

U.S. Department of Labor
Occupational Safety and Health Administration
1033 La Posada
Suite 375
Austin, TX 78752
Phone: 512-374-0271 Fax: 512-374-0086



COPY

Citation and Notification of Penalty

To:
American Spincast, Inc.
and its successors
P.O. Box 769
Belton, TX 76513

Inspection Number: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015

Inspection Site:
2505 Taylors Valley Rd.
Belton, TX 76513

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 04/07/2015. The conference will be held by telephone or at the OSHA office located at 1033 La Posada, Suite 375, Austin, TX 78752 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 999520

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513
Issuance Date: 04/07/2015

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, 1033 La Posada, Suite 375, Austin, TX 78752**

Citation Number 1 Item Number 1a was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 1b was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 1c was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 1d was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 2 was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 3 was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 4 was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 5 was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 6 was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 7a was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 7b was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 8a was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 8b was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 8c was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 9 was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 10 was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 11a was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 11b was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 12 was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 13a was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 13b was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 14a was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 14b was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 14c was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 15a was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 15b was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 16 was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 17a was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 17b was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 17c was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 18a was corrected on _____
By (Method of Abatement): _____

Citation Number 1 Item Number 18b 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.



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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 1 a Type of Violation: **Serious**

29 CFR 1910.95(b)(1): When employees were subjected to sound levels exceeding those listed in Table G-16, feasible administrative or engineering controls were not utilized:

The employer did not utilize feasible administrative or engineering controls, such as employee rotation or installation of sound absorbing coverings for walls and floor, when Foundry Floor Workers were exposed to sound levels exceeding those listed in Table G-16.

Instance (a): On or about 10/22/2014, where noise sampling performed for 475 minutes indicated that the employee was exposed to a 681.7% noise dose which is equivalent to approximately 103.80 dBA. Zero exposure was assumed for the 5 minutes not sampled.

Instance (b): On or about 10/22/2014, where noise sampling performed for 359 minutes indicated that the employee was exposed to a 490.0% noise dose which is equivalent to approximately 101.46 dBA. Zero exposure was assumed for the 121 minutes not sampled; however, the projected 8-hour TWA exposure was 653.9% which is equivalent to approximately 103.5 dBA.

Instance (c): On or about 10/22/2014, where noise sampling performed for 478 minutes indicated that the employee was exposed to a 452.2% noise dose which is equivalent to approximately 100.89 dBA. Zero exposure was assumed for the 2 minutes not sampled.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 08/13/2015
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.



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.95(c)(1): The employer did not administer a continuing, effective hearing conservation program as described in 29 CFR 1910.95(c) through (o) whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level of 85 decibels measured on the A scale, or equivalently a dose of fifty percent:

On or about 10/22/2014 the employer did not administer a continuous, effective hearing conservation program in that employees exposed to hazardous levels of noise were not afforded timely baseline and annual audiograms to detect hearing loss:

Instance (a): A Foundry Floor Worker who was hired in 2012 was not provided a baseline audiogram for 21 months. The noise sampling performed for 475 minutes indicated that the employee was exposed to a 681.7% noise dose which is equivalent to approximately 103.80 dBA. Zero exposure was assumed for the 5 minutes not sampled.

Instance (b): A Foundry Floor Worker who was hired in 2007 was not provided audiograms each year, including 2011 and 2012, and had no baseline comparison when audiometric testing resumed in 2013. Noise sampling performed for 359 minutes indicated that the employee was exposed to a 490.0% noise dose which is equivalent to approximately 101.46 dBA. Zero exposure was assumed for the 121 minutes not sampled; however, the projected 8-hour TWA exposure was 653.9% which is equivalent to approximately 103.5 dBA.

Instance (c): A Foundry Floor Worker hired in 1989 was not provided an audiogram every year, including 2011 and 2012, and had no baseline comparison when audiometric testing resumed in 2013. Noise sampling performed for 478 minutes indicated that the employee was exposed to a 452.2% noise dose which is equivalent to approximately 100.89 dBA. Zero exposure was assumed for the 2 minutes not sampled.

