OCCUPATIONAL SAFETY AND HEALTH REVIEW COMMISSION
1924 Building - Room 2R90, 100 Alabama Street, S.W.
Atlanta, Georgia 30303-3104

Secretary of Labor, Complainant v. Heat Transfer Products, LLC, Respondent.	OSHRC Docket No. **16-0289**

Appearances:

Thomas J. Motzny, Esquire, U.S. Department of Labor, Office of the Solicitor, Nashville, Tennesse
For the Secretary

Carla J. Gunnin, Esquire, Jackson Lewis, P.C., Atlanta, Georgia
For the Respondent

BEFORE: Administrative Law Judge Heather A. Joys

DECISION AND ORDER

This proceeding is before the Occupational Safety and Health Review Commission pursuant to § 10(c) of the Occupational Safety and Health Act of 1970, 29 U.S.C. § 651- 678 (the Act). Heat Transfer Products, Inc., (hereinafter "HTP") is a manufacturer of refrigeration equipment components. Beginning October 5, 2015, Occupational Safety and Health Administration Compliance Officer (CSHO) Benjamin Bailey conducted an inspection of HTP at its facility in Scottsboro, Alabama. Based upon CSHO Bailey's inspection, the Secretary of Labor, on January 19, 2016, issued a Citation and Notification of Penalty alleging one serious violation of 29 C.F.R. § 1910.176(a) for failure to have visible floor markings for permanent aisles used by powered industrial trucks and pedestrians. The Secretary proposed a penalty of $4590.00 for the Citation. HTP timely contested the Citation. Both the violation and penalty are at issue.

A hearing was held in this matter on July 22, 2016, in Decatur, Alabama. The proceedings were conducted pursuant to the Commission's Simplified Proceedings. 29 C.F.R. §§ 2200.200-211. The parties presented oral arguments at the close of the hearing and were afforded the opportunity to submit written supplementary statements. HTP timely submitted a letter brief. The Secretary notified the court he would not be submitting a written supplementary statement.

For the reasons that follow, the citation is affirmed and a penalty of $450.00 is assessed.

Jurisdiction

At the hearing, the parties stipulated that jurisdiction of this action is conferred upon the Commission pursuant to § 10(c) of the Act (Tr. 7). HTP also admits that at all times relevant to this action, it was an employer engaged in a business affecting interstate commerce within the meaning of § 3(5) of the Act, 29 U.S.C. § 652(5) (Tr. 7). Based on the stipulations and evidence presented at the hearing, I find the Commission has jurisdiction of this matter and HTP is covered under the Act.

Background

HTP is an Alabama based manufacturer of component parts of commercial refrigeration equipment (Tr. 93). It is owned by Rheem Manufacturing Company (Tr. 25). The inspection at issue took place at HTP's facility in Scottsboro, Alabama, that has approximately 280 employees (Tr. 25). Nationally, the company has 12,000 employees (Tr. 25).

On October 5, 2015, CSHO Bailey[1] began an inspection of HTP's Scottsboro facility (Tr. 20). He was assigned to conduct the inspection after the OSHA Birmingham Area Office received an employee complaint (Tr. 20). Among other things, the complaint alleged employees in the facility were exposed to hazards associated with obstructed aisles and with pedestrian and forklift traffic using the same aisles (Tr. 20).[2] After holding an opening conference with

[1] CSHO Bailey has been employed by OSHA for six years (Tr. 15). He was a safety compliance officer in the Air Force from which he retired in 2004 after serving 23 years (Tr. 15). After retiring from the military, CSHO Bailey worked for several private employers prior to working for OSHA (Tr. 16-18). He holds a bachelor's degree in professional aeronautics and a master's degree in occupational safety and health (Tr. 18).

[2] There is a dispute of fact between the parties whether CSHO Bailey presented a copy of the complaint to representatives of HTP at any time during the inspection or otherwise informed HTP management the complaint addressed floor markings. CSHO Bailey testified he provided the complaint and told HTP representatives the

representatives of HTP, CSHO Bailey conducted a walk around inspection of the facility (Tr. 20-24, 26). Kristi Yates, HTP's environmental health and safety manager, accompanied CSHO Bailey on the walk around (Tr. 94). CSHO Bailey estimated he spent 5 ½ hours at the facility (Tr. 25).

