

# CONNEY COMPLIANCE SOLUTIONS



## Table of Contents

- 1 Overview
- 2 How Does it Work?
- 3 Sample Compliance Calendar
- 4 How We Work With You
- 5 Scope of Services
- 6 Safety Services
- 7 Environmental Services
- 8 Cost
- 9-10 FAQ
- 11 Find Out More

*Conney gets you in compliance and keeps you there!*

## What keeps you awake at night?

- Reducing costs?
- Driving revenue?
- Preventing unexpected risks?

Employee safety and OSHA/EPA compliance are very important. But doing it right can be a real distraction when your budget is limited and there seems to be a snake crawling out from under every rock.

A nation-wide professional services firm, Conney Safety's Compliance Division specializes in helping companies like yours achieve and maintain compliance, freeing you to do the things that drive profitable growth and productivity. And we do it better and at a fraction of the cost of going it alone.

We have 20 field advisors, backed up by a seasoned staff of safety and environmental professionals, who will work with you on site to identify compliance gaps and develop with you a prioritized plan to mitigate risks over time. Our professionals do more than identify the issues. They help write and implement the required programs, too. We can document your policies, take care of your recordkeeping, file the numerous required government forms by the appropriate deadlines, apply for licenses, handle onsite training, and organize and run your safety committee or emergency response teams.

We're not consultants. Like your accountant, we do a job that requires a knowledgeable professional and delivers a result. Our services are available to you as a reasonable monthly subscription--predictable and affordable.

## Conney Compliance Solutions Overview

Staying in OSHA and EPA compliance is an on-going challenge, requiring continuous monitoring and specialized knowledge. Although you are an expert in your area of business, you may not be an expert in safety or environmental matters--or have a team of full-time safety and environmental professional on staff.

Conney Compliance Solutions specializes in handling the details of achieving and maintaining regulatory compliance--freeing you to focus on driving your company's growth and profitability. We are not consultants. We provide a professional service, working in partnership with our clients.

### We can help you to:

- Protect against needless and expensive fines from OSHA/EPA/Local Agencies
- Be prepared for surprise inspections
- Reduce the risk of litigation for willful or negligent incidents
- Increase the likelihood of reductions in insurance premiums
- Keep workers compensation claims to a minimum
- Stay on top of regulatory paperwork and deadlines
- Coordinate your safety committee and run its meetings
- Experience peace of mind in knowing you have a team of experts staying on top of complex and ever-changing regulations

*Conney gets you in compliance and keeps you there!*

## How the Program Works

Conney Compliance Solutions are customized to meet your specific needs. We offer both project-based services, which are designed to address one-time special compliance projects, and ongoing, subscription-based services for customers who want continual professional support. Most customers find our subscription service best meets their need for ongoing safety and environmental compliance planning and implementation. Subscription services offer you:

- Outsourcing of OSHA/EPA compliance requirements to the degree you want and need
- An ongoing service schedule, providing both continuity and efficiency
- Flexible frequency, to meet your specific needs and requirements
- Convenient monthly invoicing

So...how do we start working together to get you into compliance and stay there?

Once we receive a request for more information, we will contact you to obtain further information about your specific safety and environmental needs and concerns. This initial consultation is completely **FREE** and will result in a proposal written to your specifications and budget.

Should you choose our subscription services, our next steps are to bring your facility into compliance and make it a safer workplace. To do this, we will:

- Assign an Environmental, Health and Safety (EHS) Advisor who will conduct facility inspections, perform employee training, develop the required written programs for your site, and be the liaison to our other team members who will support your compliance needs. Our staff of twenty compliance advisors are well-trained in local, county, state and federal regulations and have experience working with over 600 client companies from many different industries. Our advisors are backed up by an extensive team of safety and compliance specialists based in our regional and corporate offices.
- Perform a comprehensive audit and needs assessment for your organization during your EHS Advisors first visit, allowing us to identify areas of non-compliance and to prioritize your regulatory responsibilities.
- Develop a detailed "Compliance Calendar" with specific program delivery dates, training sessions and environmental reporting requirements for the facility
- Direct our team of professionals to work with appropriate staff to meet your specific worker safety and environmental responsibilities.
- Provide our Compliance Manual and Environmental Compliance filing system for proper documentation and organization of regulatory materials produced for your facility
- With your approval, implement the plan, including regularly scheduled on-site visits, and be available to field any safety or environmental compliance questions that may arise between your scheduled visits, including supporting regulatory agency visits.