Instance (d): A Cut Off Operator hired in 1992 was not provided an audiogram every year, including 2011 and 2012, and had no baseline comparison when audiometric testing resumed in 2013. Noise sampling performed for 480 minutes indicated that the employee was exposed to a 242.1% noise dose which is equivalent to approximately 96.38 dBA.

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: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

Instance (e): A Machine Operator hired in 1996 was not provided an audiogram every year, including 2011 and 2012, and had no baseline comparison when audiometric testing resumed in 2013. Noise sampling performed for 478 minutes indicated that the employee was exposed to a 127.7% noise dose which is equivalent to approximately 91.76 dBA. Zero exposure was assumed for the 2 minutes not sampled.

Instance (f): A Cut Off Operator hired in 1994 was not provided a baseline audiogram until 2013. Noise sampling performed for 483 minutes indicated that the employee was exposed to a 99.49% noise dose which is equivalent to approximately 89.96 dBA. The projected 8-hour TWA exposure was 98.66% which is equivalent to approximately 89.9 dBA.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/19/2015

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

Inspection Number: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.95(l)(1): The employer did not post a copy of 29 CFR 1910.95 in the workplace:

At the inspection site, a copy of 29 CFR 1910.95 Occupational Noise Exposure was not posted for employees who were exposed to noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dBA while engaged in production of stainless steel centrifugal castings, exposing employees to the hazards of occupational noise.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/21/2015

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

Inspection Number: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.95(m)(3)(ii): The employer did not retain audiometric test records for the duration of the affected employee's employment as required by 29 CFR 1910.95(m):

At the inspection site, where employees were exposed to noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dBA while engaged in production of stainless steel centrifugal castings, records of annual audiometric testing were not retained for employees exposed to the hazards of occupational noise.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/19/2015

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: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.106(d)(2)(i): Approved containers and/or portable tanks were not used for the storage of flammable liquids:

On or about October 8, 2014, in the CNC shop, five-gallon buckets containing Kerosene, a Class 3 flammable liquid, used by employees to clean chucks and jaws were not approved for storage of flammable liquids, exposing employees to the hazards of fire.

Date By Which Violation Must be Abated:
Proposed Penalty:

04/08/2015
\$2100.00

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

Inspection Number: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.106(e)(2)(ii): Flammable liquids were not stored in tanks or closed containers:

On or about October 8, 2014, in the CNC shop, a gallon can containing Kerosene used by employees to clean chucks and jaws was stored without a cover in the Safety-Kleen parts washer with the lid in the open position, exposing employees to the hazards of fire.

Date By Which Violation Must be Abated:
Proposed Penalty:

04/08/2015
\$2100.00

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: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

Citation 1 Item 4 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:

On or about October 8, 2014, in the machine shop, shop towels contaminated with residues of flammable Crack Check PHF Penetrant were discarded in open metal containers by employees after wiping excess liquid from casting surfaces, exposing employees to the hazards of fire.

Date By Which Violation Must be Abated:
Proposed Penalty:

04/10/2015
\$2100.00

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: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.132(d)(1)(i): The employer did not select and have each affected employee use, the types of personal protective equipment that would protect the affected employee(s) from the hazards identified in the hazard assessment:

On or about October 8, 2014, in the foundry, the employer did not enforce use of aluminized suits by employees that were pouring molten metal, and use of long-sleeved arm protection for employees performing tasks on melt platforms, including, but not limited to, charging furnaces, skimming slag, and pulling buttons (samples) from molten metal for the lab, exposing employees to the hazards of molten metal splashes.

Date By Which Violation Must be Abated:	04/08/2015
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.

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

Inspection Number: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.133(a)(1): The employer did not ensure that each affected employee uses appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation:

(a) On or about October 8, 2014, in revert / raw materials, employees were wearing safety glasses with sideshields in lieu of appropriate eye/face protection while using corrosive Bulldozer Industrial Strength Equipment Wash to degrease borings, exposing employees to the hazards of corrosive chemical splashes.

