

U.S. Department of Labor

Occupational Safety and Health Administration
10810 Executive Center Drive
Danville Building - Suite 206
LITTLE ROCK, AR 72211
Phone: (501)224-1841 FAX: (501)224-4431



Citation and Notification of Penalty

To:
PINNACLE FOODS GROUP, LLC
and its successors
1100 W. 15th Street
Fayetteville, AR 72701

Inspection Number: 315973891
Inspection Date(s): 12/12/2011-05/01/2012
Issuance Date: 05/31/2012

Inspection Site:
1100 W. 15th Street
Fayetteville, AR 72701

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.

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. 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 5 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 or endorsements 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, conditions, or endorsements do not exist.

Notification of Corrective Action - For each violation which you do not contest, you are required by 29 CFR 1903.19 to submit an Abatement Certification to the Area Director of the OSHA office issuing the citation and identified above. The certification must be sent by you within **10 calendar days** of the abatement date indicated on the citation. For **Willful** and **Repeat** violations, documents (examples: photos, copies of receipts, training records, etc.) demonstrating that abatement is complete must accompany the certification. Where the citation is classified as **Serious** and the citations states that abatement documentation is required, documents such as those described above are required to be submitted along with the abatement certificate. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item.

All abatement verification documents must contain the following information: 1) Your name and address; 2) the inspection number (found on the front page); 3) the citation and citation item number(s) to which the submission relates; 4) a statement that the information is accurate; 5) the signature of the employer or employer's authorized representative; 6) the date the hazard was corrected; 7) a brief statement of how the hazard was corrected; and 8) a statement that affected employees and their representatives have been informed of the abatement.

The law also requires a copy of all abatement verification documents, required by 29 CFR 1903.19 to be sent to OSHA, also be posted at the location where the violation appeared and the corrective action took place.

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.

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.

Inspection Activity Data - 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 that you have received this citation. 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.

ABATEMENT CERTIFICATION

CARLOS M. REYNOLDS, Area Director
U.S. Department of Labor - OSHA
10810 Executive Center Drive
Danville Building - Suite 206
LITTLE ROCK, AR 72211
Phone: (501)224-1841

PINNACLE FOODS GROUP, LLC
1100 W. 15th Street
Fayetteville, AR 72701

The hazard referenced in Inspection Number _____ for the violation identified as
Citation _____ and Item _____ was corrected on _____
by _____.

The hazard referenced in Inspection Number _____ for the violation identified as
Citation _____ and Item _____ was corrected on _____
by _____.

The hazard referenced in Inspection Number _____ for the violation identified as
Citation _____ and Item _____ was corrected on _____
by _____.

The hazard referenced in Inspection Number _____ for the violation identified as
Citation _____ and Item _____ was corrected on _____
by _____.

The hazard referenced in Inspection Number _____ for the violation identified as
Citation _____ and Item _____ was corrected on _____
by _____.

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

Signature

Typed or Printed Name



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 05/31/2012. The conference will be held at the OSHA office located at 10810 Executive Center Drive, Danville Building - Suite 206, LITTLE ROCK, AR, 72211 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

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

29 CFR 1910.22(a)(2): Floor(s) of workroom(s) were not maintained, in a clean, orderly and so far as possible a dry condition:

Employer does not maintain workroom floors in a clean and dry condition. On or about February 15, 2012 and times prior thereto, the floor in the north engine room had an accumulation of oil and water presenting a slipping hazard in the vicinity of the water separator and purger.

Pursuant to 29 CFR 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 the floor drain remains functional and the floor stays dry.

Date By Which Violation Must be Abated: 06/19/2012
Proposed Penalty: \$ 3300.00

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

29 CFR 1910.22(c): Cover(s) and/or guardrail(s) were not provided to protect personnel from the hazards of an open sump crock:

On or about February 15, 2012 and times prior thereto, employer does not protect employees from tripping hazards presented by uncovered sump crocks that are approximately 25 inches deep in the pits under LTPR-5 and the old LTPR-1 vessels.

