



**SOUTH CAROLINA
PALMETTO STAR
VOLUNTARY PROTECTION
PROGRAM**

August 2000

**S.C. Department of Labor,
Licensing and Regulation
Office of OSHA Voluntary Programs
P.O. Box 11329
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I. Purpose

A. Voluntary Protection Program (VPP)

SCOSHA has long recognized that compliance with occupational safety and health standards alone cannot accomplish all the goals of the OSH Act. The standards, no matter how carefully conceived and developed, will never cover all unsafe and unhealthful activities and conditions. Furthermore, limited resources will never permit regular or exhaustive inspections of all of the state's workplaces. But most importantly, no amount of standard setting and enforcement can replace the understanding of work processes, materials and hazards that come with employers' and employees' day-to-day, on-the-job experience. This knowledge, combined with the ability to evaluate and address hazards rapidly and to reward positive action, places employers in a unique position to improve workplace safety and health in ways simply not available to SCOSHA.

The purpose of the PS is to emphasize the importance of, encourage the improvement of, and recognize excellence in employer-provided, employee-participative, generally site-specific occupational safety and health programs. These programs are comprised of management systems for preventing or controlling occupational hazards. The systems not only ensure that OSHA's standards are met, but, using flexibility and creativity in striving for excellence, go beyond the standards to provide the best feasible protection for workers at that site. In the process, these work sites serve as models for effective safety and health programs in their industries.

Participation does not diminish existing employer and employee rights and responsibilities under the Act. In particular, SCOSHA does not intend to increase the liability of any party in an approved PS site. Employees or any representatives of employees taking part in an approved PS safety and health program are not assuming the employer's statutory or common law responsibilities for providing safe and healthful workplaces or undertaking in any way to guarantee a safe and healthful work environment. PS participants enter into a new relationship with SCOSHA, one in which safety and health problems can be approached cooperatively when and if they arise.

The program is voluntary in the sense that no employer is required to participate, and any employer in Standard Indus-

trial Code (SIC) 20-39 may choose to apply. Compliance with SCOSHA standards and applicable laws remains mandatory. Achievement and maintenance of the requirements of the program are continuing conditions of participation.

Approval for participation is determined by the Palmetto Star Team who recommends approval to the Administrator of OSHA Voluntary Programs (OVP) with ultimate approval by the Director of Labor, Licensing and Regulation.

II. Program Description

A. General

PS is a voluntary program that provides recognition to qualified employers and emphasizes the importance of work site safety and health management systems in meeting the goals of the Act “to assure so far as possible every working man and woman in the state safe and healthful working conditions...” This emphasis is demonstrated through assistance to employers in their efforts to reach the PS level of excellence; through cooperation among government, labor and management to resolve safety and health problems; and through official recognition of excellent safety and health programs. PS sites are not expected to be perfect, but they are expected to effectively protect their workers from the hazards of the workplace through their safety and health programs.

PS is for work sites that are able to function independently of SCOSHA and are self-sufficient in their ability to control hazards at the work site.

B. Recognition

By approving an applicant for participation in VPP, SCOSHA recognizes that the applicant is providing, at a minimum, the basic elements of ongoing, systematic protection of workers at the site. The symbols of recognition are certificates of approval and flags. The participant may also choose to use program logos on such items as letterhead or awards for employee contests.

Each approved site shall have a designated SC Palmetto Star contact person to handle information and assist with requests.

SCOSHA will continue to investigate valid, formal employee safety and health complaints, significant chemical spills or leaks, all fatalities and catastrophes, and other significant incidents that come to its attention.

III. Term of Participation

The term for participation in an approved PS is unlimited, contingent upon continued, favorable triennial evaluation.

IV. Experience

All elements of the safety and health program must be in place and must have been implemented for a period of not less than 12 months before PS approval.

V. Results

The applicant, at the time of approval, must meet the following criteria:

a. Both the injury and illness incidence rates and the lost workday injury and illness case rates for each of the most recent three calendar years at the time of approval must be at or below 50 percent of the most recent specific industry state rates (at the two, three- or four- digit level) published by the S.C. Bureau of Labor Statistics (SCBLS).