(b) Amstock Supply and Shipping & Receiving, on 10/08/2014 an employee was wearing regular prescription glasses in lieu of appropriate personal protective equipment for the eyes and/or face while cutting castings with an abrasive cutting wheel, using compressed air to clean the stock saw, and moving materials with a forklift, exposing employee(s) to the hazards of being struck by flying particles in the eyes.

Date By Which Violation Must be Abated: 04/08/2015
Proposed Penalty: \$3500.00

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: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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 7 a 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:

On or about October 8, 2014, in the Blast Department, airborne exposures to silica, crystalline quartz (respirable) were not evaluated for employee(s) who were wearing Bullard continuous flow supplied air respirators during abrasive blasting operation on rough castings in the blast booth and Saf-T-Fit N95 filtering facepiece respirators for processes associated with blasting operations, including dry sweeping and shoveling blasting media in the booth, reloading the blasting hopper with the sweepings, moving castings in and out of the booth with a forklift, and shoveling out the dust collection box for the bag house, exposing employees to the inhalation hazards of silica.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/19/2015
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.



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.1000(c): Employee(s) were exposed to silica, crystalline quartz (respirable) listed in Table Z-3, in excess of 10 mg/m³ / %SiO₂ + 2 as an 8 hour Time-Weighted Average concentration:

On or about October 22, 2014, in the blast booth, airborne exposure to silica, crystalline quartz (respirable) measured 25.6 times the PEL for dust containing 5.0% silica for an employee who was conducting abrasive blasting operations. Bullard continuous flow supplied-air respirators were worn while blasting rough castings. However, during other operations in the blast booth such as dry sweeping and shoveling used blasting media, Saf-T-Fit N95 filtering facepiece respirators with an Assigned Protection Factor of 10xPEL when properly fit-tested were worn, exposing employees to the inhalation hazards of silica.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/19/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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 1910.134(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:

On or about October 8, 2014, at the inspection site, where employee(s) were required to wear Bullard continuous flow supplied air respirators and N95 filtering facepiece respirators for protection from particulates, including silica, while engaged in abrasive blasting operations, the employer did not provide medical evaluations prior to respirator use, exposing employees to health hazards associated with increased metabolic rate, pulse rate and blood pressure.

Date By Which Violation Must be Abated:
Proposed Penalty:

04/10/2015
\$2100.00

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

Inspection Number: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

Citation 1 Item 8 b 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:

On or about October 8, 2014, in the blasting department, respirator fit testing was not provided to employees who were wearing Saf-T-Fit N95 filtering facepiece respirators for tasks associated with abrasive blasting, including dry sweeping and shoveling used blasting media into buckets for reloading the blasting hopper, cleaning the blast booth, and shoveling out the dust collector for the baghouse, exposing employees to the inhalation hazards of silica.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/10/2015

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: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.134(g)(1)(i)(A): Respirators with tight-fitting facepieces were worn by employees who had facial hair that came between the sealing surface of the facepiece and the face or that interfered with valve function:

On or about October 8, 2014, in the blast booth, employee(s) were allowed to wear N95 filtering facepiece respirators with beards while cleaning dust from abrasive blasting operations out of the booth, exposing employees to the inhalation hazards of silica.

Date By Which Violation Must be Abated:

04/08/2015

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: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

Citation 1 Item 9 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:

On or about October 8, 2014, outside the blast booth, employee(s) were storing supplied air abrasive blasting respirators in loosely covered drums with steel shot blast media, subjecting interiors of helmets and shrouds to contamination with dust from blasting operations on rough castings, exposing employees to the inhalation hazards of silica.

