



The Risk Resource

A publication of the F&P Risk Control Department.

FIVE IMPORTANT OSHA ISSUES TO MONITOR IN 2014

Courtesy of EHS Today

As we close the book on 2013 – a remarkable year of OSHA enforcement and regulatory activity – we look to the future, and think about what to expect from OSHA in 2014.

Without further ado, here are the five OSHA-related developments you should anticipate in 2014, so says the collective wisdom of the national OSHA Practice Group at Epstein Becker & Green:

1. A Busy OSHA Rulemaking Docket
Although OSHA enforcement has reached levels never before seen by any measure, rulemaking activity under the current administration has been slow. During President Barack Obama’s first term, OSHA identified numerous rulemaking initiatives in its periodic regulatory agenda updates, including rules for combustible dust, crystalline silica, beryllium and an injury and illness prevention program (I2P2) rule. All of these proposed rules, however, missed important rulemaking deadlines or were completely set aside. We expect that to change in 2014 and for the balance of this administration, as the OSHA leadership team will strive to leave its legacy.

Just as we saw OSHA de-emphasize rulemaking in the year leading up to the 2012 presidential election, we already are seeing signs of a typical post-election, second-term, aggressive rule-making calendar from OSHA.

The first sign of the new rulemaking push could be seen in speeches by David Michaels, the assistant secretary of labor for OSHA, who characterized the

proposed I2P2 rule as his and OSHA’s “highest priority.” Secondly, OSHA recently issued its fall 2013 regulatory agenda, which, as we expected, returned several rulemaking initiatives – including the I2P2 rule – from the back burner, where they were deposited prior to the 2012 presidential election, back to the active rulemaking calendar. Finally, OSHA also has introduced new rules, such as a proposed rule to require employers to proactively report to OSHA injuries and illnesses, not just record them on the 300 Log. Other important rules in the proposed or pre-rule stage to monitor in the coming year include:

- Occupational Exposure to Crystalline Silica (comments and hearings coming due in early 2014).
- Request for information about the Process Safety Management Standard (including a reevaluation of the exemption of above-ground atmospheric storage tanks).
- Walking Working Surfaces and Personal Fall Protection Systems (now in the final-rule stage).
- Review/lookback of OSHA chemical standards (an effort to make wholesale changes to existing chemical-exposure limits).

2. OSHA Will Focus on Temporary-Worker Safety

The treatment of temporary workers is expected to become more significant as the Affordable Care Act (ACA) is implemented, particularly when the “employer mandate” kicks in. The ACA will require employers with 50 or more workers to provide affordable coverage to employees who work at least 30 hours per week. This will result in employers

using more part-time workers and hiring more contractors; i.e., workers who will not be counted toward the 50-worker minimum for ACA coverage. Both characteristics commonly are associated with “temporary workers.”

With an expected increase in the use of temporary workers, along with recent reports of temporary workers suffering fatal workplace injuries on their first days on a new job, OSHA will make temporary-worker safety a top priority in 2014, and already has launched a Temporary Worker Initiative. OSHA’s stated goals for the Temporary Worker Initiative are to:

- Protect temporary workers from workplace hazards.
- Ensure staffing agencies and host employers understand their safety and health obligations.

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- Learn information regarding hazards in workplaces that utilize temporary workers.

To achieve these goals, OSHA is developing outreach materials (such as fact sheets and web pages), and will use a combination of enforcement and training. However, based on OSHA's track record, we expect this will involve mostly enforcement. OSHA's director of enforcement programs already issued a memorandum to the agency's regional administrators instructing them to increase efforts to investigate employers' use and protection of temporary workers.

This side of the Temporary Work Initiative already is showing results. In the last quarter of FY 2013 alone, OSHA issued citations at 262 worksites where temporary workers allegedly were exposed to safety and health violations. Additionally, OSHA has conducted more than twice as many inspections of staffing agencies this year as it did last year. This trend undoubtedly will continue in 2014, so it is critical for host employers and staffing agencies to understand the dividing line of responsibility for addressing hazards to which temporary workers are exposed.

