



**STATE OF WASHINGTON**  
DEPARTMENT OF LABOR AND INDUSTRIES  
*Division of Occupational Safety and Health*

315 5<sup>th</sup> Ave S, Ste 200  
Seattle, WA 98104  
206-515-2872

2-10-16

**SEIU Local 775**

Attn: Casey Cabalquinto  
215 Columbia St  
Seattle, WA 98104

Dear Mr. Cabalquinto:

Earlier, you contacted us about hazards you believe exist at Menzies Aviation, located at SeaTac Airport, 17801 International Blvd. Seattle, WA 98158.

**In response to your complaint, we inspected this workplace.** Our inspection found: Employee exposure to ergonomic hazards, deficient ergonomic training, multiple powered industrial trucks were not maintained or inspected, unguarded nip points on baggage and fixed conveyors, belt loaders and lavatory trucks with absent or inadequate guard rail systems, inadequate personal protective equipment for workers conducting lavatory service for aircraft, a damaged extension cord used to charge electric carts, safety meetings were not being held regularly, nor did safety meetings discuss all required topics, dirty bathrooms with fixtures not maintained and a dirty lunch room.

Additionally, the Department opened an inspection with Alaska Airlines and the Port of Seattle. The Department found that Alaska Airlines is an exposing, controlling, creating and correcting employer for Menzies worker exposure to ergonomic hazards while conducting ramp work. A citation for ergonomics was also issued to Alaska Airlines. The Port of Seattle inspection has not been completed and results of that inspection cannot be reported at this time.

Allegations that did not result in violations include: rain pants, jackets and shoes that weren't durable, no eye protection provided when working in the rain, malfunctioning sink in the piers area, D7 women's soap dispenser was not working (soap runs out), the lunch room was infested with cockroaches, inadequate hazardous cargo handling training, deicing fluid causing slips and falls and damaged aircraft power cords.

These issues were not cited because:

Rain jackets and pants are not required by LNI.

LNI does not require shoes be provided. Menzies workers are allowed to wear their shoes outside of work. Replacement shoes are available upon request.

Eye protection is not required to protect workers from the rain. Menzies does provide ball caps with bills to workers.

The sink in the piers area was functioning at the time of the inspection. The soap dispenser was broken. A citation will be issued to the Port who controls maintenance of this bathroom.

The D7 women's restroom had been remodeled after the complaint was lodged and the soap dispenser functioned and provided soap.

While one dead cockroach was found in room next to the lunch room, I was not able to determine the presence of cockroaches in the lunch room.

Hazardous cargo handling training was evaluated and found to be extensive and compliant.

No damaged aircraft power cords were identified.

While de-icing fluid is slippery, workers are provided shoes that are generally non-slip. The employer's powered industrial truck (PIT) violation included instances of failure to maintain non-slip surfaces in the PITs that are driven by workers. Additionally, the employer was found to have deficient hand railings on belt loaders. Installation of compliant railing will provide better hand holds when workers walk on the belt loaders.

**If you disagree with the inspection results**

You may ask for a review of the inspection results by writing to the Regional Compliance Manager explaining your disagreement. If after reading the posted Citation and Notice, you believe the abatement date for a citation is unreasonable you have the right to appeal by following the instructions on the Citation and Notice.

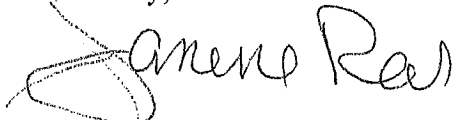
Venetia Runnion, CIH, CSP  
315 5th Ave S, Ste. 200  
Seattle, WA 98104  
206-515-2821

**If any employer takes action against you for reporting this hazard**

This may be discrimination. Even when we have not revealed your name, we cannot guarantee that your employer won't find out who filed this complaint. If you believe an employer has taken action against you for reporting hazards or for participating in workplace safety and health activities, you may call or write us. To consider your WISHA discrimination complaint, we must receive it within 30 days of the alleged discrimination. Call our WISHA discrimination section at (360) 902-6088 for more information on discrimination or for help filing a complaint.

Thank you for your efforts to help make this workplace safer. If you have any questions, please contact the Regional Compliance Manager at the above phone number.

Sincerely,



Janine Rees  
Industrial Hygienist

Enclosure: Citation and Notice

cc: Compliance Regional Firm File  
Central Files





STATE OF WASHINGTON  
DEPARTMENT OF LABOR AND INDUSTRIES  
Division of Occupational Safety and Health  
PO Box 44600 • Olympia, Washington 98504-4600

February 12, 2016

MENZIES AVIATION (USA) INC  
MENZIES AVIATION (USA) INC  
Attn Rocky Woods  
Po Box 610330  
Dfw Airport, TX 75261

OSHA #: 1094827  
Inspection: 317937582  
UBI: 601034860  
Region: 2-Health  
Inspector ID: A8841  
Reference: 209475833

Dear Employer:

Enclosed are the results of the safety and health inspection of your workplace. This packet contains:

- **Citation Invoice** – The total assessed penalty is \$62,000.00
- **Citation and Notice of Assessment** – Washington Administrative Code (WAC) Violations.
- **Employer Certification of Abatement instruction and form** - Correct all violations and return written verification or additional penalties may result.
- **Employer Appeal Rights** – You have 15 working days to appeal this citation.

You must immediately post this Citation and Notice of Assessment at or near where the violation(s) occurred, where employees can easily find and read it, or where employees normally receive posted information. All postings must remain until you have corrected all violations, or for three working days, whichever is longer. "Working day" means a calendar day, except Saturdays, Sundays and all legal state holidays.

