

U.S. Department of Labor

Occupational Safety and Health Administration

Robinson Plaza

55 N. Robinson, Suite 315

Oklahoma City, OK 73102

Phone: (405)278-9560 FAX: (405)278-9572



Citation and Notification of Penalty

To:

Sigma Processed Meats, Inc.
and its successors
701 E. Goodhope Rd.
Seminole, OK 74868

Inspection Number: 314933524
Inspection Date(s): 06/09/2011 - 11/29/2011
Issuance Date: 11/30/2011

Inspection Site:

701 E. Goodhope Rd.
Seminole, OK 74868

The violation(s) described in this Citation and Notification of Penalty 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 Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

Posting - The law requires that a copy of this Citation and Notification of Penalty 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 of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation 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. **The penalty dollar amounts need not be posted and may be marked out or covered up prior to posting.**

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 during the 15 working day contest period. **To schedule an informal conference, you must contact this office by telephone.** During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the page 4 Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest - You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.

Penalty Payment - Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to "DOL-OSHA". Please indicate the Inspection Number on the remittance.

OSHA does not agree to any restrictions or conditions put on any check or money order for less than the full amount due and will cash the check or money order as if these restrictions or conditions do not exist.

Notification of Corrective Action - For violations which you do not contest, you should notify the U.S. Department of Labor Area Office promptly by letter that you have taken appropriate corrective action within the time frame set forth on this Citation. Please inform the Area Office in writing of the abatement steps you have taken and of their dates, together with adequate supporting documentation, e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results, etc. If the citation indicates the violation was "Corrected During Inspection", no abatement certification is required for that item.

Employer Discrimination Unlawful - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities - The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

You should be aware that OSHA publishes information on its inspection and citation 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 you have received this citation, but not sooner than 30 calendar days after the citation issuance date. 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.

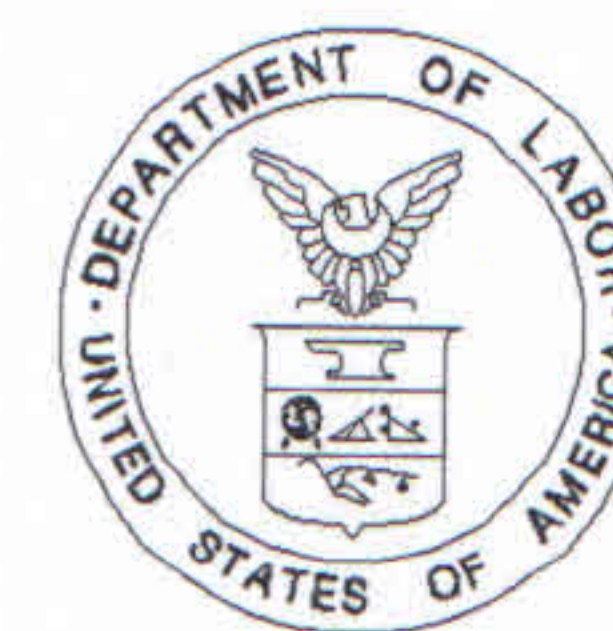
Notice to Employees - The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 11/30/2011. The conference will be held at the OSHA office located at Robinson Plaza, 55 N. Robinson, Suite 315, Oklahoma City, OK, 73102 on _____ at _____.

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



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

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

29 CFR 1910.119(e)(3)(vii): The process hazard analysis did not address a qualitative evaluation of a range of the possible safety and health effects of failure of controls on employees in the workplace:

The employer does not perform an evaluation of the safety and health effects of failure of controls on employees operating and/or maintaining the swing compressor of the ammonia refrigeration system such as, but not limited to, failure of automated devices programmed to shutdown the process equipment, deviating from normal operating limits, and the failure of safety relief valves for the process hazard analysis conducted in February 2008.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure the process hazard analysis addresses a qualitative evaluation of a range of the possible safety and health effects of failure of controls on employees in the workplace.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated:	01/13/2012
Proposed Penalty:	\$ 5500.00



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

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

29 CFR 1910.119(e)(5): The employer did not assure that process hazard analysis recommendations were resolved in a timely manner:

The employer does not assure the recommendations in the 2008 process hazard analysis for the swing compressor in the ammonia refrigeration system are addressed in a timely manner:

- a) Recommendation #2, sections A.3 and P.4, "Consider obtaining SCBAs and other necessary PPE prior to startup of the facility," had not been resolved.
- b) Recommendation #10, section B.3, "Consider ensuring that confined spaces are identified and labeled appropriately," had not been resolved.
- c) Recommendation #13, section B.6, "Consider adding additional roof egress point (potentially from roof to pipe bridge)," had not been resolved.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure the process hazard analysis recommendations are evaluated, resolved, and documented in a timely manner.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated:	01/16/2012
Proposed Penalty:	\$ 7000.00



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for illness.

