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Standards Board Report

Another California Landmark — ATD, Zoonotic Disease Protections Adopted

SAN DIEGO — If — or when — a deadly new influenza strain strikes California, protections from aerosol-transmissible diseases (ATDs) the Cal/OSH Standards Board voted to put in place May 21 would prevent the kind of incident related to the board by nurse Ingela Dahlgren before it cast its landmark vote.

Dahlgren, a Camarillo nurse and executive director of the Nurse Alliance of California (part of Service Employees International Union), said that at the height of the H1N1 outbreak, one emergency room manager was instructed by the hospital to stand outside the front door of the ER and hand out surgical masks to patients and visitors.

But there was a “mad rush” to get N95 facemasks and not enough to go around for nurses and other staff. To make matters worse, the human resources director of the facility called the association and said, “You have to have your nurses stop scaring patients by wearing facemasks.”

That will change under new General Industry Safety Orders §5199, approved 6-0 by the board, which also adopted a companion standard covering “zoonotic” diseases — those that can originate on or be spread by animal-handling operations.

Both standards are the first of their kind in the country. “Once again, California is leading the way for the nation,” said Mark Catlin, industrial hygienist at SEIU headquarters in Washington, D.C., calling the vote “quite amazing.”

An ATD is a disease or pathogen for which droplet or airborne precautions are required. Such infection control procedures range from simple precautions to airborne infection isolation. (See sidebar for a list of ATDs.)

The standard covers a number of employment sectors, including:

- Hospitals
- Skilled nursing facilities
- Clinics, medical offices and other outpatient facilities
- Facilities that perform high-hazard procedures
- Home health care
- Long-term health care facilities and hospices
- Medical outreach services



Ingela Dahlgren: Nurses “Scaring” patients with surgical masks?

Water, Shade Violations in 100°F-Plus Heat — EEEEC Shuts Down More Farm Labor Contractors

During enforcement sweeps in the Coachella Valley and San Diego County last week, California’s Economic and Employment Enforcement Coalition (EEEC), which includes the Division of Occupational Safety and Health, shut down five farm labor contractors (FLCs) for heat illness prevention violations that the coalition said put workers in serious danger.

The shutdowns follow similar actions against three FLCs in mid-May.

In the most recent sweeps, DOSH issued an Order to Prohibit Use (OPU) to four FLCs in Coachella Valley. They include Galvan Brothers, Inc., of Mecca, Valley Pride of Coachella, Young’s Nursery of Thermal and Salvador Alvarado of Coachella. The Division also issued an OPU to Joel Salazar Farm Labor of Escondido.

EEEC said its investigators encountered work crews toiling in temperatures in excess of 100°F in the Coachella area with no shade. In Escondido, a crew was working in temperatures as high as an incredible 116°F with “little water.” Department of Industrial Relations says the crew of 15 had to share less than a gallon of water.

Cal/OSHA now has shut down eight labor contractors because of heat illness hazards in the past two weeks. The agency requires such employers to develop an acceptable heat illness prevention program before it allows them to resume operation.

In addition to the OPUs, the California Labor Commissioner is investigating the licensing status of the employers.

Car Wash Settlement

The CLEAN Car Wash Campaign, which spearheaded a safety and health campaign against two Los Angeles car washes that lead to citations for serious violations against the owners by Cal/OSHA, is hailing a settlement agreement reached today in the cases.

Vermont Car Wash and Hollywood Car Wash, owned 

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by Benny and Nissan Pirian, agreed to pay \$20,000 of a proposed \$25,000 penalty and hire a consultation to implement a safety and health training program at the operations.

Last year, DOSH cited the two car washes for six serious and four general violations, alleging employees were exposed to unguarded machine parts, and had no emergency eyewash stations or a hazard communication program. The Division inspected the operations after the Southern California Coalition on Occupational Safety and Health filed a complaint on behalf of workers at the car washes. CLEAN says that workers at car washes throughout the Los Angeles area are exposed to hazardous conditions without training or protection, and that workers who complain are fired.

Under the settlement, the Pirians will hire a consultant to implement a training program for workers related to the hazardous chemicals they must work with.

CLEAN applauded DOSH for defending the citations. Director Henry Huerta expressed hope that Cal/OSHA will take "strong action" against other area car washes as well.

The citations against Hollywood Car Wash alleged violations of General Industry Safety Orders §§ 5162, 4070(a), 3382, 3395 and 5194 and 4075(a) against Vermont. In its serious allegations, DOSH said the car washes had no emergency eyewash stations, and a water pump pulley, pump shaft, chain and sprocket drive and a washing machine belt and pulleys were not guarded.

