

U.S. Department of Labor
Occupational Safety and Health Administration
11 Executive Drive
Suite 11
Fairview Heights, IL 62208
Phone: 618-632-8612 Fax: 618-632-5712



Citation and Notification of Penalty

To:
ALL STEEL PRODUCTS, INC.
and its successors
P.O. BOX 270
Staunton, IL 62088

Inspection Number: 1012612
Inspection Date(s): 12/09/2014 - 12/09/2014
Issuance Date: 05/06/2015

Inspection Site:
1201 JANETTE DRIVE
Vandalia, IL 62471

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 either call to schedule an informal conference (see paragraph below) or 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. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on OSHA Penalty Payment Form. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>.

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will process the payments as if these restrictions or conditions 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, training records, 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 05/06/2015. The conference will be held by telephone or at the OSHA office located at 11

Executive Drive, Suite 11, Fairview Heights, IL 62208 on _____ at

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1012612

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471
Issuance Date: 05/06/2015

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, 11 Executive Drive, Suite 11, Fairview Heights, IL 62208**

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: 1012612
Inspection Date(s): 12/09/2014 - 12/09/2014
Issuance Date: 05/06/2015



Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.106(e)(2)(iv)(a): Category 1 or 2 flammable liquids, or Category 3 flammable liquids with a flashpoint below 100 degrees F (37.8 degrees C), were not kept in covered containers when not actually in use:

In the spray paint area, category 3 liquids with a flashpoint below 100 degrees F (37.8 degrees C), were not kept in covered containers when not actually in use. Open containers with xylene were observed and paint guns and sprayer lines were in the open containers, creating a flash burn hazard.

Abatement certification is required for this item in accordance with the requirements of 29 CFR 1903.19(c).

Date By Which Violation Must be Abated:
Proposed Penalty:

05/12/2015
\$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: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.106(e)(6)(ii): Category 1 or 2 flammable liquids, or Category 3 flammable liquids with a flashpoint below 100 degrees F (37.8 degrees C), were dispensed into containers without the containers being electrically interconnected.

In the spray painting area, paint containers were not grounded/bonded while flammable paints were utilized and dispensed:

- a.) BB-99 Black Bituminous Pipe Coating (flammable paint) was dispensed from a 55-gallon drum into 5-gallon containers without proper bonding between containers.
- b.) BB-99 Black Bituminous Pipe Coating (flammable paint) was dispensed from a 55-gallon drum into 5-gallon containers and the 55-gallon drum was not grounded.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 05/12/2015
Proposed Penalty: \$4900.00

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

Inspection Number: 1012612
Inspection Date(s): 12/09/2014 - 12/09/2014
Issuance Date: 05/06/2015



Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.106(e)(9)(iii): Combustible waste material and residues in a building or unit operating area were not kept to a minimum, stored in covered metal receptacles and disposed of daily:

Combustible waste material and residues in the spray paint area were not kept to a minimum, stored in covered metal receptacles and disposed of daily.

Abatement certification is required for this item in accordance with the requirements of 29 CFR 1903.19(c).

Date By Which Violation Must be Abated:	05/12/2015
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.

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

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Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.107(c)(6): Electrical wiring and equipment not subject to deposits of combustible residues but located in a spraying area as herein defined were not explosion-proof type approved for Class I, group D locations and did not otherwise conform to the provisions of subpart S of this part, for Class I, Division 1, Hazardous Locations:

In the spray painting area, a 120V AC electrical receptacle was observed covered with combustible residues and was not classified for the hazardous location.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/18/2015
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.

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

Inspection Number: 1012612
Inspection Date(s): 12/09/2014 - 12/09/2014
Issuance Date: 05/06/2015



Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.107(g)(2): All spraying areas were not kept as free from the accumulation of deposits of combustible residues as practical, with cleaning conducted daily if necessary:

In the spray painting area, deposits of combustible residues were observed accumulated on building structures and equipment with a 120V AC electrical receptacle.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/18/2015
\$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: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

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

29 CFR 1910.134(c)(1): A written respiratory protection program that included the provisions in 29 CFR 1910.134(c)(1)(i) - (ix) with worksite specific procedures was not established and implemented for required respirator use:

When respirators were required for spray painting operations, a written respiratory protection program was not implemented that included the provisions in 29 CFR 1910.134(c)(1)(i) - (ix) that included the following worksite specific procedures:

- i. Procedures for selecting respirators for use in the workplace;
- ii. Medical Evaluations for those employees required to wear respirators;
- iii. Procedures for proper use of respirators in routine and reasonable foreseeable emergency situations;
- iv. Procedures and schedules for cleaning, disinfecting, repairing, discarding and otherwise maintaining respirators;
- v. Procedures and schedules for changing cartridges and the method/means used to determine this schedule;
- vi. Training employees in the respiratory hazards to which they are potentially exposed during routine and emergency situations;
- vii. Training employees in the proper use of respirators;
- viii. Procedures for regularly evaluating the effectiveness of the respiratory protection program.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/18/2015
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.