Pursuant to 29 CFR 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 covers are installed on open sump crocks.

Date By Which Violation Must be Abated: 06/19/2012
Proposed Penalty: \$ 3300.00

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

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

29 CFR 1910.23(a)(8): Floor hole(s), into which persons could accidentally walk, were not guarded by standard railings with standard toeboards on all exposed sides or by floor hole covers of standard strength and construction:

Employer does not assure that floor openings are protected with guard rails, toe boards or covers to prevent employees from accidentally stepping into. On or about February 15, 2012 and times prior thereto an approximate 10 inch gap exists which an employee could accidently step into between the elevated work platform and the wall on the exit side of the #10 Amerio.

Pursuant to 29 CFR 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 walking and working platforms are constructed such that employees cannot accidently step through openings.

Date By Which Violation Must be Abated:	06/19/2012
Proposed Penalty:	\$ 3300.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

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

29 CFR 1910.36(d)(1): Exit doors were not unlocked. Employees were not able to open an exit route door from the inside at all times without keys, tools, or special knowledge:

Employer does not assure that exit route doors are unlocked at all times. On or about February 15, 2012 and times prior thereto, the exit gates in the fencing surrounding the exterior of the south engine room were locked and unable to be opened from the inside without a key.

OR IN THE ALTERNATIVE

29 CFR 1910.37(a)(3): Exit routes were not free and unobstructed.

Employer does not assure that exit routes are free and unobstructed. On or about February 15, 2012 and times prior thereto, the emergency exit route for the south engine room had its discharge obstructed by a chained and locked gate.

Pursuant to 29 CFR 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 all exit route doors remain unlocked and capable of being opened from the inside without the use of a key or special tool.

Date By Which Violation Must be Abated: 06/19/2012
Proposed Penalty: \$ 5500.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

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

29 CFR 1910.119(d)(3)(i)(D): Process safety information pertaining to the equipment in the process did not include the relief system design and design basis:

On or about February 28, 2012 the employer does not have a design and design basis for the relief system for the following equipment:

- a. Compressor 22
- b. Compressor 23
- c. Compressor 24
- d. Compressor 25
- e. Compressor 26
- f. Compressor 27
- g. LTPR 5
- h. IC-5
- i. IC-6
- j. HPR-1
- k. HPR-2
- l. HPR-3
- m. HPR-4
- n. HPR-5
- o. HTPR-5
- p. HTPR-2
- q. LTPR-3
- r. LTPR-4
- s. LTPR-7
- t. LTPR-1
- u. LTPR-6
- v. IHPR-9
- w. HSC 17
- x. HSC 5
- y. LSC 20
- z. HTPR-10
- aa. HTPR-11
- bb. TV-1
- cc. TV-2
- dd. TV-3

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011 - 05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

This condition exposes employees to the hazard of being struck by pieces of a vessel in the event of vessel failure in an overpressure situation and exposure to ammonia.

Pursuant to 29 CFR 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 the design and design basis for the relief systems for the following equipment is documented: Compressors 22, 23, 24, 25, 26, 27, LTPR 5, IC-5, IC-6, HPR-1, HPR-2, HPR-3, HPR-4, HPR-5, HTPR-5, HTPR-2, LTPR-3, LTPR-4, LTPR-7, LTPR-1, LTPR-6, ITHPR-9, HSC 17, HSC 5, LSC 20, HTPR-10, HTPR-11, TV-1, TV-2 and TV-3.

