

U.S. Department of Labor
Occupational Safety and Health Administration
36 Triangle Park Drive
Cincinnati, OH 45246
Phone: 513-841-4132 Fax: 513-841-4114



Citation and Notification of Penalty

To:
Knowlton Manufacturing Co., Inc.
2524 Leslie Ave
Cincinnati, OH 45212

Inspection Number: 107657
Inspection Date(s): 10/12/2011 - 11/29/2011
Issuance Date: 04/06/2012

Inspection Site:
2524 Leslie Ave
Cincinnati, OH 45212

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 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 must provide *abatement certification* to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that *abatement documentation* is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, etc., verifying that abatement has occurred is required to be provided to the Area Director.

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.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 04/06/2012. The conference will be held at the OSHA office located at 36 Triangle Park Drive, Cincinnati, OH 45246 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 107657

Company Name: Knowlton Manufacturing Co., Inc.
Inspection Site: 2524 Leslie Ave, Cincinnati, OH 45212
Issuance Date: 04/06/2012

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 36 Triangle Park Drive, Cincinnati, OH 45246**

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

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

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

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

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

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

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

Signature

Date

Typed or Printed Name

Title

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

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

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

Inspection Number: 107657
Inspection Date(s): 10/12/2011 - 11/29/2011
Issuance Date: 04/06/2012



Citation and Notification of Penalty

Company Name: Knowlton Manufacturing Co., Inc.
Inspection Site: 2524 Leslie Ave, Cincinnati, OH 45212

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

29 CFR 1910.212(a)(1): One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks.

a) In the tool room, employee(s) were using (3) Cincinnati machine lathes without the guards in place over the rotating chucks.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated:
Proposed Penalty:

04/09/2012
\$3000.00

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

Inspection Number: 107657
Inspection Date(s): 10/12/2011 - 11/29/2011
Issuance Date: 04/06/2012



Citation and Notification of Penalty

Company Name: Knowlton Manufacturing Co., Inc.
Inspection Site: 2524 Leslie Ave, Cincinnati, OH 45212

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

29 CFR 1910.215(a)(2): The safety guard shall cover the spindle end, nut, and flange projections.

a) In the die shop area, employee(s) were using a pedestal grinder that had the guard missing on the right side over the spindle end, nut and flange projection.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated:
Proposed Penalty:

04/09/2012
\$2400.00

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

Inspection Number: 107657
Inspection Date(s): 10/12/2011 - 11/29/2011
Issuance Date: 04/06/2012



Citation and Notification of Penalty

Company Name: Knowlton Manufacturing Co., Inc.
Inspection Site: 2524 Leslie Ave, Cincinnati, OH 45212

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

29 CFR 1910.217(b)(3)(i): Machines using full revolution clutches shall incorporate a single-stroke mechanism.

a) In the lower press room, employee(s) were operating a Toledo 85-ton full revolution mechanical power press, by foot pedal control, with the machine not having a single stroke mechanism incorporated to prevent repeated strokes.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated:
Proposed Penalty:

05/18/2012
\$4200.00

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

Inspection Number: 107657
Inspection Date(s): 10/12/2011 - 11/29/2011
Issuance Date: 04/06/2012



Citation and Notification of Penalty

Company Name: Knowlton Manufacturing Co., Inc.
Inspection Site: 2524 Leslie Ave, Cincinnati, OH 45212

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

29 CFR 1910.217(d)(6)(i): All dies shall be stamped with the tonnage and stroke requirements, or have these characteristics recorded if these records are readily available to the die setter.

a) In the upper and lower press rooms, employee(s) were handling and making die changes within the mechanical power presses with there being no records of, or dies stamped with, tonnage and stroke requirements.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated:
Proposed Penalty:

05/18/2012
\$3000.00

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

Inspection Number: 107657
Inspection Date(s): 10/12/2011 - 11/29/2011
Issuance Date: 04/06/2012



Citation and Notification of Penalty

Company Name: Knowlton Manufacturing Co., Inc.
Inspection Site: 2524 Leslie Ave, Cincinnati, OH 45212

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

29 CFR 1910.217(d)(9)(iv): The employer shall provide and enforce the use of safety blocks for use whenever dies are being adjusted or repaired in the press.

a) In the upper and lower press rooms, employee(s) were making adjustments and repairs to dies during die setting without the use of safety blocks on presses #5,#6,#10,#11,#16,#17,#18,#18b,#19,#27,#33, #34,#36, and #38.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated:
Proposed Penalty:

05/18/2012
\$3000.00

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

Inspection Number: 107657
Inspection Date(s): 10/12/2011 - 11/29/2011
Issuance Date: 04/06/2012