NOTE: As the North American Industry Classification System (NAICS) is implemented using a six-digit classification code, the South Carolina Palmetto Star Program will also use this classification system (6-5-4-3-2).

b. Newly constructed work sites (operating less than three years) may be considered for the PS if the following conditions are met:

1. The average injury and illness incidence rates and the average lost workday injury and illness case rates for at least the first year and since the start of operations must be at or below 50 percent of the most recent specific industry state average (at the two, three- or four-digit level) published by the SCBLS; or

2. The average of the above rates for the most recent

two calendar years must be at or below 50 percent of the most recent specific industry state average; and

3. The parent company must be able to demonstrate a corporate commitment to effective workplace safety and health.

VI. Application Submission

An application shall be submitted to the S.C. Department of Labor, Licensing and Regulation, Division of Labor, Office of OSHA Voluntary Programs.

VII. Application Withdrawal

Any applicant may withdraw a submitted application at any time after formal acceptance and before approval or denial.

The Office of OSHA Voluntary Programs may keep the assigned PS Coordinator's copy of the application for a year before discarding it, in order to knowledgeably respond should the applicant raise questions concerning the handling of the application. Once an application has been withdrawn, a new submission of an application is required.

If the application is substantially incomplete, and if after notification the applicant has not responded within 90 days to the request for more information, the application will be considered unacceptable and shall be returned to the site. The site may resubmit the application when it is complete.

VIII. Qualification Verification

A. Initial Review

The initial review of the application is made to determine whether those qualifications that can be documented by paper submission have been met. The applicant will be given the opportunity to amend the application with additional or substitute materials for the purpose of improving the application. A preliminary onsite visit may be necessary by the contact person to ensure qualification.

B. Pre-Approval Onsite Review

1. **Purpose.** The pre-approval review, which is conducted by a team of nonenforcement OVP staff on the site for which participation has been requested, is a management review of the site safety and health program. It is conducted to:

(1) Verify the information supplied in the application concerning qualification for PS;

(2) Identify the strengths and weaknesses of the site's safety and health program;

(3) Determine the adequacy of the safety and health program to address the potential hazards of the site; and

(4) Obtain information to assist the Administrator of OVP and the Director of Labor, Licensing and Regulation in making the approval decision.

2. **Preparation.** The review shall be arranged at the mutual convenience of OVP and the applicant. The review team shall consist of a team leader, a backup team leader, and industrial hygiene and safety consultants as required by the size of the site and the complexity of the safety and health program.

3. **Duration of the Review.** The time required for the pre-approval review shall depend upon the size of the site. Reviews shall usually average three days onsite, unless the site has complicating factors.

4. **Content.** All pre-approval reviews shall include a review of injury and illness records, recalculation of the rates submitted with the application, verification that the safety and health program described in the application has been implemented, and a general assessment of safety and health conditions to determine if the safety and health program adequately protects workers from the hazards at the site.

The review shall also include interviews with relevant individuals (such as members of joint labor-management and other safety and health committees, management personnel, and randomly selected non-supervisory personnel, including contract workers).

Onsite documents review shall include the following records (or samples of them) if they exist and are relevant to

the application of the safety and health program:

- (1) Written safety and health program;
- (2) Management statement of commitment to safety and health;
- (3) The OSHA 200 Log for the site and for all applicable contractor employees on the site, with appropriate backup documentation;
- (4) Safety and health manual(s);
- (5) Safety rules, emergency procedures, and examples of safe work procedures;
- (6) The system for enforcing safety rules;
- (7) Reports from employees of safety and health problems and documentation of the response;
- (8) Self-inspection procedures, reports and correction tracking;
- (9) Accident investigation;
- (10) Safety and health committee minutes;
- (11) Employee orientation and safety training programs and attendance records;
- (12) Industrial hygiene monitoring records;
- (13) Annual safety and health program evaluations and site and/or corporate audits, including the documented follow-up activities, for at least the last three years;
- (14) Preventive maintenance program;
- (15) Accountability documentation;
- (16) Contractor safety and health program(s); and
- (17) Other records that provide relevant documentation of qualifications.

IX. Application Approval

A. Deferred Approval

If, at the conclusion of the pre-approval review, the applicant needs to take actions to meet one or more of the requirements for approval, reasonable time—up to 90 days—shall be

allowed for those actions to be taken before a recommendation is made to The Administrator of OSHA Voluntary Programs and then to the Director of Labor, Licensing and Regulation. Where necessary, an onsite visit shall be made to verify the actions taken after the pre-approval review visit.

