



# Fed-OSHA 2023 Enforcement Policies & Regulatory Agenda and Phylmar Regulatory Roundtable OSH Forum

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# Lawrence P. Halprin



Lawrence Halprin is nationally recognized for his work in the areas of occupational safety and health and chemical regulation. He represents companies and trade associations at the federal and state levels before the Occupational Safety and Health Administration (OSHA), the US Environmental Protection Agency (EPA), the National Institute for Occupational Safety and Health (NIOSH), and the Alcohol and Tobacco Tax and Trade Bureau. His chemical regulation practice includes the Globally Harmonized System of Chemical Classification (GHS) and its implementation in the US, Canada, and the EU; Prop 65; EPA RMP and OSHA PSM program requirements; TSCA risk assessments, risk management standards, PMNs and consent orders and implementation; and CERCLA and EPCRA requirements.

Mr. Halprin's engineering and financial backgrounds have been invaluable to his clients in handling enforcement actions, providing compliance counseling, and assisting clients in evaluating and responding to agency rulemaking proposals and policy initiatives. He has participated in numerous OSHA, EPA, and Cal-OSHA rulemaking initiatives over the past 30 years.

Mr. Halprin has been a strong advocate of measures to enhance the effectiveness of regulatory agencies and ensure they do not overreach their authority. This is reflected in his testimony before Congress, his participation in agency rulemakings and policy initiatives, as well as litigation he has brought on behalf of clients. Lawrence is a frequent writer and speaker on a broad range of environmental, product stewardship, and health and safety management issues.



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# Topics to be Discussed

- ◆ Significant OSHA Rulemakings
- ◆ Significant Court Decisions
- ◆ Significant OSHA Administrative and Enforcement Activities
- ◆ Significant EPA Rulemakings



# Significant OSHA Rulemakings



# OSHA 1904 Recordkeeping (1)

- ◆ **Purpose:** provide OSHA with detailed, site-specific injury and illness data it would use for targeting enforcement and other OSHA interventions and facilitating employee engagement and public shaming in a time of increasing focus on ESG
- ◆ **Mechanism:** the rule would significantly expand the scope of the site-specific OSHA injury and illness data to be submitted to OSHA in electronic format and made publicly available – reinstating most of the Obama Admin rule rescinded by the Trump Administration
- ◆ **Timing**
  - ◆ Proposed: 3/30/2022 Federal Register
  - ◆ End of extended comment period: 6/30/2022
  - ◆ Target date for final rule: 06/2023

# OSHA 1904 Recordkeeping (2)

## ◆ **Content**

- ◆ New: as proposed, the rule would require employers with 100 or more employees in certain industries to electronically submit data from OSHA 300 and 301 – excluding what OSHA narrowly viewed as personally identifiable info
- ◆ Retained: employers with 20+ employees in certain industries would be required to electronically submit their OSHA 300A annual summary once a year
- ◆ OSHA would shift from the 2012 to 2017 NAICS classification system to determine the list of industries covered by the electronic submission requirement

## ◆ **Issues**

- ◆ Effective disclaimer to blunt unfair public shaming
- ◆ Understated costs of compliance (e.g., audit)
- ◆ OSHA understated personally identifiable info (given site-specific reporting)
- ◆ Will OSHA portal be ready and user-friendly?

# Lockout/Tagout (LOTO) Update



- ◆ Apparent purpose: amend LOTO standard to authorize energy control with reliable control systems rather than relying on energy isolation
  - ◇ To reflect current, recognized global practices in many sectors per EU Machinery Directive and conforming standards (ISO 12100, ISO 13849, etc.), B11 standards, ANSI Z244.1, etc.
  - ◇ To provide greater certainty for OSHA and stakeholders, and reflect case law (*GM Delco, 1995*)
  - ◇ Recognizes variance option is not viable
  - ◇ Issues: scope of activities (criteria for new exception), enforcement, older machines, risk v. hazard based
  - ◇ Recurring issue: box manufacturing, printing, plastic molding
- ◆ Request for Information (RFI) issued in 2019
  - ◇ BLS data supports conclusion that energy isolation not essential for safety
- ◆ Target Date for NPRM: 7/2023 (multiple delays of previous target dates)

