

U.S. Department of Labor

Occupational Safety and Health Administration
1141 Montlimar Drive
Suite 1006
Mobile, AL 36609
Phone: 251-441-6131 Fax: 251-441-6396



Citation and Notification of Penalty

To:
Daeil USA Corporation
1135 Towel Avenue
Valley, AL 36854

Inspection Number: 1081204
Inspection Date(s): 07/29/2015 - 07/30/2015
Issuance Date: 01/27/2016

Inspection Site:
1135 Towel Avenue
Valley, AL 36854

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 01/27/2016. The conference will be held by telephone or at the OSHA office located at 1141 Montlimar Drive, Suite 1006, Mobile, AL 36609 on _____ at _____ . Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1081204

Company Name: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854
Issuance Date: 01/27/2016

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, 1141 Montlimar Drive, Suite 1006, Mobile, AL 36609**

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

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

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

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

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

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

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review

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

Inspection Number: 1081204
Inspection Date(s): 07/29/2015 - 07/30/2015
Issuance Date: 01/27/2016



Citation and Notification of Penalty

Company Name: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.141(a)(3)(ii): Floor(s) of workroom(s) were not maintained, so far as practical, in a dry condition:

a) Chemical room; On or about July 29, 2015 and at times prior; the employer exposed employees to slip and fall hazards in that employees were permitted to walk and work in an area where oil and water were present resulting in the presence of slippery floors.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/08/2016
\$3960.00

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: Daeil USA Corporation

Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.147(c)(4)(ii)(B): The energy control procedure did not clearly and specifically procedural steps for shutting down, isolating, blocking and securing machines or equipment to control hazardous energy:

a) Robot cell (UMA Line); On or about July 29, 2015 and at times prior; the employer exposed employees to hazardous energies (including electrical, pneumatic), caught-in and amputations hazards in that the machine specific lockout/tagout procedure did not adequately outline the procedural steps for shutting down, isolating, blocking and securing machines or equipment to control all energy sources when employees perform service or maintenance inside the Robot cell at the UMA Line.

b) Robot cell (ANA Line); On or about July 29, 2015 and at times prior; the employer exposed employees to hazardous energies (including electrical, pneumatic), caught-in and amputations hazards in that the machine specific lockout/tagout procedure did not adequately outline the procedural steps for shutting down, isolating, blocking and securing machines or equipment to control all energy sources when employees perform service or maintenance inside the Robot cell at the ANA Line.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

02/08/2016

Proposed Penalty:

\$6930.00

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: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

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

- a) Robotic Cell (UMA Line); On or about July 29, 2015 and at times prior; the employer exposed employees to potential hazardous energies in that employees were allowed to service and perform preventive maintenance following a procedure that had not been reviewed at least annually to correct any deviations or inadequacies identified.
- b) Robotic Cell (ANA Line); On or about July 29, 2015 and at times prior; the employer exposed employees to potential hazardous energies in that employees were allowed to service and perform preventive maintenance following a procedure that had not been reviewed at least annually to correct any deviations or inadequacies identified.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/08/2016
Proposed Penalty:	\$6930.00

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

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

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Issuance Date: 01/27/2016



Citation and Notification of Penalty

Company Name: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.147(c)(7)(i): The employer did not provide training to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees:

a) Robotic cells: On or about July 29, 2015, and at times prior; the employer exposed employees to potential hazardous energies in that employees were allowed to enter inside the robotic cell without first being trained to ensure those employees had the knowledge and skills for the safe application, usage, and removal of energy controls.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/08/2016
Proposed Penalty:	\$6930.00

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

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

Company Name: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.147(f)(3)(ii)(D): Each authorized employee did not affix a personal lockout or tagout device to the group lockout device before working on the machine or equipment:

a) Robotic cells: On or about July 29, 2015, and at times prior; employer exposed employees to potential hazardous energies in that employees were allowed to clean inside the robotic cells together without all employees applying a personal lockout device on the energy control lockout point.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/08/2016
Proposed Penalty:	\$6930.00

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

U.S. Department of Labor
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Issuance Date: 01/27/2016



Citation and Notification of Penalty

Company Name: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.151(c): Where employees were exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body were not provided within the work area for immediate emergency use.