Date By Which Violation Must be Abated:
Proposed Penalty:

04/10/2015
\$3500.00



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.138(a): The employer did not select and require employee(s) to use appropriate hand protection when employees' hands were exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns; and harmful temperature extremes:

(a) On or about October 8, 2014, and at times prior thereto and thereafter, in the foundry, employees were wearing leather/canvas gloves in lieu of chemical-resistant gloves while using corrosive Muriatic Acid to wash machine oil off molds, exposing employees to the skin contact hazards of corrosive chemical, including tissue destruction.

(b) On or about October 8, 2014, in the foundry, where employees were wearing leather/canvas gloves in lieu of heat and water-resistant gloves while cooling hot molds with water spray, employees were exposed to the hazards of steam burns when wet canvas contacted hot molds.

(c) On or about October 9, 2014, in the CNC shop, employees were not provided personal protective equipment for the hands while using Kerosene to clean parts, exposing employees to skin contact hazards of Kerosene, including skin irritation and dermatitis.

Date By Which Violation Must be Abated:
Proposed Penalty:

04/08/2015
\$2800.00

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

Inspection Number: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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 11 a Type of Violation: **Serious**

29 CFR 1910.141(d)(2)(iii): Lavatories were not provided with hand soap or similar cleansing agent:

On or about October 8, 2014, in the machine shop, where employees were using hazardous chemicals including, but not limited to, Crack Check DNF Developer containing methylene chloride, hand soap or similar cleansing agent was not provided at the sink used for hand washing on the east wall, exposing employees to the hazards of chemicals and bacterial contamination.

Date By Which Violation Must be Abated:
Proposed Penalty:

04/08/2015
\$2100.00

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: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.141(d)(2)(iv): Lavatories were not provided with individual hand towels or sections thereof, of cloth or paper, warm air blowers or clean individual sections of continuous cloth toweling:

On or about October 8, 2014, in the machine shop, where employees were using hazardous chemicals including, but not limited to, Crack Check DNF Developer containing methylene chloride, there were no provisions for employees to dry their hands after washing at the sink on the east wall, exposing employees to the contact hazards of chemicals and bacterial contamination.

Date By Which Violation Must be Abated:

04/08/2015

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

Inspection Number: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.151(b): Adequate first aid supplies were not readily available:

On or about October 8, 2014, at the inspection site, where employee(s) were using Airtron Corporation Action A/C Condenser Coil Cleaner Concentrate containing hydrofluoric acid to clean coils on window air-conditioning units, calcium gluconate solution or gel, or other appropriate topical agent, was not provided for first aid treatment of fluoride burns, exposing employees to the skin contact hazards of hydrofluoric acid.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3500.00

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

Inspection Number: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.1052(i)(2): Where reasonably foreseeable that an employee's eyes may contact solutions containing 0.1 percent or greater methylene chloride, the employer did not provide appropriate eyewash facilities within the immediate work area for emergency use:

On or about October 8, 2014, in the machine shop, where employees were spray coating castings with aerosol Crack Check DNF Developer for crack checking and cleaning castings with Crack Check CNF Cleaner for I.D. marking, the eyewash was not available for immediate emergency use in that rust-contaminated water flowed from the eyewash when tested, exposing employees to the hazards of contact with methylene chloride.

Date By Which Violation Must be Abated:

04/10/2015

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

Inspection Number: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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 14 a Type of Violation: **Serious**

29 CFR 1910.1026(d)(1): The employer with a workplace or work operation covered by this standard did not determine the 8-hour time-weighted average exposure for each employee exposed to chromium (VI):

In revert/raw materials, airborne exposures to chromium (VI) were not evaluated for employees who were using an oxy lance to cut stainless steel castings for re-melting, exposing employees to the inhalation hazards of chromium (VI).

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$2100.00

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: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.1026(l)(1)(iii): The employer did not include chromium (VI) in the hazard communication program established to comply with the HCS (1910.1200), and did not ensure that each employee had access to labels on containers of chromium (VI) and to safety data sheets, and was trained in accordance with the requirements of HCS and paragraph (l)(2) of this section:

At the inspection site, where employees were exposed to chromium (VI) while melting chromium-containing metal and performing hot work on stainless steel, including oxyacetylene cutting of stainless steel castings, information and training on the hazards of chromium (VI) was not provided, exposing employees to chromium (VI) inhalation and contact hazards.