Citation and Notification of Penalty

Company Name: Knowlton Manufacturing Co., Inc.
Inspection Site: 2524 Leslie Ave, Cincinnati, OH 45212

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

29 CFR 1910.305(a)(2)(x): Flexible cords and cables shall be protected from accidental damage, as might be caused, for example, by sharp corners, projections, and doorways or other pinch points.

a) In the upper press room, employee(s) were exposed to a potential electrical shock hazard due to the inner flexible wires hanging loose from the conduit to the two-hand control pedestal on the 100-ton Stamtec press.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated:
Proposed Penalty:

04/09/2012
\$3000.00



Citation and Notification of Penalty

Company Name: Knowlton Manufacturing Co., Inc.
Inspection Site: 2524 Leslie Ave, Cincinnati, OH 45212

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

Citation 2 Item 1 a Type of Violation: **Willful - Serious**

29 CFR 1910.147(d)(3): All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s).

- a) On or about October 11, 2011, an employee was exposed to an amputation hazard due to hands being between the dies during cleaning/servicing of the dies on the 85-ton Toledo full revolution mechanical power press due to power to the press not being isolated.
- b) In the upper and lower press rooms, employees performing die changes on mechanical power presses had hands between the dies (e.g., #16 Stamtec 200-ton part revolution power press) and the power to the press(es) were not isolated.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated:
Proposed Penalty:

05/18/2012
\$42000.00



Citation and Notification of Penalty

Company Name: Knowlton Manufacturing Co., Inc.
Inspection Site: 2524 Leslie Ave, Cincinnati, OH 45212

Citation 2 Item 1 b Type of Violation: **Willful - Serious**

29 CFR 1910.147(d)(4)(i): Lockout or tagout devices shall be affixed to each energy isolating device by authorized employees.

a) On or about October 11, 2011, an employee was exposed to an amputation hazard due to hands being between the dies during cleaning/servicing of the dies on the 85-ton Toledo full revolution mechanical power press due to power to the press not being locked out.

b) In the upper and lower press rooms, employees were performing die changes on mechanical power presses having hands between the dies (e.g., #16 Stamtec 200-ton part revolution mechanical power press) and the press(es) were not locked out.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated:

05/18/2012



Citation and Notification of Penalty

Company Name: Knowlton Manufacturing Co., Inc.
Inspection Site: 2524 Leslie Ave, Cincinnati, OH 45212

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

29 CFR 1910.217(c)(1)(i): It shall be the responsibility of the employer to provide and insure the usage of "point of operation guards" or properly applied and adjusted point of operation devices on every operation performed on a mechanical power press. See Table O-10.

a) On or about October 11, 2011, an employee was exposed to an amputation hazard due to the operation of a Toledo 85-ton full revolution mechanical power press (foot pedal activated) that had no method of guarding for the point of operation.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated:
Proposed Penalty:

05/18/2012
\$42000.00



Citation and Notification of Penalty

Company Name: Knowlton Manufacturing Co., Inc.
Inspection Site: 2524 Leslie Ave, Cincinnati, OH 45212

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

29 CFR 1910.217(e)(1)(i): It shall be the responsibility of the employer to establish and follow a program of periodic and regular inspections of his power presses to ensure that all their parts, auxiliary equipment, and safeguards are in a safe operating condition and adjustment. The employer shall maintain a certification record of inspections which includes the date of inspection, the signature of the person who performed the inspection and the serial number, or other identifier, of the power press that was inspected.

a) In the upper and lower press rooms, employee(s) were exposed to amputation hazards in that there were 14 mechanical presses in use that were not being periodically inspected to ensure all their parts, equipment and safeguards were in safe operating condition.

The Knowlton Manufacturing Co., Inc. was previously cited for a violation of this Occupational Safety and Health standard or its equivalent standard, 29 CFR 1910.217(e)(1)(i) which was contained in OSHA inspection number 311165336, Citation Number 1, Item Number 3, issued on July 26, 2007.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated:
Proposed Penalty:

05/18/2012
\$8400.00

A handwritten signature in blue ink that reads "William Wilkerson".

William Wilkerson
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
36 Triangle Park Drive
Cincinnati, OH 45246
Phone: 513-841-4132 Fax: 513-841-4114



INVOICE / DEBT COLLECTION NOTICE

Company Name: Knowlton Manufacturing Co., Inc.
Inspection Site: 2524 Leslie Ave, Cincinnati, OH 45212
Issuance Date: 04/06/2012

Summary of Penalties for Inspection Number	107657
Citation 1, Serious	\$18600.00
Citation 2, Willful - Serious	\$84000.00
Citation 3, Repeat - Serious	\$8400.00
TOTAL PROPOSED PENALTIES	\$111000.00

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 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 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.

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.



William Wilkerson

Area Director



Date