a) Chemical room: On or about July 29, 2015 and at times prior; employees dispensing, carrying and transferring Yumage WSW-60 (corrosive chemical) are not provided with a functional eye and body wash station.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/08/2016
\$4950.00

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: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

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

a) Auto check machine (UMA Line): On or about July 29, 2015 and at times prior; the employer exposed his employees to caught-in and amputation hazards in that employees were allowed to operate the auto check machine at the UMA line without been properly guarded.

b) Long bar machine: On or about July 29, 2015 and at times prior; the employer exposed his employees to caught-in and amputation hazards in that employees were allowed to operate the long bar machine without been properly guarded.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/08/2016
\$5940.00

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

Inspection Number: 1081204
Inspection Date(s): 07/29/2015 - 07/30/2015
Issuance Date: 01/27/2016



Citation and Notification of Penalty

Company Name: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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 1910.215(a)(4): Work rest(s) on grinding machinery were not adjusted closely to the wheel with a maximum opening of one eighth inch

a) Maintenance Shop; On or about July 29, 2015 and at times prior, the employer exposed employees to struck-by hazards in that they were allowed to operate a bench grinder with the work rest work rest exceeding one eighth inch.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/08/2016
\$3960.00

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: 1081204
Inspection Date(s): 07/29/2015 - 07/30/2015
Issuance Date: 01/27/2016



Citation and Notification of Penalty

Company Name: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.215(b)(9): The distance between the abrasive wheel periphery(s) and the adjustable tongue or the end of the safety guard peripheral member at the top exceeded one fourth inch.

a) Maintenance Shop ; On or about July 29, 2015 and at times prior, the employer exposed employees to struck-by hazards in that they were allowed to operate a bench grinder with the tongue guard missing.

Date By Which Violation Must be Abated:

02/08/2016

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

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

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Issuance Date: 01/27/2016



Citation and Notification of Penalty

Company Name: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.215(d)(3): The contact surface(s) of wheel(s), blotter(s) or flange(s) on grinding machine(s) were not flat and free of foreign matter:

a) Maintenance Shop ; On or about July 29, 2015 and at times prior, the employer exposed employees to struck-by hazards in that they were allowed to operate a bench grinder with a grinding wheel that's surface was not flat.

Date By Which Violation Must be Abated:

02/08/2016

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

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

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Citation and Notification of Penalty

Company Name: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.242(b): Compressed air used for cleaning purposes was not reduced to less than 30 psi.

a) On or about July 29, 2015 and at times prior; the employer exposed his employees to compressed air hazards in that employees were permitted to use compressed air that was not reduced to less than 30 psi for cleaning and/or blow off themselves.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/08/2016
\$5940.00

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: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.303(b)(7)(iv): There shall be no damaged parts that may adversely affect safe operation or mechanical strength of the equipment, such as parts that are broken, bent, cut, or deteriorated by corrosion, chemical action, or overheating.

- a) Hose bracket Welding machine (UMA Line): On or about July 29, 2015, and at times prior, the employer exposed his employees to struck-by and caught-in hazards from broken stop buttons.
- b) Conveyor (ANA Line): On or about July 29, 2015, and at times prior, the employer exposed his employees to struck-by and caught-in hazards from broken stop buttons.

Daeil USA Corporation was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.144(a)(1)(iii), which was contained in OSHA inspection number 824881 citation number 1 item number 2 and was affirmed as a final order on May 15, 2013, with respect to a workplace located at 3509 45th St. SW Lanett, AL 36863.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/08/2016
Proposed Penalty:	\$4950.00

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: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.147(c)(4)(i): Procedures were not developed, documented and utilized for the control of potentially hazardous energy when employees were engaged in activities covered by this section:

- a) Stab bracket machine- UMA line; On or about July 30, 2015 and at times prior, the employer exposed his employees to potential hazardous energies in that employees were allowed to perform service and/or maintenance on the stab machine at the UMA line without being provided with a lockout/tagout machine specific procedure to prevent the accidental start-up of the machine or the release of hazardous energy.
- b) Piercing machine- UMA line; On or about July 30, 2015 and at times prior, the employer exposed his employees to potential hazardous energies in that employees were allowed to perform service and/or maintenance on the piercing machine at the UMA line without being provided with a lockout/tagout machine specific procedure to prevent the accidental start-up of the machine or the release of hazardous energy.
- c) Sizing machine- ANA line; On or about July 30, 2015 and at times prior, the employer exposed his employees to potential hazardous energies in that employees were allowed to perform service and/or maintenance on the sizing machine at the ANA line without being provided with a lockout/tagout machine specific procedure to prevent the accidental start-up of the machine or the release of hazardous energy.
- d) Knuckle bracket machine- Lambda line; On or about August 23, 2015 and at times prior, the employer exposed his employees to potential hazardous energies in that employees were allowed to perform service and/or maintenance on the knuckle bracket machine at the Lambda line without being provided with a lockout/tagout machine specific procedure to prevent the accidental start-up of the machine or the release of hazardous energy.
- e) Stab bracket machine- ANA line; On or about September 7, 2015 and at times prior, the employer exposed his employees to potential hazardous energies in that employees were allowed to perform service and/or maintenance on the stab bracket machine at the ANA line without being provided with a lockout/tagout machine specific procedure to prevent the accidental start-up of the machine or 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: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

release of hazardous energy.

f) Base cap welder machine- Lambda line; On or about September 14, 2015 and at times prior, the employer exposed his employees to potential hazardous energies in that employees were allowed to perform service and/or maintenance on the base cap welder machine at the lambda line without being provided with a lockout/tagout machine specific procedure to prevent the accidental start-up of the machine or the release of hazardous energy.

g) Spring seat welder machine- ANA line; On or about September 14, 2015 and at times prior, the employer exposed his employees to potential hazardous energies in that employees were allowed to perform service and/or maintenance on the spring seat welder machine at the ANA line without being provided with a lockout/tagout machine specific procedure to prevent the accidental start-up of the machine or the release of hazardous energy.

h) Stab bracket machine- Lambda line; On or about September 21, 2015 and at times prior, the employer exposed his employees to potential hazardous energies in that employees were allowed to perform service and/or maintenance on the stab bracket machine at the lambda line without being provided with a lockout/tagout machine specific procedure to prevent the accidental start-up of the machine or the release of hazardous energy.

i) Piercing machine- Lambda line; On or about September 22, 2015 and at times prior, the employer exposed his employees to potential hazardous energies in that employees were allowed to perform service and/or maintenance on the piercing machine at the lambda line without being provided with a lockout/tagout machine specific procedure to prevent the accidental start-up of the machine or the release of hazardous energy.

j) Spring seat welder machine- Lambda line; On or about September 22, 2015 and at times prior, the employer exposed his employees to potential hazardous energies in that employees were allowed to perform service and/or maintenance on the spring seat welder machine at the lambda line without being provided with a lockout/tagout machine specific procedure to prevent the accidental start-up of the machine or the release of hazardous energy.

k) Lot marker machine- LFA line; On or about September 23, 2015 and at times prior, the employer

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: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

exposed his employees to potential hazardous energies in that employees were allowed to perform service and/or maintenance on the Lot marker machine at the LFA line without being provided with a lockout/tagout machine specific procedure to prevent the accidental start-up of the machine or the release of hazardous energy.

1) Knuckle bracket machine- ANA line; On or about September 23, 2015 and at times prior, the employer exposed his employees to potential hazardous energies in that employees were allowed to perform service and/or maintenance on the knuckle bracket machine at the ANA line without being provided with a lockout/tagout machine specific procedure to prevent the accidental start-up of the machine or the release of hazardous energy.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/08/2016
Proposed Penalty:	\$69300.00

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: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.95(d)(1): A representative monitoring program was not developed and implemented when information indicated that an employee's exposure may equal or exceed an 8 hour time weighted average of 85dBA.

a) On or about July 30, 2015 and at times prior; the employer exposed the employees to hi-noise hazards in that the employer failed to develop and implement a noise monitoring program when information indicates that any employee's exposure may equal or exceed an 8-hour time-weighted average of 85 decibels.

The Daeil USA Corporation was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.95(c)(1), which was contained in OSHA inspection number 824881 citation number 1, item number 1 and was affirmed as a final order on May 15, 2013, with respect to a workplace located at 3905 45th St. SW, Lanett, AL 36863

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/08/2016
Proposed Penalty:	\$200.00

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: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.95(k)(3): The employer did not ensure that each employee exposed to noise at or above an 8-hour time weighted average of 85 decibels was trained and informed of the information included in sections k(3)(i) through k(3)(iii).

