

U.S. Department of Labor Occupational Safety and Health Administration
6393 Oak Tree Blvd,
Suite 203
Independence, OH 44131
Phone: 216-447-4194 Fax: 216-520-1624



01/29/2015

ALLIANCE TUBULAR PRODUCTS LLC
640 E. KEYSTONE ST.
Alliance, OH 44601

Dear Employer,

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following an OSHA Inspection", (OSHA 3000) revised 1990, which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone.

You will note on page 6 of the booklet that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dated together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

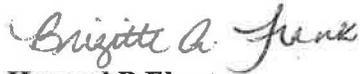
As indicated on page 8 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

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 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 the citation. The running of this contest period is not interrupted by an informal conference. You must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing conditions as well as of 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.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of 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.

Sincerely,



for **Howard B Eberts**
Area Director

Enclosures

U.S. Department of Labor
Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131
Phone: 216-447-4194 Fax: 216-520-1624



Citation and Notification of Penalty

To:
ALLIANCE TUBULAR PRODUCTS LLC
640 E. KEYSTONE ST.
Alliance, OH 44601

Inspection Number: 994442
Inspection Date(s): 07/30/2014 - 07/30/2014
Issuance Date: 01/29/2015

Inspection Site:
640 E. KEYSTONE ST.
Alliance, OH 44601

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 \$50,000 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 01/29/2015. The conference will be held by telephone or at the OSHA office located at 6393 Oak Tree Blvd, Suite 203, Independence, OH 44131 on _____ at

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 994442

Company Name: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601
Issuance Date: 01/29/2015

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, 6393 Oak Tree Blvd, Suite 203, Independence, OH 44131**

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: 994442
Inspection Date(s): 07/30/2014 - 07/30/2014
Issuance Date: 01/29/2015



Citation and Notification of Penalty

Company Name: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

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

29 CFR 1910.23(e)(3)(v)(b): Railing construction type, size and/or arrangement did not meet the minimum requirement of strength to withstand at least 200 pounds top rail pressure:

On or about July 30, 2014, the top rail of the rinse tank located at the Rush Street Pickle Line was broken, in disrepair, and corroded beyond capability of withstanding 200 lbs. of top rail pressure.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/13/2015
\$3300.00

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: 994442
Inspection Date(s): 07/30/2014 - 07/30/2014
Issuance Date: 01/29/2015



Citation and Notification of Penalty

Company Name: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

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

29 CFR 1910.147(c)(6)(i): The employer did not conduct a periodic inspection of the energy control procedure at least annually to ensure that the procedure and the requirement of this standard were being followed:

On or about October 20, 2014, the employer had not conducted a periodic inspection of the energy control procedures at least annually. Equipment and machinery within the facility includes but is not limited to, weld mills, presses, grinders, straighteners, cut-off saws, and cranes. Potential hazardous energies include pneumatic, electrical, mechanical, hydraulic, and gravitational.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/05/2015
Proposed Penalty:	\$7000.00

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



Citation and Notification of Penalty

Company Name: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

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

29 CFR 1910.147(d): The established procedure for the application of energy control (the lockout or tagout procedures) did not cover the actions listed in and was not done in sequence as required by 29 CFR 1910.147(d)(1)-(6)

- a) On or about October 21, 2014, employees performing set up and adjustments on the #9 Roto flux line were not protected from potentially hazardous energies. Lock out, tag out, and verification of isolation of all energy sources was not performed prior to the work being done. Hazardous energies present on the equipment includes electrical, pneumatic, and hydrostatic.
- b) On or about October 21, 2014, employees performing change over operations on the Taylor Wilson cut off saw were not protected from the potentially hazardous energies. Lock out, tag out, and verification of isolation of all energy sources was not performed prior to the work being done. The employee merely relied on the emergency stop switch of the equipment and did not use blocks to isolate to gravitational hazard of the grips. Hazardous energies present on the equipment include electrical, pneumatic, hydraulic, and gravitational.
- c) On or about October 21, 2014, employees were not protected from the knife cutting apparatus of the #4 mill weld line. Employees both reach under the equipment to tighten and service equipment and climb above the equipment to hammer worn knives down. Guarding is not in place to protect the employee from the point of operation.
- d) On or about October 21, 2014, employees were not protected from the knife cutting apparatus of the #5 mill weld line. Employees both reach under the equipment to tighten and service equipment and climb above the equipment to hammer worn knives down. Guarding is not in place to protect the employee from the point of operation.