3. Hazard Communication Comes Into Focus

Dec. 1, 2013, marked the first key implementation deadline of OSHA's Hazard Communication standard, which recently was amended to align with the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals. The HazCom standard now requires employers to use a standardized system of labeling chemical containers and a standardized format for safety data sheets (formerly material safety data sheets). The Dec. 1, 2013, deadline was the date by which employers were required to have trained all employees on the new labeling formats and safety data sheet format. We expect OSHA to scrutinize employers' compliance with that training requirement in the coming year, to make sure the rollout of the rest of the new standard's requirements proceeds as planned.

The next major deadline under the HazCom standard is not until June 1, 2015, by when employers must implement the new labels and safety data sheets. That work should start in earnest in 2014 or employers will find themselves behind the eight ball when these requirements kick in. During the transition period, chemical importers, distributors, manufacturers and employers may comply with the old HazCom standard, the new HazCom standard or a combination of both.

4. New Judges May Change the Outcomes of OSHA Disputes

The Occupational Safety and Health Review Commission (OSHRC) is a body of independent administrative law judges who adjudicate contests of OSHA citations at the hearing level, and a three-judge panel of commissioners who hear appeals of those cases. Historically, the OSHRC commissioners have included two commissioners from the president's party and the third from the opposite political party. For years now, the commission has been comprised only of two commissioners, both of the president's party, and the potentially more pro-employer seat has remained empty until now.

The White House just announced a nominee for the empty seat on the review commission: Heather L. MacDougall. For the past decade, MacDougall has been an attorney representing management in OSHA disputes. Prior to 2003, she served as chief legal counsel and special advisor to the chairman of the OSHRC. Although MacDougall likely will be in the minority in many decisions by the review commission, having a management-side voice in the discussion at that level only can help the employer community.

On the flip side, a development with more potential impact on OSHA disputes is Sen. Harry Reid's decision to exercise "the nuclear option" to change Senate rules on judicial appointments. Specifically, the Senate approved a rules change in November to eliminate the filibuster on presidential nominees (except for Supreme Court nominees).

This means that Obama's judicial and executive branch nominees no longer need 60 votes to reach the Senate floor for an up-or-down vote.

This matters to OSHA disputes because OSHA cases can be appealed from the three-commissioner panel at OSHRC out to the U.S. Court of Appeals for either the circuit with jurisdiction over the cited workplace or the District of Columbia Circuit. In other words, every OSHA case can be appealed to the D.C. Circuit, which long has been a conservative, pro-employer body. The nuclear option ultimately was executed because three of Obama's appointees to the D.C. Circuit were being blocked. With the rules changed in the Senate, the president now may be able to stack the D.C. Circuit, and change its complexion from the good forum it is now for employers in OSHA cases.

5. More Attention on Heat Illness

Over the past few years, Cal/OSHA aggressively has enforced California's Heat Illness Prevention statute, Title 8 Section 3395(d), which requires employers to provide to employees training, access to shade and adequate drinking water for work outdoors in high-heat conditions. Under Cal/OSHA's heat illness statute, employers also are required to maintain one or more shaded areas, with either open-air ventilation, forced ventilation or forced cooling, and employers are required to allow and encourage employees to access these shaded or cooled areas for cool-down periods of no less than five minutes or as employees feel the need to do so.

On Oct. 10, 2013, the California Legislature joined Cal/OSHA's fight, and signed a bill amending California Labor Code Section 226.7 to include penalties for failure to provide cool-down recovery periods (CDRPs). This requirement kicked in on Jan. 1; now California employers are required to pay a premium for not providing CDRPs to employees.

An important distinction between the new statute and Cal/OSHA's heat illness prevention rule is that Cal/OSHA's rule applies only to employees working in high-heat conditions, whereas the CDRP

legislation does not identify specific working conditions that trigger it. Employees working in air-conditioned offices also may be entitled to CDRPs. The amendment also now allows private litigants to recover for violations, so 2014 is sure to see substantial new litigation in California including new heat illness-related wage-and-hour class-action suits. This also will trigger more employee complaints to Cal/OSHA about heat illness to support their civil suits, and therefore, even more Cal/OSHA heat illness prevention citations.