Because this inspection is public information, the result will be posted online 30 days after the above date by the Department of Labor & Industries. You may view it at <https://secure.lni.wa.gov/verify/>.

If you have questions, call the compliance supervisor, Christopher Jacomme, at (206) 515-2873.

Respectfully,

*Anne F. Soiza*

Anne F. Soiza  
L&I Assistant Director  
Division of Occupational Safety & Health

Enclosure(s)



Washington State Department of  
**Labor & Industries**  
Division of Occupational Safety and Health

## Invoice

**Inspection: 317937582**

**UBI:** 601034860  
**Legal Name:** MENZIES AVIATION (USA) INC  
**DBA Name:** MENZIES AVIATION (USA) INC  
**Inspection:** 17801 International Blvd,  
**Site:** SeaTac Airport, Seattle, WA, 98158

**Issued:** February 12, 2016  
**Opening Conference:** August 17, 2015  
**Closing Conference:** February 3, 2016  
**Inspector ID:** A8841

### Summary of Assessed Penalties Due

The Citation and Notice of Assessment includes a full description of each violation.

<b>Violation Item</b>	<b>Violation Type</b>	<b>WAC</b>	<b>Correction Due Date</b>	<b>Penalty Amount</b>
1-1a	Serious	WAC 296-800-11010	3/31/2016	\$7,000.00
1-1b	Serious	WAC 296-800-11005	3/31/2016	\$0.00
1-2	Serious	WAC 296-800-14020	3/31/2016	\$7,000.00
1-3	Serious	WAC 296-863-30005	Corrected	\$7,000.00
1-4	Serious	WAC 296-806-42028	Corrected	\$7,000.00
1-5	Serious	WAC 296-24-75007(2)	3/31/2016	\$7,000.00
1-6	Serious	WAC 296-800-26010(1)	Corrected	\$7,000.00
1-7	Serious	WAC 296-800-16065	2/20/2016	\$3,900.00
1-8	Serious	WAC 296-800-16020	2/20/2016	\$3,900.00
1-9a	Serious	WAC 296-800-28030(1)	Corrected	\$3,900.00
1-9b	Serious	WAC 296-24-95707(7)(b)(iii)	Corrected	\$0.00
1-10	Serious	WAC 296-863-30010	Not Applicable	\$7,000.00
2-1	Repeat General	WAC 296-800-13020(1)	Not Applicable	\$1,300.00
3-1	General	WAC 296-800-13020(2)	Not Applicable	\$0.00
3-2	General	WAC 296-800-22005	2/25/2016	\$0.00
3-3	General	WAC 296-800-23020(3)	2/20/2016	\$0.00
<b>Total Penalty Due</b>				<b>\$62,000.00</b>

## PAYMENT INFORMATION

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**Payment is due 15 working days from receipt of this citation.**

Make check payable to the Department of Labor and Industries.

Write Inspection number 317937582 on the check and mail to:

**Attn: DOSH Cashier  
Department of Labor and Industries  
PO Box 44835  
Olympia, WA 98504-4835  
Or deliver to: Any L&I office**



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**Post This Document**  
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**UBI:** 601034860

**Legal Name:** MENZIES AVIATION (USA) INC

**DBA Name:** MENZIES AVIATION (USA) INC

**Inspection** 17801 International Blvd, SeaTac Airport Seattle,  
**Site:** WA 98158

**Issued:** February 12, 2016

**Opening Conference:** August 17, 2015

**Closing Conference:** February 3, 2016

**Inspector ID:** A8841

**Violation 1 Item 1a**

**Violation Type: Serious**

**WAC 296-800-11010**

Menzies Aviation did not provide safety devices, safeguards, work practices, processes and the means to make the workplace safe from hazards that were causing, or likely to cause, serious physical harm to ramp agent employees who handle cargo and passenger baggage at SeaTac Airport, Seattle, Washington.

Ramp employees are exposed to a high frequency of manual handling tasks during short durations of time. Employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, throwing, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof, which have caused, or are likely to cause musculoskeletal disorders (MSDs).

The following work activities are a brief summary of the hazards identified in the Department's Ergonomic Evaluation of the work site (Please review the complete report for more detail):

Transferring baggage from the baggage piers conveyors to the baggage carts;  
Transferring baggage and cargo from the baggage carts to the belt loader;  
Loading and unloading aircraft cargo hold with the belt loader;  
Transferring baggage and cargo from the belt loader to the baggage carts;  
Unloading baggage carts at the bagwell carousel;  
Pulling loaded baggage carts;  
Pushing loaded baggage carts;  
Pushing empty baggage carts.

Abatement measures include, but are not limited to:

- Obtain a complete ergonomic assessment, by a certified professional ergonomist, industrial engineer, or other qualified professional, of all the manual material handling tasks. The ergonomist, or other qualified professional, shall make recommendations for reducing or eliminating ergonomic risk factors, of the ramp employees handling baggage in terminals and during aircraft loading and unloading.
- Have a certified professional ergonomist, or other competent person, review ramp employees' ergonomics training and practices to ensure implementation and effectiveness.
- During all construction, renovation, modification and upgrades to airline tenant baggage handling space at the airport, identify and correct current design deficiencies that increase the risk of musculoskeletal injuries. Such hazard are identified in ATA SG 901 Safety Guidelines SG 901: New Baggage Handling Systems for Passenger Terminals, revision 2014.1 (or subsequent versions).