# Process Safety Management (PSM) Revision (1)



- ◆ **Purpose:** further reduce frequency and severity of catastrophic chemical releases/incidents in the workplace
- ◆ **Mechanism:** adoption of additional requirements, coordinated with EPA RMP amendment due 8/2023, plus stronger enforcement of existing requirements
- ◆ **Content**
  - ◇ OSHA is considering many of the changes under consideration by EPA for the RMP rule, as well as others designed to expand the scope of the PSM Standard, including the following
    - (1) Expanding PSM coverage and requirements for reactive chemical hazards;
    - (2) Updating and expanding the list of highly hazardous chemicals in Appendix A;
    - (3) Re-defining (“clarifying”) the limits of a PSM-covered process (explicitly adopting expansive interpretation of what is considered part of a covered process)

# Process Safety Management (PSM) Revision (2)

## ◆ **Timing**

- ◆ OSHA and EPA SBREFA Process completed in 2016
- ◆ Virtual stakeholder meeting: 10/12/2022
- ◆ Written comments/input: due 11/14/2022
- ◆ NPRM: no OSHA target date, apparently waiting for EPA amendment to RMP Rule, which means OSHA lagging EPA by two years

## ◆ **Issues**

- ◆ Third-party audits? Trigger?
- ◆ STAA requirements? Scope? Informative v. mandatory implementation?
- ◆ Influence of OSHA emergency response initiative?
- ◆ Degree of EPA and OSHA harmonization?

# Heat Stress (1)

## ◆ Purpose

- ◆ Adopt standards to address heat stress for indoor and outdoor settings because use of General Duty Clause challenging and ineffective
- ◆ Top priority because one of the most significant workplace hazards
- ◆ Climate change increasing the severity of the hazard

## ◆ History and timing

- ◆ Interim measures
  - National Emphasis Program launched on April 8, 2022
  - Expected 2023 update to NEP
- ◆ SBREFA Panel required (possibly by Spring 2023)
- ◆ Speculation: NPRM by Spring/Summer 2024? Final Rule by Winter 2025-6?

# Heat Stress (2)

## ◆ Issues

- ◆ Outdoor v. indoor and outdoor
- ◆ Scientific-based PEL-based standard may be too complex or infeasible
- ◆ Validation of any mechanism other than a PEL-based approach (except as safe harbor) unclear

# Emergency Response (1)

- ◆ **Stated purpose:** enhance current emergency response requirements, which are inadequate and do not reflect current best practice
- ◆ **Mechanism:** unclear
  - ◇ Replace fire brigade standard and expand scope to encompass emergency response without amending existing standards (e.g., HAZWOPER, Confined Spaces, First Aid) – which makes no sense – OR
  - ◇ Replace and/or update all current standards addressing emergency response – apparently would require too many resources

# Emergency Response (2)

## ◆ History and timing

- ◆ 2016: NACOSH subcommittee of experts generated a comprehensive, resource-intensive emergency response standard
  - Appropriate (ideal) for major city fire departments
  - Beyond the available resources and impractical for most employers and volunteer fire departments
  - Enormous scope (extricating employee trapped in machine or vehicle)
- ◆ OSHA published a Request For Information and held stakeholder meetings
- ◆ 12/2/2021: completed SBREFA panel; panel confirmed NACOSH standard impractical for most employers and could cause employers and some fire departments to withdraw from emergency response tasks  
<https://www.regulations.gov/document/OSHA-2007-0073-0115>
- ◆ 9/2023: Target date for NPRM (???)

# Emergency Response (3)

## ◆ OSHA

- ◆ Is a single emergency response standard feasible? Or should OSHA amend and integrate all standards addressing emergency response versus gap-filling?
- ◆ How to establish appropriate minimum performance thresholds that maximize the availability of generally competent and effective albeit imperfect emergency response
- ◆ Should revise HAZWOPER Std to address “questionable” TECO decision by the Review Commission and 11<sup>th</sup> Circuit?