According to CSHO Bailey, the complaint items focused on aisles in the facility's storage area. In that area, CSHO Bailey observed both perimeter aisles and larger main aisles that ran through the center of the facility (Tr. 26). CSHO Bailey noted both forklift and pedestrian traffic in both areas. He found the aisles sufficiently wide for the traffic involved and described the facility as "relatively well lit." (Tr. 27, 41). He noted yellow painted lines on the floor indicating the perimeter of the aisles and orange painted lines separating forklift aisles from pedestrian aisles (Tr. 31, 33). He inquired whether there was a policy regarding where pedestrians were to walk, to which Ms. Yates responded yes (Tr. 27-28). At the hearing, Ms. Yates testified employees are trained to walk in the pedestrian aisles demarcated with orange lines (Tr. 103, 105; 111; 113; 118).[3]

During his walk around the facility, CSHO Bailey saw areas where the orange lines were barely visible or completely worn off (Tr. 29-30, 33). He photographed these areas (Exhs. S-1; S-2; and S-3). He testified these were areas where he observed both forklift and pedestrian traffic (Tr. 32-35). Ms. Yates later informed CSHO Bailey HTP was in the process of repainting the lines on the floor. Ms. Yates testified that due to wear and tear, the company finds it necessary to repaint the floor markings twice per year (Tr. 101). She further testified the aisles have remained in the same locations for 10 or 11 years (Tr. 102). Several months following the inspection, Ms. Yates provided the OSHA Birmingham Area Office with photographs showing the newly painted floor markings (Tr. 44, 98; Exhs. S-12 and S-13).

CSHO Bailey also observed employees not following the rule to walk within the orange

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complaint addressed floor markings, among other things. Kristie Yates, HTP's only witness, testified she was never provided a copy of the complaint despite requesting one and was never informed floor markings were the subject of the complaint. Nothing in the Act or regulations requires the Secretary or his representative to provide an employer with a copy of an employee complaint before conducting an inspection. HTP does not argue its consent to the inspection was not voluntary or obtained through fraud or deceit. Therefore, I do not find the issue material. HTP argues this is an issue of witness credibility. No material fact is in dispute that requires a resolution of credibility.

[3] Ms. Yates was somewhat equivocal on the specific training provided but did concede on cross examination and redirect employees were told pedestrian walkways were marked by orange lines (Tr. 113; 118).

lines. He observed one large group of employees traveling on foot from a work area to a break area using the center of the aisle (Tr. 23; 47-48). He testified this occurred in an area that was not well marked (Tr. 23). At another time, he observed and photographed one employee walking on the side opposite the designated pedestrian aisle (Exh. S-3). He did not testify he observed forklifts operating in pedestrian aisles. Ms. Yates testified she was unaware of anyone having been disciplined for an infraction of the rule requiring pedestrians to remain in designated pedestrian aisles (Tr. 111).

Ms. Yates testified HTP has identified the use of the aisles by both forklifts and pedestrians as a potentially hazardous situation (Tr. 108; 114). In order to minimize this hazard, in addition to marking the separate aisles by painted lines, HTP has equipped the forklifts with LED lights to increase visibility (Tr. 83-84; 106-07); a governor that prevents travel over 6 mph (Tr. 108); and horns that employees are trained to sound at intersections or blind corners (Tr. 84; 104). CSHO Bailey testified he heard forklift drivers using their horns frequently during his inspection. Convex mirrors are located throughout the facility to help both forklift drivers and pedestrians see oncoming traffic (Tr. 108). Blue lights illuminate when doors are opened as a warning to drivers (Tr. 81-82; 106).

As a result of his observation of the poor condition of the floor markings for pedestrian aisles, CSHO Bailey recommended a citation be issue alleging a violation of the standard at 29 C.F.R. § 1910.176(a). HTP timely contested the citation.

Analysis

The Citation

The Secretary has the burden of establishing the employer violated the cited standard. To prove a violation of an OSHA standard, the Secretary must show by a preponderance of the evidence that (1) the cited standard applies; (2) the employer failed to comply with the terms of the cited standard; (3) employees had access to the violative condition; and (4) the cited employer either knew or could have known with the exercise of reasonable diligence of the violative condition. *JPC Group, Inc.*, 22 BNA OSHC 1859, 1861 (No. 05-1907, 2009).