HAZCOM TRAINING: DON'T PANIC

Courtesy of EHS Today

Now that OSHA has aligned the hazard communication (HazCom) standard with the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS), the clock has run out on the deadline to train your employees on the new GHS formatting. HazCom still will be HazCom, but with a whole new look.

For one thing, HazCom will feature new label elements, including the definitions for hazards, the classification of mixtures and the format for safety data sheets (SDS), which will replace material safety data sheets (MSDS). Labels on shipped containers now will require signal words, hazard pictograms, hazard statements, precautionary statements and the name, address and telephone number of the chemical manufacturer, importer or other responsible party.



Signal words alert users of the relative severity of a potential hazard. "Warning" indicates a less severe hazard; "Danger" alerts users to a more severe hazard. Pictograms identify the product the same way globally. Hazard statements describe the nature of the chemical, and precautionary statements describe the measures that should be taken to prevent adverse effects.

The deadline for covered employers to train employees on the GHS formatting passed on Dec. 1, 2013. But if you fear roving bands of OSHA inspectors banging on doors to identify GHS scofflaws, don't hit the panic button. Just get started.

Don't Panic

During my tenure as Virginia's labor commissioner, my colleagues and I did our best to keep perspective. In the big picture, our goal was not so much to find an idealized picture of workplace perfection behind every door; that's unrealistic. Instead, we tried to work with employers to identify, prevent and abate known hazards. And while safety is critical, we were not blind to other interests that compete for employers' time and attention.

Making the task more difficult, many conscientious employers, especially small and midsize employers, lack a full-time or even a part-time safety and health director. Many of these employers may be completely unaware of the new directive.

At least in the foreseeable future, OSHA likely will identify GHS violations incidentally. Often, they will be discovered in the course of a regularly scheduled inspection or when responding to a reported incident or hazard. You should be prepared at any time to provide documentation demonstrating that all covered employees have completed the HazCom training.

What Should You Do?

First of all, breathe. And get the training for your co-workers. Avoid or reduce the sting of a citation by showing good faith. How? One quick and relatively inexpensive way is to schedule a brief training with a safety or health consultant. Anna Jolly, the owner and managing director of Circle Safety and Health Consultants in Richmond, Va., said GHS training doesn't have to be daunting.

"A lot of employers don't understand that they are included if they use any chemicals, including gasoline for tools and equipment," said Jolly. "Knowing

you have to get it done is the most important step. If the employer has a hazard communication program already in place, we can get its employees up to speed within two hours. The training is important so that employees will understand the pictograms and warnings of the new system as chemical manufactures update their materials."

You also can conduct your own training using videos and materials offered online, such as those provided by the National Safety Council. OSHA's website includes helpful information such as QuickCards, its GHS fact sheet, its Hazard Communications page and its brief on GHS-compliant labels and pictograms.

Flood and Peterson's Risk Advisors are available help you with your training or provide you with the materials to easily do the training yourself.

Whether you use a piece of string on your finger (which I do NOT recommend) or an electronic calendar, go ahead and note the other GHS deadlines on the horizon:

- June 1, 2015 – New label requirements and SDS must be in place. Distributors must be in compliance if they are not passing along manufacturer labels.
- Dec. 1, 2015 – Distributors may ship products under the old system. All labels must be updated by this date.
- June 1, 2016 – Employers must update alternative workplace labeling and hazard communication programs as necessary, and provide additional employee training for newly identified physical or health hazards. The transition period is complete and all manufacturers, distributors, importers and employers must be in compliance with the final standard.

So if you missed the Dec. 1 GHS training deadline, don't panic. Just schedule the training for your employees. Let your demonstration of good faith be the angel by your side.

As these deadlines come and go, remind yourself that workplace safety and health compliance isn't a destination; it's a process – for all of us. Keep that in mind and you'll stay ahead of the curve.