B. Application Approval

If, in the opinion of the pre-approval review team, the applicant has met the qualification requirements of the VPP, the team's recommendation shall be made to the Administrator of the Office of OSHA Voluntary Programs, who, on concurrence, shall recommend approval to the Director of Labor, Licensing and Regulation to approve participation. Approval shall occur on the day that the Director of Labor, Licensing and Regulation signs a certificate of approval.

X. Application Denial

A. Application Withdrawal

If it is determined that the applicant cannot meet the requirements for participation in the PS or for any reason does not wish to continue the approval process, reasonable time (not to exceed 30 calendar days) shall be allowed for application withdrawal before a denial recommendation is made by the Administrator of the Office of OSHA Voluntary Programs to the Director of Labor, Licensing and Regulation.

B. Denial

1. Should the Director of Labor, Licensing and Regulation for any reason reject the Administrator's recommendation to approve, a letter from the Director of Labor, Licensing and Regulation denying approval shall be sent to the applicant. The denial shall occur as of the date of the letter.

2. Should an applicant appeal to the Director of Labor, Licensing and Regulation a finding by the team that qualifications have not been met, the Administrator shall forward the appeal to the Director of Labor, Licensing and Regulation, along with the team's recommendation of denial and the Administrator's own recommendation.

If the Director of Labor, Licensing and Regulation accepts the recommendation to deny approval, the denial shall occur as of the date the Director of Labor, Licensing and Regulation signs a letter informing the applicant of the decision.

XI. Inspection Requirements

A. Complaints/Catastrophes

Workplace complaints to S.C. OSHA, significant chemical leaks or spills, and all fatalities and catastrophes shall be handled by enforcement personnel in accordance with normal SCOSHA enforcement procedures.

B. Significant Accidents and Incidents

SCOSHA may also choose to investigate other significant accidents or incidents that come to its attention.

XII. Referrals

The history of PS indicates that safety and health problems discovered during contact with work sites for PS purposes are resolved cooperatively. Nevertheless, SCOSHA must reserve the right, where employees' safety and health are seriously endangered and site management refuses to correct the situation, to refer the situation to the Director of Labor, Licensing and Regulation for review and enforcement action.

a. The employer shall be informed in advance that a referral will be made to the Director of Labor, Licensing and Regulation, and that enforcement action may result.

b. Because companies with excellent safety and health programs are interested in participating in the PS, they are not likely to refuse to address a serious problem in a cooperative spirit. It is important, however, for interested employers and employees to be aware of and understand SCOSHA's obligation in the event that such a situation should occur.

c. When a cooperative spirit does not exist between SCOSHA and a company, participation is not appropriate. Therefore, if a company in this situation does not choose to withdraw from consideration or participation, the Director of La-

bor, Licensing and Regulation may deny or terminate participation effective on the date the Director of Labor, Licensing and Regulation declares the cooperative spirit not to exist.

XIII. Evaluation

A. The Purpose of Evaluation is:

- (1) To determine continued qualification for the PS;
- (2) To document results of program participation in terms of the evaluation criteria and other striking aspects of the site program and its results; and
- (3) To identify any problems that have the potential to adversely affect continued PS qualification and to determine if those problems require additional evaluations.

B. Frequency

PS participants shall be evaluated every three years (except when the identification of potential serious problems creates the need for an earlier evaluation). The evaluation shall include a review of injury and illness incidence and lost work-day injury and illness case rates for the site. The rates reported shall be for the latest three complete calendar years and averaged for the three years preceeding the Director of Labor, Licensing and Regulation's decision.

C. Measures of Effectiveness

The following factors shall be used in the evaluation of PS participants:

- (1) Continued compliance with the program requirements;
- (2) Satisfaction of the participants;
- (3) Nature and validity of any complaints received by SCOSHA;
- (4) Nature and resolution of problems that may have come to SCOSHA's attention since approval or the last evaluation; and

(5) The effectiveness of employee participation programs.

D. Description of Evaluation

OVP's evaluation of PS participants shall consist mainly of an onsite visit similar in duration and scope of the pre-approval program review. Documentation of program implementation since pre-approval review or the previous evaluation shall be reviewed.