Date By Which Violation Must be Abated: 07/03/2012
Proposed Penalty: \$ 7000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

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

29 CFR 1910.119(d)(3)(ii): The employer did not document that the equipment in the process complied with recognized and generally accepted good engineering practices:

The employer does not ensure that process safety information pertaining to the equipment in the process contains documentation that all equipment complies with RAGAGEP such as Guidelines for Identification of Ammonia Refrigeration Piping and System Components, Bulletin #114, September 1991, International Institute of Ammonia Refrigeration (IIAR) and American National Standards Institute (ANSI) A13.1, Scheme for Identification of Piping Systems, 2007. Vessels and valves are not identified or labeled. Pipes are not marked or labeled as to the content, physical state of the refrigerant, relative pressure level of the refrigerant and the direction of flow. Instance a was observed on or about 12-13-11 and instances b-q were observed on or about February 15, 2012 and prior thereto. Additionally, on or about January 11, 2012, the pressure safety valves (PSV) present on the following equipment were not replaced every five years in accordance with IIAR Bulletin 109, Section 4.9.7. These are listed as Instances r-cc:

In the Amerio Freezer Line 3 Room equipment such as but not limited to

- a. A stop valve before an abandoned section of piping scheduled for removal on 12-3-11 is not uniquely marked or labeled for identification

In the North Engine Room equipment such as but not limited to

- b. Intercooler #1 is not uniquely labeled or marked for identification
- c. Discharge stop valve on LSC oil Separator C2 is not uniquely labeled or marked for identification
- d. Orange pipe, high side discharge LSC Oil Separator C2 is not labeled as to content, refrigerant state or direction of flow
- e. Two valves to the high flow indicator on Intercooler #1 are not uniquely labeled or marked for identification
- f. Stop valve to the sight column on Intercooler #1 is not uniquely labeled or marked for identification
- g. Blue Vilter vessel is not uniquely labeled or marked for identification

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

- h. Orange pipe at HSC#1 vessel is not labeled as to refrigerant state or direction of flow
- i. At compressor #8, an expansion valve is not uniquely labeled or marked for identification
- j. At HSC Oil Cooler #8 a green pipe (thermal siphon supply) is not identified as to content, refrigerant state and direction of flow
- k. At HSC Oil Cooler #8 an orange pipe (thermal siphon return) is not identified as to content, refrigerant state and direction of flow
- l. At HSC Oil Cooler #8 an orange pipe is not identified as to content, refrigerant state and direction of flow
- m. At HSC 7 the vessel (oil separator) is not uniquely labeled or marked for identification
- n. At HSC 7 the orange pipe (thermal siphon return) is not identified as to content, refrigerant state and direction of flow
- o. At HSC 7 the green pipe ((thermal siphon supply) is not identified as to content, refrigerant state and direction of flow
- p. At LSC oil Separator C3 the orange pipe (booster discharge) is not labeled as to content refrigerant state and direction of flow
- q. At LSC oil Separator C3 the orange pipe (thermal siphon) is not labeled as to content refrigerant state and direction of flow
- r. LSC 22
- s. LSC 23
- t. LSC 24
- u. HSC 25
- v. HSC 26
- w. HSC27

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

- x. HPR 1
- y. HPR 3
- z. HPR 4
- aa. HPR 5
- bb. HTPR 11
- cc. TV 2

Pursuant to 29 CFR 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 vessels and valves are identified and piping is labeled as to content, refrigerant state and direction of flow.

Date By Which Violation Must be Abated: 06/26/2012
Proposed Penalty: \$ 7000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

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

29 CFR 1910.119(e)(3)(iv): The process hazard analysis did not address the consequences of failure of engineering and administrative controls:

The November 2006 PHA conducted for the Amerio Line 2 Overhead Feed Project did not address the hazards of abandoned piping. On December 3, 2011, a contractor involved in this project, drilled a hole in abandoned piping resulting in an uncontrolled release of anhydrous ammonia.

Pursuant to 29 CFR 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 PHAs address consequences of failure of engineering and administrative controls.

Date By Which Violation Must be Abated: 07/03/2012
Proposed Penalty: \$ 7000.00

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

29 CFR 1910.119(e)(6): The employer did not ensure after the initial process hazard analysis that the process hazard analysis was updated and revalidated at least every five (5) years by a team meeting the requirements of 29 CFR 1910.119(e)(4):

The process hazard analysis (PHA) for the ammonia refrigeration system in the South Engine Room is not revalidated every 5 years. The PHA for the South Engine Room was last conducted in 2005 and no update or revalidation has been completed as of February 28, 2012. This condition exposes employees to hazards associated with an ammonia release, vessel failure or explosion.