FMCSA CLARIFIES REST-BREAK EXEMPTIONS FOR SHORT-HAUL DRIVERS

Courtesy of Safety & Health

Washington – The Federal Motor Carrier Safety Administration has released [guidance](#) on break requirements for short-haul commercial truck drivers who unintentionally exceed time or distance driving limits.

Current [hours-of-service regulations](#) require non-exempt long-haul truck drivers to break for 30 minutes after eight hours of continuous on-duty time. Short-haul drivers are [exempt](#) if they only operate up to a maximum 12 continuous hours per duty day and drive within a radius of 100 air miles. Short-haul drivers who do not require a commercial driver's license to operate also qualify for the exemption if they drive only within a radius of 150 air miles.

According to FMCSA's guidance, schedule changes or other situations may force short-haul drivers to exceed the time or distance eligibility criteria after they already have driven for eight continuous hours. FMCSA stated that these drivers will not be in violation of the 30-minute break requirement as long as they take a break at the "earliest safe opportunity" after exceeding the limits and note in their [record-of-duty-status](#) logbook the reason why they did not take a break at the required time.

CLIENT SPOTLIGHT

GOLD DUST WEST CASINO-RESORT CARSON CITY NEVADA ACHIEVES NEVADA DEPARTMENT OF BUSINESS AND INDUSTRY'S & OSHA'S SAFE PARTNER AWARD

By: Dave Murray, Safety Consultation and Training Section (SCATS) and Flood and Peterson



Congratulations to the employees and owners of the Gold Dust West Casino Resort in Carson City, Nevada for diligently working over the past several years to achieve the nationally recognized OSHA Safe Partner Award. Recognition for this workplace safety and health award is due to Gold Dust West Carson City going above and beyond standard workplace safety and health regulations to achieve a favorable safety record. Multiple safety and health surveys along with extensive employee safety and health training have been conducted over the past several years. Findings and suggestions from safety and health surveys along with safety and health awareness training by the Nevada Department of Business and Industry's Safety Consultation and Training Services (SCATS) have been implemented. These actions have favorably lead to reduced workplace injuries, a showplace operating environment, and most importantly happy employees with a positive attitude toward safety both at work and at home.

Gold Dust West Carson City has fully utilized the safety and health consultation services provided by the SCATS unit in Reno, Nevada. Nevada operates a state managed Federal Occupational Safety and Health Program (OSHA).

Through the sincere and devoted safety and health efforts of Richard Bolger – Security Manager, and Michael Howe – Human Resources Manager at Gold Dust West Carson City, an exemplary safety record has been and is being achieved. This business has just over 200 employees. It is now on the path and striving for the highly recognized Safety and Health Achievement Recognition Program (SHARP) status by OSHA.

We congratulate the efforts and investment that Gold Dust West Carson City has made in their workplace safety and health activities at this property. Other benefits from these safety and health efforts include guest safety and insurance underwriting analysis for reduced workers compensation and property and casualty insurance policy costs.

Gold Dust West Carson City is a brand within the family of Jacobs Entertainment, Inc. (JEI). JEI is a developer, owner and operator of gaming and entertainment facilities in four regions of the United States. Gold Dust West Carson City was added to the Jacobs family in 2006 and resides on eighteen sprawling acres at the foothills of the Sierra Mountains. JEI has two additional gaming properties under the Gold Dust West brand residing in Reno and Elko, NV as well as two gaming properties in Blackhawk, CO – The Lodge Casino and Gilpin Casino. The Lodge/Gilpin Casinos have been longstanding valued partners with Flood and Peterson for over 25 years.

With achieving the prestigious Safe Partner Award under the Nevada SCATS program, Gold Dust West Carson City is now directing their efforts towards achieving OSHA's SHARP Certification. The Safety and Health Achievement Recognition Program (SHARP) offers qualified Nevada employers expanded safety and health consultation services, program management assessment and evaluation, and training services. Companies meeting the qualifications and successfully completing the SHARP consultation process receive a two year exemption from Nevada OSHA general schedule enforcement inspections, which is quite a benefit for hotel and gaming facilities.