E. Evaluation Recommendations

Three possible recommendations may follow a VPP evaluation visit:

(1) Recommendation for continued participation in the PS;

(2) Recommendation for a one-year conditional approval to continue in the PS. The PS onsite review team may recommend this status if it finds that the site has allowed one or more program element to slip below PS quality. The site must return its safety and health program to Star quality within 90 days of the evaluation visit and must demonstrate a commitment to maintain that level of quality prior to the recommendation being made to the Director of Labor, Licensing and Regulation. A PS onsite review team shall return in one year to determine if the program is again maintaining PS quality in all program elements. If so, the team shall recommend the site be approved to continue participation in the PS; or

(3) Recommendation for termination. The PS onsite review team shall recommend this action if it finds the site has significantly failed to maintain its safety and health program at Star quality. A request to the site to withdraw from the PS shall precede a recommendation for termination to the Director of Labor, Licensing and Regulation.

XIV. Termination or Post-Approval Withdrawal

A. Reason for Termination

1. Sale of the approved site to another company, reloca-

tion of the approved site or any management change that eradicates or significantly weakens the safety and health program may be the basis to terminate the approval.

2. The participating site management, or the duly authorized collective bargaining agent where applicable, may terminate participation for any reason.

3. OVP may terminate participation for cause.

B. Cause for OVP Termination

Termination by OVP shall occur when a significant failure to maintain the safety and health program in accordance with the program requirements has been identified.

C. Notification

OVP shall provide the participant and other relevant parties 30 days notice of intent to terminate participation unless:

1. Other terms for termination were agreed upon before approval;

2. A set period for approval is expiring;

3. Evidence is presented that the trust and cooperation among labor, management and OVP, upon which the approval was based, no longer exists.

D. Reapplication Following Termination

Reapplication from terminated sites shall not be considered for a period of three years from the date of termination by the Office of OSHA Voluntary Programs.

E. Post-Approval Withdrawal

Upon receipt of notice of intent to terminate, or for any reason, a participant may withdraw from PS by submitting written notification to the assigned contact person.

XV. Reinstatement

Reinstatement requires reapplication.

XVI. Guidelines for Document Submission

A. General Information

1. Company Name
Home Address
Site Address
Site CEO
Title
Site PS Representative
Title
Address
Phone Number
2. Corporation Name (if different)
Corporate PS Representative (if applicable)
Title
Address
Phone Number
3. Collective Bargaining Agent(s)
Address(es)
Phone Number(s)
4. Number of Employees
Regular
Temporary
Contract Workers
5. Type of Work Performed and Products Produced
6. Industry SIC Code (3–4 digit)
Site
Contractor
7. Injury and Illness Incidence Rate (for each of last 3 complete calendar years) including copies of OSHA 200 Logs and manhours
8. Lost Workday Injury and Illness Case Rate (for each of last 3 complete calendar years) including copies of OSHA 200 Logs and manhours

B. Management Commitment and Planning

- I. Commitment to Safety and Health Protection

- a. **Written Policy and Goals:** Describe established policies and results-oriented objectives for worker safety and health protection which have been communicated to all employees.
- b. **Line of Accountability:** Describe documented system for holding all line managers and supervisors accountable for safety and health (i.e., job performance evaluation, etc.). Describe authority and responsibility for safety and health protection that is clearly defined and implemented, accountability through evaluation of supervisors, and the system for rewarding good and correcting deficient performances.
- c. **Resources:** Define adequate resources including personnel, equipment and promotions, etc. committed to workplace safety and health.
- d. **Management Involvement:** Describe top management's involvement in worker safety and health concerns, including clear lines of communication with employees and setting an example of safe and healthful behavior.
- e. **Contract Worker Coverage:** Describe work site safety and health rules and procedures applicable to contractors and subcontractors, including special precautions necessary as a result of their activities and applicant's procedures for informing contractors of known potential hazards related to or in near proximity to contract work. Define the criteria for evaluation and selection of contractors based on their safety and health programs and performance. Define the contractor's responsibility to the applicant to submit injury/illness and lost workday data, disciplinary procedures, prompt correction and control of known hazards, evaluation of safety and health protection, etc.
- f. **Temporary Employees:** Describe how temporary employees are included in the safety