Pursuant to 29 CFR 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 the process hazard analysis for the South Engine Room is revalidated.

Date By Which Violation Must be Abated: 07/03/2012
Proposed Penalty: \$ 7000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

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

29 CFR 1910.119(f)(1): The employer did not develop and implement written operating procedures that provided clear instructions for safely conducting activities in each covered process consistent with the process safety information and which addressed the elements listed in 29 CFR 1910.119(f)(1)(i) through (f)(1)(v):

On or about March 2, 2012 the employer does not develop written operating procedures for activities such as but not limited to the following:

- a. Draining oil pot for LTPR 3
- b. Draining oil pot for LTPR 7
- c. Taking on or adding ammonia to the system for the South Engine Room

Pursuant to 29 CFR 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 written operating procedures are developed and have sufficient detail and specificity to provide clear operating steps.

Date By Which Violation Must be Abated: 07/03/2012
Proposed Penalty: \$ 7000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
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Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

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

29 CFR 1910.119(f)(3): The operating procedures were not reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, or changes to facilities:

The employer does not ensure that written operating procedures reflect current operating practices for Pump-Out Compressors and Oil Stills. Operators no longer use the pump out compressors to drain the oil pots and not longer use the heater at the oil drain as is stated in the current operating procedure "4.0 Pump-Out Compressors and Oil Stills".

Pursuant to 29 CFR 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 written operating procedures reflect current operating practices for Pump-Out Compressors and Oil Stills.

Date By Which Violation Must be Abated: 07/03/2012
Proposed Penalty: \$ 5500.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

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

29 CFR 1910.119(f)(4): The employer did not develop and implement safe work practices for employees and contractor employees 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 December 3, 2011 and times thereto employer failed to implement the procedures and precautions identified in the Line Break Permit such as but not limited to ensuring that:

- a section of the line being broken is isolated and purged
- personal protective equipment is in use
- lines are bled and valves are open
- verify system is in a vacuum prior to line break or at zero pressure

Pursuant to 29 CFR 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 safe work practices are developed and implemented.

Date By Which Violation Must be Abated: 07/03/2012
Proposed Penalty: \$ 7000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

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

Citation 1 Item 12a Type of Violation: **Serious**

29 CFR 1910.119(g)(1)(i): The employer did not initially train each employee, presently involved in operating a process, in a overview of the process and in the operating procedures as specified in 29 CFR 1910.119(f).

On or about March 22, 2012 the employer does not provide training on the written operating procedures to the ammonia systems for operators of the ammonia refrigeration systems for the North Engine Room and South Engine Room. This condition exposed employees to the hazards associated with an ammonia release, vessel failure or explosion.

Pursuant to 29 CFR 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 operators of the ammonia refrigeration systems in the North and South Engine Rooms are provided with training on the written operating procedures.

Date By Which Violation Must be Abated: 07/03/2012
Proposed Penalty: \$ 7000.00

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U.S. Department of Labor
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Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 12b Type of Violation: **Serious**

29 CFR 1910.119(g)(3): The employer did not prepare a record which contained the identity of the employee, the date training was completed and the means used to verify the employee understood the training:

The employer does not document that employees are provided with training on the written operating procedures and the means used to verify that the employee understands the training for the ammonia refrigeration systems in the North and South Engine Rooms.

Pursuant to 29 CFR 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 for each operator that receives training, a record is prepared which contains the identity of the employee, the date of training and the means used to verify that the employee understands the training.

Date By Which Violation Must be Abated:

07/03/2012

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011 - 05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 13 Type of Violation: **Serious**

29 CFR 1910.119(h)(2)(iii): The employer did not explain to contract employers the applicable provisions of the emergency action plan required by 29 CFR 1910.119(n):

On or about December 3, 2011, the Pinnacle Foods Group did not explain to Multi-Craft Contractors the applicable provisions of the emergency action plan. Employees of Multi-Craft Contractors, performing work at the Pinnacle Foods Group facility, at the Amerio Line Room, were not provided information or training and were not aware of the applicable provisions of the emergency evacuation plan such as notification to evacuate and emergency evacuation routes.