On behalf of everyone at Flood and Peterson, we wish to congratulate the management team at Gold Dust West Carson City for achieving excellence in safety in receiving the SCATS Safe Partner Award.



CLIENT SPOTLIGHT

A QUALITY CRISIS LEADS TO A NATIONAL BUSINESS ETHICS AWARD

By: Mike Stajduhar with Neenan Construction

It was the Fall of 2011. An issue was identified at a new school that had been recently designed and constructed by The Neenan Company. An outside structural engineer, hired by the school district, called for a structural review of the one year old building after a gym wall moved a few inches.

Neenan, one of the most prestigious design-build firms in Colorado, was about to be shocked. Their reputation for integrated project delivery with quality and safety was being called into question.

Understanding the potential gravity of the situation the senior management team initiated third-party structural reviews on a few school projects that were under construction. Although Neenan continued to receive support from many clients, local news outlets picked up the story and concerns grew.

Immediately, Neenan commissioned comprehensive reviews of 94 projects which they felt needed attention. The company's president, Randy Myers, personally met with many clients associated with these projects to provide assurance that issues or concerns would be addressed.

"I remember reading the first article online initially but it didn't brace me for the shock...our reputation is key to our business, we have never let our clients down in the past and we weren't going to start now. We reached out to our clients immediately about the situation and how it might affect them. The scary thing was not knowing the depth of the problem and whether we could survive the financial and reputation hits. I was resolved that we would never put ourselves in this position again." -Randy Myers, President, The Neenan Company

Neenan turned to their insurance broker, Flood and Peterson and insurance carrier, Zurich. Through this partnership they began the arduous task of assessing their existing quality system to identify and prioritize deficiencies that needed to be addressed. Neenan internally committed to revamp their processes starting with implementation of structural peer reviews for every project going forward. The leadership needed a road map to guide them through the implementation of a comprehensive "best in class" quality management system.

In February of 2012, Neenan committed to quality improvement and began using a self-assessment tool provided by Zurich to establish a baseline for the journey that was about to begin. As part of this commitment the Quality Assurance team was re-organized to report directly to the chief operating officer at the recommendation of Zurich and Flood and Peterson.

Neenan, Flood and Peterson, and Zurich established a task force to meet monthly. For 2012, Neenan was on a quality program mission. According to Randy Myers, President of The Neenan Company, "We brought in our partners at Zurich and Flood and Peterson to help us honestly assesses our current processes and areas to focus. While we were strong in some areas, we were mediocre or weak in others. We had follow-up meetings every six weeks to review our progress and ask questions to improve our processes." These meetings helped sustain momentum.

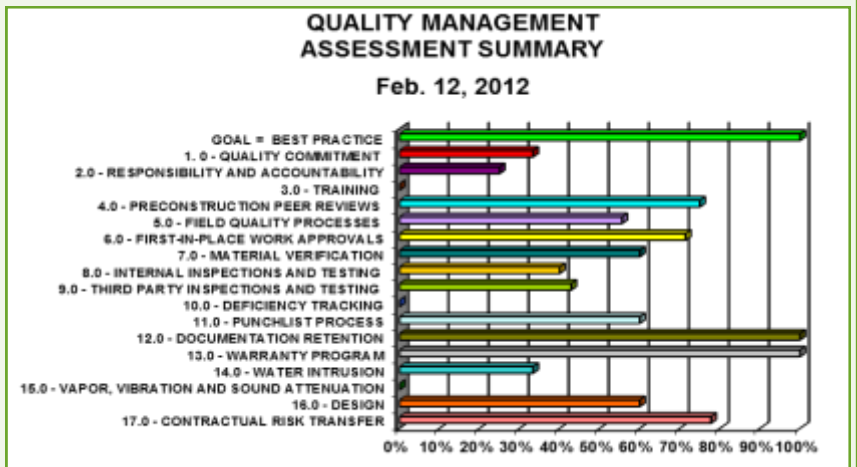
The initial assessment identified several key areas that were lacking for a "best in class" quality management system. It was developed specifically for Neenan utilizing existing Zurich Risk Engineering tools and risk management expertise from Flood And Peterson.