A) Engineering controls: Engineering controls may include additional material handling equipment, workplace



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redesign, work station redesign, equipment or tool redesign, and changes in work methods, practices, procedures and techniques. The goal is to make the job task fit the worker.

Examples of control measures applicable to the observed job specific tasks may include but are not limited to the following: the PowerStow, Rampsnake, Bendi-belt, Belly Rollers, Sliding Carpets, RRT Longreach, vacuum lifts, and other equipment to enable sliding baggage and cargo.

- 1) Redesign the piers conveyer system including two tiered conveyors so that conveyors are placed at a height and working distance to reduce bending and extended reaches while handling baggage and cargo.
  - 2) Remove the horizontal members of the conveyor bollards such as those identified in the N Piers to ensure Ramp employees can move close to the conveyors and use both hands when transferring baggage.
  - 3) Reduce the concentration of pulling and pushing forces with one hand during aircraft loading and unloading by improving the scanning equipment currently used so that it frees both hands for handling baggage. Provide a ring scanner or a scanner mounted to the forearm so that workers can use both hands to secure and move bags. This is common in other material handling jobs. The forces that can be safely moved with two hands are considerably higher than those that can be moved with one.
  - 4) Reduce the awkward postures, lifting weights, reaching, bending, and twisting hazards in all locations.
- B) Administrative Controls: Administrative controls, in addition to engineering controls, can be implemented to reduce the duration, frequency, and magnitude of the ramp employees' exposure to ergonomics risk factors. These controls may include, but are not limited to, job rotation, work rest scheduling, reduction of repetitive task rate through additional staffing, and the reduction of work quotas and pace. For any administrative control measure, a detailed job and task analysis must be performed to assure that other stressors, body part movements, or musculoskeletal system usage is not present at a magnitude that would be beyond the capability of the worker.
- C) Additional Training: in addition to engineering and work practice controls and administrative controls, additional tailored training must be implemented to increase employee awareness of ergonomics hazards and how to implement procedures on the ramp.
- D) Enforcement: Require workers use and follow identified controls and training. Currently workers are counseled or "written up" only after they have sustained an injury. Require ramp employees to request assistance with lifting heavy bags. Make necessary assistance available on the ramp. This will require adequate staffing so there are other employees in the area to help with heavier lifts.
- E) Medical Management: Enhanced medical management procedures, in addition to engineering, work practice, administrative and training measures, can be implemented to monitor and prevent MSDs. Medical management procedures may include developing and implementing a mechanism for early reporting of signs and symptoms of MSDs as well as teaching ramp employees to understand the mechanism of MSD progression and the importance of early recognition and reporting of signs and symptoms of work related MSDs.

Submit to the inspector, within 45 calendar days, a detailed written initial plan on how abatement methods will be developed and implemented. This plan must include an implementation schedule.



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This will be accomplished through the following steps:

- (1) Evaluation of engineering/administrative control options.
- (2) Selection of optimum and feasible control methods and completion of design.
- (3) Procurement, implementation and installation of control measures.
- (4) Testing, modification, and acceptance of controls.
- (5) Provide quarterly written updates to the inspector detailing abatement progress.

**ABATEMENT DOCUMENTATION AND CERTIFICATION IS REQUIRED**

The following additional correction documentation is required for this violation: See above.

The following additional correction documentation is required for this violation: See above.

**Correct by: 3/31/2016**  
**Assessed penalty: \$7,000.00**



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**Violation 1 Item 1b**

Violation Type: Serious

WAC 296-800-11005

Menzies Aviation did not provide a workplace free from recognized hazards that are causing, or likely to cause serious injury to ramp agent employees who handle cargo and passenger baggage at SeaTac Airport, Seattle, Washington.

Ramp employees are exposed to a high frequency of manual handling tasks during short durations of time. Employees are required to perform manual material handling tasks involving ergonomic risk factors including repetitive motions, lifting, throwing, pulling, pushing, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof, which have caused, or are likely to cause musculoskeletal disorders (MSDs). Menzies employees have approximately a 4 times higher injury rate than other employers in their risk class.

The following work activities are a brief summary of the hazards identified in the Department's Ergonomic Evaluation of the work site (Please review the complete report for more detail):

Transferring baggage from the baggage piers conveyors to the baggage carts;  
Transferring baggage and cargo from the baggage carts to the belt loader;  
Loading and unloading aircraft cargo hold with the belt loader;  
Transferring baggage and cargo from the belt loader to the baggage carts;  
Unloading baggage carts at the bagwell carousel;  
Pulling loaded baggage carts;  
Pushing loaded baggage carts;  
Pushing empty baggage carts.

Abatement measures include, but are not limited to:

- Obtain a complete ergonomic assessment, by a certified professional ergonomist, industrial engineer, or other qualified professional, of all the manual material handling tasks. The ergonomist, or other qualified professional, shall make recommendations for reducing or eliminating ergonomic risk factors, of the ramp employees handling baggage in terminals and during aircraft loading and unloading.
- Have a certified professional ergonomist, or other competent person, review ramp employees' ergonomics training and practices to ensure implementation and effectiveness.
- During all construction, renovation, modification and upgrades to airline tenant baggage handling space at the airport, identify and correct current design deficiencies that increase the risk of musculoskeletal injuries. Such hazard are identified in ATA SG 901 Safety Guidelines SG 901: New Baggage Handling Systems for Passenger Terminals, revision 2014.1 (or subsequent versions).