- a) Spring seat welder machine operator (UMA Line): On July 30, 2015 and at times prior; the employer exposed the employee to noise at levels of 69.7% (equivalent to an 8 hour time weighted average TWA of 87.4 dBA) which is 1.4 times the action level of 50 % (equivalent to an 8 hour TWA of 85 dBA) while working in the UMA line at the facility. Results were calculated for a 420 minutes sampling period with a zero concentration assumption for the remaining 60 minutes. Annual training on the effects of noise, purpose of hearing protectors, advantages, disadvantages, instruction on selection and care purpose of audiometric testing and explain of the test procedures was not provided for the employee.
- b) Hose bracket machine operator (ANA Line): On July 30, 2015 and at times prior; the employer exposed the employee to noise at levels of 62.4% (equivalent to an 8 hour time weighted average TWA of 86.6 dBA) which is 1.2 times the action level of 50% (equivalent to an 8 hour TWA of 85 dBA) while working in the UMA line at the facility. Results were calculated for a 479 minutes sampling period with a zero concentration assumption for the remaining 1 minute. Annual training on the effects of noise, purpose of hearing protectors, advantages, disadvantages, instruction on selection and care purpose of audiometric testing and explain of the test procedures was not provided for the employee.
- c) Spring seat welder machine operator (ANA Line): On July 30, 2015 and at times prior; the employer exposed the employee to noise at levels of 83.2% (equivalent to an 8 hour time weighted average TWA of 88.6 dBA) which is 1.7 times the action level of 50% (equivalent to an 8 hour TWA of 85 dBA) while working in the UMA line at the facility. Results were calculated for a 478 minutes sampling period with a zero concentration assumption for the remaining 2 minutes. Annual training on the effects of noise, purpose of hearing protectors, advantages, disadvantages, instruction on selection and care purpose of audiometric testing and explain of the test procedures was not provided for the employee.

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



Citation and Notification of Penalty

Company Name: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

d) Leak test machine operator: On July 30, 2015 and at times prior; the employer exposed the employee to noise at levels of 84.7% (equivalent to an 8 hour time weighted average TWA of 88.8 dBA) which is 1.7 times the action level of 50% (equivalent to an 8 hour TWA of 85 dBA) while working in the UMA line at the facility. Results were calculated for a 479 minutes sampling period with a zero concentration assumption for the remaining 1 minute. Annual training on the effects of noise, purpose of hearing protectors, advantages, disadvantages, instruction on selection and care purpose of audiometric testing and explain of the test procedures was not provided for the employee.

e) Bubble check machine operator: On July 30, 2015 and at times prior; the employer exposed the employee to noise at levels of 65.9% (equivalent to an 8 hour time weighted average TWA of 87.0 dBA) which is 1.3 times the action level of 50% (equivalent to an 8 hour TWA of 85 dBA) while working in the UMA line at the facility. Results were calculated for a 475 minutes sampling period with a zero concentration assumption for the remaining 5 minutes. Annual training on the effects of noise, purpose of hearing protectors, advantages, disadvantages, instruction on selection and care purpose of audiometric testing and explain of the test procedures was not provided for the employee.

The Daeil USA Corporation was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.95(c)(1), which was contained in OSHA inspection number 824881 citation number 1, item number 1 and was affirmed as a final order on May 15, 2013, with respect to a workplace located at 3905 45th St. SW, Lanett, AL 36863.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/08/2016
Proposed Penalty:	\$200.00

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: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

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

29 CFR 1910.144(a)(1)(iii): Emergency stop bars, stop buttons or switches which letters or other markings appear, used for emergency stopping of machinery were not red.

- a) Hose bracket Welding machine (UMA Line): On or about July 29, 2015, and at times prior, the employer exposed his employees to struck-by and caught-in hazards from emergency stop buttons not being red.
- b) Conveyor (ANA Line): On or about July 29, 2015, and at times prior, the employer exposed his employees to struck-by and caught-in hazards from emergency stop buttons not being red.