**Conney gets you in compliance and keeps you there!**

## Sample Compliance Calendar

SAMPLE

**ABC COMPANY, INC.**  
**Safety & Health Compliance Calendar 2009**

Month	Employee Training	Compliance Program Issues & Facility Events	ERT/Safety Committee Meetings
January	<ul style="list-style-type: none"> <li>PPE</li> <li>Hearing Conservation</li> <li>Respiratory Vol. Use</li> </ul>	<ul style="list-style-type: none"> <li>OSHA 300 Log Review</li> <li>JHAs – Finalize</li> </ul>	<ul style="list-style-type: none"> <li>Goals – 2009</li> </ul>
February	<ul style="list-style-type: none"> <li>PPE Job Hazard Assessments (JHAs)</li> </ul>	<ul style="list-style-type: none"> <li>Post OSHA 300A</li> <li>Back/Ergo – ID risk areas &amp; controls</li> </ul>	<ul style="list-style-type: none"> <li>Accident Summary 2008</li> </ul>
March	<ul style="list-style-type: none"> <li>Back Injury Prevention</li> </ul>	<ul style="list-style-type: none"> <li>Combustible Dust Overview</li> </ul>	<ul style="list-style-type: none"> <li>Standard Agenda</li> </ul>
April	<ul style="list-style-type: none"> <li>Open</li> </ul>	<ul style="list-style-type: none"> <li>JHA for Maintenance Dept</li> <li>PSM Evaluation</li> <li>Hot Work Assessment &amp; Review</li> </ul>	<ul style="list-style-type: none"> <li>Severe Weather Review</li> </ul>
May	<ul style="list-style-type: none"> <li>Hot Work</li> </ul>	<ul style="list-style-type: none"> <li>Confined Space Program Assessment</li> <li>Inspections Outline</li> <li>Contingency &amp; Emergency Response Plan Review</li> </ul>	<ul style="list-style-type: none"> <li>Spill Protocols</li> </ul>
June	<ul style="list-style-type: none"> <li>Confined Space</li> </ul>		<ul style="list-style-type: none"> <li>Star</li> </ul>
July	<ul style="list-style-type: none"> <li>Emergency Preparedness, Prevention &amp; Response (includes evacuation and extinguisher)</li> </ul>	<ul style="list-style-type: none"> <li>Lockout/Tagout Audit &amp; Periodic Inspection (begin)</li> </ul>	<ul style="list-style-type: none"> <li>Fire rev</li> </ul>
August	<ul style="list-style-type: none"> <li>Fire Drill</li> </ul>	<ul style="list-style-type: none"> <li>Lockout/Tagout Audit &amp; Periodic Inspection (continue)</li> </ul>	<ul style="list-style-type: none"> <li>Fire</li> </ul>
September	<ul style="list-style-type: none"> <li>Lockout/Tagout</li> <li>Machine Guarding</li> </ul>	<ul style="list-style-type: none"> <li>Crane Safety Program Assessment</li> <li>Forklift Safety Program Assessment</li> </ul>	<ul style="list-style-type: none"> <li>Star</li> </ul>
October	<ul style="list-style-type: none"> <li>Open</li> </ul>	<ul style="list-style-type: none"> <li>Industrial Hygiene Program &amp; Testing Review</li> <li>Respiratory Protection Program Review</li> <li>Hazard Communication Program Review</li> </ul>	<ul style="list-style-type: none"> <li>Blo (Oct Ver</li> </ul>
November	<ul style="list-style-type: none"> <li>Make-up/Open</li> </ul>		<ul style="list-style-type: none"> <li>Star</li> </ul>
December	<ul style="list-style-type: none"> <li>2010 Planning</li> <li>Upcoming:                             <ul style="list-style-type: none"> <li>a) RTK in 1/10 (including Hex Chrome and Exposure Records)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Compliance Calendar Development</li> </ul>	<ul style="list-style-type: none"> <li>201</li> </ul>