Pursuant to 29 CFR 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 contractors working onsite are provided an explanation of the applicable provisions of the emergency response plan such as notification to evacuate and emergency evacuation routes.

Date By Which Violation Must be Abated:	06/19/2012
Proposed Penalty:	\$ 7000.00

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 14 Type of Violation: **Serious**

29 CFR 1910.119(j)(2): The employer did not establish and implement written procedures to maintain the on-going mechanical integrity of process equipment:

On or about January 11, 2012 and prior thereto, the employer does not implement written mechanical integrity procedures for the maintenance of the pressure safety valves (PSVs) on equipment such as but not limited to the following:

- a. LSC 22
- b. LSC 23
- c. LSC 24
- d. HSC 25
- e. HSC 26
- f. HSC 27
- g. HPR 1
- i. HPR 3
- h. HPR 4
- j. HPR 5
- k. HTPR 11
- l. TV 2

This condition exposes employees to the hazard of a release of ammonia or a vessel failure in an overpressure situation due to the PSV not functioning properly.

Pursuant to 29 CFR 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 mechanical integrity procedures for the maintenance of pressure safety valves (PSVs) on the following equipment are replaced every 5 years: LSC 22, LSC 23, LSC 24, HSC 25, HSC 26, HSC 27, HPR 1, HPR 3, HPR 4, HPR 5, HTPR 11 and TV 2.

Date By Which Violation Must be Abated: 07/03/2012
Proposed Penalty: \$ 7000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 15 Type of Violation: **Serious**

29 CFR 1910.119(j)(4)(iv): The employer did not document each inspection and test that had been performed on process equipment to maintain its mechanical integrity:

Employer does not document inspections of the pressure relief valves on its refrigeration equipment. On or about March 2, 2012 and times prior thereto employer is unable to show documentation for the pressure safety relief valves on the following equipment; Compressors 22, 23, 24, 25, 26, 27, LTPR5, IC-5, IC-6, HPR-1, HPR-2, HPR-3, HPR-5, HTPR-2, LTPR-4, LTPR-7, LTPR-1, LTPR-6, ITHPR-9, HSC-5, LSC-20, HTPR-10, HTPR-11, TV-1, TV-2, TV-3.

Pursuant to 29 CFR 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 inspections of pressure safety relief valves are documented.

Date By Which Violation Must be Abated: 07/03/2012
Proposed Penalty: \$ 7000.00

Citation 1 Item 16 Type of Violation: **Serious**

29 CFR 1910.119(k)(2): The hot work permit did not document that the fire prevention and protection requirements in 29 CFR 1910.252(a) had been implemented prior to beginning the hot work operations:

Employer does not effectively document the fire prevention elements of its hot work permit. The permit requires that equipment be purged of combustible gases before hot work commences. On or about December 3, 2011 a hot work permit was issued for the removal of ammonia piping. The piping was not effectively purged prior to the initiation of the hot work which resulted in an uncontrolled ammonia release.

Pursuant to 29 CFR 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 all elements of 29 CFR 1910.252(a) are implemented prior to beginning hot work operations.

Date By Which Violation Must be Abated: 06/19/2012
Proposed Penalty: \$ 7000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

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

Citation 1 Item 17a Type of Violation: **Serious**

29 CFR 1910.119(l)(2)(i): The written procedures to manage changes did not assure that the technical basis for the proposed change was addressed prior to any change:

Employer does not assure that management of change procedures include the technical basis for the proposed change. MOC #11_ dated November 1, 2011 for the replacement of undersized relief piping and valves did not contain the calculations for the piping and valve sizing.

Pursuant to 29 CFR 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 MOCs address the technical basis for the change.