The citation alleges a serious violation of 29 C.F.R. § 1910.176(a) which requires,

> Where mechanical handling equipment is used, sufficient safe clearances shall be allowed for aisles, at loading docks, through doorways and wherever turns or passage must be made. Aisles and passageways shall be kept clear and in good repair, with no obstruction across or in aisles that could create a hazard. Permanent aisles and passageways shall be appropriately marked.

The citation alleges,

> On or about October 05, 2015 - Manufacturing plant, some aisles and passageways for pedestrians and forklift traffic were severely faded and/or blocked making it difficult to safely determine where pedestrians and forklift traffic should walk/operate.

CSHO Bailey testified the citation addressed aisles in the storage area of the facility that are depicted in Exhibits S-1, S-2, and S-3.

Applicability of the Standard

The standard generally applies to any area where "mechanical handling equipment is used." HTP does not dispute forklifts are used in the cited areas.

The obligation to mark aisles only applies, under the terms of the standard, to those aisles that are permanent. In *General Electric Company*, 3 BNA OSHC 1031 (No. 2739, 1975), the Commission addressed the conditions under which aisles are considered permanent, requiring them to be marked in accordance with § 1910.176(a). Reversing the ALJ's vacatur of the citation, the Commission rejected the ALJ's conclusion the unmarked aisles were not permanent because they were in a temporary storage facility. *General Electric*, 3 BNA OSHC at 1047. The Commission went on to find the aisles, which were intended for egress in case of emergency, met the requirement of permanent aisles that were to be marked under the standard. *Id*. at 1048. In addressing the meaning of the term "permanent," the Commission wrote

> In the sense of the standard, "permanent" obviously does not mean forever. It must be construed in light of the objective of the standard – here provision for marked ways of egress in case of emergency. It suggests any duration other than transitory. *Id*.

HTP cites *Anchor Hocking Glass Company, Inc.,* 17 BNA OSHC 1644 (No. 94-0178, 1996), in which Judge Michael Schoenfeld vacated a citation alleging a violation of §

1910.176(a) for failure to mark certain pedestrian walkways.[4] While rejecting the Respondent's argument the standard was not intended to protect pedestrians, Judge Schoenfeld vacated the citation on the ground the standard makes no distinction between aisles for forklifts and walkways for pedestrians. For that reason, he concluded the standard cannot be found to require markings for both.[5] He further reasoned, even if the standard did require markings for both, the Secretary had failed to establish the pedestrian walkways were permanent.

I agree with Judge Schoenfeld's conclusion the standard was intended to protect pedestrians as well as forklift drivers.[6] I disagree with his conclusion the standard does not require the employer to appropriately mark pedestrian aisles. It simply does not follow from his premise that because the standard fails to distinguish between aisles used by forklifts and aisles used by pedestrians in the same areas, only the forklift aisles need be marked. Where material handling equipment is used, the standard only limits applicability to those aisles that are **permanent**. It follows in an area in which forklift and pedestrian traffic are separated by permanently designated aisles, the standard requires that separation be appropriately marked because it demarcates the parameters of the forklift aisle as well as the pedestrian aisle. In the instant case, the orange lines at HTP's facility did not simply identify pedestrian aisles, it signaled to forklift drivers where they were to drive.

Ms. Yates testified the aisles at the facility had been in the same location for 10 to 11 years. She stated the designation of forklift and pedestrian aisles have been in place for that same amount of time (Tr. 102). Employees are trained at hire and annually thereafter to walk in the designated pedestrian aisles. HTP's New Employee Environmental Health and Safety

[4] Judge Schoenfeld's decision is an unreviewed ALJ decision and, consequently, is without precedential value. HTP cites to the decision as instructive.

[5] In contrast to Judge Schoenfeld's reasoning, Judge David Harris, in *Pep-Com Industries, Inc*., 1979 WL 7981 (No. 78-4177, 1979), affirmed a violation of the same standard for not marking pedestrian walkways. In doing so, he relied solely on the CSHO's unrebutted testimony that he observed forklifts and pedestrians in the same area. Judge Harris provides little analysis of the issue.

