

U.S. Department of Labor

Occupational Safety and Health Administration

1205 Texas Ave.

Room 806

Lubbock, TX 79401



Notice of Unsafe or Unhealthful Working Conditions

To:

Bureau of Land Management, dba Cliffside Helium
Enrichment Unit
13301 Brickplant Road
Amarillo, TX 79124

Inspection Number: 1536046

Inspection Date(s): 06/08/2021 - 06/10/2021

Issuance Date: 01/12/2022

Inspection Site:

13301 Brickplant Road
Amarillo, TX 79124

The violation(s) described in this Notice is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This Notice of Unsafe or Unhealthful Working Conditions (Notice) describes violations of the Occupational Safety and Health Act of 1970, the Executive Order 12196, and 29 CFR 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters. You must abate the violations referred to in this Notice by the dates listed unless, within 15 working days (excluding weekends and Federal holidays) from your receipt of this Notice you request an Informal Conference with the U.S. Department of Labor OSHA Area Office at the address shown above. Please refer to the enclosed publication "Federal Employer Rights and Responsibilities Following an OSHA Inspection" which outlines the appeals procedure for this Notice and which should be read in conjunction with this form. If you have any questions, please contact this office at (806) 472-7681.

Posting - The law requires that a copy of this Notice be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because the nature of the employer's operations, where it will be readily observable by all affected employees. This Notice must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

Notification of Corrective Action - For each violation which you do not appeal, you must provide abatement certification to the Area Director of the OSHA office issuing the Notice and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the Notice indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Notice. In addition, where the Notice indicates that abatement documentation is required, evidence of

the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

Program Responsibilities - Section 19(a)(1) of the OSH Act requires the head of each Federal agency to comply with applicable occupational safety and health standards. The intent of this section and Executive Order 12196 is implemented through 29 CFR 1960.8(b). If you are cited for violations of applicable safety and health standards, you have also violated the program element 29 CFR 1960.8(b), which stipulates:

“The head of each agency shall comply with the Occupational Safety and Health Administration standards applicable to the agency.”

Informal Conference - An informal conference is not required. However, if you wish to have such a conference, you may request one with the Area Director within 15 working days after receipt of this Notice. As soon as the time, date, and place of the informal conference have been determined, please complete the enclosed “Notice to Employees” and post it where the Notice is posted. During such an informal conference, you may present any evidence or views you believe would support an adjustment to the Notice. In addition, bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far.

If you are considering a request for an informal conference to discuss any issues related to the Notice, you must take care to schedule it early enough to allow time to appeal after the informal conference should you decide to do so. Please keep in mind that a written letter of intent to appeal must be submitted by the Agency’s National OSH Manager to the OSHA Area Director within 15 business days of your receipt of the OSHA Notice to request that OSHA’s Regional Administrator review the case.

Inspection Activity Data - You should be aware that OSHA publishes information on its inspection and notice activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this Notice. You are encouraged to review the information concerning your establishment at www.OSHA.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with the Occupational Safety and Health Administration (OSHA) to discuss the Notice of Unsafe or Unhealthful Working Conditions (Notice) issued on 01/12/2022. The conference will be held by telephone or at the OSHA office located at 1205 Texas Ave., Room 806, Lubbock, TX 79401 on _____ at _____.

Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

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Employer Instruction: List the specific method of correction for each item on the enclosed notices that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 1205 Texas Ave., Room 806, Lubbock, TX 79401.** Failure to submit a timely certification of corrective action may result in a notification to your agency DASHO.

Notice Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Notice Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Notice Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Notice Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Notice Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Notice Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review.

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Notice 1 Item 1 Type of Violation: **Serious**

29 CFR 1910.119(d)(3)(i)(D): The employer did not include, in the process safety information compilation, the relief system design and the design basis:

(a) On June 8, 2021, and at times prior the Bureau of Land Management failed to include in the process system information compilation, the relief system design and the design basis such as but not limited to:

- All applicable overpressure scenarios
- All applicable relief load calculations
- PRD Documentation - PRD make/model, and materials of construction
- Installation Documentation - Relief piping isometrics, inlet, and outlet pressure drop calculations including PRV stability (engineering analysis), and piping stress and reaction force analysis.

This condition exposed employees to struck-by hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: February 25, 2022

See Pages 1 through 3 of this Notice for information on employer and employee rights and responsibilities.

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Notice 1 Item 2 Type of Violation: **Serious**

29 CFR 1910.119(e)(2)(iv): Hazard and Operability Study (HAZOP);

(a) On June 8, 2021, and at times prior, the Bureau of Land Management's Hazard and Operability Study did not include information in the severity, likelihood, or risk columns. This condition exposes employees to struck-by hazards.