U.S. Department of Labor
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Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.134(c)(3): The employer did not designate a program administrator who was qualified by appropriate training or experience to administer or oversee the respiratory protection program and to conduct the required evaluations of program effectiveness:

The employer did not designate a program administrator who was qualified to administer or oversee the respiratory protection program for employees required to wear respirators for exposures to respiratory hazards in the spray painting area.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/18/2015

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: 1012612
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Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.134(d)(1)(iii): The employer did not identify and evaluate the respiratory hazard(s) in the workplace; including a reasonable estimate of employee exposures to respiratory hazards and identification of the contaminant's chemical state and-physical form:

The employer did not identify and evaluate the respiratory hazards during spray painting operations in the spray painting area and did not determine acceptable exposure to each contaminant, taking into account the chemical and physical characteristics of each.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/18/2015

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

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Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.134(e)(1): The employer did not provide a medical evaluation to determine the employee's ability to use a respirator, before the employee was fit tested or required to use the respirator in the workplace:

The employer did not provide medical evaluations to determine the employees ability to use a respirator for employees in the spray painting area prior to requiring them to wear respirators.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:

Corrected During Inspection

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
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Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.134(e)(3)(i): The employer did not provide a follow-up medical examination for employees who gave a positive response to any question among questions 1 through 8 in Section 2, Part A of Appendix C, or whose initial medical evaluation demonstrated a need for a follow-up medical examination:

The employer did not ensure that a follow-up medical examination was provided for an employee who gave a positive response to any of the questions 1 through 8 in Section 2, Par A of Appendix C.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/12/2015

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U.S. Department of Labor
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Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.134(f)(2): Employee(s) using tight-fitting facepiece respirators were not fit tested prior to initial use of the respirator:

Employees required to use tight-fitting respirators in the spray painting area were not fit tested prior to initial use of the respirator.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:

Corrected During Inspection

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: 1012612
Inspection Date(s): 12/09/2014 - 12/09/2014
Issuance Date: 05/06/2015



Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.134(h)(1): Respirators were not cleaned and disinfected using the procedures in Appendix B-2 of 29 CFR 1910.134 or equivalent procedures recommended by the respirator manufacturer:

Respirators required for use in the spray painting area were not cleaned and disinfected using the procedures in Appendix B-2 or equivalent procedures recommended by the manufacturer.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/12/2015

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: 1012612
Inspection Date(s): 12/09/2014 - 12/09/2014
Issuance Date: 05/06/2015



Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.134(h)(2)(i): Respirators were not stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals or were not packed or stored to prevent deformation of the facepiece and exhalation valve:

Respirators were not stored to protect them from damage and contamination and were not packed or stored to prevent deformation of the facepiece and exhalation for respirators used in the spray painting area.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/12/2015

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: 1012612
Inspection Date(s): 12/09/2014 - 12/09/2014
Issuance Date: 05/06/2015



Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.134(k)(3): Training was not provided prior to requiring employees to use a respirator in the workplace:

The employer did not provide training prior to requiring employees in the spray painting area to use respirators.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 05/12/2015

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: 1012612
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Issuance Date: 05/06/2015



Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.157(c)(1): Portable fire extinguishers were not mounted, located and identified so that they were readily accessible without subjecting the employees to injuries:

In the spray painting area, portable fire extinguishers were not mounted, located and identified so that they were readily accessible to employees. Two fire extinguishers were stored in a cabinet in the spray painting area.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/12/2015
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.

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

Inspection Number: 1012612
Inspection Date(s): 12/09/2014 - 12/09/2014
Issuance Date: 05/06/2015



Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

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

29 CFR 1910.157(c)(4): Portable fire extinguishers were not maintained in a fully charged and operable condition:

In the spray painting area, one of two portable fire extinguishers available for use, located in a cabinet, had been discharged and was not maintained in a fully charged and operable condition.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/12/2015
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.