*Note: All events are subject to change.*

SAMPLE

**ABC COMPANY, INC.**  
**2009 Environmental Report Calendar Major Deadlines and Trainings**

Month	Description	Dept*	Due Date (mo/day)	Lead Party	
				Facility	USCC
January	Environmental Packet	---	1/9	X	
	Compliance Certification	AQ	1/30		X
	Semi-Annual Deviations Report	AQ	1/30		X
	Annual Air Report	AQ	1/30		X
February	Annual O&M Plan Training	AQ	Jan		X
	Hazardous Waste License Renewal	WW	2/8		X
March	Annual SPCC Training	WW	Feb		X
	Tier II Deadline	SA	3/1		X
	Storm Water Annual Report	WW	3/31		X
April	Hazardous Waste Management Training	WW	Mar		X
	Annual Emissions Report	AQ	4/1		X
May	Annual Storm Water Training	WW	May		X
June					
July	TRI Deadline	SA	7/1		X
	Semi-Annual Deviations Report	AQ	7/30		X
August					
September					
October	Receive Environmental Packet	---	Oct		X
November					
December					

\*AQ = Air Quality; WW = Waste and Water; SA = SARA

SAMPLE

**ABC COMPANY, INC.**  
**2009 Environmental Report Calendar Operational Requirements**

Dept*	Requirement
<b>Daily</b>	
AQ	Daily Recordkeeping of solvent based coatings and cleaner/thinners
AQ	O&M Plan (Baghouse): Inspection & Monitoring
AQ	O&M Plan (Panel Filters): Inspection & Monitoring
<b>Weekly</b>	
WW	Hazardous Waste Inspections
<b>Monthly</b>	
WW	Monthly SPCC Inspections
AQ	Air Emissions/Usage Calculations (Completed by the 15 <sup>th</sup> of each month)
AQ	O&M Plan (Baghouse): Inspection & Monitoring
AQ	O&M Plan (Panel Filters): Inspection & Monitoring
<b>Bi-Monthly (April, June, August, October)</b>	
WW	Storm Water Site Inspection
<b>Quarterly</b>	
AQ	O&M Plan (Baghouse): Inspection & Monitoring
AQ	O&M Plan (Panel Filters): Inspection & Monitoring
<b>Annually</b>	
AQ	O&M Plan (Baghouse): Inspection & Monitoring
AQ	O&M Plan (Panel Filters): Inspection & Monitoring
AQ	Recordkeeping Review of in-house RK

\*AQ = Air Quality; WW = Waste and Water; SA = SARA

The facility is responsible for the understanding and completion of the operational requirements. Any questions related to such requirements should be directed to U.S. Compliance.

This document is a summary of the most pertinent reports and trainings that need to be completed. It is not all inclusive and does not necessarily list every requirement with which the facility must comply. It is the facility's responsibility to ensure all reports have been submitted and to maintain compliance with all conditions listed in the active environmental permits. U.S. Compliance provides the necessary support to maintain compliance, and should be contacted with any questions related to environmental permitting or compliance.