# Hazard Communication Update (1)

## ◆ **Stated purposes**

- ◆ Adopt 7<sup>th</sup> revision of GHS to roughly track EU and Canada
- ◆ Amend HCS to “clarify” existing requirements
  - Adopt practical implementation approaches in existing LOIs (e.g., labeling issues)
  - Adopt the most expansive requirements in the history of the HCS

## ◆ **Apparent primary purpose**

- ◆ A manufacturer/importer would be responsible for classifying its chemical to reflect:
  - The inherent hazards of the chemical as supplied (including physical changes from all anticipated downstream uses)
  - The hazards of all anticipated downstream chemical reactions and their reaction products

# Hazard Communication Update (2)

- ◇ In effect, requires a PHA for all processes that use the chemical
- ◇ Clearly incompatible with GHS, CLP, Canada HPA
  - OSHA’s solution—differentiate hazards in SDS and exclude chemical reaction hazards from label
- ◇ **Timing**
  - ◇ Target date for final rule: Summer/Fall 2023
  - ◇ Adopting proposal would trigger huge legal challenge and justify petition for stay

# Court Decisions

# TECO Decision (1)

## ◆ FACTS

- ◆ 2017 ammonia release on large campus of Tampa Electric Power Plant
- ◆ Ammonia exited relief valves into water sump designed to absorb ammonia
- ◆ Sump became saturated and ammonia escaped into surrounding air
- ◆ Three contractor security guards were adversely affected (one from 500 feet away) and two were hospitalized
- ◆ TECO's designated employee responders responded by vehicle from locations 1/4 mile away
- ◆ Added water to sump and called central control to achieve cutoff of ammonia source to leaking pipe, did not use available quench systems or respiratory protection
- ◆ Ammonia cleared from air about an hour after source cutoff

## ◆ CONTESTED CITATION

- ◆ HAZWOPER citation for failure to use SCBA in responding to emergency release
- ◆ No 1910.134 citation although required to wear SCBA when entering unknown atmosphere

# TECO Decision (2)

## ◆ STANDARD

- ◆ Emergency response: (1) response by employees from outside the immediate release area or by other designated responders to (2) an occurrence that results, or is likely to result, in an uncontrolled release of a hazardous substance
- ◆ Exceptions: (1) responses to incidental releases of hazardous substances where the substance can be safely absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel, and (2) responses to releases of hazardous substances where there is no potential safety or health hazard

# TECO Decision (3)

## ◆ DECISION

- ◆ OSHRC held (1) release was incidental because it was controlled by the process design and the response of TECO personnel in the release area, and (2) there was no potential safety or health hazard (because the TECO personnel responded in a way that avoided significant exposure and harm – windsock, no cloud or strong odor)
- ◆ 11<sup>th</sup> Circuit upheld OSHRC decision in a 3-0 opinion – “We hold that the release here was controlled – or, in the words of the regulation, that it wasn’t uncontrolled”
  - Under the court’s analysis, fall protection is not needed unless the worker falls, and machine guarding is not needed unless the worker gets a hand caught in the machine



# OSHA Policy and Enforcement Activities



# OSHA Enforcement Memoranda (1)



- ◆ Exercising Discretion When Not to Group Violations (1/26/2023)
  - ◇ Where grouping does not elevate the gravity or classification and resulting penalty
    - Far more probable for large employers
  - ◇ Will encourage citation of additional violations not previously issued
- ◆ Application of Instance-by-Instance (IBI) Penalty Adjustments (1/26/2023)
  - ◇ If provided for by rule
  - ◇ Authorizes IBI citations for high-gravity serious violations involving falls, trenching, machine guarding, respiratory protection, permit-required confined spaces, lockout tagout, and other-than-serious recordkeeping violations (apparently intended to be limited to Section 1904 but not stated)
- ◆ Severe Violators Enforcement Program
  - ◇ Alleged willful, repeated, or failure-to-abate violations now trigger SVEP status even if they do not involve specific types of elevated hazards

# OSHA Enforcement Memoranda (2)

- ◆ Section 17(j) of OSH Act
  - ◇ “The Commission shall have authority to assess all civil penalties provided in this section, giving due consideration to the appropriateness of the penalty with respect to the size of the business of the employer being charged, the gravity of the violation, the good faith of the employer, and the history of previous violations.”
- ◆ Chao v. Jindal United Steel and Saw Pipes USA, Inc., 480 F.3d 320 (5<sup>th</sup> Cir. 2007)
  - ◇ OSHA issued IBI citations alleging willful violations of Section 1904.2(a) (failure to record cases) and proposed either \$8,000 or \$9,000 per alleged violation
  - ◇ ALJ upheld 82 willful violations against Jindal and 59 against Saw Pipes, combined them into a single violation by each company, and assessed the max penalty of \$70,000

