

U.S. Department of Labor

**Occupational Safety and Health Administration
Toledo Area Office
420 Madison Ave, Suite 600
Toledo, Ohio
419-259-7542**



November 6, 2012

Mr. Gary Schwert
B.W. Grinding Co. dba B.W. Supply
15048 CR 10-3
Lyons, OH 43533

Dear Mr. Schwert:

Enclosed are the results of information gathered on June 27, 2012, to evaluate potential employee exposure to respirable crystalline silica, metal fumes, coal tar pitch volatiles, noise, and respirable dust at your work site located 15048 CR 10-3, Lyons, OH 43533.

OSHA regulation 29 CFR 1910.1020 (e)(2) requires the access of each employee and designated representative to employee exposure records relevant to the employee. The employer has the responsibility of providing access to employee exposure records. Please post or make available to all affected employees the sample results that are summarized in the enclosed table.

Sincerely,

A handwritten signature in cursive script that reads "Vanessa L. Martini".

Kimberly Nelson
Area Director

Respirable Dust				
Occupation	Time Sampled (min)	Flow Rate (L/min)	8 hr TWA (mg/m3)	OSHA PEL (mg/m3)
Grinder	465	1.69	0.25	5

Noise				
Occupation	Time Sampled (min)	8 hr TWA (dBA)	OSHA Action Level (dBA)	OSHA PEL (dBA)
Grinder	468	94.8	85	90
Green Sand Molding	460	89.2	85	90
Grinding	464	96.2	85	90
Sand Reclaim/Shakeout	470	89.4	85	90

Metal Fumes					
Occupation	Time Sampled (min)	Flow Rate (L/min)	Substance	8 hr TWA (mg/m3)	OSHA PEL (mg/m3)
Furnace Tender	391	1.99	Antimony	ND	0.50
			Beryllium	ND	0.002
			Chromium	ND	1.00
			Cobalt	ND	0.10
			Copper fume	ND	0.10
			Iron Oxide	0.41	10.0
			Lead	ND	0.05
			Manganese	0.01	5.0
			Molybdenum	ND	15.0
			Nickel	ND	1.0
			Vanadium	ND	0.10
			Zinc	ND	5.0
			Cadmium	ND	0.005
Metal Pourer	395	1.94	Antimony	ND	0.50
			Beryllium	ND	0.002
			Chromium	ND	1.00
			Cobalt	ND	0.10
			Copper fume	0.004	0.10
			Iron Oxide	0.80	10.0
			Lead	ND	0.05
			Manganese	0.014	5.0
			Molybdenum	ND	15.0
			Nickel	ND	1.0
			Vanadium	ND	0.10
			Zinc	ND	5.0
			Cadmium	ND	0.005

Coal Tar Pitch Volatiles				
Occupation	Time Sampled (min)	Flow Rate (L/min)	8 hr TWA (mg/m3)	OSHA PEL (mg/m3)
Pouring Green Sand Molds	60	2.0	0.0687	.2

Silica			
Occupation	Time Sampled (min)	8 hr TWA (mg/m3)	OSHA PEL (mg/m3)
Green Sand Molding	465	ND	-
Grinder	465	1.156	1.515
Table Blast	462	1.28	0.978
Grinder	466	1.08	1.449
Shake Out/Sand Reclaim	469	1.82*	1.66

*Potential Overexposure (Lower confidence level was not greater than 1)

Abbreviations:

- TWA= Time Weighted Average
- ppm= parts per million
- OSHA= Occupational Safety and Health Administration
- PEL = Permissible Exposure Limit
- NIOSH= National Institute for Occupational Safety and Health
- REL= Recommended Exposure Limit
- ACGIH= American Conference of Governmental Industrial Hygienists
- TLV= Threshold Limit Value
- ND= None Detected
- NA = Not Applicable

U.S. Department of Labor
Occupational Safety and Health Administration
420 Madison Ave
Suite 600
Toledo, OH 43604
Phone: 419-259-7542 Fax: 419-259-6355

U.S. Department of Labor



Citation and Notification of Penalty

To:
B.W. Grinding Co., dba B.W. Supply
and its successors
P.O. Box 307
Lyons, OH 43533

Inspection Number: 444333
Inspection Date(s): 05/25/2012 - 08/27/2012
Issuance Date: 11/06/2012

Inspection Site:
15048 CR 10-3
Lyons, OH 43533

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance.