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Notice 1 Item 3 Type of Violation: **Serious**

29 CFR 1910.119(e)(3)(v):Facility siting;

(a) On June 8, 2021, and at times prior, the Bureau of Land Management did not adequately address the facility siting of the control room in the Process Hazard Analysis. This condition exposed employees to struck-by hazards.

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Notice 1 Item 4 Type of Violation: **Serious**

29 CFR 1910.119(e)(3)(vi): Human factors;

(a) On June 8, 2021, and at times prior, the Bureau of Land Management's Process Hazard Analysis did not address human factors related to hiring and retaining experienced personnel. This condition exposed employees to struck-by hazards

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Notice 1 Item 5 Type of Violation: **Serious**

29 CFR 1910.119(f)(1)(ii)(A): The employer did not develop and implement written operating procedures that addressed the consequences of deviations from the operating limits in the covered process;

a) On June 8, 2021, and at times prior, the Bureau of Land Management's operating procedures did not include the consequences of deviations from the operating limits including but not limited to:

Phase I Procedures:

DGA System start-up and shutdown
TSA system start-up and shutdown
K100 feed gas compressor start-up and shutdown
Cold plant restart
G200 A/B Pump start-up and shutdown

Phase II Procedures:

Hazards of the Helium Enrichment Unit,
Lower pressure operation,
Alarm response
Purging procedures
Locked valve checklist

Phase III Procedures:

Emergency plant shutdown
Routine plant shutdown
Nitrogen system startup and shutdown
Waukesha compressor startup and shutdown

This condition exposed employees to struck-by hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Notice 1 Item 6 Type of Violation: **Serious**

29 CFR 1910.119(g)(1)(i): The employer did not train each employee in the operating procedures as specified in paragraph (f) of 29 CFR 1910.119.

(a) On June 8, 2021, and at times prior, the Bureau of Land Management did not train each employee in the operating procedures including but not limited to:

Phase I Procedures

DGA System start-up and shutdown

TSA system start-up and shutdown

K100 feed gas compressor start-up and shutdown

Cold plant restart

G200 A/B Pump start-up and shutdown

Phase II Procedures:

Hazards of the Helium Enrichment Unit,

Lower pressure operation,

Alarm response

Locked valve checklist

Phase III Procedures:

Emergency plant shutdown

Routine plant shutdown

This condition exposed employees to struck-by hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Notice 1 Item 7 Type of Violation: **Serious**

29 CFR 1910.119(j)(2): The employer did not establish written procedures to maintain the ongoing integrity of process equipment

(a) On June 8, 2021, and at times prior, the Bureau of Land Management did not establish written procedures to maintain the ongoing integrity of the process equipment including for all pressure vessels, relief and vent systems, emergency shutdown systems, and controls. This condition exposed employees to struck-by hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Notice 1 Item 8 Type of Violation: **Serious**

29 CFR 1910.119(j)(4)(iv): The employer shall document each inspection and test that has been performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.

(a) On June 8, 2021, and at times prior, the Bureau of Land Management did not document each inspection and test that was performed on Piping systems, Emergency shutdown systems, and controls. This condition exposed employees to struck-by hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Notice 1 Item 9 Type of Violation: **Serious**

29 CFR 1910.119(m)(1): The employer shall investigate each incident which resulted in, or could reasonably have resulted in a catastrophic release of highly hazardous chemicals in the workplace.

(a) On June 8, 2021, and at times prior, the Bureau of Land Management failed to investigate each incident that resulted in, or could reasonably have resulted in a catastrophic release of HHC in the workplace. This condition exposed employees to struck-by hazards.

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Notice 1 Item 10 Type of Violation: **Serious**

29 CFR 1910.119(o)(1): The employer did not verify that the procedures and practices developed under the standard were being followed:

(a) On June 8, 2021, and at times prior, the Bureau of Land Management did not conduct compliance audits to verify that the procedures and practices under the process safety management were adequate and being followed.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Notice 1 Item 11 Type of Violation: **Serious**

29 CFR 1910.147(d)(3): All energy isolating devices that were needed to control the energy to the machine or equipment were not physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s):

(a) On July 7, 2021, the Bureau of Land Management failed to ensure that all energy isolating devices that were needed to control the energy on the K610 compressor piping were physically located and operated in such a manner as to isolate the equipment from the energy source. This condition exposed employees to struck-by hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Notice 1 Item 12 Type of Violation: **Serious**

29 CFR 1960.26(b)(5): The Agency official did not promptly contact the Designated Agency Safety and Health Official and other responsible agency officials when the official in charge of the workplace needed assistance to undertake full abatement:

(a) On or about June 8, 2021, the Bureau of Land Management failed to address deficiencies in assuring the mechanical integrity of the unit's process equipment and the control of hazardous energy during service and maintenance of machinery and equipment identified through the course of the agency's inspection program allowing these hazards to persist unabated exposing employees responsible for the operation and maintenance of the unit to potentially serious harm or death.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: February 11, 2022



Notice of Unsafe or Unhealthful Working Conditions

Company Name: Bureau of Land Management, dba Cliffside Helium Enrichment Unit
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Notice 2 Item 1 Type of Violation: **Willful - Serious**

29 CFR 1910.119(j)(4)(i): The employer did not perform inspection and tests on process equipment:

(a) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 4"x6" relief valve PSV-200 (S/N 1101-1705-084474) with a set pressure of 225 psig

(b) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 4"x6" relief valve PSV-300 (S/N 1101-1806-143074) with a set pressure of 325 psig

(c) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 3"x4" relief valve PSV-7123 with a set pressure of 275 psig

(d) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 0.75x1 relief valve PSV-7137 with a set pressure of 275 psig

(e) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 4"x6" relief valve PSV-7124A (S/N 458835-3-V10-T2) with a set pressure of 250 psig

(f) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 4"x6" relief valve PSV-7124B (S/N 458835-3-V10-T2) with a set pressure of 260 psig.

This condition exposed employees to struck-by hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Notice 2 Item 2 Type of Violation: **Willful - Serious**

29 CFR 1910.119(j)(4)(i): The employer did not perform inspection and tests on process equipment:

- (a) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the critical Shutdown Valve NV-4106
- (b) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the critical Level Controller LIC-4111A
- (c) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the critical Level Switch High High LSHH-4111B
- (d) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the critical Pressure Switch Low Low PSLL-4153
- (e) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the critical Temperature Switch Low Low TSLL-4156
- (f) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the critical Temperature Switch High High TSHH-4161
- (g) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the critical Pressure Differential Switch Low Low PDSLL-4163
- (h) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the critical Pressure Switch High High PSHH-4146
- (I) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the critical High-Level Switch LSHH-7131
- (j) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the critical Accuload Emergency shutdown UA-7136

This condition exposed employees to struck-by hazards.

See Pages 1 through 3 of this Notice for information on employer and employee rights and responsibilities.

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Notice 2 Item 3 Type of Violation: **Willful - Serious**

29 CFR 1910.119(j)(4)(i): The employer did not perform inspection and tests on process equipment:

- (a) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the S-100 Suction bottle (S/N 2200-1) pressure vessel.
- (b) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the B-100 Suction bottle (S/N 2200-2) pressure vessel
- (c) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the B-100 Discharge Bottle (S/N 2200-3) pressure vessel
- (d) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the E-447A Gas/Gas Exchanger (S/N C23004966-1) pressure vessel
- (e) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the E-447B Gas/Gas Exchanger (S/N C23004966-2) pressure vessel
- (f) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the E-445 Process Gas Chiller (S/N 0230496A-1) pressure vessel
- (g) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the S-200 Stage 2 Suction scrubber (S/N 2200-4) pressure vessel
- (h) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the B-200 Suction bottle (S/N 2200-5) pressure vessel
- (I) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the E-445 Surge Drum (S/N 023049613-1) pressure vessel
- (j) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the C-445 Primary Gas Separator (S/N 22703-405) pressure vessel
- (k) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the C-446 Secondary Gas Separator (S/N 22703-406) pressure vessel

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(l) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the C-442 Chiller Receiver (S/N 22703-404) pressure vessel

(m) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the C-443 Bulk Oil Separator (S/N 0230508A-1) pressure vessel

This condition exposed employees to struck-by hazards.

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Notice 2 Item 4 Type of Violation: **Willful - Serious**

29 CFR 1910.119(j)(4)(i): The employer did not perform inspection and tests on process equipment:

On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 250 psig NGL storage tank T-710. This condition exposed employees to struck-by hazards.