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: 994442
Inspection Date(s): 07/30/2014 - 07/30/2014
Issuance Date: 01/29/2015



Citation and Notification of Penalty

Company Name: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/13/2015
Proposed Penalty:	\$7000.00

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



Citation and Notification of Penalty

Company Name: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

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

29 CFR 1910.255(b)(4): All press welding machine operations, where there was a possibility of the operator's fingers being under the point of operation, were not effectively guarded by use of a device such as an electronic eye safety circuit, two hand controls or protection similar to that prescribed for punch press operation, 1910.217:

- d) On or about October 21, 2014, the point of operation of the welder on the #4 weld mill was not guarded against employee contact.
- e) On or about October 21, 2014, the point of operation of the welder on the #5 weld mill was not guarded against employee contact.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/05/2015
Proposed Penalty:	\$7000.00



Citation and Notification of Penalty

Company Name: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

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

29 CFR 1910.212(a)(1): One or more methods of machine guarding was not 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) On or about October 21, 2014, employees were not protected from the movement of steel between the #4 mill entry area and the #4 mill shear cut off. The swing gate allowing entry into the area was not locked or interlocked allowing employees exposure to the steel traveling between portions of the line.

b) On or about October 21, 2014, employees were not protected from the movement of in going rollers behind the knife cutting portion of the #4 mill. Employees stand on a small platform on the mill equipment and hammer down worn knives. Employees are not protected from the movement of the steel itself, or the rotating rollers of the mill.

c) On or about October 21, 2014, employees were not protected from the movement of the rotating bead collector of the #4 mill outside diameter cutter. A small barrier guard is placed over the lower portion of the rotating table exposing employees to the movement of the upper portion of the table and the hot coil remnants.

d) On or about October 21, 2014, employees were not protected from the movement of the rotating bead collector of the #5 mill outside diameter cutter. A small barrier guard is placed over the lower portion of the rotating table exposing employees to the movement of the upper portion of the table and the hot coil remnants.

e) On or about October 21, 2014, employees were not protected from the movement of steel between the #4 mill exit area and the #4 mill cut off saw. The swing gate allowing entry into the area was not locked or interlocked allowing employees exposure to the shear itself and the steel traveling between portions of the line. Employees reach over the swing gate to paint markings on the steel pipe before entry into the cut off saw.

f) On or about July 30, 2014, employees were not protected from the movement of steel pipe between the in feed portion and entry portion of the #1 NDT line. A swing gate was present on the pedestrian

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: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

walkway side which was not interlocked or locked to prevent employee entry to the area. The operator side contained no guarding or swing gates to prevent employee entrance to the area.

g) On or about October 21, 2014, employees were not protected from the rotating parts of the #1 NDT roto flux. The plexi-glass barrier guard present on the equipment contained too large an opening allowing employees exposure to the moving apparatus.

h) On or about October 21, 2014, employees were not protected from the rotating parts of the #9 roto flux. The plexi-glass barrier guard present on the equipment contained too large an opening allowing employees exposure to the moving apparatus.

i) On or about October 21, 2014 employees were not protected from the feed rollers on the entry side and middle of the #9 Roto Flux. No guarding mechanisms were present on the equipment.

j) On or about October 21, 2014, employees were not protected from the gripping apparatus at the exit side of the #9 roto flux. Additionally, guarding was not effective in protecting the employee from coolant chemicals being sprayed. A denim cloth guard was in place over the area.

k) On or about October 21, 2014 employees were not protected from the rollers of the Taylor Wilson cutoff saw at the rear cutoff area. No guarding mechanisms were present on the equipment.

l) On or about October 21, 2014, employees were not protected from the rotating grips and motor of the Taylor Wilson cutoff saw.

m) On or about October 21, 2014, employees were not protected from the power driven scrap conveyor system of the 5 line conveyor. A hinged steel grating was placed over the conveyor with spaces large enough for employee fingers to enter and was not locked or interlocked preventing full entrance.

n) On or about October 21, 2014, employees were not protected from the steel remnants, coils, and feed rollers of the entry side trimmer. An employee was observed kneeling below the knife cutting area to make adjustments. No barrier guards or other guards were present to protect the employee.

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: ALLIANCE TUBULAR PRODUCTS LLC

Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

o) On or about October 21, 2014, employees were not protected from the hydraulic rams of the #4 mill entry rollers. The closing area of the upper and lower rams was not guarded to prevent employees from the pinch point.

p) On or about October 21, 2014, employees were not protected from the hydraulic rams of the #5 mill entry rollers. The closing area of the upper and lower rams was not guarded to prevent employees from the pinch point.

q) On or about October 21, 2014, employees were not protected from the in feed rollers, and moving machine parts of 3 roto testers of the #1 NDT magnetic analysis line.

Alliance Tubular Holdings LLC was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.212(a)(1), which was contained in OSHA inspection number 955062, citation number 1, item number 4 and was affirmed as a final order on March 11, 2014, with respect to a workplace located at 305 Cannelton Road, Darlington, PA 16115.

Alliance Tubular Holdings LLC was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.212(a)(1), which was contained in OSHA inspection number 719901, citation number 1, item number 1 and was affirmed as a final order on December 10, 2012, with respect to a workplace located at 305 Cannelton Road, Darlington, PA 16115.