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

Notification of Corrective Action – For each violation which you do not contest, you must provide *abatement certification* to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that *abatement documentation* is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, 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 11/06/2012. The conference will be held at the OSHA office located at 420 Madison Ave, Suite 600, Toledo, OH 43604 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 444333

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533
Issuance Date: 11/06/2012

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 420 Madison Ave, Suite 600, Toledo, OH 43604**

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



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to struck-by and crushing hazards.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about June 27, 2012, employees working in the green sand molding department where exposed to struck-by and crushing hazards when using a skip hoist with a damaged hoist rope. The hoist rope had approximately half of the strands broken and was still being used to lift the skip hoist bucket containing approximately 800 pounds of sand.

Among other methods, one feasible and acceptable method to correct the hazard is to ensure that the wire rope is maintained according to ASME B20.1 2009 "Safety Standard for Conveyors and Related Equipment" Section 6.14.3 by requiring the hoist rope being removed from service when the wear indicates a possibility of failure and Wire Rope Users Manual, Second Edition, published by the American Iron and Steel Institute.

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

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$3,500.00



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.23(e)(1): Every open-sided floor or platform 4 feet or more above adjacent floor or ground level was not guarded by a standard railing (or the equivalent as specified in paragraph (e)(3) of this section) on all open sides except where there is entrance to a ramp, stairway, or fixed ladder:

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure the platform located in the molding area, used by employees to check catalyst and resin levels in the chemical tanks, was equipped with a standard guardrail exposing employees to a 53 inch fall to concrete.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/16/2012
Proposed Penalty:	\$2,800.00



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.95(c)(1): The employer did not administer a continuing, effective hearing conservation program, as described in paragraphs (c) through (o) of this section, whenever employee noise exposures equal or exceeded an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response) or, equivalently, a dose of fifty percent. For purposes of the hearing conservation program, employee noise exposures shall be computed in accordance with appendix A and Table G-16a, and without regard to any attenuation provided by the use of personal protective equipment.

- a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about June 27, 2012, the employer did not ensure an effective hearing conservation program consisting of hearing conservation training and audiometric testing was implemented in the green sand molding department where employees were performing molding operations. Employees received a noise dose of 116% at an equivalent dBA of 91.1 during a sampling time 470 minutes.

- b. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about June 27, 2012, the employer did not ensure an effective hearing conservation program consisting of hearing conservation training and audiometric testing was implemented in the sand reclaim department where employees were performing the sand reclaim operation. Employees received a noise dose of 122% at an equivalent dBA of 91.4 during a sampling time 470 minutes.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/16/2012
Proposed Penalty:	\$4,900.00

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: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.106(e)(2)(ii)(b)(2): The quantity of liquid that may be located outside of an inside storage room or storage cabinet in a building or in any one fire area of a building exceeded 120 gallons of Category 2, 3, or 4 flammable liquids in containers.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure no more than 120 gallons of Category 2 flammable liquids were stored in a single fire area. Two-55 gallon drums of Refcahol, one-55 gallon drum of Refcosolv and four-5 gallon buckets of Refcosolv were located outside of the supervisor's office adjacent to the melt department.

