

**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



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## Citation and Notification of Penalty

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**To:**  
IVEX Protective Packaging Inc.  
and its successors  
456 S. Stolle Drive  
Sidney, OH 45365

**Inspection Number:** 850603  
**Inspection Date(s):** 01/28/2013 - 06/14/2013  
**Issuance Date:** 07/15/2013

**Inspection Site:**  
456 S. Stolle Drive  
Sidney, OH 45365

*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.*

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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.

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](http://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 07/15/2013. The conference will be held by telephone or 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: 850603**

Company Name: IVEX Protective Packaging Inc.  
Inspection Site: 456 S. Stolle Drive, Sidney, OH 45365  
Issuance Date: 07/15/2013

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): \_\_\_\_\_  
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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  
\_\_\_\_\_  
Typed or Printed Name

\_\_\_\_\_  
Date  
\_\_\_\_\_  
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:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

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

29 CFR 1910.119(d)(2)(i)(D): Information concerning the technology of the process did not include safe upper and lower limits for such items as temperatures, pressures, flows or compositions.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer's process safety information did not ensure the safe upper and lower pressures were documented for the resin pressure levels in the foam extruder. If resin levels are too low, isobutane gas can travel upstream and down-stream of the injection point and exit the extruder, causing fires or explosions.

b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer's process safety information did not ensure the safe upper and lower limits were documented for the die gap on the foam extruders. If the die gap is too large, isobutane could be ejected out of the extruder and cause a fire or explosion.

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:	08/14/2013
Proposed Penalty:	\$6,300.00

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:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(d)(2)(i)(E): Information pertaining to the technology of the process did not include an evaluation of the consequences of deviations, including those affecting the safety and health of employees.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process safety information included the consequences of deviation for operating the foam extruders with low resin levels. Low resin levels could allow isobutane gas to escape the extrusion barrel, causing fires or explosions.

b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process safety information included the consequences of deviation for operating the foam extruders with a large die gap. A large die gap could cause isobutane to escape the extruder barrel and exit the extruder, causing fires or explosions.

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:

08/14/2013



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(d)(3)(i)(B): Information pertaining to the equipment in the process did not include piping and instrument diagrams (P&ID's).

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure process piping and instrument diagrams (P&IDs) for the high pressure isobutane pumping area were accurate in that the P&ID did not show the low pressure piping supplying isobutane to the second high pressure pump for Line #2 and the high pressure piping leading from the pump to the extruder.

b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure process piping and instrument diagrams (P&IDs) for the high pressure isobutane pumping area were accurate in that the P&ID did not show that an older high pressure pumping system was disconnected from the system.

c. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure process piping and instrument diagrams (P&IDs) for the high pressure isobutane pumping area were accurate in that the P&ID did not show the numerous low pressure relief valves located on globe valves throughout the piping system.

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:	08/14/2013
Proposed Penalty:	\$4,500.00

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:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(d)(3)(ii): The employer did not document that equipment complied with recognized and generally accepted good engineering practices.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not document that the exhaust system leading to the regenerative thermal oxidizer (RTO), used to remove isobutane vapors generated in the polyethylene foam extrusion process, was capable of operating beneath 25% of the LEL under all conditions, including the maximum loading of all potential sources; that the employer did not document that the exhaust system complied with recognized and generally accepted good engineering practices, in that it did not contain flammable vapor detection equipment or explosion isolation devices to isolate the work area from the RTO. At the time of the explosion on January 25, 2013, the ductwork was not equipped with flammable vapors sensors and explosion isolation devices.

b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not document that the sizing on the relief system for the 18,000 gallon isobutane storage tank complied with recognized and generally accepted good engineering practices.

c. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not document that the relieving location for the relief valves on 18,000 gallon isobutane storage tank complied with recognized and generally accepted good engineering practices.

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:	08/15/2013
Proposed Penalty:	\$6,300.00

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:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(e)(3)(i): The process hazard analysis did not address the hazards of the process.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process hazard analysis addressed the hazard of isobutane gas entering the regenerative thermal oxidizer during foam extrusion start-up operations and process upsets, resulting in fire and explosion hazards.

b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process hazard analysis addressed the hazard associated with isobutane gas traveling back up stream from the foam extruder injection point and catching fire in the resin feed tube.

c. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process hazard analysis addressed the hazard of the relief valves on the 18,000 gallon isobutane storage tank located on the north side of the facility, relieving to a safe location. If a large quantity of isobutane vapor were to be relieved through the vessel's pressure relief devices, the vapors would sink to the ground under the isobutane tank and potentially expose employees to the flammable vapors.

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:	07/24/2013
Proposed Penalty:	\$6,300.00



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(e)(3)(iv): The process hazard analysis did not address the consequences of failure of engineering and administrative controls.

- a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process hazard analysis addressed the failure of engineering controls such as the combustible gas detectors located throughout the facility. The combustible gas detectors are one of the main safety mechanisms used to shut off the flow of isobutane to the process in the case of an emergency.
- b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process hazard analysis addressed the failure of the combustible gas detectors not detecting isobutane vapors at the beginning of the process due to the environmental chamber doors being open, upsetting the designed ventilation airflow through the room.
- c. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process hazard analysis addressed the failure of the isobutane emergency shutdown system.

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:	08/14/2013
Proposed Penalty:	\$6,300.00



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(e)(3)(v): The process hazard analysis did not address facility siting.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure facility siting for the environmental capture rooms was addressed in the company's process hazard analysis. On January 25, 2013, an explosion in the thermal oxidizer sent a flame front down the duct work and into the employee's work area inside the environmental chambers.

b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure facility siting for the front offices and the main production building was addressed in the company's process hazard analysis. The front offices are several hundred feet from the 18,000 gallon isobutane storage tank located at the North end of the facility.