# OSHA Enforcement Memoranda (3)



- ◆ OSHA appealed and 5<sup>th</sup> Circuit reversed, holding Review Commission may not combine separately established violations
  - “The ALJ should not apply the appropriateness factors of § 666(j) first, and then manipulate the number of violations so that the penalty range fits his appropriateness determination. Rather, the ALJ should determine the penalty range based on the number of violations separately charged and proven and then assess an appropriate penalty from within that range.”
- ◆ OSHA must persuade the Review Commission and courts to buy into some aspects of these changes

# OSHA Enforcement Memoranda (4)

- ◆ 1910.1200(f)(1) Labels on shipped containers
- ◆ The chemical manufacturer, importer, or distributor shall ensure that each container of hazardous chemicals leaving the workplace is labeled, tagged, or marked...where the chemical manufacturer or importer is required to label, tag, or mark the following information shall be provided
  - ◇ 1910.1200(f)(1)(i) Product identifier;
  - ◇ 1910.1200(f)(1)(ii) Signal word;
  - ◇ 1910.1200(f)(1)(iii) Hazard statement(s);
  - ◇ 1910.1200(f)(1)(iv) Pictogram(s);
  - ◇ 1910.1200(f)(1)(v) Precautionary statement(s); and,
  - ◇ 1910.1200(f)(1)(vi) Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party
- ◆ **Potential citations?**

# OSHA Enforcement Memoranda (5)



- ◆ 1910.147 LOTO
  - ◆ 1910.147(c)(4)(i) Citation for failure to develop, document, and utilize procedures v. citation for each required element of the procedures
  - ◆ 1910.147(d) Citation for failure to apply LOTO v. citation for each step identified in 1910.147(d)
  - ◆ The upcoming LOTO update is likely to include revisions to facilitate greater use of ungrouped citations
  
- ◆ **Potential citations?**

# OSHA Enforcement Memoranda (6)



- ◆ 1910.132(d) [PPE] Hazard assessment and equipment selection
- ◆ 1910.132(d)(1) Requires the employer to determine if hazards are likely to be present that necessitate the use of PPE
- ◆ If so, the employer must:
  - ◇ 1910.132(d)(1)(i)...have **each affected employee** use...PPE that will protect the affected employee from [those] hazards
  - ◇ 1910.132(d)(1)(ii) Communicate selection decisions to **each affected employee;**
  - ◇ 1910.132(d)(1)(iii) Select PPE that properly fits **each affected employee**
- ◆ **Potential citations?**

# OSHA Enforcement Memoranda (7)

- ◆ 1910.132(f) [PPE] Training
- ◆ 1910.132(f)(1) The employer shall provide training to each employee who is required by this section to use PPE
- ◆ Each such employee shall be trained to know at least the following:
  - ◇ 1910.132(f)(1)(i) When PPE is necessary;
  - ◇ 1910.132(f)(1)(ii) What PPE is necessary;
  - ◇ 1910.132(f)(1)(iii) How to properly don, doff, adjust, and wear PPE;
  - ◇ 1910.132(f)(1)(iv) The limitations of the PPE; and,
  - ◇ 1910.132(f)(1)(v) The proper care, maintenance, useful life, and disposal of the PPE
- ◆ 1910.132(f)(2) 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
- ◆ **Potential Citations?**

# Worker Walkaround Representative Designation Process (1)

- ◆ **Reg Agenda:**

- ◆ “This rulemaking will clarify the right of workers and certified bargaining units to specify a worker or union representative to accompany an OSHA inspector during the inspection process/facility walkaround, **regardless of whether the representative is an employee of the employer**, if in the judgment of the Compliance Safety and Health Officer such person is **reasonably necessary to an effective and thorough physical inspection.**”

- ◆ **1903.8(c)**

- ◆ **The representative(s) authorized by employees shall be an employee(s) of the employer**

- ◆ **Controversial, Withdrawn 2/21/2013 LOI to Mr. Steve Sallman, Health and Safety Specialist, USW:**

- ◆ “It is OSHA's view that representatives are "reasonably necessary" when they will **make a positive contribution** to a thorough and effective inspection.”