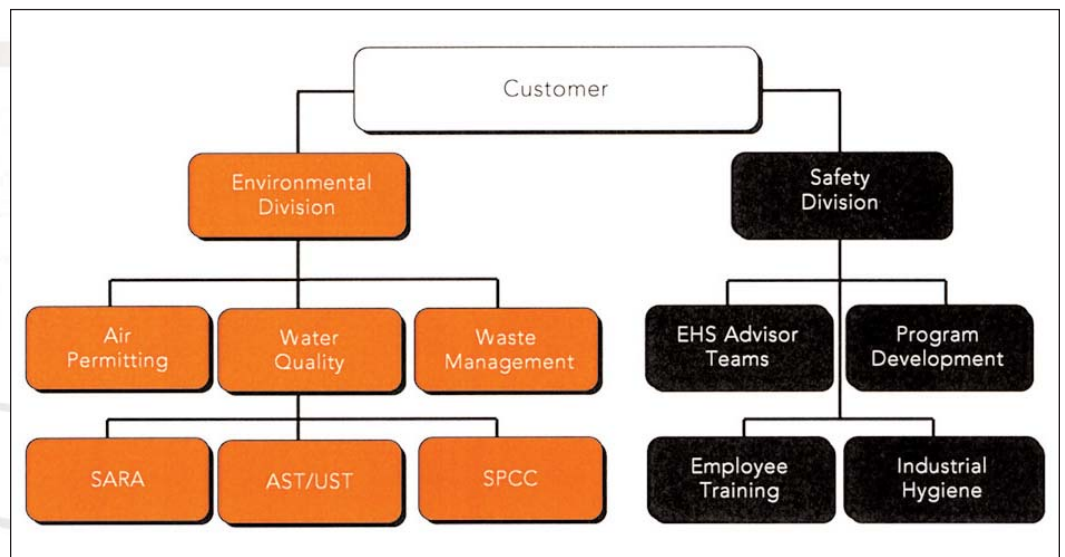
## How We Work With You

Working toward compliance is a mutual communication process to create the most effective methods to achieve and maintain safety and environmental compliance. Each client's needs and specific requirements are slightly different, so we work with you to create a program that's as unique as your business.

Some customers want us to handle their entire program, some want us to simply help supplement an existing compliance program. In general, most of our programs work as follows:

- Environmental, Health, and Safety Advisors administer comprehensive reviews of the on-going compliance status of facilities with regularly scheduled visits. They conduct on-site worker safety and environmental training, facility inspections, and are available for questions in the event of an OSHA, EPA, or Insurance audit. Between visits, program developers create site-specific programs tailored to meet the individual needs of our clients.
- Environmental Specialists work in-house to help you fulfill your environmental reporting requirements. We have staff experts in Air Quality, Hazardous Waste, Industrial Wastewater, Storm Water, and SARA Reporting. Specialists are available daily to answer questions and assist with specific environmental compliance projects.

The strategic relationship we create with our client companies is the core of our services. Conney Safety fully recognizes the importance of regulatory compliance and the value our clients place on these issues. As a key professional services partner with our clients, we take our role in your compliance very seriously.



*Conney gets you in compliance and keeps you there!*

## Scope of Services

Conney's trained service professionals have the knowledge, experience and skills to work with you and your employees to get your company into compliance and stay there. We provide the plan, the tools, and can do as much of the implementation work as you need. All you need to provide is the focus and dedication to workplace safety and environmental compliance.

Conney Safety offers a complete array of SAFETY and ENVIRONMENTAL programs, including the following:

## Safety Services:

- **Routine Plant Inspections**
- **Assistance with Agency Audits**
- **Safety Committee/ER Team Meeting Coordination and Management**
- **OSHA 300 Log Training and Review**
  - Periodically verify that your log is properly maintained
  - Train on-site personnel on the proper completion of the log
- **Hazard Communication Program**
  - Develop, implement and maintain a complete hazard communication program that includes a hazardous container labeling system
  - Provide hazard Communication training for employees
  - Deliver annual refresher training
  - MSDS management and reviews
- **Respiratory Protection and fit Testing**
  - Determine testing needs and assist with industrial hygiene surveys
  - Develop a written Respiratory Protection Program
  - Assist with initial and annual trainings
  - Assist with fit-testing of respirators as needed
  - Help with the OSHA Respirator Medical Evaluation Questionnaire
- **Personal Protective Equipment**
  - Assist with appropriate JHA development. In some cases, a team of facility employees may need to help complete the JHAs
  - Develop, implement and maintain a Personal Protective Equipment program
  - Perform periodic plant-wide training
  - Help select equipment per the conditions identified in JHAs
  - Identify an employee who will be responsible for fit-testing and demonstrating the proper use of Personal Protective Equipment
- **Powered Industrial Truck Operation**
  - Help develop a written Powered Industrial Truck program
  - Provide formal classroom training
  - Help develop tools for practical training of operators and evaluation of operator performance on the job
  - Assist in the set up of a formal inspection program



