

U.S. Department of Labor
Occupational Safety and Health Administration
FEDERAL OFFICE BUILDING RM 899
1240 EAST 9TH STREET
CLEVELAND, OH 44199-2050
Phone: (216) 615-4266 FAX: (216) 615-4234



Citation and Notification of Penalty

To:
ILAPA Inc.
and its successors
26000 Richmond Rd
Bedford Heights, OH 44146

Inspection Number: 315312868
Inspection Date(s): 03/11/2011- 03/15/2011
Issuance Date: 09/06/2011

Inspection Site:
26000 Richmond Rd
Bedford Heights, OH 44146

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. 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 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 your inspection will be available 30 calendar days after the Citation Issuance Date.ress 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 your inspection will be available 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 OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 09/06/2011. The conference will be held at the OSHA office located at FEDERAL OFFICE BUILDING RM 899, 1240 EAST 9TH STREET, CLEVELAND, OH, 44199-2050 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.



Citation and Notification of Penalty

Company Name: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

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

Section 5(a)(1) of the Occupational Safety and Health Act of 1970: The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to fall and crushed by hazards:

On or about March 11, 2011 the employer was using a fork lift to lift employees in wooden boxes used as unsecured elevating platforms up to approximately 20 feet which is ceiling height, to hang tents for drying. Employees were exposed to falls up to 20 feet.

Feasible Means Of Abatement:

Acceptable method to correct this would be to follow American National Standards Institute ANSI/ITSDF B56.1-2005 Safety Standard for Low Lift and High Lift Trucks, Sections 4.17.2 and 7.37.3. The company could also provide fall protection and man cages to employees.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 4900.00

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

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

On or about March 11, 2011 the employer did not maintain the floors in a dry condition to prevent slip and trip hazards. Water was noted on the floor in the washing and drying area.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 4200.00

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: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

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

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

29 CFR 1910.23(b)(1): Wall opening(s) from which there was a drop of more than four (4) feet, were not guarded:

On or about March 11, 2011 the employer did not guard a storage area that was at a height of approximately 10 feet outside the operations manager's office.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 2800.00

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

29 CFR 1910.23(d)(1)(v): Flight(s) of stairs with 4 or more risers, 88 or more inches wide, were not equipped with one standard handrail on each enclosed side, one standard railing on each open side and one intermediate standard stair railing located approximately midway of the width:

On or about March 11, 2011 the employer did not provide a mid rail on stairs leading up to the operations manager's office. The highest riser was approximately 10 feet high off the ground.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
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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: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

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

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

29CFR1910.37(a)(3): Exit routes were not free and unobstructed:

On or about March 11, 2011 the warehouse had a blocked emergency exit in the washing area and a blocked exit on the southwest side of the warehouse.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/10/2011
Proposed Penalty:	\$ 3500.00

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

29 CFR 1910.38(a)(1): The emergency action plan required by 29 CFR 1910.160(c)(1) was not in writing:

On or about March 11, 2011 the employer did not have a written emergency action plan.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
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Citation and Notification of Penalty

Company Name: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

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

29 CFR 1910.110(f)(2)(i): LP-Gas container(s) in storage were not located so as to minimize exposure to excessive temperature rise, physical damage, or tampering by unauthorized persons:

On or about March 11, 2011 the employer did not store propane tanks in an area to minimize exposure to physical damage. Propane tanks were stored inside the warehouse next to garage doors that are accessed daily by company trucks. Propane tanks were also not secured and could have easily fallen over.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 3500.00

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

29 CFR 1910.132(a): Protective equipment, including personal protective equipment for the 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 environmental, 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:

On or about March 11, 2011 the employer did not provide fall protection which would include a harness and lanyard to employees required to use the Crown Picker to retrieve items approximately 14 feet high.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 4900.00

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: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

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

29 CFR 1910.132(d)(1): The employer did not evaluate the workplace for hazards that necessitated the use of personal protective equipment:

On or about March 11, 2011 the employer did not assess the workplace to determine if hazards are present or are likely to be present when switching out propane tanks or fork truck batteries, lifting employees up in wooden boxes or on a picker, and when employees wash tents in the washing area.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 4900.00

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

29 CFR 1910.133(a)(1): The use of appropriate face protection was not ensured when employees were exposed to hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation:

On or about March 11, 2011 the employer did not provide appropriate PPE such as a face shield for employees exposed to battery acid while working on fork truck batteries.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 2800.00

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: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