[6] Despite directing the court's attention to Judge Schoenfeld's decision, HTP argued in its letter brief the standard does not apply to pedestrians. In so arguing, HTP draws a distinction between §1910.22(b) (under Subpart D - Walking and Working Surfaces), and § 1910.176(a) (under Subpart N - Materials Handling and Storage). HTP does not argue, as it could have, that § 1910.22(b)(2) is the more applicable standard. Rather, HTP argues the use of the term "appropriately marked" fails to provide the employer notice of what actions it must take to be in compliance. Because § 1910.176(a) and § 1910.22(b)(2) contain identical language, HTP's position would necessarily be that neither passes muster.

Orientation materials specify the existence of separate designated aisles for pedestrians (Exh. R-1 pp. 8-9). The evidence establishes both the forklift and pedestrian aisles were permanent as that term is used in the standard. The standard applies.

Failure to Comply with the Standard

To establish HTP failed to comply with the standard, the Secretary has the burden to show the condition of the orange lines demarcating the pedestrian walkways was not appropriate marking. The requirement for appropriate markings is discussed in few Commission decisions. *See Hughes Tool Company*, 6 BNA OSHC 1366 (No. 15086, 1978)[7]; and *Paper Products Company, Inc*., 2 BNA OSHC 1126 (No. 2987, 1974).[8] Although there are numerous unreviewed ALJ decisions addressing allegations of violation of § 1910.176(a), few address the specific question at issue here of what constitutes appropriate markings.

Interpretations and guidance from the Secretary provide no more definitive answer to the question of what constitutes appropriate markings. In a 1973 interpretative document referenced by the Commission in *Hughes Tool,* the Secretary answered the question "What is meant by appropriately marked aisles?" as follows:

> The standard is intentionally vague because there are many ways aisles could be appropriately marked. For example, racks define aisles because all areas between the racks are aisles. Striping and signs also are good ways to mark aisles.

Hughes Tool, 6 BNA OSHC at 1368, *citing Qs. and As. to Part 1910*, OSHA 2095, December 1973, reprinted at CCH Employment Safety and Health Guide, para. 1115.13. HTP cites to other guidance documents issued by the Secretary that contain similar language (E-Tools for Powered Industrial Trucks (Exh. R-2); Standard Interpretation - § 1910.22(b) (Exh. R-4); and STD 01-01-004, 29 CFR 1910.22(b)(2), Marking of Aisles and Passageways (Exh. R-5)). The E-Tool for Powered Industrial Trucks suggests measures such as railings, barriers, or painted lines demarcating pedestrian walkways for protecting pedestrians where forklifts are operated under §

[7] In *Hughes Tool,* cited by HTP, the two-member Commission was not able to reach agreement on disposition of the citation alleging a violation of § 1910.176(a). Although the Commissioners agreed painted lines were not the sole method by which aisles may be appropriately marked, they differed as to whether the method used by the employer was adequate. They were also unable to agree whether obstructions in the aisles created a hazard. The decision is of limited precedential value.

[8] *Paper Products Company* contains no discussion of the requirements of the standard.

1910.176(a) (Exh. R-2 p. 2). The Standard Interpretation and STD 01-01-004 (Exhs. R-4 and R-5) contain interpretations of the identical language found at 29 C.F.R. § 1910.22(b).[9] The Standard Interpretation states,

> The lines used to delineate the aisles may be any color so long as they clearly define the area considered as aisle space. The lines may be composed of dots, square, strip or continuous, but they too must define the aisle area. (Exh. R-4)

STD 01-01-004 reads,

> The intent of "appropriately marked" is not to restrict the markings to one method only….Painted lines remain the most feasible method of marking, where practical, since they may last several years without maintenance or repainting. Other appropriate methods such as marking pillars, powder stripping, flags, traffic cones or barrels are acceptable, when the training programs for vehicle operators and employees include the recognition of such markings. (Exh. R-5)

HTP argues because none of these documents "provide clear guidance of what it takes to comply" the standard is "unconstitutionally vague." I disagree.

A standard is not unconstitutionally vague or otherwise unenforceable simply because it does not specify the exact method of compliance applicable to every set of circumstances. The term "appropriately" means "suitable or fitting for a particular purpose." *Webster's New Collegiate Dictionary*. The Secretary's guidance recognizes different workplaces may require different types of markings. In using the word "appropriately," the standard is akin to a performance standard. "Under Commission precedent, 'because performance standards ... do not identify specific obligations, they are interpreted in light of what is reasonable.'" *Central Florida Equipment Rentals, Inc*., 2016 WL 4088876 (No. 08-1656, 2016) at p. 6, *quoting Thomas Indus. Coatings, Inc.*, 21 BNA OSHC 2283, 2287 (No. 97-1073, 2007). Consistent with the purpose of the standard, appropriate markings are those suitable to the environment that a reasonable person would find sufficient to put employees on notice of the location of the aisles and how to make safe passage. *See General Electric*, 3 BNA OSHC at 1048.