Date By Which Violation Must be Abated:	07/03/2012
Proposed Penalty:	\$ 7000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 17b Type of Violation: **Serious**

29 CFR 1910.119(l)(2)(ii): The written procedures to manage changes did not assure that the impact of the change on safety and health was addressed prior to any change:

Employer does not assure that management of change procedures includes the impact of the change on safety and health. MOC 11-17 involving the removal of abandoned ammonia piping did not address the impact of change on safety and health, such as but not limited to; permits, the use of respirators and personal protective equipment.

Pursuant to 29 CFR 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 MOCs address the impact of the change on safety and health.

Date By Which Violation Must be Abated:

07/03/2012

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 17c Type of Violation: **Serious**

29 CFR 1910.119(l)(2)(iii): The written procedures to manage changes did not assure that the modifications to operating procedures were addressed prior to any change:

Employer does not assure that management of change procedures address modifications to operating procedures prior to implementation of the change in the following instances:

- a. On or about May 17, 2011 and times thereto MOC #11-12 for the installation of new control panels on the ammonia compressors does not certify that operator training has been completed.
- b. On or about August 22, 2011 and times thereto MOC #11-20 for a major repiping of intercoolers and vessels does not contain the changes in operating procedures.

Pursuant to 29 CFR 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 MOCs address modifications to operating procedures.

Date By Which Violation Must be Abated:

07/03/2012

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011 - 05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 17d Type of Violation: **Serious**

29 CFR 1910.119(l)(2)(v): The written procedures to manage changes did not assure that the authorization requirements for the proposed change were addressed prior to any change:

The employer does not assure that management of change procedures include authorization requirements for the proposed change in the following instances:

- a. MOC #11-12 lacks authorization signatures from the Safety, Plant and Utilities Managers.
- b. MOC #11-17 lacks authorization signatures from Safety, Plant and Utilities Managers.
- c. MOC #11-20 lacks authorization signatures from the Safety, Plant and Utilities Managers.
- d. MOC #11- _ lacks authorization signatures from the Safety, Plant and Utilities Managers.

Pursuant to 29 CFR 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 MOCs contain required authorizations.

Date By Which Violation Must be Abated: 07/03/2012

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011 - 05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 18 Type of Violation: **Serious**

29 CFR 1910.119(o)(1): The employer did not certify that they had evaluated compliance with the provisions of 29 CFR 1910.119 at least every three years to verify that the procedures and practices developed under this standard were adequate and are being followed:

The employer does not conduct a compliance audit at least every 3 years for the following ammonia refrigeration systems to verify that the procedures and practices they have developed are being followed in the following instances:

- a. North Engine Room
- b. South Engine Room

Pursuant to 29 CFR 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 a compliance audit for the ammonia refrigeration systems for the North and South Engine Rooms is being conducted.

Date By Which Violation Must be Abated: 07/03/2012
Proposed Penalty: \$ 3300.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011 - 05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 19 Type of Violation: **Serious**

29 CFR 1910.119(o)(4): The employer did not determine and document an appropriate response to each of the findings of the compliance audit required by 29 CFR 1910.119(o)(1), and document that the deficiencies had been corrected:

Employer does not document that findings on PSM compliance audits are appropriately addressed and document that deficiencies are corrected. Items such as but not limited to the following deficiencies noted in the 2008 compliance audit were not documented as being corrected:

- Contract employees not evaluated for their performance in fulfilling their safety obligations
- Hot work permit needs a remark section for identifying cracks, holes and conveyors where sparks may drop or be conveyed to combustible material.
- Incomplete Process Safety Information for the south engine room
- Missing documentation that items from the 2005 audit have been completed
- Not providing PSSR for all projects

Pursuant to 29 CFR 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 deficiencies found in compliance audits are addressed and documented as corrected.

Date By Which Violation Must be Abated:	07/03/2012
Proposed Penalty:	\$ 7000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011 - 05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

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

Citation 1 Item 20a Type of Violation: **Serious**

29 CFR 1910.120(q)(2)(xi): The emergency response plan did not address, to the extent not addressed elsewhere, the PPE and emergency equipment:

The employer's written Chemical Response Plan did not address information such as but not limited to the specific personal protective equipment to be used, the location of the personal protective and under what circumstances employees were to use the personal protective equipment. On or about December 3, 2011 employees responded to a release of anhydrous ammonia at the Amerio Line 3 room. This condition exposes employees to hazards associated with inhalation and skin contact with chemicals such as but not limited to anhydrous ammonia.