Date By Which Violation Must be Abated:

04/08/2015

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

Inspection Number: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.1026(l)(2)(i)(A): The employer did not provide appropriate information and training for all employees exposed to chromium (VI), in that employees could not demonstrate knowledge of the contents of the Chromium (VI) standard, 29 CFR 1910.1026:

At the inspection site, information and training on the contents of the chromium (VI) standard was not provided to employees who were melting chromium-containing metal and performing hot work, such as oxyacetylene cutting of stainless steel castings for re-melting, exposing employees to chromium (VI) inhalation and contact hazards.

Date By Which Violation Must be Abated:

04/14/2015

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: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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 15 a Type of Violation: **Serious**

29 CFR 1910.1052(d)(2): The employer did not perform initial monitoring to determine each employee's exposure to methylene chloride:

In the machine shop, the employer did not perform initial monitoring for employees who were using Crack Check DNF Developer (aerosol) containing methylene chloride to test castings, exposing employees to the hazards of methylene chloride.

Date By Which Violation Must be Abated:	05/19/2015
Proposed Penalty:	\$2100.00

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: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.1052(h)(1): Where needed to prevent methylene chloride induced skin or eye irritation, the employer did not provide clean protective clothing and equipment resistant to methylene chloride, at no cost to the employee, and/or did not ensure that each affected employee used it:

In the machine shop, the employer did not provide protective clothing to employee(s) whose clothing and skin were subject to contamination while coating casting surfaces (interior and exterior) with aerosol Crack Check DNF Developer and wiping away excess liquid with shop towels, exposing employees to the hazards of methylene chloride.

Date By Which Violation Must be Abated:

04/10/2015

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: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.1052(l)(1): The employer did not provide information and training for each affected employee prior to or at the time of initial assignment to a job involving potential exposure to methylene chloride:

In the machine shop, the employer did not provide information and training for employees who were using Crack Check DNF Developer (aerosol) to test castings and Crack Check CNF Cleaner (aerosol) to clean casting surfaces for marking , exposing employees to the hazards of methylene chloride.

Date By Which Violation Must be Abated:	04/08/2015
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: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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 17 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:

(a) On or about October 8, 2014, and at times prior thereto and thereafter, in the maintenance department, employee(s) were using chemicals from quart spray bottles that were not labeled with the contents, including, but not limited to, corrosive Action A/C Condenser Coil Cleaner Concentrate containing hydrofluoric acid for cleaning coils on window air-conditioning units, exposing employees to the contact hazards of chemicals.

(b) On or about October 9, 2014, in the machine shop, employees were using Maxus GS.8 Premium Metalworking Fluid (ethanolamine) in a recycled Wesco Refractories "ThermoCote 90" (corrosive) bucket that was not labeled with the actual contents for cooling tools during abrasive grinding, exposing employees to the hazards of chemical contact.

(c) On or about October 9, 2014, in the CNC shop, employees were using Kerosene 3 as a parts washing solvent from a gallon can labeled Parts Cleaner, exposing employees to the hazards of chemical contact.

(d) On or about October 8, 2014, outside the blasting booth, drums containing steel shot abrasive blasting media used for shot blasting rough castings were not labeled with the contents, exposing employees to the hazards of chemical inhalation.