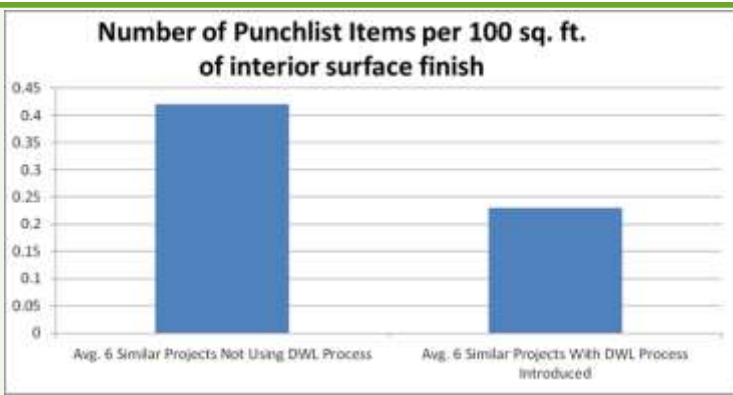
From this initial assessment, through collaborative task force meetings, Neenan identified and prioritized elements that would ensure steady and efficient progress to implement a redesigned quality system.

With a goal of full company implementation by January of 2013, Neenan took one month to identify their quality program initiatives for design and construction phases while establishing timeline goals for each phase. These initiatives consisted of design tollgates, mock-ups, team submittal reviews, pre-installation meetings, and first-in-place reviews.

Expectations and user documents were developed for each initiative over the next six months. Neenan's Database Administrator, Greg Bundy, developed a web based deficient work list tracking tool and chose six projects (user groups) to test the systems. Listening to requests from the user groups, they developed an iPad app to track deficient work items. Neenan's IT group continues to be an integral part in the development of the quality process tools.

The value of the testing phase for the new processes and tools exceeded everyone's expectations. Mike Stajduhar, Neenan's Director of Quality Assurance states, "Not only did the user groups provide input for continuous process improvements, it showed just what can be accomplished when we all work collaboratively towards a common goal." When comparing historical owner punch





list (deficient work items) data with early and consistent use of the newly developed deficient work tracking tool, the size of owner punch lists declined by 46%. The Deficient Work List (DWL) tracking tool was obviously working.

The complete quality program was rolled-out to the company after 10 months, two months ahead of the original goal. This roll-out included the field, project management and project coordinator disciplines initially, then was followed-up with design and preconstruction disciplines. The 2012 quality program mission was accomplished.

In January of 2013, five new projects were selected to utilize the new processes throughout all phases of design and construction.

Neenan developed web-based tools to measure team participation in the new quality program during the first quarter of 2013. These tools were created to be shared with and accessed by everyone in the company.

The quality program was locked and loaded after 15 months of hard work. The real world test was about to begin. The first project using the full quality process was completed in August of 2013 and the initial results are very promising. The project team surpassed intended participation goals and the owner’s punch list items decreased by another 50%.

Neenan’s continued success in upgrading their quality management system is due to methodical and widespread involvement throughout the organization. By continuing to push the envelope, new tools such as performance metrics are being utilized. These tools provide extra motivation and will help with ongoing continuous improvement.

The Neenan Company was recently awarded the 2013 American Business Ethics Award by the Foundation for Financial Service Professionals. Established in 1994 the American Business Ethics Award recognizes companies that exemplify high standards of ethical behavior in their everyday business conduct and in response to specific crises or challenges. Chosen from a field of 30 other companies across the U.S., The Neenan Company received high marks for its “stand up, don’t cover up” philosophy, which guided the company to take care of its clients and create a “best in class” quality management system.



On behalf of everyone at Flood and Peterson, we would like to congratulate The Neenan Company on achieving a National Business Ethics Award. The Neenan Company will be leading a breakout session on QA/QC at this year’s Flood and Peterson Symposium on Friday, October 3rd at the Embassy in Loveland. Be sure to attend to learn more.