# Worker Walkaround Representative Designation Process (2)

## OSH Act

- ◆ 8(e) Subject to regulations issued by the Secretary, a representative of the employer and **a representative authorized by his employees** shall be given an opportunity to accompany the [OSHA inspector] during the physical inspection of any workplace...for the purpose of aiding such inspection
  - ◆ **Where there is no authorized employee representative**, the [CSHO] shall consult with a reasonable number of employees...
- ◆ 8(f)
  - ◆ (1) Any...**representative of employees**...may request an inspection...any such [request] shall...set forth...the grounds...and shall be signed by the...representative of employees...
  - ◆ (2) Prior to or during any inspection of a workplace, any...**representative of employees employed in such workplace** may notify the Secretary...of any [alleged] violation of this Act

# Worker Walkaround Representative Designation Process (3)

## 1903.8 – Representatives of Employers and Employees

- ◆ (a) A representative of the employer and **a representative authorized by his employees** shall be given an opportunity to accompany the [CSHO] during the physical inspection of any workplace...a [CSHO] may permit additional employer representatives and **additional representatives authorized by employees** to accompany him...a different employer and **employee representative** may accompany the [CSHO] during each different phase of an inspection...
- ◆ 1903.8(b) [CSHOs] shall have authority to resolve all disputes as to who is the representative authorized by...employees for the purpose of this section
  - ◆ If there is no **authorized representative of employees**...the [CSHO]...shall consult with a reasonable number of employees...

# Worker Walkaround Representative Designation Process (4)

## 1903.8 – Representatives of Employers and Employees

- ◆ 1903.8(c) The representative(s) authorized by employees shall be an employee(s) of the employer
- ◇ However, if in the judgment of the Compliance Safety and Health Officer, good cause has been shown why accompaniment by a third party who is not an employee of the employer (such as an industrial hygienist or a safety engineer) is **reasonably necessary** to the conduct of an effective...**physical inspection** of the workplace, such third party may accompany the [CSHO] during the inspection

# Worker Walkaround Representative Designation Process (5)

## OSHA Field Operations Manual

- ◆ “For Employees Represented by a Certified or Recognized Bargaining Agent” heading
  - ◇ Highest ranking union official or union employee representative on-site shall designate who will participate in the walkaround...
  - ◇ §1903.8(b) gives the CSHO the authority to resolve representation disputes
  - ◇ CSHO may determine accompaniment by a third party (such as an industrial hygienist or a safety engineer), is reasonably necessary to conduct an effective inspection

# Worker Walkaround Representative Designation Process (6)

## OSHA Field Operations Manual

- ◇ Where employees are not represented by an authorized representative, there is no established safety committee, or employees have not chosen or agreed to an employee representative for OSHA inspection purposes (regardless of the existence of a safety committee), CSHOs shall determine if other employees would suitably represent the interests of employees on the walkaround
- ◇ If selection of such an employee is impractical, CSHOs shall conduct interviews with reasonable number of employees during the walkaround
- ◆ “Safety Committee or Employees at Large” heading
  - ◇ Employee members of an established workplace safety committee or employees at large can designate an employee representative for OSHA inspection purposes

# Worker Walkaround Representative Designation Process (7)

- ◆ **Controversial, Withdrawn 02/21/2013 LOI to Mr. Steve Sallman, Health and Safety Specialist, USW**  
<https://www.osha.gov/laws-regs/standardinterpretations/2013-02-21>
- ◆ **Question # 2 – May workers at a worksite without a collective bargaining agreement designate a person affiliated with a union or a community organization to act on their behalf as a walkaround representative?**
- ◆ Yes, the OSH Act authorizes participation in the walkaround portion of an OSHA inspection by "a representative authorized by [the employer's] employees" 29 U.S.C. § 657(e)
- ◆ Therefore, a person affiliated with a union without a collective bargaining agreement or with a community representative can act on behalf of employees as a walkaround representative so long as the individual has been authorized by the employees to serve as their representative...