Pursuant to 29 CFR 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 the written Chemical Response Plan addresses information such as the specific personal protective equipment to be used, the location of the personal protective equipment and under what circumstances employees were to use the personal protective equipment.

Date By Which Violation Must be Abated:	06/19/2012
Proposed Penalty:	\$ 7000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 20b Type of Violation: **Serious**

29 CFR 1910.120(g)(10): Chemical protective clothing and equipment to be used by organized and designated HAZMAT team members, or to be used by hazardous materials specialists, did not meet the requirements of 29 CFR 1910.120(g)(3) through (5):

The employer does not have a written personal protective equipment program for members of the hazardous materials team who are exposed to chemicals such as but not limited to anhydrous ammonia that addresses the elements of 29 CFR 1910.120(g)(5). On or about December 3, 2011 employees responded to a release of anhydrous ammonia at the Amerio Line 3 room. This condition exposes employees to hazards associated with inhalation and skin contact with chemicals such as but not limited to anhydrous ammonia.

Pursuant to 29 CFR 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 a written personal protective equipment program that addresses the following is developed: use and limitations of PPE, work mission duration, PPE maintenance and storage, PPE decontamination and disposal, PPE training and proper fitting, PPE donning and doffing procedures, PPE inspection procedures prior to, during and after use, evaluation of the effectiveness of the PPE program and limitations during temperature extremes, heat stress and other appropriate medical considerations.

Date By Which Violation Must be Abated:

06/19/2012

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011 - 05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 21 Type of Violation: **Serious**

29 CFR 1910.132 (a): Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, were not provided, used, and maintained in a sanitary and reliable condition wherever it was necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, or mechanical irritants, encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact:

The employer does not provide and require employees responding to a release of anhydrous ammonia to wear personal protective equipment to prevent skin exposure with anhydrous ammonia to the arms, torso and legs. On or about December 3, 2011, employees on the Hazardous Materials Team responded to a release of anhydrous ammonia in the Amerio Line 3 room without the use of personal protective equipment for their arms, legs and torso. This condition exposes employees to the hazard of skin contact with anhydrous ammonia.

Pursuant to 29 CFR 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 employees responding to a release of ammonia wear personal protective equipment to prevent exposure to anhydrous ammonia to the arms, torso and legs.

Date By Which Violation Must be Abated: 06/19/2012
Proposed Penalty: \$ 5500.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011 - 05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 22 Type of Violation: **Serious**

29 CFR 1910.133 (a)(3): The employer did not ensure that each affected employee who wore prescription lenses while engaged in operations that involved eye hazards wore eye protection that incorporated the prescription in its design, or wore eye protection that can be worn over the prescription lenses without disturbing the proper position of the prescription lenses or the protective lenses:

On or about March 2, 2011, the employer does not provide eye protection for exposure to ammonia such as a Scott full face respirator face-piece that incorporates prescription eyewear inserts into the design. This condition exposes employees wearing full face respirator face-pieces without their glasses to restricted vision which results in trips and falls and not being able to effectively perform tasks which involve identifying valves and equipment.

Pursuant to 29 CFR 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 employees are provided with prescription eyewear inserts to use with a full face-piece respirator.

Date By Which Violation Must be Abated:	06/19/2012
Proposed Penalty:	\$ 4400.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 23 Type of Violation: **Serious**

29 CFR 1910.134(g)(1)(i)(A): The employer permitted respirators with tight-fitting face-pieces to be worn by employees who had facial hair that came between the sealing surface of the face-piece and the face or that interfered with valve function:

On or about February 29, 2012 and prior thereto, employees wearing Scott full face respirators with cartridges and Scott full face masks with self contained breathing air (SCBA) have full beards which interfere with the face to face-piece seal of the respirators. This condition exposes employees to anhydrous ammonia.