2014 F&P RISK CONTROL OUTREACHES

Please mark your calendars for the upcoming 2014 F&P Risk Control Outreachs. Invitations will be sent out with more information on each of these.

Morning F&P Risk Control Outreach

Date: Friday, June 13th
 Time: 8:30—11:00 am
 Place: DoubleTree Hotel, 83 East 120th Avenue, Thornton (NEW LOCATION)

17th Annual F&P Risk Control Symposium

Date: Friday, October 3rd
 Time: 7:30 am—3:00 pm
 Place: Embassy Suites Hotel, 4705 Clydesdale Pkwy, Loveland



The Symposium will include a keynote speaker, breakout sessions, exhibitors, networking, and giveaways.

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MOTORCYCLE SAFETY

Ride Safe With These Motorcycle Tips

Courtesy of Safeco Insurance

Motorcyclists know that riding gives them a freedom that driving a car just can't match. But the best riders also know that motorcycles require more focus to operate and don't provide the same protections cars do in the event of a crash. The best riders also take great care in all situations, whether they're in heavy traffic on I-25, stuck in the rain or just taking a quick ride on a perfect day.

If your habits aren't as safe as they could be, or if you're new to motorcycling, don't worry! Instead, take time to improve. The quick safety tips below are a great place to start.

Want more? Check out the Motorcycle Safety Foundation (<http://www.msf-usa.org>) or the American Motorcyclist Association (www.americanmotorcyclist.com). And remember to give Flood and Peterson a call when you need to get coverage for your bike (or your home or auto, boat or more)!

First things first

- Wear proper safety gear and, most importantly, a helmet – no matter how short your trip may be.
- Make sure you can be seen by other motorists. Make it easier for them by wearing reflective clothing, always using turn signals (and perhaps hand signals as well) and keeping your headlight on.
- Even when taking the above precautions, stay alert and assume that other drivers don't see you — especially at intersections and when making lane changes or passing.
- Be patient. Don't tailgate, and if someone is tailgating you, get out of their way.
- Don't ride after drinking or taking any medications that could impair your abilities.



Riding at night

- Again, make sure you're visible — particularly at dusk. Consider upgrading your headlight or adding other lights to your ride. Is your bike black? What about your clothing? Both will make you more difficult to see at night.
- Your vision needs to be clear, so keep your visor or goggles clean and free from scratches. If you don't use face or eye protection, consider it.
- Carry a flashlight or other emergency gear with you so a mechanical problem doesn't leave you stranded — and invisible — on the side of a dark road.

Bad weather?

- Keep rain and cold-weather gear handy. Riding isn't just more enjoyable when you're warm and dry — it's safer, too.
- Use extreme caution when it first begins to rain, as the roads are most slick at that point. Pull over and wait if necessary. It's better to be late than ride in unsafe conditions.

We wish that all of your rides could be on sunny days with wide-open roads, but we know that's not going to happen. So think about safety every time you start up your bike!

Spring is here...Time to watch for Motorcycles, Bicyclists, and Pedestrians

Just a friendly reminder that with the warmer weather comes more outdoor activities. Please remember:

- Look twice before switching lanes, making turns, or pulling out of a drive way.
- Stay on your side of the road, especially in corners.
- Don't follow too closely.
- Keep your eyes on the road and off your cell phone

F&P Celebrating 75 Years!



Flood and Peterson is excited to announce it is celebrating its 75th anniversary in 2014. During the past 75 years, F&P has evolved from a traditional broker to a risk management focused advisor. Flood and Peterson has 115 employees serving clients from three locations along the front range in Denver, Fort Collins and Greeley. Flood and Peterson is proud of its continued commitment of protecting and promoting the prosperity of their clients, employees and communities.



About F&P's Risk Resource

The Risk Resource is published quarterly by Flood and Peterson and is committed to providing current information to assist our clients in achieving their risk control goals. If you have any questions, or suggestions, regarding this newsletter please contact the

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