Daeil USA Corporation was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.144(a)(1)(iii), which was contained in OSHA inspection number 824881 citation number 1 item number 2 and was affirmed as a final order on May 15, 2013, with respect to a workplace located at 3509 45th St. SW Lanett, AL 36863.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/08/2016
Proposed Penalty:	\$200.00

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: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

Citation 3 Item 4 Type of Violation: **Repeat**

29 CFR 1910.147(c)(5)(i): Locks, tags, chains, wedges, key blocks, adapter pins, self-locking fasteners, or other hardware were not provided by the employer for isolating, securing or blocking of machines or equipment from energy sources:

a) Robotic cells: On or about July 29, 2015: the employer exposed his employees to struck-by/caught-in hazards in that the employer had not provided locks for each of his employees to use to lockout the robotic cell prior enter to clean the area so that the robots could not accidentally start up.

Daeil USA Corporation was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.147(c)(5)(i), which was contained in OSHA inspection number 824881 citation number 1 item number 4 and was affirmed as a final order on May 15, 2013, with respect to a workplace located at 3509 45th St. SW Lanett, AL 36863.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/08/2016
Proposed Penalty:	\$13860.00

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: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

Citation 3 Item 5 Type of Violation: **Repeat**

29 CFR 1910.252(b)(2)(iii): Workers and other persons adjacent to the welding area were not protected from the rays by noncombustible or flameproof screens or shields:

a) Hose bracket machine (ANA Line): On or about July 29, 2015 and at times prior; employees were exposed to eye injury hazards and skin burns from welding arc flashes and sparking due to the employers failure to ensure the shaded welding flash and spark shields were in place on the hose bracket machine at the ANA line.

The Daeil USA Corporation was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.252(b)(2)(iii), which was contained in OSHA inspection number 316304310 citation number 1, item number 1 and was affirmed as a final order on May 1, 2012, with respect to a workplace located at 3905 45th St. SW, Lanett, AL 36863.

The Daeil USA Corporation was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.252(b)(2)(iii), which was contained in OSHA inspection number 824881 citation number 2, item number 2 and was affirmed as a final order on May 15, 2013, with respect to a workplace located at 3905 45th St. SW, Lanett, AL 36863.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/08/2016
Proposed Penalty:	\$29700.00

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: 1081204
Inspection Date(s): 07/29/2015 - 07/30/2015
Issuance Date: 01/27/2016



Citation and Notification of Penalty

Company Name: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854

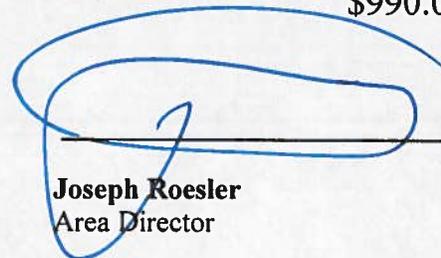
Citation 4 Item 1 Type of Violation: **Other-than-Serious**

29 CFR 1904.40(b): Employer did not provide government representative the requested records within 4 business hours.

a) Daeil USA Corporation: On July 29, 2015 the employer did not provided to the OSHA Compliance Officer the OSHA 300 logs (2011-2015) within 4 business hours.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$990.00



Joseph Roesler
Area Director

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

U.S. Department of Labor
Occupational Safety and Health Administration
1141 Montlimar Drive
Suite 1006
Mobile, AL 36609
Phone: 251-441-6131 Fax: 251-441-6396



INVOICE / DEBT COLLECTION NOTICE

Company Name: Daeil USA Corporation
Inspection Site: 1135 Towel Avenue, Valley, AL 36854
Issuance Date: 01/27/2016

Summary of Penalties for Inspection Number	1081204
Citation 1, Serious	\$57420.00
Citation 2, Willful	\$69300.00
Citation 3, Repeat	\$44160.00
Citation 4, Other-than-Serious	\$990.00
TOTAL PROPOSED PENALTIES	\$171870.00

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

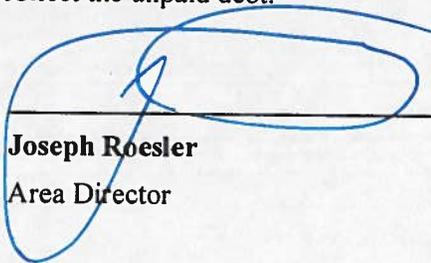
your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.

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.



Joseph Roesler
Area Director

1/27/2016
Date