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**• Hearing Conservation**

- Initial audit to determine if the Hearing Conservation standard applies
- Create and implement a written Hearing Conservation program
- Develop a point-in-time noise map of your facility
- Train employees on required elements of the program
- Assist with the review audiogram results
- Help with the proper selection of hearing protection and identify areas where it should be mandatory

**• Bloodborne Pathogens**

- Develop an Exposure Control Plan
- Assist in obtaining proper BBP kits and equipment
- Train all employees who may be affected
- Assist in tracking and completing Hepatitis B Vaccinations

**• Ergonomics**

- Provide periodic training on ergonomics and back injury prevention
- Assistance and guidance in the identification of operational tasks that involve high risk factors for ergonomic disorders
- Help with the completion of Job Safety Analyses

**• Lockout/Tagout**

- Provide a written Lockout/Tagout program to meet your needs
- Help with the selection of Lockout/Tagout equipment and materials
- Assist in the training of affected and authorized personnel
- Conduct an annual formal audit of the program and procedures
- Set up a system for periodic inspections

**• Confined Space**

- Provide an initial site review
- Complete a Confined Space entry (CSE) program
- Perform periodic CSE awareness training for all employees
- Select air quality monitoring, ventilation and emergency equipment
- Assist in evaluating options for emergency procedures

**• Accident Prevention**

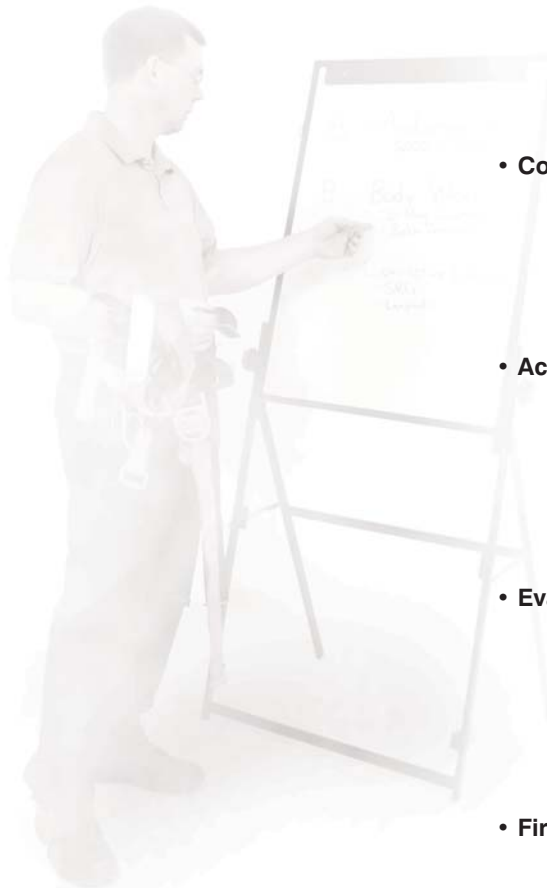
- Complete a site specific program
- Establish annual goals and objectives
- Audit the program to determine overall effectiveness
- Meet with your ERT/Safety Committee to discuss your program, emergency response, safety topics, etc.
- Assist with the implementation of a walk-through inspection process

**• Evacuation**

- Develop an Emergency Response and Contingency Plan as required
- Distribute copies of the completed plan to appropriate agencies
- Help set up and manage an on-site Emergency Response Team (ERT)
- Provide employee awareness training
- Facilitate periodic on-site fire drills
- Assist in the required annual review of the plan

**• Fire Extinguisher**


- Assist with the annual classroom fire extinguisher training



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**Environmental  
Services:**