No additional abatement information is needed for this item.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$2,800.00



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.133(a)(3): The employer did not ensure that each affected employee who wore prescription lenses while engaged in operations that involve eye hazards wears eye protection that incorporates the prescription in its design, or wore eye protection that could be worn over the prescription lenses without disturbing the proper position of the prescription lenses or the protective lenses.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about August 23, 2012, the employer did not ensure an employee working in the finishing department grinding castings and performing various small jobs was wearing safety glasses.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/16/2012
Proposed Penalty:	\$3,500.00



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

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

29 CFR 1910.134(c)(1): In any workplace where respirators were necessary to protect the health of the employee or whenever respirators were required by the employer, the employer did not establish and implement a written respiratory protection program with worksite-specific procedures. The program shall be updated as necessary to reflect those changes in workplace conditions that affect respirator use. The employer shall include in the program the following provisions of this section, as applicable:

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure the written respiratory protection program contained the following information:

1. Provisions for medical evaluations;
2. Description of the fit testing procedures;
3. Procedures for proper cleaning, cleaning schedules, disinfecting, storing, inspecting, repairing, and maintaining respirators;

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/16/2012
Proposed Penalty:	\$3,500.00

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: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.134(h)(2)(i): All respirators were not stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals, and they shall be packed or stored to prevent deformation of the face-piece and exhalation valve.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, The employer did not ensure respirators were stored to protect them from contamination. The inside of the respirator storage cabinet located next to the shipping office was covered in dust and not kept clean.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/16/2012



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.134(k)(1)(v): The employer did not ensure that each employee could demonstrate knowledge of what the procedures were for maintenance and storage of the respirator.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 25, 2012, the employer did not ensure employees were provided with training on how to properly maintain and store the respirators.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/16/2012



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.134(l)(1): The employer did not conduct evaluations of the workplace as necessary to ensure that the provisions of the current written program are being effectively implemented and that it continues to be effective.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure the company's respiratory protection program was being properly implemented. The company failed to ensure initial medical evaluations were being performed, employees were not properly trained on respirator maintenance and storage, the company's written respirator program was deficient.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/16/2012



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

Citation 1 Item 7 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; this evaluation did not include a reasonable estimate of employee exposures to respiratory hazard(s) and an identification of the contaminant's chemical state and physical form:

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure an evaluation was performed to determine employee exposures to respirable crystalline silica dust in the grinding operation and the table blast operation.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/10/2012
Proposed Penalty:	\$4,900.00



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.212(a)(1): One or more methods of machine guarding were 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. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure employees working in the green sand department were protected from nip point and crushing hazards created by the movement of the skip hoist bucket.

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

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$3,500.00



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.243(c)(2)(i): Cup wheels were not protected by safety guards as specified in paragraph (c)(1) of this section.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure hand held cup wheel grinders used by employees working in the finishing department were properly guarded.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/16/2012
Proposed Penalty:	\$3,500.00



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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 10 a Type of Violation: **Serious**

29 CFR 1910.332(b)(1): Employees were not trained in and familiar with the safety-related work practices required by 1910.331 through 1910.335 that pertain to their respective job assignments.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about July 23, 2012, the employer did not ensure a maintenance employee was properly trained on what electrical protective equipment was required to be worn while troubleshooting fuses in a 480 volt electrical cabinet for the palmer sand mixer.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/26/2012
Proposed Penalty:	\$4,900.00



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.335(a)(1)(i): Employees working in areas where there are potential electrical hazards were not provided with, and required to use, electrical protective equipment that was appropriate for the specific parts of the body to be protected and for the work to be performed.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about July 23, 2012, the employer did not ensure a maintenance employee was wearing electrical protective equipment for the body and hands while troubleshooting fuses in a 480 volt electrical cabinet for the palmer sand mixer.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/26/2012



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.335(a)(1)(v): Employees did not wear protective equipment for the eyes or face wherever there was danger of injury to the eyes or face from electric arcs or flashes or from flying objects resulting from electrical explosion.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about July 23, 2012, the employer did not ensure a maintenance employee was wearing electrical protective equipment for the face while troubleshooting fuses in a 480 volt electrical cabinet for the palmer sand mixer.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 11/16/2012



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.137(b)(2)(viii): Electrical protective equipment was not subjected to periodic electrical tests. Test voltages and the maximum intervals between tests shall be in accordance with Table I-5 and Table I-6.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about July 23, 2012, the employer did not ensure the electrical insulated rubber gloves available for maintenance employees to wear when exposed to electrical hazards, were tested every six months.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 11/16/2012