Citation 1 Item 3a Type of Violation: **Serious**

29 CFR 1910.119(f)(1)(iii)(B): The employer's written operating procedures did not address safety and health considerations and the precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment:

The employer's operating procedures for the high stage screw compressor for the ammonia refrigeration system do not include safety and health considerations and the precautions necessary to prevent employee exposure to anhydrous ammonia including engineering controls, administrative controls, and personal protective equipment.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure operating procedures address the safety and health considerations and the precautions necessary to prevent employee exposure and health effects, including engineering controls, administrative controls, and personal protective equipment.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated:	01/16/2012
Proposed Penalty:	\$ 7000.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

Citation 1 Item 3b Type of Violation: **Serious**

29 CFR 1910.119(g)(1)(i): Each employee presently involved in operating a process, and each employee before being involved in operating a newly assigned process, were not trained in an overview of the process and in the operating procedures as specified in paragraph (f) of this section:

The employer does not provide training on the safety and health precautions necessary to reduce or prevent exposure to anhydrous ammonia for the employees operating and maintaining the swing compressor of the ammonia refrigeration system.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure the ammonia refrigeration system operators are trained on the safety and health considerations, precautions, and effects of potential exposure to anhydrous ammonia.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated: 01/16/2012



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

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

29 CFR 1910.119(f)(4): The employer did not develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel:

On or about June 9, 2011, the employer does not ensure that machinery room contents comply with recognized and generally accepted good engineering practices. In the machinery room, approximately 300 gallons of combustible Frick 3 Oil was not stored in accordance with consensus standards such as, but not limited to, the International Institute of Ammonia Refrigeration guidelines.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that oils and other combustible materials are not stored in machinery rooms.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated:	01/16/2012
Proposed Penalty:	\$ 5500.00



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

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

29 CFR 1910.119(n): The employer did not establish and implement an emergency action plan for the entire plant in accordance with 29 CFR 1910.38, including procedures for handling small releases:

Where there is a potential for fire, explosion, chemical release, and inclement weather the employer does not establish and implement an emergency action plan that includes:

- a) Procedures for emergency evacuation, including type of evacuation and exit route assignments for employees working at the powerhouse.
- b) Procedures to account for all employees after an evacuation of the plant.
- c) Procedures to be followed by employees performing rescue or medical duties.
- d) The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.
- e) A review of the plan with each employee covered by the plan when the employee is initially assigned to a job in the powerhouse area performing maintenance activities.
- f) Procedures for employees expected to respond to small releases of anhydrous ammonia in the powerhouse area.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure the emergency action plan addresses procedures for employees in the event of an emergency and small releases of chemicals and these procedures are communicated to all affected employees.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated:	01/16/2012
Proposed Penalty:	\$ 5500.00



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

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

29 CFR 1910.120(q)(1): The employer did not implement an emergency response plan to handle anticipated emergencies prior to the commencement of emergency response operations. The emergency response plan was not available for inspection and copying by employees and their representatives:

For employees expected to respond to a release of anhydrous ammonia from equipment such as, but not limited to, the ammonia refrigeration system swing compressor:

- a) The employer does not implement the emergency response plan.
- b) The employer does not make the emergency response plan available for inspection and copying by employees. Employees are not aware the plan exists and have no knowledge of its contents.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure the emergency response plan is implemented and is available to all affected employees.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated:	01/16/2012
Proposed Penalty:	\$ 7000.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for illness.

Citation 1 Item 7a Type of Violation: **Serious**

29 CFR 1910.120(q)(2)(ii): The employer did not develop an emergency response plan for emergencies which addresses personnel roles, lines of authority, training, and communication:

For employees expected to respond to releases of anhydrous ammonia from equipment such as, but not limited to, the refrigeration system swing compressor, the employer does not develop an emergency response plan that addresses:

- a) Lines of authority or chain of command specific to the facility.
- b) Roles and responsibilities for internal personnel and outside responders.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure the emergency response plan contains lines of authority specific for the facility and addresses the roles and responsibilities of internal personnel and outside responders.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated:	01/16/2012
Proposed Penalty:	\$ 7000.00



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

Citation 1 Item 7b Type of Violation: **Serious**

29 CFR 1910.120(q)(2)(iii): The employer did not develop an emergency response plan for emergencies which addresses emergency recognition and prevention:

For employees expected to respond to releases of anhydrous ammonia from equipment such as, but not limited to, the refrigeration system swing compressor, the employer does not develop an emergency response plan that addresses:

- a) An inventory of the hazardous chemicals stored at the facility.
- b) The foreseeable types of releases.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure the emergency response plan contains an inventory of hazardous chemicals at the facility and addresses the types of releases that could occur at the facility.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated: 01/16/2012



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

Citation 1 Item 7c Type of Violation: **Serious**

29 CFR 1910.120(q)(2)(iv): The employer did not develop an emergency response plan for emergencies which addresses safe distances and places of refuge:

For employees expected to respond to releases of anhydrous ammonia from equipment such as, but not limited to, the refrigeration system swing compressor, the employer does not develop an emergency response plan that addresses safe distances and places of refuge.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure the emergency response plan addresses safe distances and places of refuge.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated: 01/16/2012

Citation 1 Item 7d Type of Violation: **Serious**

29 CFR 1910.120(q)(2)(v): The employer did not develop an emergency response plan for emergencies which addresses site security and control:

For employees expected to respond to releases of anhydrous ammonia from equipment such as, but not limited to, the refrigeration system swing compressor, the employer does not develop an emergency response plan that addresses site security and control.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure the emergency response plan addresses site security and control.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated: 01/16/2012



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

Citation 1 Item 7e Type of Violation: **Serious**

29 CFR 1910.120(q)(2)(vi): The employer did not develop an emergency response plan for emergencies which addresses evacuation routes and procedures:

For employees expected to respond to releases of anhydrous ammonia from equipment such as, but not limited to, the refrigeration system swing compressor, the employer does not develop an emergency response plan that addresses evacuation routes and procedures.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure the emergency response plan that identifies safe evacuation routes and procedures.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated: 01/16/2012

Citation 1 Item 7f Type of Violation: **Serious**

29 CFR 1910.120(q)(2)(xi): The employer did not develop an emergency response plan for emergencies which addresses PPE and emergency equipment:

For employees expected to respond to releases of anhydrous ammonia from equipment such as, but not limited to, the refrigeration system swing compressor, the employer does not develop an emergency response plan that addresses personal protective equipment and emergency equipment.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure the emergency response plan identifies personal protective equipment and emergency equipment required to safely respond to an emergency release.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated: 01/16/2012

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

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

29 CFR 1910.120(q)(6): Employees who participate, or are expected to participate, in emergency response, were not given training:

The employer does not provide emergency response training to employees expected to participate in an emergency response to an anhydrous ammonia release from equipment such as, but not limited to, the swing compressor in the refrigeration system.

Pursuant to 29 C.F.R. 1903.19 within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure the employees expected to respond to a release of hazardous chemicals are provided training to the skill level for each employee's duties in emergency response.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated:	01/16/2012
Proposed Penalty:	\$ 3300.00



Citation and Notification of Penalty

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868

Citation 1 Item 9 Type of Violation: Serious

29 CFR 1910.134(d)(1)(iii): The employer did not identify and evaluate the respiratory hazard(s) in the workplace; this evaluation did not include a reasonable estimate of employee exposures to respiratory hazard(s) and an identification of the contaminant's chemical state and physical form. Where the employer could not identify or reasonably estimate the employee exposure, the employer did not consider the atmosphere to be IDLH:

On or about June 9, 2011, and at times prior thereto, for employees required to perform maintenance and operations does not perform an evaluation of the respiratory hazards:

- a) For ozone gas in the Statco area.
- b) In the power house compressor room where employees routinely repair leaking pipes and valves containing ammonia without respiratory protection.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that respiratory hazards are identified and evaluated in the workplace.

*****Abatement Certification and Documentation Required*****

Date By Which Violation Must be Abated:	12/26/2011
Proposed Penalty:	\$ 5500.00

A handwritten signature in cursive script, reading "David A. Bates".

David A. Bates
Area Director

U.S. Department of Labor

Occupational Safety and Health Administration

Robinson Plaza

55 N. Robinson, Suite 315

Oklahoma City, OK 73102

Phone: (405)278-9560 FAX: (405)278-9572



INVOICE/ DEBT COLLECTION NOTICE

Company Name: Sigma Processed Meats, Inc.
Inspection Site: 701 E. Goodhope Rd., Seminole, OK 74868
Issuance Date: 11/30/2011

Summary of Penalties for Inspection Number 314933524

Citation 1, Serious	= \$ 53300.00
TOTAL PROPOSED PENALTIES	= \$ 53300.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to:

"DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance.

OSHA does not agree to any restrictions or conditions put on any check or money order for less than full amount due and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to two (2) times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

Interest. Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges. A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs. Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



David A. Bates
Area Director



Date