken: _____

Item No. 08

Correction Due Date: April 9, 2021

Correction Date: _____

Corrective Action Taken: _____

Item No. 09

Correction Due Date: April 9, 2021

Correction Date: _____

Corrective Action Taken: _____

Item No. 10

Correction Due Date: April 9, 2021

Correction Date: _____

Corrective Action Taken: _____

Signature:

Mr. Michael McAllister, Director of Human Capital

Date: _____

Note: An extension of the time frame set for the correction of the serious hazards may be requested in writing if you have made a good faith effort to correct the hazards, show that the delay was beyond your control, and give assurance that interim safeguards are in use to protect employees from the hazard. To request an extension, send a request in writing to: Jim Leonard, Department of Labor Standards, 37 Shattuck Street, Lawrence, MA 01843 or you may email the request to jim.p.leonard@mass.gov.