- **Community Right-to-Know**
- **SARA Tier II Reporting, HMIS, HMBP**
  - Request applicable information
  - Compile a chemical assessment spreadsheet
  - Evaluate storage thresholds
  - Complete Tier II forms
  - Submit final Tier II reports to client for review and submission
  - Toxic Release Inventory (Form R/A) Reporting
  - Pollution Prevention Planning
- **Spill Prevention Control and Countermeasures Plans**
  - Complete spill assessment
  - Report correct spill report documentation to appropriate agencies
  - Provide required follow-up to applicable agencies
  - Submit spill report to client for filing
- **Hazardous Waste**
  - Review site storage practices
  - Assist with Universal and Special Waste Management
  - Review weekly inspection logs
  - Develop contingency plans
  - Assist with Hazardous Waste Compliance Inspections
  - Complete generator reports (as required)
  - Produce hazardous waste summaries
  - Provide hazardous waste (RCRA) training
  - Waste Minimization Plan
  - Manifest Reviews
- **Air Permitting Assessment**
  - Prepare an emissions summary calculating Potential to Emit (PTE)
  - Quantify criteria pollutants and hazardous air pollutants generated from each emission source
  - Identify significance of each emission source
  - Evaluate state/local regulations to determine permit applicability
  - Determine permit type based on your facility's Potential to Emit (PTE)
  - Evaluate the location of your facility regarding ambient air quality non-attainment areas
  - Determine the applicability of air permit requirements
  - Complete the necessary permit applications on an out-of-scope project basis
  - Write letters explaining permit requirements
  - Provide guidance on monthly recordkeeping
  - Provide guidance through deviation and compliance reporting
  - Complete annual emissions reports
  - Handle permit renewals, modifications and amendments
- **Water Quality**
  - Industrial Discharge Permits and Reports
  - Collect and submit information to complete application
  - Determine wastewater regulatory authority
  - Discharge Monitoring Reports
  - Storm Water Permits and Reports
  - Storm Water Pollution Prevention Plan and Training



*Don't see exactly what you're looking for? Don't worry...Conney Safety will work with you to design a customized program to fit the specific needs of your business!*

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## Costs

### How much does it cost?

Our full OSHA/EPA compliance services range in cost from as little as \$750 to \$2250 per month, depending upon your specific needs and budget. At these affordable monthly rates, you get peace of mind and the means to achieve and maintain compliance at only a fraction of the cost you'd incur going it alone.

### Getting into compliance can easily and quickly pay for itself many times over by:

- Avoiding even one major OSHA/EPA fine
- Avoiding the expense and hassle of litigation
- Decreasing workers comp claims
- Decreasing insurance premiums
- Keeping key employees in other areas--HR, Plant Operations, Facilities Maintenance--focused on their area of expertise, rather than making them responsible for compliance in addition to their other duties



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## Frequently Asked Questions

### How does the program work?

Once we receive a request for more information, our trained professional staff members will provide a **FREE** initial telephone consultation to determine your specific safety and environmental compliance needs and how best to address them. An on-site assessment can help fill in the necessary details and pinpoint areas needing immediate attention.

Once we've developed a program that you feel best meets your needs, our staff will work with you **ON-SITE** to implement the program, train your staff, help you with record-keeping--whatever you need.

### What types of services are offered?

Each customer's needs are unique; our initial **FREE** consultation will determine the best and most effective way to address your company's unique compliance issues. Whether your need is for a one-time project or training or ongoing services, we offer a full line of Safety and Environmental Compliance Solutions which address today's biggest safety and environmental compliance concerns. We also offer a number of different types of subscription service packages, providing you with the coverage and flexibility you need.

### I don't see the exact type of service/training I'm looking for; can Conney Compliance Solutions handle it?

**YES!** If our wide array of existing services don't exactly meet your needs, Conney Compliance Solutions professionals will work with you to design a customized and affordable program to fit the unique and specific needs and requirements of your business.