- and health process and the quality of safety and health protection afforded them
2. Commitment to PS Participation—Explain assurances including:
 - a. Management statement. Describe management commitment to PS and assurance statements including all of the following:
 1. Commitment to excel in providing outstanding safety and health protection to employees through management systems and employee involvement.
 2. Commitment to the achievement and maintenance of the Star Program requirements and to the goals and objectives of the PS.
 3. Agreement to provide the information listed below for OVP review onsite and to retain these records until OVP communicates its decision regarding initial PS participation. Agreement to retain comparable records for the period of PS participation to be covered by each subsequent evaluation until OVP communicates its decision regarding continued approval.
 - * Written safety and health program
 - * Tracking records for employee hazard reports
 - * Self-inspections and accident investigation records
 - * Safety and health orientation and training records
 - * Safety committee minutes (as applicable)
 - * Annual safety and health evaluation
 - * Monitoring, sampling and analysis records (where applicable)
 - * OSHA Log and first reports of injury
 - * Collective bargaining agreement concerning employee participation (where applicable)
 4. Company's Trade Secret/Proprietary Information Policy
 5. Agreement to correct all hazards identi-

- fied through self-inspections, employee reports, or accident investigations in a timely manner and provide the results to employees.
6. Agreement to protect any employee with safety-related duties from discriminatory actions resulting from these duties.
 7. Agreement to provide OVP, each year by February 15, annual injury and illness incidence and lost workday case rates, hours worked, and estimated average employment for the past calendar year separately for regular employees and for applicable onsite contract employees. Agreement to provide a copy of the company's most recent safety and health program evaluation.
 8. Agreement to notify employees, including new hires, about participation in the PS, their right to register a complaint with SCOSHA, and their right to obtain self-inspection and accident investigation results upon request.
- b. Written employee notification (including new hires).
 - Describe:
 1. PS explanation method and commitment.
 2. Hazard correction.
 3. Nondiscrimination.
 4. Access to self-inspection and accident/incident results
 5. OVP access to written programs, logs, and any monitoring and sampling results.
 - c. Union/Collective bargaining agent's statement (if applicable). Document union/collective bargaining agent's position on site participation in PS.
 3. Planning. Indicate how safety and health practices are integrated into comprehensive management planning. For contract workers on site, include procedures for pre-job planning and preparation for different phases of construction as the project progresses.
 4. Written safety and health program. List all critical

elements, including:

- a. HAZARD ASSESSMENT
- b. HAZARD CORRECTION AND CONTROL
- c. SAFETY AND HEALTH TRAINING
- d. EMPLOYEE PARTICIPATION
- e. SAFETY AND HEALTH EVALUATION (annually)

C. Hazard Assessment

Describe the method(s) used by management to determine hazards or potential hazards, such as initial or periodic comprehensive surveys or pre-job planning.

1. Pre-use analysis. Define how new processes, materials, substances, and/or equipment are analyzed before selection and use to determine potential hazards and plan for prevention or control.
2. Comprehensive surveys. Explain the company's method(s) used currently and at the time of design for initial determination of all potential safety and health hazards at the site.

Including:

- a. Baseline surveys of health hazards accomplished through initial comprehensive industrial hygiene surveying and other comprehensive means of assessment.
 - b. The use of nationally recognized procedures for all sampling, testing and analysis with written records of results.
3. Self-inspections. Describe in writing your system for conducting self-inspections, including frequency and the written results, procedures, findings and tracking of hazard corrections. Include Industrial hygiene sampling and monitoring procedures and protocols with a summary of the testing and analysis procedures used and qualifications of person(s) conducting them.
 4. Hazard analysis. Describe how routine examination and analysis of hazards associated with individual jobs, processes or phases is accomplished, how management and employees are involved, and how the results are included in training and hazard control programs.