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

29 CFR 1910.176(a): Aisle(s) or passageway(s) were not kept clear and in good repair where mechanical handling equipment was used:

On or about March 11, 2011 the employer did not keep clear aisleways used by forktrucks. The aisleways located in the facility were approximately 8 feet wide. Forktrucks have to maneuver excessively around product to get down the aisleway.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 3500.00

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

29 CFR 1910.176(b): The storage of material was not secure and created a hazard:

On or about March 11, 2011 the employer did not securely store tents during the drying process. Tents hang from the ceiling on a pole on a rope and pulley system. If the rope is not secured correctly the pole can fall from the ceiling along with the tent. Employees clean the floor below during the drying process and could be seriously injured.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 4200.00

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: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

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

29 CFR 1910.178(g)(2): Battery changing and charging installations for industrial trucks were not provided with facilities for flushing and neutralizing spilled electrolyte:

On or about March 11, 2011 the employer did not provide an eye wash station/quick drench where employees were working with fork truck batteries and were exposed to battery acid.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 2800.00

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

CFR 1910.178(g)(4): A conveyor, overhead hoist, or equivalent material handling equipment had not been provided for handling batteries.

On or about March 11, 2011 the employer did not provide material handling equipment for employees required to handle fork truck batteries that weigh a minimum of 2400 lbs exposing employees to a crushing and corrosive hazard.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 2800.00

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: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

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

29 CFR 1910.178(q)(7): Industrial trucks were not examined before being placed in service and at least daily:

On or about March 11, 2011 the employer did not examine forktrucks on a daily basis before they were put into service.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 2800.00

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: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

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

29 CFR 1910.1200(e)(1): The employer did not develop, implement, and/or maintain at the workplace a written hazard communication program which describes how the criteria specified in 29 CFR 1910.1200(f), (g), and (h) will be met:

On or about March 11, 2011 the employer did not develop, implement and maintain a written hazard communication program at the site. Employees who handle propane, degreaser and work around battery acid were not trained on the hazards associated with these activities.

NOTE:

A comprehensive hazard communication program needs to include the following required elements:

- 1) A written program specific to the company.
- 2) Material safety data sheets.
- 3) A hazardous chemical inventory list.
- 4) Labeling of all containers.
- 5) Documented "employee" training.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 2800.00

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: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

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

29 CFR 1910.1200(e)(1)(i): The written hazard communication program did not include a list of the hazardous chemicals known to be present using an identity that was referenced on the appropriate material safety data sheet:

On or about March 11, 2011 the employer did not maintain a hazardous chemical inventory list at the site. Employees use propane, degreaser and work around battery acid and were not provided with a hazardous chemical inventory list.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 2800.00

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

29 CFR 1910.1200(g)(1): The employer did not have a material safety data sheet (MSDS) for each hazardous chemical which they used:

On or about March 11, 2011 the employer did not maintain material safety data sheets at the site. Employees use propane, degreaser and work around battery acid and were not provided with MSDS's for these chemicals.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 2800.00

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: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

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

29 CFR 1910.178(l)(1)(i): The employer did not provide training and evaluation for powered industrial truck operators:

On or about March 11, 2011 the employer failed to train employees and evaluate employees in the safe operation of powered industrial trucks that were required to be operated on a daily basis. The failure to train employees resulted in damaged racking systems, near misses, and obstructed aiseways. Near misses consisted of almost hitting employees and aiseways were obstructed by wooden boxes, tents, pallets and tables.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 49000.00

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

29 CFR 1910.334(a)(4): Portable electric equipment and flexible cords used in highly conductive work locations, or in job locations where employees were likely to contact water or conductive liquids, were not approved for those locations:

On or about March 11, 2011, in the wash pad area, the employer provided flexible cords that were not approved for wet conditions. The flexible cords had damage to the outer and inner insulation with exposed inner wiring that caused an electrical shock to employees standing in an accumulation of water. In addition, several cords were also covered in electrical tape from damage.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 49000.00

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: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

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

29 CFR 1910.22(d)(1): In every building or other structure, or part thereof, used for mercantile, business, industrial, or storage purposes, the loads approved by the building official was not marked on plates of approved design which shall be supplied and securely affixed by the owner of the building, or his duly authorized agent, in a conspicuous place in space to which they relate.