EEOC inspected more than 550 car washes in 2008, issuing more than 500 citations for safety and health, wage and hour, workers' comp and registration violations. In all, EEOC proposed more than \$3 million in penalties.

No Fatalities

Cal/OSHA reports no fatalities in the week of May 19-25. The Division is investigating a May 18 incident at

Healdsburg High School in Sonoma County which injured a metal shop teacher and a student.

According to a newspaper report, acetylene fumes accumulated in a cabinet, then exploded. The teacher was hit by flying debris, falling back, and the student suffered a leg gash.

Petition Seeks Use of Governor Switch to Detect Speeding Elevators

A petition to the Cal/OSH Standards Board seeks a change to the Elevator Safety Orders (ESO) to allow use of governor overspeed switches to detect when an ascending elevator is moving too fast and threatens to strike a hoistway overhead structure.

Debbie Prince, code specialist for Motion Control Engineering, Inc., of Rancho Cordova, filed the petition to revise ESO §3141.7 to state:

"The detection means for the ascending car overspeed protection device required by ASME A17.1-2004, section 2.26.2.29 shall be permitted to be satisfied by another device specified in ASME A17.1-2004, section 2.26.2, provided that the device used complies with ASME A17.1-2004, section 2.19.1.2(a)."

Prince's rationale is that governor overspeed switches satisfy all other requirements of the consensus standard, "and there appears to be no other prohibition against using it" other than the fact that it is not expressly granted by the standard. The practice is allowed in other North American jurisdictions, she added.

"The proposed verbiage allows someone to use the governor overspeed switch as the ascending car overspeed detection means without telling them how to do their design," Prince said.



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Vertical Lifts: Union Opposes Practice, but Wants to Improve Regulation

SAN DIEGO — The union representing maritime workers had some suggestions for improving rules governing a practice it actually opposes, and a one-sentence change to a previously adopted regulation generated plenty of comments at a Standards Board public hearing May 21.

A third proposal that would allow the American National Standards Institute to accredit crane operator certifying entities yielded no controversy.

The International Longshore and Warehouse Union weighed in on vertical tandem lifts (VTL), in which a container crane lifts two or more containers, one on top of the other and connects them by a device known as a semiautomatic twist lock. VTL is part of the “intermodalism” of cargo containerization that allows rapid loading and unloading of containers.

In December 2008, Fed-OSHA published a final rule on VTL, revising CFR 1917.71(i)-(k). Since Cal/OSHA has not addressed this procedure, the federal standard is more effective than the Title 8 regulation, according to Standards Board staff. The proposal, which adds subsections (j)-(l) to General Industry Safety Orders §3466, uses the federal standard verbatim.

But Brian Watley, business manager for the ILWU local in National City urged the board to make improvements to the California version of the rule. The union opposes VTLs because it considers them unsafe, and seeks an all-out ban on the technique, but it is participating in the rulemaking process because “it’s better to have some regulation than none at all” for a practice that is al-

lowed.

Watley said provisions for inspecting twist locks and corner castings call for improvement. Fed-OSHA requires only visual inspection and a determination that the devices are “sufficiently operational and free of corrosion,” he explained. ILWU believes that the locks and castings should be “thoroughly and carefully” inspected before VTLs are allowed to proceed. He also commented that Cal/OSHA should include an international maritime standard on VTLs. The Fed-OSHA rule “represents a weakening of an existing international standard,” he said.

Additionally, he called for Cal/OSHA to require that individuals doing inspections have technical knowledge and said the Fed-OSHA rule gives too much discretion to employers on safe work zones and not enough guidance on training. “The federal standards do not go far enough,” Watley said. “If these operations are going to go forward, then all maritime workers must be trained regarding the safety of VTLs,” he added.

Footwear Repair

A proposal to correct an error in a previous rulemaking action has triggered concerns over unintended consequences. In 2006, the board adopted revisions to GISO §3385(c)(2) that included a reference to ANSI Z41.1-1999, but the correct reference should have been simply Z41-1999.

But wait, say several commenters, including John Vocke of Pacific Gas & Electric Co., Elizabeth Treanor of Phylmar Regulatory Roundtable and Judith Freyman of ORC Worldwide. The reference to the ANSI Z41-1999 standard, Personal Protection

GISO §3466 at a Glance

- Employees involved in VTL operation shall be trained and competent in the safety-related work practices, procedures and requirements pertaining to their job assignments.
- No more than two intermodal containers may be lifted in a VTL. Employers must ensure that containers to be lifted are empty.
- Lifts shall be performed using a shore-based container gantry or other crane applicable to VTL operations.
- Employers must assure that interbox connectors are properly engaged on coupled containers.
- Below-deck containers may not be handled as VTL.
- VTL operations may not be conducted during winds above 55 miles per hour or the manufacturer’s recommendation.
- Employer must ensure that interbox connectors conform to certain requirements.
- Employers must develop, implement and maintain a written plan for transporting vertically connected containers that ensures safe operating and turning speeds and other safety issues, including communication and coordination.
- The employer shall establish a safe work zone within which employees may not be present when vertically connected containers are in motion.