A) Engineering controls: Engineering controls may include additional material handling equipment, workplace redesign, work station redesign, equipment or tool redesign, and changes in work methods, practices, procedures and techniques. The goal is to make the job task fit the worker.

Examples of control measures applicable to the observed job specific tasks may include but are not limited to the following: Devices such as extendable belt loader conveyors or other devices (PowerStow, Rampsnake,



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Bendi-belt , Belly Rollers. Sliding Carpets, RRT Longreach, vacuum lifts) and other equipment to enable sliding baggage and cargo.

1) Redesign the piers conveyer system including two tiered conveyors so that conveyors are placed at a height and working distance to reduce bending and extended reaches while handling baggage and cargo.

2) Remove the horizontal members of the conveyor bollards such as those identified in the N Piers to ensure Ramp employees can move close to the conveyors and use both hands when transferring baggage.

3) Reduce the concentration of pulling and pushing forces with one hand during aircraft loading and unloading by improving the scanning equipment currently used so that it frees both hands for handling baggage. Provide a ring scanner or a scanner mounted to the forearm so that workers can use both hands to secure and move bags. This is common in other material handling jobs. The forces that can be safely moved with two hands are considerably higher than those that can be moved with one.

4) Reduce the awkward postures, lifting weights, reaching, bending, and twisting hazards in all locations.

B) Administrative Controls: Administrative controls, in addition to engineering controls, can be implemented to reduce the duration, frequency, and magnitude of the ramp employees' exposure to ergonomics risk factors. These controls may include, but are not limited to, job rotation, work rest scheduling, reduction of repetitive task rate through additional staffing, and the reduction of work quotas and pace. For any administrative control measure, a detailed job and task analysis must be performed to assure that other stressors, body part movements, or musculoskeletal system usage is not present at a magnitude that would be beyond the capability of the worker.

C) Additional Training: in addition to engineering and work practice controls and administrative controls, additional tailored training must be implemented to increase employee awareness of ergonomics hazards and how to implement procedures on the ramp.

D) Enforcement: Require workers use and follow identified controls and training. Currently workers are counseled or "written up" only after they have sustained an injury. Require ramp employees to request assistance with lifting heavy bags. Make necessary assistance available on the ramp. This will require adequate staffing so there are other employees in the area to help with heavier lifts.

E) Medical Management: Enhanced medical management procedures, in addition to engineering, work practice, administrative and training measures, can be implemented to monitor and prevent MSDs. Medical management procedures may include developing and implementing a mechanism for early reporting of signs and symptoms of MSDs as well as teaching ramp employees to understand the mechanism of MSD progression and the importance of early recognition and reporting of signs and symptoms of work related MSDs.

Submit to the inspector, within 45 calendar days, a detailed written initial plan on how abatement methods will be developed and implemented. This plan must include an implementation schedule.

This will be accomplished through the following steps:

- (1) Evaluation of engineering/administrative control options.
- (2) Selection of optimum and feasible control methods and completion of design.
- (3) Procurement, implementation and installation of control measures.



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- (4) Testing, modification, and acceptance of controls.
- (5) Provide quarterly written updates to the inspector detailing abatement progress.

**ABATEMENT DOCUMENTATION AND CERTIFICATION IS REQUIRED.**

The following additional correction documentation is required for this violation: See above.

The violations above have been grouped because they involve similar or related hazards that may increase the potential for illness or injury resulting from an exposure or accident. A single penalty is applied to the first item in the group.

**Correct by: 3/31/2016**  
**Assessed penalty: Included in Violation 1 Item 1A**



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**Violation 1 Item 2**

Violation Type: Serious

WAC 296-800-14020

Menzies did not implement, supervise, and enforce a training program to prevent serious Musculoskeletal Disorders (MSDs) during cargo and baggage handling (manual handling). Worker training was limited to about a half hour of class room, computer and video instruction. There was no on-the-job manual handling training for 13 new hires when assigned to handle baggage and cargo.

During the inspection, leads and supervisors were present when workers performed baggage handling tasks that did not conform to the limited training for manual handling provided in the class room. Leads and supervisors did not correct workers who used improper material handling techniques that can contribute to MSDs.

Workers perform manual baggage and cargo handling tasks involving ergonomic risk factors including repetitive motions, forceful exertion, lifting, twisting, throwing, stacking, bending, reaching, transferring and awkward postures.

Without supervising and enforcing a training program with proper manual handling practices, and prohibiting workers from engaging in unsafe practices, employees can develop MSDs including back, shoulder, arm and neck sprains, strains and other injuries.

**Correct by: 3/31/2016**  
**Assessed penalty: \$7,000.00**



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**Violation 1 Item 3**

Violation Type: Serious

**WAC 296-863-30005**

Menzies did not ensure powered industrial trucks, including their baggage cart trailers, were in safe working conditions.

The following hazards were identified during the inspection:

8-17-2015.

Menzies Stewart and Stevenson Pushback Tractor PB 101 GT-1628 did not have functioning back up lights. The brake pedal of pushback did not fully engage until the brake pedal was depressed by two thirds.

Menzies Tug Pushback Baggage Tractor 102 GT-35 had two back-up lights that did not work. The left brake light did not work. The hand brake did not work.

Menzies Pushback Baggage Tractor 103 GT-35 had a left rear brake light that did not work. The hand brake did not work.

8-18-2015.

Menzies TLD, TMX-150 Pushback PB 104 had a brake pedal that was missing the non-slip rubber cover.