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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 1910.1000(c): An employee's exposure to any substance listed in Table Z-3, in any 8-hour work shift of a 40-hour work week, exceeded the 8-hour time weighted average limit given for that substance in the table.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about June 27, 2012, an employee operating the table blast machine adjacent to the finishing department was overexposed to respirable crystalline silica dust at 1.28 mg/m³ as an 8-hour time weighted average which was 1.3 times the OSHA PEL of 0.97 mg/m³. The sampling period was 462 minutes with zero exposure used for the unsampled portion of the work shift.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/22/2013
Proposed Penalty:	\$4,900.00



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.1000(e): To achieve compliance with paragraphs (a) through (d) of this section, administrative or engineering controls were not determined and implemented whenever feasible. When such controls were not feasible to achieve full compliance, protective equipment or any other protective measures were not used to keep the exposure of employees to air contaminants within the limits prescribed in this section.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about June 27, 2012, the employer did not determine and implement feasible engineering controls to control employee exposure to respirable crystalline silica. An employee operating the table blast machine adjacent to the finishing department was overexposed to respirable crystalline silica dust at 1.28 mg/m³ as an 8-hour time weighted average which was 1.3 times the OSHA PEL of 0.97 mg/m³. The sampling period was 462 minutes with zero exposure used for the unsampled portion of the work shift.

Step 1: Provide effective respiratory protection and ensure it is used by exposed employees as an interim protective measure until feasible engineering and/or administrative controls can be implemented or whenever such controls fail to reduce employee exposure to within permissible exposure limits.

Step 2: A written detailed plan of abatement shall be submitted to the Area Director outlining a schedule for the implementation of engineering and/or administrative measures to control employee exposures to hazardous substances as referenced in this citation. This plan shall include, at a minimum, target dates for the following actions which must be consistent with the abatement dates required by this citation:

- (1) Evaluation of engineering /administrative control options;
- (2) Selection of optimum control methods and completion of design;
- (3) Procurement, installation and operation of selected control measures;
- (4) Testing and acceptance or modification/redesign.

All proposed control measures shall be approved for each particular use by a competent industrial hygienist or other technically qualified person. 90 day progress reports are required during the

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: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

abatement period.

Step 3: Abatement shall have been completed by the implementation of feasible engineering and/or administrative controls upon verification of their effectiveness in achieving compliance.

Feasible engineering controls include, but are not limited to installing more efficient duct work leading from the table blast to the bag house and ensuring the baghouse filters are replaced as needed to ensure the maximum performance of the ventilation equipment.

Step1: Abatement Date- PPE	12/24/2012
Step2: Abatement Date- Plan	02/07/2013
Step3: Abatement Date- Engineering Controls	03/22/2012

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **03/22/2013**



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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 12 a Type of Violation: **Serious**

29 CFR 1910.1200(h)(3)(ii): Employee training did not include the physical and health hazards of the chemicals in the work area:

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer failed to ensure employees working in the green sand molding department were trained on the physical and health effects of coal tar pitch volatiles which are emitted during the metal pouring operation.

b. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer failed to ensure employees working in the finishing department, table blast, molding department, and sand reclamation area were trained on the health effects of silica dust.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/16/2012
Proposed Penalty:	\$4,900.00



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.1200(h)(3)(iv): Employee training did not include the details of the hazard communication program developed by the employer, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information:

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure employees in all departments were provided with an explanation of the material safety data sheets.

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

Date By Which Violation Must be Abated: 11/16/2012



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

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

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

- a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure the resin tank containing approximately 100 gallons of furfuryl alcohol and formaldehyde located next to the palmer sand mixer in the molding area, was labeled as to the identity of the substance.
- b. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure the catalyst tank containing approximately 250 gallons of toluene sulfonic acid catalyst located adjacent to the Kloster sand mixer in the no-bake department, was labeled as to the identity of the substance.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/16/2012
Proposed Penalty:	\$3,500.00



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.1200(f)(5)(ii): The employer did not ensure each container of hazardous chemicals in the workplace was labeled, tagged, or marked with the appropriate hazard warnings, or alternatively, words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

- a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure the resin tank containing approximately 100 gallons of furfuryl alcohol and formaldehyde located next to the palmer sand mixer in the molding area, was labeled as to the physical and health hazards of the substance.