Foot Protection Proposal at a Glance

§3385(c)(2). Protective footwear purchased on or before January 26, 2007 shall meet the requirements of either the American National Standard for ~~Men’s Safety-Toe Personal Protection—Protective Footwear~~, American National Standards Institute (ANSI) Z41-1-1999, or the American Society for Testing and Materials (ASTM) F2412-05, Standard Test Methods for Foot Protection and ASTM F 2413-05, Standard Specification for Performance Requirements for Foot Protection which are hereby incorporated by reference.

Crane Certifier Accreditation at a Glance

§ 5006.1(a)(1)(c). Accredited Certifying Entity. A certifying entity is any organization whose certification program is accredited by either the National Commission for Certifying Agencies (NCCA), or the American National Standards Institute (ANSI). ANSI accreditation shall be in accordance with the requirements of the ANSI, International Organization for Standardization (ISO), International Electrotechnical Commission (IEC) 17024:2003(E), Conformity Assessment-General Requirements for Bodies Operating Certification of Persons, which is hereby incorporated by reference.

☞ — Protective Footwear, precludes the use of aftermarket “hang-on” or “strap on” toe appliances, caps, metatarsal guards and other devices. The consensus standard says such protections must be manufactured into the protective footwear and tested as an integral part of it.

Vocke, Treanor and Freyman suggest the board add federal language that cites the consensus standard but allows protections that “shall be demonstrated by the employer to be equally effective.”

Board management representative William Jackson said that the proposal “with the stroke of a pen” would change the rules on protective footwear. Occupational safety and health representative Dr. Jonathan Frisch commented that the board is between a rock and a hard place on the matter. If it adopts the rule, it would leave out certain protections, but if it rejects it, it would leave workers with no protection.

Board Principal Engineer Mike Manieri told the board that if it wants to allow strap-on protections, it will take a separate rulemaking action because the issue is beyond the scope of the proposal in the public hearing.

ANSI as Accreditor

There were no comments at the hearing on proposed revisions to GISO §5006.1 to add the American National Standards Institute (ANSI) as an accrediting entity for crane operator certification. This means that employers would be permitted to have their crane operators certified by an entity accredited by either ANSI or the National Commission for Certifying Agencies (NCCA).

ANSI accreditation must conform to the requirements of ANSI, International Organization for Standardization, International Electrotechnical Commission, Conformity Assessment—General Requirements for Bodies Operating Certification of Persons, which is incorporated by reference in the proposal.

ATDs

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- Paramedic and emergency medical services, including firefighters and other emergency responders
- Facilities, services or operations that receive persons from scenes of uncontrolled hazardous-substances releases involving biological agents
- Police officers who must transport and/or detain persons who might be “reasonably anticipated” to be infected with ATDs
- Public health services
- Correctional facilities, homeless shelters and drug treatment programs
- Operations that perform aerosol-generating procedures on cadavers
- Laboratories that perform procedures with materials containing ATDs
- Maintenance, service or repair operations involving air-handling systems that may be reasonably anticipated to be contaminated with ATDs

- Any other facility that has been determined in writing by the chief of the Division of Occupational Safety and Health (DOSH) by special order to require application of the standard

The standard has three levels of requirements, the highest of which incorporates hospitals and other high-risk settings, where employers must provide all safeguards required by the standard, including an exposure control plan, personal protective equipment, respirators, training and medical services, at no cost to employees.

So-called “referring” employers, which might come in contact with a suspected ATD case first, then send that person to a health care facility for treatment, require a less-extensive level of protection. These employers are required to screen persons they come in contact with for airborne infectious diseases and refer those cases. They are not required to provide further medical services beyond first aid, initial treatment or screening and referral, and they are not required to transport, house or isolate suspected cases.

The third level of protection is required of laboratories, including feasible engineering and work-practice controls to minimize employee exposures and establishing a biosafety plan. Labs also would be subject to the training and recordkeeping provisions of the standard.

Broad Support

Labor and management took turns praising the standards before the board vote, and after the board unanimously adopted them, the crowd applauded. Some stood. DOSH Senior Safety Engineer Deborah Gold, who, along with colleague Robert Nakamura had a major role in crafting the standards, noted that California has one of the highest incidences of tuberculosis in the country. And while public health authorities have given “good guidance” to employers, it sometimes has been inconsistent and is unenforceable.