On or about March 11, 2011 the employer did not load rate the area above the employee lunchroom next to the operation managers office. The area contained a pool table and wooden pallets.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 0.00

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

Citation 3 Item 2a Type of Violation: **Other**

29 CFR 1910.157(c)(1): The employer did not mount, locate, and identify portable fire extinguishers so that they are readily accessible to employees without subjecting the employees to possible injury:

On or about March 11, 2011 the employer did not mount fire extinguishers. Fire extinguishers were not mounted by office doors on eastside of building, in the washing pad area on the south side of the building, and by garage doors on southside of building. The fire extinguishers were classified as ABC extinguishers.

Abatement documentation required on this item.

Date By Which Violation Must be Abated:	09/24/2011
Proposed Penalty:	\$ 0.00

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: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

Citation 3 Item 2b Type of Violation: Other

29 CFR 1910.157(e)(2): Portable fire extinguishers were not visually inspected at least monthly:

On or about March 11, 2011 the employer did not do visual checks monthly on ABC fire extinguishers.

Abatement documentation required on this item.

Date By Which Violation Must be Abated: 09/24/2011



Citation and Notification of Penalty

Company Name: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

Citation 3 Item 2c Type of Violation: Other

29 CFR 1910.157(g)(2): The educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage fire fighting was not provided to all employees upon initial employment, and at least annually thereafter:

On or about March 11, 2011 the employer did not train employees on how or when to use ABC fire extinguishers when fire extinguishers were available for employee use. Employees were never trained initially upon hire.

Note: Employer may exercise one of the following options.

- 1) Provide portable fire extinguishers as specified in 29 CFR 1910.157(c)(1), meet the distribution requirements per 29 CFR 1910.157(d) (75' to the nearest extinguisher for Class A fires and 50' to the nearest unit for Class B fires), and provide training and education for all employees in the use of such equipment and the hazards associated with incipient stage fire fighting as required in 29 CFR 1910.157(g). The other sections of 29 CFR also apply.
- 2) Provide extinguishers as specified in 29 CFR 1910.157(c)(1), designate certain employees to be the only employees authorized to use such equipment and require all other employees to immediately evacuate upon the sounding of the fire alarm, establish this in writing in an emergency action plan as outlined in 29 CFR 1910.38(a) and train/educate designated employees per 1910.157(g). Utilizing this option exempts the employer from distribution requirements of 29 CFR 1910.157(d).
- 3) Establish a written fire safety policy which requires the immediate and total evacuation of employees from the workplace upon the sounding of a fire alarm signal. This policy shall include an emergency action plan and a fire prevention plan as specified in 29 CFR 1910.38(a) and (b). Utilizing this option exempts the employer from the requirements of 29 CFR 1910.157 to include the need for providing portable fire equipment unless a specific standard requires that a portable fire extinguisher be provided (such as those requirements in 29 CFR 1910.106/107 related to use/storage of flammable/combustible liquids). If extinguishers are provided, but not intended for employee use, 29 CFR 1910.157(e) and (f) are still applicable (inspection, maintenance, and testing of equipment).

Abatement documentation required on this item.

See pages 1 through 4 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: 315312868
Inspection Dates: 03/11/2011 - 03/15/2011
Issuance Date: 09/06/2011



Citation and Notification of Penalty

Company Name: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146

Date By Which Violation Must be Abated: 09/24/2011



Howard B. Eberts
Area Director

See pages 1 through 4 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
FEDERAL OFFICE BUILDING RM 899
1240 EAST 9TH STREET
CLEVELAND, OH 44199-2050
Phone: (216) 615-4266 FAX: (216) 615-4234

OSHA Website Address: <http://www.osha.gov>



**INVOICE/
DEBT COLLECTION NOTICE**

Company Name: ILAPA Inc.
Inspection Site: 26000 Richmond Rd, Bedford Heights, OH 44146
Issuance Date: 09/06/2011

Summary of Penalties for Inspection Number 315312868

Citation 1, Serious	= \$	56000.00
Citation 2, Willful	= \$	98000.00
Citation 3, Other	= \$	0.00
TOTAL PROPOSED PENALTIES	= \$	154000.00

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 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 two 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 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.



Howard B. Eberts
Cleveland Area Office

9-6-2011

Date

Corrective action, taken by you for each alleged violation should be submitted to this office on or about the abatement dates indicated on the Citation and Notification of Penalty.

If the hazards itemized on this citation(s) are not abated/corrected and a follow-up inspection is conducted, your establishment may receive Failure to Abate Citation for the uncorrected hazards with subsequent additional monetary penalties of up to thirty (30) times the original penalty amount of the uncorrected hazards.

A work sheet has been provided to assist in providing the required abatement information. A completed copy of this worksheet should be posted at the worksite with the Citation(s).