### My company already has a full-time safety and compliance staff. Why should I consider Conney Compliance Solutions?

Even if your business has a full-time staff of safety professionals to handle developing and implementing your program, Conney Compliance Solutions can help them to be more effective and efficient. We can help your safety team save both time and money by:

- Conducting routine training and re-training, which allows your safety team to focus on program development and enhancement. This can be particularly valuable for companies where routine training must be done at multiple locations and at regular intervals. Think of the cost savings in travel time and budgets alone!
- Filing routine forms and handling record-keeping
- Conducting safety and environmental audits from the perspective of an outsider—often a fresh set of eyes can uncover previously unnoticed problems or reveal new ways to tackle recurring issues
- Handling one-time special projects, where your current staff needs additional resources
- Much more! We work in partnership with our clients, and tailor our program to meet the specific needs, requirements, and business environment of each client company.

### OSHA On-Site Consultation Service already comes into my facility and does a site audit for free. Why should I pay for Conney Compliance Solutions?

It's true that you can invite OSHA Consultation into your site to do an audit, which they will perform for free. There are some real drawbacks to this approach, including the time it takes to get to you (OSHA Consultation is commonly backlogged many months before they can get your facility scheduled).

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**Other considerations:**

- OSHA On-Site Consultation Service is designed only for employers with less than 250 employees
- An OSHA Consultation visit is normally a one time event. They come in to perform a safety walk-through, noise survey of the plant, air quality testing, etc. Conney Compliance Solutions is a subscription service to maintain an ongoing and effective safety and health program
- OSHA Consultation requires that any serious violation found is fixed to their exact liking within a specific time frame. Conney Compliance Solutions is flexible in how problems are addressed (with no threat of being turned into OSHA)
- OSHA Consultation will not help with complicated recordkeeping duties, nor will they help develop your written programs - they only give guidance

You wouldn't invite the IRS in to do a free audit, would you? Conney Compliance Solutions gives you all the expertise of an OSHA inspection--but faster, more thorough, and with none of the associated risk! Conney Compliance Solutions can conduct a comprehensive safety audit of your facility either as first step in our subscription services, or as a special project. You'll find that it is surprisingly affordable, and conducted by friendly, expert professionals who have a vested interest in making sure you don't incur costly fines.

**I don't like working with consultants.**

We're not consultants. Like your accountant, we do a job that requires a knowledgeable professional and delivers a result. Our services are available to you as a reasonable monthly subscription--predictable and affordable.

**How much does it cost? Can I afford Conney Compliance Solutions?**

Our full OSHA/EPA compliance services range in cost from as little as \$750 to \$2250 per month, depending upon your specific needs and budget. At these affordable monthly rates, you get peace of mind and the means to achieve and maintain compliance at only a fraction of the cost you'd incur going it alone.

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- Decreasing insurance premiums
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### Three easy ways to get more information:

1. Call Conney Compliance services at **800.854.7940**
2. Visit **conney.com/ComplianceSolutions** and fill out the online form
3. Fill out this form and fax it to **(952) 567-5703**

First Name	Last Name	Company Name
Street Address		City
State	Zip Code	Email Address
Phone	Alternate Phone	Fax

Do you have an account with Conney Safety?  Yes  No

If yes, what is your Conney customer number? \_\_\_\_\_

If yes, who is your Conney Sales person? \_\_\_\_\_

If no, how did you hear of Conney? \_\_\_\_\_

Preferred method of contact  phone  email

Do you maintain site specific OSHA required written programs?  yes  no

Have you had any previous regulatory activity? (Inspections or Citations)  yes  no

Who manages your worker safety (OSHA) currently? \_\_\_\_\_

Who manages your environmental (EPA) currently? \_\_\_\_\_

Number of employees at your location \_\_\_\_\_

Additional comments
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Have you already outsourced or are you thinking of outsourcing your compliance needs?  yes  no

#### Services of interest

- Identify regulations that apply to our industry
- Training employees on various OSHA/EPA topics
- Writing site specific compliance programs and managing updates
- Environmental permitting and reporting
- Responding to an OSHA/EPA/DOT inspection

**Fax your completed form to: (952) 567-5703**

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