HTP chose to use painted lines to demarcate forklift and pedestrian aisles. HTP used no

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[9] The standard at § 1910.22(b) is titled "Aisles and Passageways." Section 1910.22(b)(1) states,

> Where mechanical handling equipment is used, sufficient safe clearances shall be allowed for aisles, at loading docks, through doorways and wherever turns or passage must be made. Aisles and passageways shall be kept clear and in good repair, with no obstruction across or in aisles that could create a hazard.

Section 1910.22(b)(2) states, "Permanent aisles and passageways shall be appropriately marked."

other method of delineating forklift from pedestrian aisles (Tr. 117). The Secretary does not challenge the use of painted lines as appropriate markings; rather the Secretary points to at least two locations observed by CSHO Bailey, where those lines were no longer sufficiently visible to put employees on notice of the delineation of forklift and pedestrian aisles. To a reasonable observer, the condition of the lines depicted in Exhibits S-1 and S-2 are so degraded they fail to meet that standard.[10] In those areas, an employee unfamiliar with the facility told to use designated pedestrian aisles would not know where to walk to stay out of the forklift aisles.[11] Similarly, forklift drivers would not know what the limits of the forklift aisles were. In those specific locations, permanent aisles were not appropriately marked. HTP failed to comply with the requirements of the standard.

Employee Exposure to the Hazard

To establish exposure to the hazard, the Secretary must show employees had access to the "zone of danger." *Donovan v. Adams Steel Erection, Inc*., 766 F.2d 804, 811 (3d Cir. 1985); and *Gilles & Cotting, Inc.*, 3 BNA OSHC 2002 (No. 504, 1976). CSHO Bailey testified he observed employees walking outside of pedestrian aisles and in the forklift aisles in areas where the aisle markings had been severely degraded. Where floor markings are degraded or non-existent pedestrians or forklift drivers unfamiliar with or new to the facility could be confused or simply unaware of which aisles to use, exposing pedestrians to the hazard of being struck by a forklift (Tr. 44-45). The evidence establishes employees were in the zone of danger and exposed to a struck by hazard.

HTP argues it took measures to reduce or even eliminate employee exposure to the hazard of being struck by a forklift. Such efforts may reduce the likelihood of an accident occurring, but do not establish a lack of employee exposure. Because employees are both walking and driving forklifts in the same area, employees continue to be exposed to a struck by

[10] Ms. Yates took photographs concurrent with CSHO Bailey. She testified the lines appear brighter in her photographs (Tr. 117). HTP did not submit these photographs into the record. Where a party does not submit evidence within its control, an inference can be drawn the evidence would not be in its favor. *Capeway Roofing Systems, Inc*., 20 BNA OSHC 1331 (No. 00-1968, 2003) (citations omitted); *see also Regina Contr. Co.*, 15 BNA OSHC 1044, 1049 ((No. 87-1309, 1991).

[11] I reject HTP's suggestion the Secretary had the burden to present evidence of specific employees who were unaware of where the pedestrian aisles were to establish the inadequacy of the markings. The totality of the evidence is sufficient to draw this inference. Moreover, the fact employees failed to observe the requirement to use pedestrian aisles suggests the markings were insufficient to notify employees of their existence and location.

hazard.

Employer Knowledge

To establish employer knowledge of a violation the Secretary must show the employer knew, or with the exercise of reasonable diligence could have known of a hazardous condition. *Dun Par Engineered Form Co*., 12 BNA OSHC 1962, 1965-66 (No. 82-928, 1986). Because corporate employers can only obtain knowledge through their agents, the actions and knowledge of supervisory personnel are generally imputed to their employers, and the Secretary can make a prima facie showing of knowledge by proving a supervisory employee knew of or was responsible for the violation. *Todd Shipyards Corp*., 11 BNA OSHC 2177, 2179 (No. 77-1598, 1984); *see also Dun Par Engineered Form Co*., 12 BNA OSHC at 1966 (the actual or constructive knowledge of an employer's foreman can be imputed to the employer). Actual knowledge refers to an awareness of the existence of the conditions allegedly in noncompliance. *Omaha Paper Stock Co.*, 19 OSHC 2039 (No. 01-3968, 2002). I find the Secretary has established HTP had knowledge of the violative condition.