Date By Which Violation Must be Abated:
Proposed Penalty:

04/08/2015
\$3500.00



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

Citation 1 Item 17 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:

- (a) In the maintenance department, employee(s) were using chemicals from quart spray bottles that were not labeled with hazard warnings, including, but not limited to, corrosive Action AC Coil Cleaner containing hydrofluoric acid for cleaning coils on window air-conditioning units, exposing employees to the contact hazards of chemicals.
- (b) In the machine shop, employees were cooling tools during abrasive grinding by dipping in Maxus GS.8 Premium Metalworking Fluid (ethanolamine) in a recycled Wesco Refractories "ThermoCote 90" bucket that was not labeled with hazard warnings for the Metalworking Fluid, exposing employees to the hazards of chemical contact.
- (c) In the CNC shop, employees were using Kerosene, 3 as a parts washing solvent from a gallon can labeled only "Parts Cleaner", exposing employees to the hazards of chemical contact.
- (d) Outside the blasting booth, drums containing steel shot abrasive blasting media used for shot blasting rough castings were not labeled, exposing employees to the hazards of chemical inhalation.

Date By Which Violation Must be Abated:

04/08/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.1200(h)(3)(iii): Employee training did not include the measures employees can take to protect themselves from chemical hazards, including specific procedures the employer had implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures and personal protective equipment to be used:

- (a) In the foundry, where employees were using corrosive Muriatic Acid to wash machine oil off dies, employees were pouring concentrated Muriatic Acid into a bucket and adding water to acid, exposing employees to the hazards of corrosive chemical splashes.
- (b) In the foundry, where employees were grinding dried refractory slurry containing silica, crystalline quartz off end plates, employees were not trained to use the updraft booth to reduce silica exposures, and were grinding end plates outside the booth, exposing employees to inhalation hazards of silica.
- (c) In shot blasting, on October 8, 2014 a Maintenance employee used compressed air to blow dust containing silica, crystalline quartz out of the exhaust duct for the bag house while the blast booth door was open, allowing escape of dust into the work area and exposing employees to inhalation hazards of silica.
- (d) In shot blasting, employees were using compressed air to blow dust containing silica, crystalline quartz off clothing after leaving the blast booth and removing their supplied-air helmets, exposing employees to inhalation hazards of silica.

Date By Which Violation Must be Abated:

04/08/2015

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

Inspection Number: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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 18 a Type of Violation: **Serious**

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

At the inspection site, the employer did not have material safety data sheets for each chemical which they used including, but not limited to, steel shot abrasive blasting media, exposing employees to the inhalation hazards of blasting media.

Date By Which Violation Must be Abated:
Proposed Penalty:

04/14/2015
\$3500.00

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: 999520
Inspection Date(s): 10/08/2014 - 02/06/2015
Issuance Date: 04/07/2015



Citation and Notification of Penalty

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513

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

29 CFR 1910.1052(k)(1)(iii): The employer did not ensure that each employee had access to labels on containers of methylene chloride and to safety data sheets:

(a) In the machine shop, safety data sheets (or material safety data sheets) were not accessible in the work area while employees were using Crack Check DNF Developer and Crack Check CNF Cleaner containing methylene chloride, exposing employees to the hazards of methylene chloride.

Date By Which Violation Must be Abated:

04/08/2015

A handwritten signature in cursive script that reads "R. Casey Perkins".

R. Casey Perkins, CSP
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
1033 La Posada
Suite 375
Austin, TX 78752
Phone: 512-374-0271 Fax: 512-374-0086



INVOICE / DEBT COLLECTION NOTICE

Company Name: American Spincast, Inc.
Inspection Site: 2505 Taylors Valley Rd., Belton, TX 76513
Issuance Date: 04/07/2015

Summary of Penalties for Inspection Number	999520
Citation 1, Serious	\$53900.00
TOTAL PROPOSED PENALTIES	\$53900.00

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.

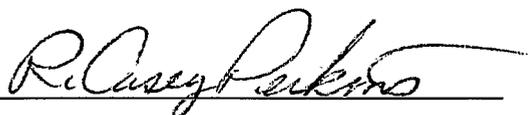
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within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

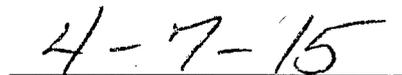
Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per 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.



R. Casey Perkins, CSP

Area Director



Date