Pursuant to 29 CFR 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 employees wearing respirators such as a Scott Full face respirator with cartridges and Scott full face mask with SCBA do not have facial hair that interferes with the face to face-piece seal.

Date By Which Violation Must be Abated:	06/19/2012
Proposed Penalty:	\$ 5500.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011 - 05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 24 Type of Violation: **Serious**

29 CFR 1910.147(c)(4)(ii) (B): The energy control procedures did not clearly and specifically outline the steps for shutting down, isolating, blocking and securing machines or equipment to control hazardous energy:

Employer does not provide machine specific lockout procedures for refrigeration equipment. On or about December 16, 2011 and times prior thereto employer does not have written lockout procedures for equipment such as but not limited to ammonia compressors.

Pursuant to 29 CFR 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 equipment specific lockout procedures exist for refrigeration equipment such as but not limited to ammonia compressors.

Date By Which Violation Must be Abated:	07/03/2012
Proposed Penalty:	\$ 7000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011-05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 25 Type of Violation: **Serious**

29 CFR 1910.151(c): Where employees were exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body were not provided within the work area for immediate emergency use:

Employees performing servicing and maintenance on pumps and draining oil pots are exposed to the hazard of eye contact with anhydrous ammonia in the event of a release or leak. Emergency eyewash stations are not provided for employees to flush their eyes with water in the following locations:

- a. Pit located under LPTR-5
- b. Pit located under LTPR-3
- c. Pit located under LTPR-7

Pursuant to 29 CFR 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 emergency eyewash stations are available in the pits located under LPTR-5, LPTR-3 and LTPR-7.

Date By Which Violation Must be Abated: 07/03/2012
Proposed Penalty: \$ 5500.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011 - 05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 26 Type of Violation: **Serious**

29 CFR 1910.305(b)(1)(i): Conductors entering boxes, cabinets, or fittings were not protected from abrasions:

Employer does not assure that conductors entering boxes are protected from abrasions. On or about February 15, 2012 and times prior thereto under the working platform on the exit side of the #2 Amerio the conduit for an electrical outlet box is broken free and exposes the conductors to the rough edges of the box's opening.

Pursuant to 29 CFR 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 electrical installations protect from abrasions the conductors entering the boxes or cabinets.

Date By Which Violation Must be Abated:	06/12/2012
Proposed Penalty:	\$ 3300.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

Inspection Number: 315973891
Inspection Dates: 12/12/2011 - 05/01/2012
Issuance Date: 05/31/2012



Citation and Notification of Penalty

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701

Citation 1 Item 27 Type of Violation: **Serious**

29 CFR 1910.305(g)(1)(iv)[A]: The employer did not ensure that flexible cords and cables were not used as a substitute for the fixed wiring of a structure.

Employer does not ensure that flexible cords are not used in lieu of fixed wiring for a structure. On or about February 15, 2012 and times prior thereto the fixed oil drain tank in the north engine room is powered via an extension cord. The cord lays on the floor adjacent to the tank and presents a trip hazard to employees.

Pursuant to 29 CFR 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 extension cords are not used in lieu of permanent wiring for a fixed structure.

Date By Which Violation Must be Abated:	06/19/2012
Proposed Penalty:	\$ 3300.00


CARLOS M. REYNOLDS
Area Director

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor



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U.S. Department of Labor

Occupational Safety and Health Administration
10810 Executive Center Drive
Danville Building - Suite 206
LITTLE ROCK, AR 72211
Phone: (501)224-1841 FAX: (501)224-2697



**INVOICE/
DEBT COLLECTION NOTICE**

Company Name: PINNACLE FOODS GROUP, LLC
Inspection Site: 1100 W. 15th Street, Fayetteville, AR 72701
Issuance Date: 05/31/2012

Summary of Penalties for Inspection Number 315973891

Citation 1, Serious = \$ 156700.00
TOTAL PROPOSED PENALTIES = \$ 156700.00

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 2 times.

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 5%. 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.