Menzies Pushback Tractor 104 had a front window wiper blade that was not secured to the wiper arm and fell off.

The Alaska Jetline Model B320, serial number 1648 Pushback Tractor 1648 had worn non-slip coating on the cab floor on the driver's and passenger's sides.

8-19-15.

Menzies baggage tractor BT104 Tug MIA 40-I had a horn that did not function. The left headlight did not work. The brakes were soft. The driver's side floor non-skid material was worn off to bare metal.

Menzies BT 105 baggage tractor Tug BTC had a hand brake that did not work. The gear shifter had to be jiggled multiple times in order to start the engine.

Menzies BT 106 Harlan BTC baggage tractor had a left front tire which had the treads worn to smooth in the center of the tire.

Menzies BT 110 Tug MA 30 baggage tractor had a horn that did not work.

Alaska Baggage Cart 3965 had a curtain that was torn.

Alaska Baggage Cart 3954 had a curtain that was torn.

Alaska Baggage Cart 3871 had a bent curtain rail and the curtain was torn from the bottom grommets.



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Alaska Baggage Cart 2272 had a curtain torn at the bottom.

Alaska Charlotte T137, 137, 137-6908 Baggage Tractor 5620 made an audible grinding sound during hard left turns.

8-20-15

Menzies BT 109 Tug MA 30. During a drive test, the left turning radius of the tug was observed to be about 1/3 less than the right turning radius.

Menzies BT108 Tug MA 30 had a worn right rear tire.

Alaska Charlotte baggage tractor 5630 had a passenger seat belt that did not restrain a passenger during a drive test.

8-25-15

Alaska Baggage Cart 5327 had holes in the curtains. The bottom of the curtain also had a large tear.

Alaska Baggage Cart 3978 had two rear wheels that were dissimilar in size. The bottom curtain of the baggage cart curtain was ripped from the grommets (approximately 2.5 feet or more).

Alaska Baggage Cart 3954 had a large rip in the cart's curtains.

Alaska Jet line, Model B320, SN95332-2, GSE No. 1646 had a left rear brake light that did not work. The backup lights did not work.

Alaska Charlotte Belt loader 5580, Model CB150E, Serial Number 1/50E-107 had a driver's seat belt that intermittently caught when actuated. The guard rail did not have a locking pin.

Alaska Baggage Cart 5218 had torn curtains.

Alaska Baggage Cart 5201 had torn plastic curtain windows on both sides of the cart.

Alaska Baggage Cart 3494 had torn plastic windows in the curtain.

Alaska Baggage Cart 4622 had a tear in the curtain and at two of the retaining grommets.

Alaska Baggage Cart 3964 had a curtain that was torn from all retraining grommets on one side of the cart. The curtain on the rear side of the cart was torn from two grommets.

8-27-15

Alaska Baggage Cart 5215 had torn curtain windows.

Menzies WASP Baggage Cart 2012 had a torn curtain.

Menzies Rocky Mountain, B40-1 Baggage Cart 2030 had a torn curtain.



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Menzies WASP Baggage Cart 2028 had a torn curtain.

The Menzies Rocky Mountain Baggage Cart had a torn curtain.

9-29-15

Alaska pushback 98, Jetline B220, serial number 423 had a malfunctioning hand brake. The pushback suspension bounced severely while braking in both the forward and reverse directions.

12-22-15

Alaska Baggage Cart 5796 had a torn curtain window.

**This violation was corrected during the inspection.**  
**Assessed penalty: \$7,000.00**



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**Violation 1 Item 4**

Violation Type: Serious

WAC 296-806-42028

Menzies did not ensure nip points on all WASP and Charlotte America belt loaders (conveyors) were provided with compliant guards.

In the following instances, Menzies WASP belt loaders did not have compliant nip point guards:  
WASP A206091D Towable Beltloaders numbers 201, 202, 203, 204, 205, 206, 207, 208.

In the following instances, Alaska Airlines Charlotte America CB150E Electric belt loaders (Referred to as ASBL), which are operated by Menzies, did not have adequate nip point guards:

Alaska Charlotte Belt Loader (ASBL) 5580, Model CB150E, Serial Number 1/50E-107.

ASBL 5565, Serial number 1.50E-92.

ASBL 5553, serial number 1.50E-80.

ASBL 6443, serial number 1.50E-165.

ASBL 5532, serial number 1.50E-59.

ASBL 5529, serial number 1.50E-56.

ASBL 5569, serial number 1.50E-96.

ASBL 6440, serial number 1.50E-162.

ASBL5534, serial number 1.50E-61.

ASBL 5566, serial number 1.50-92.

ASBL 5547, serial number 1.50-74.

ASBL 5557, serial number 1.50E-84.

ASBL 5542, serial number 150E-69.

ASBL 5578, serial number 1.50E-105.

ASBL 5547, serial number 1.50E-74.

ASBL 5537, serial number 150E-64.

There were 12 N gate piers fixed conveyers with nip points of greater than 1/4 inch gap where the end of the piers conveyor belts terminated at a metal plate.

**This violation was corrected during the inspection.**

**Assessed penalty: \$7,000.00**



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**Violation 1 Item 5**

**Violation Type: Serious**

**WAC 296-24-75007(2)**

Menzies Aviation employees use WASP and Charlotte America belt loaders as a runway where workers walk up and down the belt loader to access aircraft cargo holds.