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

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Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

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

Portable fire extinguishers required for use in incipient state fires were not visually inspected at least monthly.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/12/2015

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Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.157(e)(3): Portable fire extinguishers were not subjected to an annual maintenance check:

In the spray painting area, portable fire extinguishers provided for use were not subject to an annual maintenance check and the employer did not make or provide upon request a record of the annual maintenance date.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

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05/12/2015

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Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

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:

Employees were required to fight incipient stage fires and the employer did not provide an educational program to familiarize employees in the spray painting area with the general principles of fire extinguisher use and the hazards involved with incipient stage fire fighting to all employees upon initial assignment and at least annually thereafter.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/12/2015
Proposed Penalty:	\$4900.00

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Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.305(g)(2)(ii): Flexible cords were not used in continuous lengths without splice or tap:

An energized (120V AC) orange flexible cord hanging in the spray painting area had been spliced and repaired.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/12/2015
\$2800.00

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

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Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.334(a)(2)(ii): There was a defect or evidence of damage that could have exposes an employee to injury and the defective or damaged item was not removed from service:

The 120V AC yellow and orange flexible cord sets located in the spray area showed damage to the outer insulation, splicing and internal conductor damage and twisting and were not removed from service.

Date By Which Violation Must be Abated:

05/12/2015

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: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

Citation 1 Item 12 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:

The employer did not maintain at the workplace a written hazard communication program that described the specific criteria in 1910.1200(f), (g) and (h) and employees were exposed to hazards associated with the use of Chemkut 8100-1, xylene, shopcoat paints and other products.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/18/2015
Proposed Penalty:	\$4900.00



Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

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

29 CFR 1910.1200(f)(5)(i): The employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged or marked with the identity of the hazardous chemical(s) contained therein:

The following containers were not labeled, tagged or marked with the identity of the hazardous chemicals they contained:

- a) In the saw cutting area, a 5-gallon container of Chemkut 8100-1 coolant (non-flammable) was labeled with a DOT flammable label.
- b) In the saw cutting area, one 5-gallon container of Chemkut 8100-1 coolant (non-flammable) was labeled with only a DOT flammable label.
- c) In the saw cutting area, one 5-gallon container of Chemkut 8100-1 coolant was labeled as Shopcoat Primer.
- d) In the spray painting area, there was an unlabeled 55-gallon drum of black paint (BB-99 Black Bituminous Pipe Coating).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/12/2015
Proposed Penalty:	\$4900.00



Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.1200(f)(5)(ii): The employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged or marked with the appropriate hazard warnings:

The employer did not ensure that the following containers of hazardous chemicals were labeled, tagged or marked with the appropriate hazard warnings:

- a) In the saw cutting area, a 5-gallon container of Chemkut 8100-1 coolant (non-flammable) was labeled with a DOT flammable label.
- b) In the saw cutting area, one 5-gallon container of Chemkut 8100-1 coolant (non-flammable) was labeled with only a DOT flammable label.
- c) In the saw cutting area, one 5-gallon container of Chemkut 8100-1 coolant was labeled as Shopcoat Primer.
- d) In the spray painting area, there was an unlabeled 55-gallon drum of black paint (BB-99 Black Bituminous Pipe Coating).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/12/2015

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

Inspection Number: 1012612
Inspection Date(s): 12/09/2014 - 12/09/2014
Issuance Date: 05/06/2015



Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

29 CFR 1910.1200(g)(8): The employer did not maintain in the workplace copies of the required safety data sheets for each hazardous chemical, and did not ensure that they were readily accessible during each work shift to employees when they were in their work area(s):

The employer did not maintain in the workplace copies of the required safety data sheets for each hazardous chemical such as but not limited to Chemkut 8100-1, Shopcoat Primer Gray and BB-99 Black Bituminous Pipe Coating and did not ensure they were readily accessible.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/12/2015
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.

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

Inspection Number: 1012612
Inspection Date(s): 12/09/2014 - 12/09/2014
Issuance Date: 05/06/2015



Citation and Notification of Penalty

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471

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

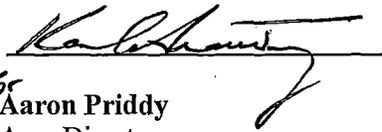
29 CFR 1910.1200(h)(1): Employees were not provided effective information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard that the employees had not been previously trained about was introduced into their work area:

The employer did not provide effective information and training on hazardous chemicals to employees throughout the facility at the time of their initial assignment.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 05/12/2015
Proposed Penalty: \$4900.00


For
Aaron Priddy
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
11 Executive Drive
Suite 11
Fairview Heights, IL 62208
Phone: 618-632-8612 Fax: 618-632-5712



INVOICE / DEBT COLLECTION NOTICE

Company Name: ALL STEEL PRODUCTS, INC.
Inspection Site: 1201 JANETTE DRIVE, Vandalia, IL 62471
Issuance Date: 05/06/2015

Summary of Penalties for Inspection Number	1012612
Citation 1, Serious	\$67900.00
TOTAL PROPOSED PENALTIES	\$67900.00

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. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

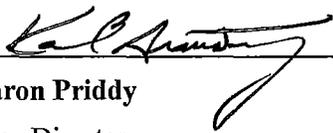
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 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.



For Aaron Priddy
Area Director

5/6/2015

Date