5. Employee notification of hazards. Explain the company's system for employees to notify appropriate management personnel about conditions that appear hazardous and mechanisms used for responding to employees. Also, include tracking and hazard correction procedures.
6. Accident/incident investigation. Describe the company's system and procedures for conducting accident/incident investigations. Include:
 - a. Training and/or guidance given to investigators
 - b. Site determination of which accidents to investigate
 - c. Near-miss incident procedures
 - d. Written reports of findings and hazard correction tracking
 - e. Procedures used to analyze illness and injury trends identifying causes and providing preventive or corrective actions.
7. Medical program. Describe the medical program, including:
 - a. Availability of physician services
 - b. First aid/CPR/other paramedical training for employees and training received
 - c. Special programs offered (i.e., audiometric testing, pre-employment physicals) and reasons necessary
 - d. Use of occupational health professionals for onsite analysis and early recognition and treatment of injury and illness

D. Hazard Correction and Control

1. Professional expertise. Provide details concerning the use and access of services of certified professionals, including Certified Industrial Hygienists, Certified Safety Professionals, Certified Safety Engineers, and/or Insurance Providers.
2. Hazard elimination and control. Describe the means for eliminating or controlling hazards including:
 - a. Engineering/administrative controls
 - b. Personal protective equipment requirements
 - c. Safety and health rules including work proce-

- cedures for specific operations
3. Disciplinary system. Describe the disciplinary actions or reorientation of employees and supervisors who break or disregard safety rules, safe work procedures, materials handling or emergency procedures.
 4. Emergency preparedness. Describe emergency planning and preparedness program, including information on:
 - a. Emergency training drills
 - b. Any necessary personal protective equipment
 - c. Evacuation and emergency egress plans and interaction with local fire departments/rescue squads
 - d. First aid and medical planning
 - e. Emergency telephone numbers
 - f. Natural disaster preparedness/crisis preparedness plan
 5. Preventive maintenance. Summarize and briefly describe the procedures for ongoing monitoring and maintenance of workplace equipment to prevent it from becoming hazardous.
 6. Hazard correction tracking. Describe the system for initiating hazard correction in a timely manner.

E. Safety and Health Training

Describe formal and informal safety and health training programs for employees, supervisors and managers. Include supervisors' training schedules and information on hazard communication, personal protective equipment, handling of emergency situations, and others. (Attach sample attendance lists and tracking methods)

F. Employee Participation

1. Safety and health involvement
 - a. Employees. Describe how employees are involved in the safety and health program, providing specific information about decision processes that employees impact, such as hazard assessment, hazard analysis, safety and health training, and evaluation of safety and health programs.

- i. Safety and health committees. Describe:
 - * Method of selecting employee members
 - * Date of committee inception
 - * Name, job and length of service of each member
 - * Average length of service of members
 - requirements of committee, including frequency, quorum rules, minutes
 - * Role of committee including responsibility, scope, frequency of inspections, employee hazard notification, accident investigation and hazard recognition
 - * Safety and health information accessible to and used by the committee
- ii. Safety observers. Explain role of safety observer, if applicable.
- iii. Ad hoc safety and health problem-solving group. Describe procedures for ad hoc problem-solving group, if applicable.
- iv. Safety and health training of other employees. Define any safety and health training of other employees on site.
- v. Analysis of hazards of job. Describe employees' role in hazard analysis.
- vi. Committees that plan and conduct safety and health awareness programs. Explain procedures used by committees that plan and conduct safety and health awareness programs, including frequency and attendance requirements.
- b. Contractors/subcontractors. Describe the program for all contract worker's safety and health protection. Include training, safe work procedures, emergency evacuation/response plans, and notification of appropriate personnel of hazards encountered by contractors. Define authority and documented evidence for the oversight, coordination and enforcement of those programs by the applicant.

G. Safety and Health Program Self-evaluation (annually)
Define the system for evaluating the operation of the safety

and health program annually to determine what changes are needed to improve workers' safety and health. Include:

1. System for providing written narrative reports with recommendations and documentation of follow-up actions.
2. Procedures regarding effectiveness of the operation of the self-inspection system, employee hazard notification system, accident investigation, employee participation, safety and health training, enforcement of safety and health rules, and the coverage of health aspects, including personal protective equipment and routine monitoring and sampling, should be determined and the findings should be used to improve the implementation of the company's written safety and health program.

H. Other relevant information

1. Miscellaneous safety and health programs, i.e., First aid/CPR training for spouses, lawn mower safety at home, seat belt usage, defensive driving classes, fire protection in the home, off-hours safety, insurance audit reports or other programs involving insurance carriers, recycling waste reduction, community actions/involvement, violence in the workplace and ISO registration...
2. Good faith. Provide information regarding previous SCOSHA inspections/interaction records and interaction with other state and federal agencies.
3. Site plan. Attach a site map or general plant layout.

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