Menzies employees use 8 WASP belt loaders that are not equipped with a standard guard rail on one side of the belt loader to protect workers from falls in excess of 4 feet. The existing railing provides no worker fall protection between the last guard rail stanchion and the aircraft.

On multiple occasions Menzies employees were observed to enter and exit the Other Airline (OA) aircraft cargo holds without deploying the WASP belt loader guard rails.

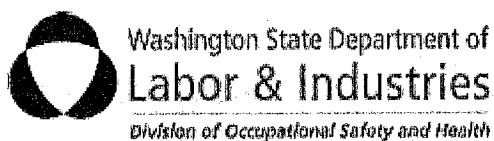
Prior to August 2015, Menzies employees did not deploy guard rails when using the Charlotte America Belt Loaders to enter and exit Alaska Aircraft.

Menzies employees use 52 Charlotte America belt loaders that are not equipped with a standard railing that provides worker protection from falls in excess of 4 feet. The existing railing provides no worker fall protection between the last guard rail stanchion and the aircraft.

In the alternative, Menzies did not comply with WAC 296-800-11005 and provide employees a workplace free from recognized fall hazards that may cause, or are likely to cause, serious injury or death.

The following additional correction documentation is required for this violation: Submit an abatement plan for correction of this violation within 45 days.

**Correct by: 3/31/2016**  
**Assessed penalty: \$7,000.00**



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**Violation 1 Item 6**

Violation Type: Serious

WAC 296-800-26010(1)

The employer did not ensure that the open sided platform on the back of the lavatory waste truck was guarded or equipped with railings. Employees were exposed to a 57.5 inch (4 ft. 9.5 in.) fall to the tarmac.

Falls can result in contusions, broken bones and head injuries.

**This violation was corrected during the inspection.**

**Assessed penalty: \$7,000.00**

**Violation 1 Item 7**

Violation Type: Serious

WAC 296-800-16065

Menzies did not ensure that appropriate hand protection was worn by a ramp agent who routinely empties lavatory and toilet waste from aircrafts.

Exposure to human waste can expose workers to pathogenic viruses, bacteria and parasites.

**Correct by: 2/20/2016**

**Assessed penalty: \$3,900.00**

**Violation 1 Item 8**

Violation Type: Serious

WAC 296-800-16020

Menzies did not ensure that employees were provided with, and required to wear, personal protective equipment that will adequately protect workers arms and body and clothing from drips of aircraft lavatory waste when emptying aircraft lavatories.

Exposure to human waste can expose workers to pathogenic viruses, bacteria and parasites.

**Correct by: 2/20/2016**

**Assessed penalty: \$3,900.00**



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**Violation 1 Item 9a**

**Violation Type: Serious**

**WAC 296-800-28030(1)**

Menzies did not remove a damaged extension cord that was used in the A5/A7 Virgin America bagwell from service.

Employee exposure to damaged extension cords may result in electric shock, fire and burns.

**This violation was corrected during the inspection.**

**Assessed penalty: \$3,900.00**

**Violation 1 Item 9b**

**Violation Type: Serious**

**WAC 296-24-95707(7)(b)(iii)**

Menzies did not ensure that the 120 Volt yellow extension cord used to charge small electric baggage tractors in the Virgin American area of the bagwell, was provided with strain relief at both ends of the cord.

Workers may be exposed to electric shocks and burns.

The violations above have been grouped because they involve similar or related hazards that may increase the potential for illness or injury resulting from an exposure or accident. A single penalty is applied to the first item in the group.

**This violation was corrected during the inspection.**

**Assessed penalty: Included in Violation 1 Item 9A**



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**Inspection: 317937582**

**Violation 1 Item 10**

Violation Type: Serious

WAC 296-863-30010

Menzies did not ensure that all Powered Industrial Trucks (PITS) were inspected daily before being put into service and after each shift when the PIT is used on a continuous basis.

During the months of August and September of 2015, Menzies did not inspect PITs 62 times prior to daily use.

Where PITS were inspected, the inspections were inadequate and failed to identify all hazards, and remove from service damaged PITS.

Undetected malfunctions can result in GSE collisions with equipment and other workers.

**Situation not believed to exist any longer. However, if this violation is identified again during future inspections, it may result in repeat or failure to abate violations which may include penalties.**

**Assessed penalty: \$7,000.00**

**Violation 2 Item 1**

Violation Type: Repeat General

WAC 296-800-13020(1)

Menzies did not hold safety committee meetings during the months of October and November of 2014 and May, June and July of 2015.

When the original citation is the final order:

The violation above is cited as a repeat of Violation #2, Item #2, cited on Citation and Notice #317385789 issued on 10/15/2014.

**Situation not believed to exist any longer. However, if this violation is identified again during future inspections, it may result in repeat or failure to abate violations which may include penalties.**

**Assessed penalty: \$1,300.00**



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**Violation 3 Item 1**

Violation Type: General

WAC 296-800-13020(2)

Menzies did not ensure that safety committee meetings included all required topics.

Safety meeting minutes did not address accident investigations which occurred since the prior meeting to determine if the cause(s) of the unsafe situation was identified and corrected.

Meetings where this topic was not discussed were September 2014, December 2014, January 2015, March 2015, April 2015, August 2015.

Safety committee meeting attendance was not documented during meetings conducted in December of 2014 and January of 2015.

**Situation not believed to exist any longer. However, if this violation is identified again during future inspections, it may result in repeat or failure to abate violations which may include penalties.**

**Assessed penalty: \$0.00**

**Violation 3 Item 2**

Violation Type: General

WAC 296-800-22005

Menzies did not ensure that all areas of the workplace were kept in a clean, orderly and sanitary condition.