“When we get sick, we count on health care workers to treat us,” Gold said in briefing the board about the rulemaking package. “They can’t do that if *they* are sick.” Just as a firefighter wouldn’t go into a burning building without personal protective equipment, we shouldn’t expect a health care worker to treat infected people without protection.

Barbara Materna, chief of the California Department of Public Health Occupational Health Branch, spoke emphatically of the need for the ATD standard. “We believe that enforceable protections for health care workers, workers in homeless shelters, poultry workers and other workers at risk are needed,” she told the board. “We have a long way to go to be adequately prepared,” Materna added, noting the H1N1 outbreak and the long-term implications such diseases can have for health care workers. “These diseases are not inconsequential.”

Enid Eck of Kaiser Permanente said the standard “provides a reasonable yet comprehensive approach to ensuring employee protection” from ATDs, by broadening protections beyond tuberculosis to diseases that have yet to be identified, and making a marked distinction between aerosol transmission and droplet transmission. (The ATD standard has its roots in a decision by Fed-OSHA earlier this decade to drop work on a tuberculosis standard. After health care employers objected to being placed under the respirator fit-

testing requirements of GISO §5144, DOSH began work on a separate regulation. That effort evolved into the ATD rule.)

Eck praised the advisory committee and development processes that guided the rulemaking effort, a sentiment that was shared by Roger Richter of the California Healthcare Association.

Vickie Wells of the San Francisco Department of Public Health told the board that the city's police department already is working to ensure that officers are trained and fit-tested to wear respirators in case of an outbreak. Prior to H1N1, the department thought officers could use powered air-purifying respirators, but it has become clear that they need to have N95 respirators as an option in infectious disease situations. "They were able to, relatively quickly, medically qualify, train and fit-test a large percentage of their force to deal with this issue," Wells said.

Kevin White, health and safety director for California Professional Firefighters, said workers in his profession provide care in uncontrolled settings where unknown illnesses might be present. "Prevention makes more sense than reaction. The issue is providing firefighters and EMS personnel with the maximum available health and safety protection."

Pete Grayshock, of the Southern California Committee on Occupational Safety and Health, stated that "while we may have momentarily dodged a bullet" with H1N1, the standard is necessary to



Mark Catlin, SEIU:
ATD Standards
"quite amazing."

prepare for the next novel pathogen. "Prevention is something that allows all workers, especially first responders, to do their jobs to the best of their abilities in an outbreak," he said.

SEIU's Catlin pointed out that when Cal/OSHA adopted the bloodborne pathogens standard in the late 1980s (it added needlestick protections in the late 1990s), opponents argued that its requirements were too onerous. "But looking back, most employers quickly met or exceeded them," Catlin said. "We believe that the most effective approach for protecting workers from aerosol-transmitted diseases is through a comprehensive standard that incorporates both airborne and droplet exposures, and covers a wide range of infectious agents. The California proposal uses this broad, comprehensive framework for effectively addressing these hazards." He also lauded the "inclusive, respectful and deliberative process" involving all stakeholders.

Standards Board members were equally effusive in their praise. "This is a remarkable piece of work," commented occupational health representative Dr. Jonathan Frisch, noting how "thorough and transparent" the rulemaking record is. "This is a groundbreaking regulation in many ways."

Management representative Bill Jackson congratulated DOSH on a "good job," and board chair John MacLeod called it "exemplary staff work."

DOSH Chief Len Welsh, who has worked in regulatory development for the Division for many years, called ATD "the most comprehensive standard I have ever worked with."



Vickie Wells, S.F. DPH
Police already fit testing.

ATDs Reach

The aerosol-transmissible diseases standard, General Industry Safety Orders §5199, covers a number of health threats in two classes:

Pathogens requiring airborne infection isolation include:

- Aerosolizable spore-containing powder or other substances capable of causing serious human disease, e.g., Anthrax/*Bacillus anthracis*
- Avian influenza/Avian influenza A viruses (strains capable of causing serious disease in humans)
- Varicella disease (chickenpox, shingles)/Varicella zoster and Herpes zoster viruses, disseminated disease in any patient
- Measles (rubeola)/Measles virus
- Monkeypox/Monkeypox virus
- Novel or unknown pathogens
- Severe acute respiratory syndrome (SARS)
- Smallpox (variola)/Variola virus
- Tuberculosis
- Any other disease for which public health guidelines recommend airborne infection isolation

Diseases requiring droplet precautions include:

- Diphtheria pharyngeal
- Epiglottitis, due to *Haemophilus influenzae* type b

- *Haemophilus influenzae* Serotype b (Hib) disease
- Influenza, human (typical seasonal variations)/influenza viruses
- Meningitis
- *Haemophilus influenzae*, type b known or suspected
- *Neisseria meningitidis* (meningococcal)
- Meningococcal disease sepsis, pneumonia (see also meningitis)
- Mumps (infectious parotitis)/Mumps virus
- Mycoplasmal pneumonia
- Parvovirus B19 infection (erythema infectiosum)
- Pertussis (whooping cough)
- Pharyngitis in infants and young children/Adenovirus, Orthomyxoviridae, Epstein-Barr virus, Herpes simplex virus
- Pneumonia
- Pneumonic plague/*Yersinia pestis*
- Rubella virus infection (German measles)/Rubella virus
- Severe acute respiratory syndrome (SARS)
- Streptococcal disease (group A streptococcus)
- Viral hemorrhagic fevers due to Lassa, Ebola, Marburg, Crimean-Congo fever viruses
- Any other disease for which public health guidelines recommend droplet precautions

Zoonotics Standard Aims to Nip Farm-Borne Pathogens in the Bud

SAN DIEGO — While the aerosol-transmissible diseases (ATD) standard is designed to protect workers from pathogens on the front line of health care, the second of the twin transmissible-disease standards adopted by the Cal/OSHA Standards Board on May 21 places protections at worksites behind those lines, but where novel pathogens sometimes begin.

New General Industry Safety Orders §5199.1 establishes minimum protections for employees exposed to animals or animal products or waste known or suspected of carrying so-called “zoonotic” diseases, such as avian or swine influenza. Similar to the ATD standard, it requires covered employers to develop controls to reduce infection risk for employees based on the nature of the exposure, the type of work setting and the level of recognized risk.

The regulation applies to:

- Operations involving the management, capture, sampling, transportation or disposal of wild birds or other wildlife.
- Farms producing animals or animal products, including the transport of animals and untreated animal products, byproducts or wastes to or from farms.
- Slaughterhouses and initial processing facilities for untreated animal products, byproducts or wastes.
- Veterinary, animal inspection and other animal health operations.
- Importers of live animals and untreated animal products.
- Zoos, animal parks, pet stores and other operations in which animals are displayed, transported or housed.
- Laboratory operations involving samples, cultures or other materials potentially containing zoonotic aerosol transmissible pathogens (zoonotic ATPs).
- Zoonotic ATP incident response operations.

The standard does not apply to restaurants or other operations that handle products inspected and passed by the U.S. Department of Agriculture (USDA) or California Department of Food and Agriculture (CDFA).

All employers covered under §5199.1 are required to establish, implement and maintain effective procedures to prevent employee exposure to zoonotic diseases. Such procedures include sanitation, investigating occupational injuries and illnesses, training, and biosecurity and use of personal protective equipment when applicable.

Employers with exposure to potential infection in the course of capturing and collecting samples from wildlife, and those collecting and disposing of wildlife subject to a Centers for Disease Control alert, must have written procedures for those operations. They include methods to minimize the “production of aerosols,” use of personal protective equipment, cleaning and decontamination procedures, medical services and training.

Additionally, when USDA or CDFA issue a quarantine order, movement of restriction or other infection-control order to an establishment at risk of increased infection, the employer is required to have written zoonotic disease control procedures.

Such employers would have to identify restricted areas and post signs warning employees. Employees required to enter these areas would be required to be supervised by a co-worker knowledgeable in the control procedures, and be provided with protective clothing and equipment, respiratory protection, sanitary facilities, medical services (including surveillance, vaccinations and prophylaxis) and training. Employers also are required to record entry into restricted areas.

Employers who handle, cull, kill, eradicate and transport infected animals also are required to develop similar, detailed zoonotic disease control procedures.

The standard also contains training and recordkeeping requirements.

Anne Katten, health and safety specialist for California Rural Legal Assistance Foundation, told the board that the organization often represents workers at animal-handling facilities “and we know they vitally need the training, planning and protection that will be provided in the standard.” She noted that outbreaks in Canada and the Netherlands underscore the importance of the standard.

Elizabeth Treanor, director of Phylmar Regulatory Roundtable, said her organization supports the standard, but she questioned a change in the application section, which says that effective procedures are required for “preventing employee exposure” instead of “controlling employee exposure.” She asked if this imposes greater requirements on employers.

Standards Board Principal Engineer Michael Manieri replied that the change was made to make the language consistent with the Injury and Illness Prevention Program standard and “does not raise the level of compliance.”

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