PTC Alliance Holdings, dba Alliance Tubular Products LLC was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.212(a)(1), which was contained in OSHA inspection number 107956, citation number 1, item number 3, and was affirmed as a final order on April 13, 2012, with respect to a workplace located at 640 Keystone St., Alliance, OH 44601.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

03/05/2015

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: 994442
Inspection Date(s): 07/30/2014 - 07/30/2014
Issuance Date: 01/29/2015



Citation and Notification of Penalty

Company Name: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

Proposed Penalty:

\$38500.00

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: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

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

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

- a) On or about October 21, 2014, employees were not protected from the knife cutting apparatus at the point of operation on the Taylor Wilson cutoff saw rear cutting area.
- b) On or about October 21, 2014, employees were not protected from the knife cutting apparatus at the point of operation on the Taylor Wilson cutoff saw front cutting area.
- c) On or about October 21, 2014, the shear cut off of the #4 mill was not guarded to prevent employees from exposure to the cutting process of the shear. A swing gate was present which was not locked or interlocked preventing employees from entering the area.
- d) On or about October 21, 2014, the point of operation of the rollers and inside diameter trimmer on the #4 weld mill were not guarded against employee contact.
- e) On or about October 21, 2014, the point of operation of the rollers and inside diameter trimmer on the #5 weld mill were not guarded against employee contact.
- f) On or about October 21, 2014, the point of operation of the rollers and outside diameter trimmer on the #4 weld mill were not guarded against employee contact.
- g) On or about October 21, 2014, the point of operation of the rollers and outside diameter trimmer on the #5 weld mill were not guarded against employee contact.
- h) On or about October 21, 2014, the ingoing nip points of the mill rolls on the #4 weld mill were not guarded against employee contact. Spaces between each weld mill stand allowed for employees to come into contact with the rollers point of operations. Barrier guards and other methods of guarding were not present.
- i) On or about October 21, 2014, the ingoing nip points of the mill rolls on the #5 weld mill were not

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: 994442
Inspection Date(s): 07/30/2014 - 07/30/2014
Issuance Date: 01/29/2015



Citation and Notification of Penalty

Company Name: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

guarded against employee contact. Spaces between each weld mill stand allowed for employees to come into contact with the rollers point of operations. Barrier guards and other methods of guarding were not present.

Alliance Tubular Holdings, LLC was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.212(a)(3)(ii), which was contained in OSHA inspection number 955062, citation number 1, item number 5 and was affirmed as a final order on March 11, 2014, with respect to a workplace located at 305 Cannelton Road, Darlington, PA 16115.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/05/2015
Proposed Penalty:	\$38500.00

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: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

Citation 2 Item 3 Type of Violation: **Repeat**

29 CFR 1910.219(f)(3): Sprocket wheels and chains which were seven -7 feet or less above floors or platforms were not enclosed:

- a) On or about October 21, 2014, employees were not protected from the chains and sprockets of the #4 mill cutoff saw. The area is accessed by employees as needed for set up and maintenance. Employees travel through a swing gate which is not interlocked or locked to prevent employees from entering the area. The chains do not have guarding present.
- b) On or about October 21, 2014, employees were not protected from the chains and sprockets of the #5 furnace. Barrier guards were in place however they were not permanently affixed or allowed for areas of the chains and sprockets to be unguarded.
- c) On or about October 21, 2014, employees were not protected from the chains and sprockets of the drive system on the Taylor Wilson cutoff saw.
- d) On or about October 21, 2014, employees were not protected from the chains and sprockets of the #5 mill cutoff saw area behind the #5 mill exit area.

Alliance Tubular Products was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.219(f)(3), which was contained in OSHA inspection number 315367235, citation number 1, item number 4 and was affirmed as a final order on February 6, 2012, with respect to a workplace located at 640 Keystone St., Alliance, OH 44601.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 03/05/2015
Proposed Penalty: \$38500.00

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

Inspection Number: 994442
Inspection Date(s): 07/30/2014 - 07/30/2014
Issuance Date: 01/29/2015



Citation and Notification of Penalty

Company Name: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601

Bryette A. Frank

H **Howard B Eberts**
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131
Phone: 216-447-4194 Fax: 216-520-1624



INVOICE / DEBT COLLECTION NOTICE

Company Name: ALLIANCE TUBULAR PRODUCTS LLC
Inspection Site: 640 E. KEYSTONE ST., Alliance, OH 44601
Issuance Date: 01/29/2015

Summary of Penalties for Inspection Number	994442
Citation 1, Serious	\$24300.00
Citation 2, Repeat	\$115500.00
TOTAL PROPOSED PENALTIES	\$139800.00

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 \$50,000 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

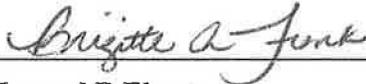
account, the bank will attempt to make the transfer up to 2 times.

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.



 **Howard B Eberts**
Area Director

1/29/15
Date