The D7 and B6 Menzies lunchrooms had dirt and old food residue on floors, under tables, on lunch tables, in microwave ovens, on counters, under vending machines and under lockers.

Garbage was observed on the floor of the bagwell between pillar R-M15 and bagwell exit door MT 3446B. Garbage included discarded beverage bottles, peanut wrapper, paper trash, discarded earplugs, zip ties, plastic trash and bottle caps. The concrete floor under the trash appeared crusted with dirt.

**Correct by: 2/25/2016**  
**Assessed penalty: \$0.00**



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**Citation and Notice of Assessment**  
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**Violation 3 Item 3**

Violation Type: General

**WAC 296-800-23020(3)**

Menzies did not provide clean and sanitary bathrooms for employees.

In the alternative, Menzies did not provide clean and sanitized washing facilities in compliance with WAC 296-800-23025

Provide convenient and clean washing facilities for employees including:

Sinks or basins for personal washing;

Hot and cold water, or lukewarm (tepid), running water in each sink and basin;

Hand soap or similar cleaning agents;

One of the following must be provided:

- Individual paper or cloth hand towels;
- Individual sections of clean continuous cloth toweling;
- Air blowers for drying hands, located near the sinks and basins.

**Correct by: 2/20/2016**  
**Assessed penalty: \$0.00**



Washington State Department of  
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Division of Occupational Safety and Health

## Employer Certification of Abatement Instructions Inspection: 317937582

### What you must do now:

- Check the correction due date(s) shown on the enclosed Employer Certification of Abatement Form. You must fully correct the hazards by these dates.
- Describe on the form how you corrected each hazard, rather than what you *intend to do* in the future. Examples:

**Right:**            *All staff have received the required training.*

**Wrong:**           *All staff will receive the required training next week.*

Use attachments if you need more space. Submit additional documentation of hazard correction if requested in the citation packet.

- Fill in the date you corrected the hazard and sign.
- Post a copy of the completed form for at least three working days, or until you have corrected all violations, whichever is longer. It must be posted near the hazard location or in a place that is readily accessible by affected employees and their representatives.
- Send your completed form to the address provided.

**Note:** If we do not receive written confirmation you have corrected the hazards, we will take follow-up action, which may include additional penalties. If you provide us with false information, you may face criminal penalties.

### If you are unable to fix the hazard(s) by the correction due date(s):

We must receive your written request for an extension **before** the correction due date(s) listed for the hazard(s). Correction due dates are shown on the enclosed Citation and Notice of Assessment and on your Employer Certification of Abatement Form(s).

Extensions are not automatically granted. To be considered for an extension, you must provide the following:

- Inspection number, employer name, telephone number, and site address.
- Violation and Item number for each requested extension.
- Correction due date on the citation and additional time needed.
- Steps taken to fix the hazard by the correction due date.
- Why you cannot correct the hazard by the correction due date.
- How you will protect your employees until you fix the hazard.

For more information, contact:  
Or call: (206) 515-2873

Christopher Jacomme, Compliance Supervisor  
Department of Labor and Industries  
315 5th Avenue South  
Suite 200  
Seattle, WA 98104-2607

You must post all documentation associated with your request for extension with your citation packet. All postings must remain until you have corrected all violations, or unless you have appealed and received and posted your hearing notice.



Washington State Department of  
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*Division of Occupational Safety and Health*

## Employer Certification of Abatement Form Inspection: 317937582

**UBI:** 601034860

**Issued:** February 12, 2016

**Legal Name:** MENZIES AVIATION (USA) INC

**DBA Name:** MENZIES AVIATION (USA) INC

**Site Address:** 17801 International Blvd, SeaTac Airport, Seattle, WA, 98158

You must complete this form and return it to: **Janine Rees, Department of Labor & Industries**  
**315 5th Ave South, Ste 200, Seattle, WA 98104**  
Or Fax to: (206) 515-2830

Violation(s) are fully described in the Citation and Notice of Assessment section.

Violation, Item & Group#	Type of Violation	WAC# Violated	Correction Due Date
1-1a	Serious	WAC 296-800-11010	3/31/2016
Violation Summary: Ergo Safe Place			
How you corrected the hazard →			
Date you corrected the hazard →			
1-1b	Serious	WAC 296-800-11005	3/31/2016
Violation Summary: Ergo Safe Place			
How you corrected the hazard →			
Date you corrected the hazard →			
1-2	Serious	WAC 296-800-14020	3/31/2016
Violation Summary: Ergo Training			
How you corrected the hazard →			
Date you corrected the hazard →			
1-5	Serious	WAC 296-24-75007(2)	3/31/2016
Violation Summary: Belt Loader open sided runway (railings)			

I certify that the hazards described in this Employer Certification of Abatement Form have been corrected as described above. Affected employees and their representatives have been informed of the correction activities. I am aware that knowingly providing false information may result in criminal penalties (RCW 49.17.190(2)).

Signature

Name

Title

Date

Phone No.

### DOSH USE ONLY

DOSH Reviewer's Signature

Date



Washington State Department of  
**Labor & Industries**  
*Division of Occupational Safety and Health*

## Employer Certification of Abatement Form

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<b>How you corrected the hazard →</b>	
<b>Date you corrected the hazard →</b>	

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\_\_\_\_\_  
Signature Name

\_\_\_\_\_  
Title Date Phone No.