# Worker Walkaround Representative Designation Process (8)

- ◇ Although the regulation acknowledges that most employee representatives will be employees of the employer being inspected, it also makes clear that there may be times when the presence of an employee representative who is not employed by that employer will allow a more effective inspection
- ◇ Thus, section 1903.8(c) explicitly allows walkaround participation by an employee representative who is not an employee of the employer when, in the judgment of the OSHA compliance officer, such a representative is "reasonably necessary to the conduct of an effective and thorough physical inspection"
- ◇ **It is OSHA's view that representatives are "reasonably necessary" when they will make a positive contribution to a thorough and effective inspection**
- ◇ **Huge Issue of OSHA interfering with NLRA rights**



# EPA Rulemaking Initiatives



# Accident Release Prevention – RMP 40 to CFR 68 (1)

- ◆ **Purpose:** further reduce frequency and severity of catastrophic chemical releases/incidents in the workplace
- ◆ **Mechanism:** adoption of additional RMP requirements, nominally coordinated with OSHA, rather than greater enforcement of existing requirements
  - ◇ Would reinstate much of what was rescinded by the Trump Admin
  - ◇ More than what was proposed seems likely to be reinstated
- ◆ **Timing**
  - ◇ NPRM issued 8/31/2022 with comments due 10/31/2022

# Accident Release Prevention – RMP 40 to CFR 68 (2)

## ◆ Significant proposed changes

- ◆ PHA must address natural hazards, power loss, siting considerations within the facility/property, and any gaps between code versions used to design facility and current codes, declined recommendations must be included in RMP filing with EPA
- ◆ STAA analysis but not implementation required for oil/coal and chemical sector – NAICS code 324 and 325 facilities
  - Paper industry dropped
  - NGOs urged expanded scope and mandatory implementation
- ◆ Root cause analysis for RMP-reportable accidents

# Accident Release Prevention – RMP 40 to CFR 68 (3)



- ◇ Audits
  - Must audit each covered process every three years; may not rely on representative audits
  - Third-party compliance audits if 2 RMP-reportable incidents in five years (one reportable incident if NAICS code 324 and 325 facility and within one mile of another NAICS code 324 and 325 facility)
- ◇ Greatly expanded employee participation in resolution of recommendations, and authority for process shutdown or stop work procedures, and access to all PHA and all other info required by the rule

# TSCA Asbestos (1)

- ◆ Asbestos
  - ◆ 2016: designated as one of first ten existing chemicals for risk evaluation
  - ◆ 2017 and 2018: draft scope of risk evaluation and EPA outreach meetings
  - ◆ 4/3/2020: draft risk evaluation (for what is now “Asbestos Part I: Chrysotile Asbestos,” excluding legacy uses)
  - ◆ 12/2020: final risk evaluation (for what is now “Asbestos Part I: Chrysotile Asbestos”)
    - No unreasonable risks to the environment
    - Unreasonable risks to human health with respect to workers and occupational non-users (and consumers)
      - Particularly chrysotile asbestos diaphragms for use in the chlor-alkali industry and chrysotile asbestos-containing sheet gaskets used in chemical production (process equipment and piping involving high pressures, high temperatures, and/or corrosive materials) – only TiO<sub>2</sub> sector identified

# TSCA Asbestos (2)

- ◇ 4/12/2022: NPRM Asbestos Part 1, to prohibit manufacture (including import), processing, distribution in commerce, and commercial use of chrysotile asbestos for those two applications (within two years) and several others in shorter time frames
- ◇ 11/2023: Target date for final Part 1 rule (11 months after statutory deadline)
- ◇ 6/29/2022: EPA released the final scope for Part 2 of the Risk Evaluation for Asbestos (final risk evaluation due 12/1/2024 per court order)

# HazCom and Respirator Provisions of SNURs



- ◆ Final Rule: 7/5/2022 (proposed 2016) 87 Fed. Reg. 39,756
- ◆ Effective date: 9/2/2022
- ◆ **Purpose:** align SNURs with OSHA HCS and OSHA Respiratory Protection Standard
- ◆ Requires that any draft or final SDS prepared to comply with OSHA requirements or for other purposes, be submitted as a part of any notification or exemption application (i.e., PMN, SNUN, LVE, LoREX, or TME)

# Personnel Changes



- ◆ Why would Marty Walsh leave cushy, low-pressure position as Asst. Secretary of Labor for OSH for the bruising NHLPA?
- ◆ “MARTY WALSH’S SALARY IN NEW NHLPA JOB LIKELY TO BE 12 TIMES WHAT HE MAKES IN GOVERNMENT...about \$3 million a year”

<https://www.hitc.com/en-gb/2023/02/08/marty-walshs-salary-in-new-nhlpa-job-likely-to-be-12-times-what-he-makes-in-government/>

Thank You

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