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Notice 2 Item 5 Type of Violation: **Willful - Serious**

29 CFR 1910.119(j)(4)(i): The employer did not perform inspection and tests on process equipment:

(a) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 12" - 300 PSIG carbon steel process piping from the 1st Stage Discharge- S-200 to K-200

(b) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 1.5" - 300 PSIG residue liquid carbon steel process piping from separator C-445 to exchanger E-448B

(c) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 1.5" - 300 PSIG residue liquid carbon steel process piping from exchanger E448A to separator C-446

(d) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 1.5" - 300 PSIG Residue Liquid/NGL carbon steel process piping from separator C-446 to G-445A/B

(e) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 1.5" - 300 PSIG Residue Liquid carbon steel process piping G-445A/B to Chiller B/L

(f) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 1" - 300 PSIG NGL carbon steel process piping from separator C446 to tank T-710

(g) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 4" - 300 PSIG NGL carbon steel process piping from tank T-710 to pump G-710

(h) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 3" - 300 PSIG NGL carbon steel process piping from pump G-710 to the truck loading nozzle

(i) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 4" - 300 PSIG NGL carbon steel process piping from pump G-710 PSV to tank T-710

(j) On June 8, 2021, and at times prior, the employer did not perform inspection and tests on the 2" - 300 PSIG vapor return carbon steel process piping from truck loading to tank T-710

This condition exposed employees to struck-by hazards.

See Pages 1 through 3 of this Notice for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1536046
Inspection Date(s): 06/08/2021 - 06/10/2021
Issuance Date: 01/12/2022



Notice of Unsafe or Unhealthful Working Conditions

Company Name: Bureau of Land Management, dba Cliffside Helium Enrichment Unit
Inspection Site: 13301 Brickplant Road, Amarillo, TX 79124

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: February 25, 2022

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1536046
Inspection Date(s): 06/08/2021 - 06/10/2021
Issuance Date: 01/12/2022



Notice of Unsafe or Unhealthful Working Conditions

Company Name: Bureau of Land Management, dba Cliffside Helium Enrichment Unit
Inspection Site: 13301 Brickplant Road, Amarillo, TX 79124

Notice 2 Item 6 Type of Violation: **Willful - Serious**

29 CFR 1910.147(c)(7)(i): The employer did not provide adequate training to ensure that the purpose and function of the energy control program were understood by employees:

(a) On June 8, 2021, and at times prior, the employer did not train operators on the facility's energy control program. This condition exposed employees to struck-by hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: February 25, 2022

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1536046
Inspection Date(s): 06/08/2021 - 06/10/2021
Issuance Date: 01/12/2022



Notice of Unsafe or Unhealthful Working Conditions

Company Name: Bureau of Land Management, dba Cliffside Helium Enrichment Unit
Inspection Site: 13301 Brickplant Road, Amarillo, TX 79124

Notice 3 Item 1 Type of Violation: **Other-than-Serious**

29 CFR 1960.25(c): The Agency did not inspect annually, all areas in each workplace, including office operations:

(a) On June 8 and at times prior, the Bureau of Land Management failed to inspect annually, all areas in each workplace, including office operations to identify safety and health hazards, routinely exposing employees to potential chemical and physical hazards associated with the operation of the crude helium enrichment plant.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: February 25, 2022



Notice of Unsafe or Unhealthful Working Conditions

Company Name: Bureau of Land Management, dba Cliffside Helium Enrichment Unit
Inspection Site: 13301 Brickplant Road, Amarillo, TX 79124

Notice 3 Item 2 Type of Violation: **Other-than-Serious**

29 CFR 1960.26(c)(3): The Agency's official in charge of the workplace did not immediately post notice of an unsafe or unhealthful working condition, or copy thereof, unedited, at or near each place where the unsafe or unhealthful working condition existed:

(a) On June 8, 2021, and at times prior, the Bureau of Land Management failed to post notices of violations identified in the audits at or near each place of an unsafe or unhealthful working condition. Audits identified hazardous conditions in that pressure vessels were not adequately tested and maintenance records were not adequately maintained, yet these findings were not posted in the facility until the hazard was abated.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: January 24, 2022

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1536046
Inspection Date(s): 06/08/2021 - 06/10/2021
Issuance Date: 01/12/2022



Notice of Unsafe or Unhealthful Working Conditions

Company Name: Bureau of Land Management, dba Cliffside Helium Enrichment Unit
Inspection Site: 13301 Brickplant Road, Amarillo, TX 79124

Notice 3 Item 3 Type of Violation: **Other-than-Serious**

29 CFR 1960.72: The Bureau of Land Management failed to submit to the Secretary by May 1 of each year the information included on its previous calendar year's occupational injury and illness recordkeeping forms.

(a) On June 8, 2021, and at times prior, the Bureau of Land Management failed to submit to the Secretary by May 1 of each year the information included on its previous calendar year's occupational injury and illness recordkeeping forms. The entire Department of Interior failed to submit any of its required injury and illness data for calendar year 2020, including for this BLM facility.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: February 25, 2022


Elizabeth Linda Routh
Area Director

See Pages 1 through 3 of this Notice for information on employer and employee rights and responsibilities.