**DOSH USE ONLY**

\_\_\_\_\_  
DOSH Reviewer's Signature Date



Washington State Department of  
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Violation(s) are fully described in the Citation and Notice of Assessment section.

Violation, Item & Group#	Type of Violation	WAC# Violated	Correction Due Date
1-7	Serious	WAC 296-800-16065	2/20/2016
Violation Summary: Gloves for lavatory waste handling			
How you corrected the hazard →			
Date you corrected the hazard →			

1-8	Serious	WAC 296-800-16020	2/20/2016
Violation Summary: lav truck body PPE			
How you corrected the hazard →			
Date you corrected the hazard →			

I certify that the hazards described in this Employer Certification of Abatement Form have been corrected as described above. Affected employees and their representatives have been informed of the correction activities. I am aware that knowingly providing false information may result in criminal penalties (RCW 49.17.190(2)).

Signature

Name

Title

Date

Phone No.

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DOSH Reviewer's Signature

Date



Washington State Department of  
**Labor & Industries**  
*Division of Occupational Safety and Health*

## Employer Certification of Abatement Form

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Or Fax to: (206) 515-2830

Violation(s) are fully described in the Citation and Notice of Assessment section.

Violation, Item & Group#	Type of Violation	WAC# Violated	Correction Due Date
3-2	General	WAC 296-800-22005	2/25/2016
Violation Summary: Clean workplace			
How you corrected the hazard →			
Date you corrected the hazard →			

I certify that the hazards described in this Employer Certification of Abatement Form have been corrected as described above. Affected employees and their representatives have been informed of the correction activities. I am aware that knowingly providing false information may result in criminal penalties (RCW 49.17.190(2)).

Signature

Name

Title

Date

Phone No.

**DOSH USE ONLY**

DOSH Reviewer's Signature

Date



Washington State Department of  
**Labor & Industries**  
*Division of Occupational Safety and Health*

## Employer Certification of Abatement Form

**Inspection: 317937582**

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Or Fax to: (206) 515-2830

Violation(s) are fully described in the Citation and Notice of Assessment section.

Violation, Item & Group#	Type of Violation	WAC# Violated	Correction Due Date
3-3	General	WAC 296-800-23020(3)	2/20/2016
Violation Summary: Bathroom cleanliness/ not maintained			
How you corrected the hazard →			
Date you corrected the hazard →			

I certify that the hazards described in this Employer Certification of Abatement Form have been corrected as described above. Affected employees and their representatives have been informed of the correction activities. I am aware that knowingly providing false information may result in criminal penalties (RCW 49.17.190(2)).

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

\_\_\_\_\_  
Phone No.

### DOSH USE ONLY

\_\_\_\_\_  
DOSH Reviewer's Signature

\_\_\_\_\_  
Date



Washington State Department of  
**Labor & Industries**  
*Division of Occupational Safety and Health*

## **Post This Document**

### **Appeal Rights**

**Inspection: 317937582**

### **For Employers**

If you are cited for a violation of Occupational Safety and/or Health rules, you have the right to appeal the citation. **You have 15 working days from the date you receive this citation to appeal.** (RCW 49.17.140(1)) "Working day" means a calendar day, except Saturdays, Sundays and all legal state holidays. Your appeal must be in writing. It may be mailed, faxed, or personally delivered.

For violations classified as serious, willful, repeat serious, or failure to abate serious, an employer must correct the violations by the date listed on the Citation and Notice / Employer's Certification of Abatement form unless a stay of abatement date is requested in the appeal as described on this page. A stay of abatement date means the employer's requirement to abate or correct the hazard is put on hold until the appeal is resolved. All general and repeat general violations under appeal automatically have stay of abatement dates until a final order on those violations has been issued. If you only need an extension of an abatement date, please see the above section entitled, **"If you are unable to fix the hazard(s) by the correction due date(s)".**

#### **Your appeal must include:**

- Name, address, telephone number, and fax number if available of the employer who is appealing, and for the employer's representative, if any, such as an attorney or interpreter.
- Inspection Number (You will find this nine-digit number in the top right corner of this page.)
- Statement explaining:
  1. What you think is wrong with the citation and any related facts.
  2. How you think the citation should be changed.
  3. What relief you are seeking and why.

**If you are requesting a stay of abatement date for serious, willful, repeat serious or failure to abate serious, you must also include:**

- Each violation and item number for which a stay of abatement date is requested; and
- The reason for the stay of abatement date request.

Note: Employees and/or employee representatives may elect to participate in appeal hearings.

### **Posting requirement:**

You must post your appeal documents (along with this citation packet) until the appeal is resolved.  
You must also post all other documents related to this appeal.

### **For Employees or Their Representatives**

If your employer is cited, you may only appeal the correction due date(s).

#### **Your appeal must include:**

- Your name, address, telephone number, and fax number if available and the same information for anyone who is representing you, if any.
- Inspection number.
- Statement explaining why the correction due date should be changed.

#### **Send all appeals to:**

**Assistant Director for DOSH**  
**Attn: Appeals Program**  
**PO Box 44604**  
**Olympia, WA 98504-4604**  
**Fax to: (360) 902-5581 or deliver to: Any L&I office**

For more information call the Appeals Program: **(360) 902-5486.**

MENZIES AVIATION (USA) INC  
MENZIES AVIATION (USA)INC  
Attn Rocky Woods  
Po Box 610330  
Dfw Airport, TX 75261

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Attn Rocky Woods  
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Dfw Airport, TX 75261