- b. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure the catalyst tank containing approximately 250 gallons of toluene sulfonic acid catalyst located adjacent to the Kloster sand mixer in the no-bake department, was labeled as to the physical and health hazards of the substance.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 11/16/2012



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.95(c)(1): The employer did not administer a continuing, effective hearing conservation program, as described in paragraphs (c) through (o) of this section, whenever employee noise exposures equal or exceeded an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response) or, equivalently, a dose of fifty percent. For purposes of the hearing conservation program, employee noise exposures shall be computed in accordance with appendix A and Table G-16a, and without regard to any attenuation provided by the use of personal protective equipment.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about June 27, 2012, the employer did not ensure an effective hearing conservation program was implemented in the finishing department for employees performing the grinding operation which consisted of hearing conservation training and audiometric testing. Employees received a noise dose of 312% at an equivalent dBA of 98.2 during a sampling time 464 minutes.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/26/2012
Proposed Penalty:	\$49,000.00

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: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

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

29 CFR 1910.134(e)(1): The employer did not provide a medical evaluation to determine the employee's ability to use a respirator, before the employee was fit tested or required to use the respirator in the workplace. The employer may discontinue an employee's medical evaluations when the employee is no longer required to use a respirator.

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure employees wearing powered air purifying respirators (PAPR) while grinding in the finishing department, were provided with medical evaluations prior to being required to wear the respirators.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/16/2012
Proposed Penalty:	\$28,000.00



Citation and Notification of Penalty

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

Citation 3 Item 1 Type of Violation: **Other-than-Serious**

29 CFR 1904.4(a): The employer did not record each work-related fatality, injury, or illness case that resulted in the general recording criteria on the OSHA 300 or equivalent:

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 7, 2012, and May 11, 2012, the employer did not record the following work place injuries or illnesses on the OSHA 300 or equivalent.

-An employee received a molten metal burn on his buttock while charging the furnace and subsequently received antibiotics, prescription narcotics.

-An employee suffered an eye injury when metal particles entered his eye and needed to be removed by a doctor. The employee received prescription medications and was placed on restricted duty.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/16/2012
Proposed Penalty:	\$700.00

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: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533

Citation 3 Item 2 Type of Violation: **Other-than-Serious**

29 CFR 1910.147(c)(5)(ii)(D): Lockout devices and tagout devices did not indicate the identity of the employee applying the device(s).

a. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about May 24, 2012, the employer did not ensure an employee working inside of the table blast machine removing castings, placed a lockout device on the electrical disconnect which identified the employee performing the lockout.

b. B.W. Grinding Co. dba B.W. Supply located in Lyons, Ohio: On or about August 23, 2012, the employer did not ensure an employee cleaning the sand mixer located in the loop molding area, placed a lockout device on the electrical disconnect which identified the employee performing the lockout.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/16/2012

Proposed Penalty:

\$0.00


for **Kimberly Nelson**
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
420 Madison Ave
Suite 600
Toledo, OH 43604
Phone: 419-259-7542 Fax: 419-259-6355



INVOICE / DEBT COLLECTION NOTICE

Company Name: B.W. Grinding Co., dba B.W. Supply
Inspection Site: 15048 CR 10-3, Lyons, OH 43533
Issuance Date: 11/06/2012

Summary of Penalties for Inspection Number	444333
Citation 1, Serious	\$51,100.00
Citation 2, Willful	\$77,000.00
Citation 3, Other-than-Serious	\$700.00
TOTAL PROPOSED PENALTIES	\$128,800.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance.

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

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

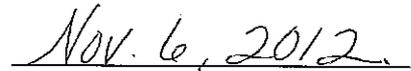
Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per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

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



Kimberly Nelson

Area Director



Date