There is no dispute HTP was aware pedestrians and forklifts used the same aisles. This fact was recognized in the company's training materials (Exh. R-1). The condition of the lines demarcating the pedestrian aisles was in plain sight. Ms. Yates informed CSHO Bailey HTP was in the process of repainting the floor lines, indicating she was aware of the condition of the lines (Tr. 100). The Secretary has established HTP was aware of the violative condition.

Classification

The Secretary alleges the violation was serious. A violation is serious when "there is a substantial probability that death or serious physical harm could result" from the hazardous condition at issue. 29 U.S.C. § 666(k). The Secretary need not show that there was a substantial probability that an accident would occur; only that if an accident did occur, death or serious physical harm would result. There can be little dispute a pedestrian being hit by a moving forklift would likely result in serious injury, such as broken bones (Tr. 50). The actions taken by HTP would reduce the likelihood of an accident occurring, but are not likely to lessen the severity of injury should an accident occur. The Secretary has established the violation was serious.

Penalty Determination

The Commission is the final arbiter of penalties. *Hern Iron Works, Inc.*, 16 BNA OSHC 1619, 1622, (No. 88-1962, 1994), *aff'd*, 937 F.2d 612 (9th Cir. 1991) (table); *see Valdak Corp.*, 17 BNA OSHC 1135, 1138 (No. 93-0239, 1995) ("The [OSH] Act places limits for penalty amounts but places no restrictions on the Commission's authority to raise or lower penalties within those limits."), *aff'd*, 73 F.3d 1466 (8th Cir. 1996). In assessing a penalty, the Commission gives due consideration to all of the statutory factors with the gravity of the violation being the most significant. OSH Act § 17(j), 29 U.S.C. § 666(j); *Capform Inc.*, 19 BNA OSHC 1374, 1378 (No. 99-0322, 2001), *aff'd*, 34 F. App'x 152 (5th Cir. 2002) (unpublished). "Gravity is a principal factor in a penalty determination and is based on the number of employees exposed, duration of exposure, likelihood of injury, and precautions taken against injury." *Siemens Energy and Automation, Inc.,* 20 BNA OSHC 2196, 2201 (No. 00-1052, 2005). Section 17(j) of the OSH Act, 29 U. S. C. § 666(j), requires the Commission to give due consideration to the gravity of the violation and the employer's size, history of violation, and good faith. *Burkes Mechanical Inc.,* 21 BNA OSHC 2136, 2142 (No. 04-0475, 2007).

The Secretary proposed a penalty of $4590.00 for the violation. I do not agree the circumstances warrant such a high penalty. HTP took many precautions to prevent forklift accidents at its facility. Aisles were sufficiently wide to allow forklifts and pedestrians to safely pass simultaneously. HTP equipped forklifts with governors that prevent speeding, as well as warning lights and horns. CSHO Bailey testified the facility was well lit, and with the exception of the painted lines, the aisles were in good repair. The Secretary presented little evidence of the number of exposed employees or the frequency and duration of exposure. Based on the evidence presented, the gravity of the violation is low. There was no evidence HTP has a history of prior serious violations (Tr. 52). HTP representatives were cooperative with the inspection and, according to CSHO Bailey, its safety policies and programs show good faith efforts toward safety compliance (Tr. 51). Taking all these factors into consideration, as well as the size of the company, a low gravity-based penalty of $450.00 is appropriate.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

The foregoing decision constitutes the findings of fact and conclusions of law in accordance with Rule 52(a) of the Federal Rules of Civil Procedure.

ORDER

Based upon the foregoing decision, it is ORDERED that: Item 1, Citation 1, alleging a serious violation of 29 C.F.R. § 1910.176(a) is affirmed, and a penalty of $450.00 is assessed.

SO ORDERED.

/s/

Judge Heather A. Joys
Administrative Law Judge
Atlanta, Georgia

Date: September 1, 2016