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:	08/14/2013
Proposed Penalty:	\$6,300.00



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(e)(3)(vi): The process hazard analysis did not address human factors.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process hazard analysis addressed human factors such as the employees working in the environmental chambers were unable to see the isobutane warning strobe light located on the east wall of the production area.

b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process hazard analysis addressed human factors such as employees not being able to access the e-stops for the isobutane delivery system if there was a fire or explosion.

c. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process hazard analysis addressed human factors such as employees not being able to identify certain valves mentioned in the operating procedures because the valve identification tags had fallen off the valves in the high pressure pumping area.

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:  
Proposed Penalty:

08/14/2013  
\$6,300.00



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(e)(4): The process hazard analysis was not performed by a team with expertise in engineering and process operations, and the team did not include at least one employee who has experience and knowledge specific to the process being evaluated. Also, one member of the team was not knowledgeable in the specific process hazard analysis methodology being used.

- a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process hazard analysis was performed by a team of individuals.
- b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process hazard analysis was performed by an individual knowledgeable in the What-If process hazard analysis methodology.

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:	08/14/2013
Proposed Penalty:	\$6,300.00



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(e)(6): At least every five (5) years after the completion of the initial process hazard analysis, the process hazard analysis was not updated and revalidated by a team meeting the requirements in paragraph (e)(4) of this section, to assure that the process hazard analysis is consistent with the current process.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the process hazard analysis was revalidated every 5 years.

b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure a previous incident was included in the PHAs which included a 2007 fire in the resin feed tube leading to the foam extruder due to the escape of isobutane gas.

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:	08/14/2013
Proposed Penalty:	\$6,300.00



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(f)(1)(i): The employer did not develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and did not address steps for each operating phase.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure that procedures for the foam extrusion operation, such as but not limited to, start-up procedures, normal operating procedures, emergency shut down procedures, and start-up procedures after an emergency shut down, clearly identified the steps employees needed to take to operate the foam extruders.

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:	08/14/2013
Proposed Penalty:	\$6,300.00



### Citation and Notification of Penalty

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(f)(1)(ii): The employer did not develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and did not address operating limits:

- a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure that procedures for the foam extrusion operation, such as but not limited to, start-up procedures, normal operating procedures, emergency shut down procedures, and start-up procedures after an emergency shut down, clearly identified consequences of deviation for adding isobutane too quickly to the extruder before there is enough resin downstream of the isobutane injection point.
- b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure that procedures for the foam extrusion operation, such as but not limited to, start-up procedures, normal operating procedures, emergency shut down procedures, and start-up procedures after an emergency shut down, clearly identified consequences of deviation for adding isobutane too quickly to the extruder before there is enough resin upstream of the isobutane injection point.
- c. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure that procedures for the foam extrusion operation, such as but not limited to, start-up procedures, normal operating procedures, emergency shut down procedures, and start-up procedures after an emergency shut down, clearly identified consequences of deviation regarding the size of the die gap.

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:** 850603  
**Inspection Date(s):** 01/28/2013 - 06/14/2013  
**Issuance Date:** 07/15/2013



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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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:	08/14/2013
Proposed Penalty:	\$6,300.00

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:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(f)(1)(iii)(A): The employer did not develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and did not address the properties of, and hazards presented by, the chemicals used in the process.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: . On or about January 25, 2013, the employer did not ensure that procedures for the foam extrusion operation, such as but not limited to, start-up procedures, normal operating procedures, emergency shut down procedures, and start-up procedures after an emergency shut down, clearly identified the safety and health considerations including the properties and fire and explosion hazards presented by the isobutane used in the process.

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:	08/14/2013
Proposed Penalty:	\$6,300.00



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(f)(1)(iii)(B): The employer did not develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and did not address the precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure that procedures for the foam extrusion operation, such as but not limited to, start-up procedures, normal operating procedures, emergency shut down procedures, and start-up procedures after an emergency shut down, addressed safety and health considerations including the engineering controls, personal protective equipment, and administrative controls such as:

1. The fire detection and suppression systems used to control a fire at the die head;
2. The static dissipating devices such as the static blowers and the static mats the employees stand on when running the process to eliminate the build-up of static electricity which could ignite flammable isobutane gas;
3. Personal protective equipment such as flame retardant clothing to protect employees from flash fires and explosions when operating the extrusion process.

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:	08/14/2013
Proposed Penalty:	\$6,300.00



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

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

29 CFR 1910.119(g)(1)(i): Each employee presently involved in operating a process, and each employee before being involved in operating a newly assigned process, was not trained in an overview of the process and in the operating procedures as specified in paragraph (f) of this section. The training did not include emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure assistant extruder operators were properly trained on the isobutane emergency shutdown system, how it operates, and at what levels the combustible gas sensors located throughout the facility activate.

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:	08/14/2013
Proposed Penalty:	\$6,300.00

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:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(g)(3): The employer did not ascertain that each employee involved in operating a process had received and understood the training required by this paragraph. The employer did not prepare a record which contained the identity of the employee, the date of training, and the means used to verify that the employee understood the training.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure assistant extruder operator training was documented.

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: 08/14/2013



### Citation and Notification of Penalty

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(j)(2): The employer did not establish and implement written procedures to maintain the on-going integrity of process equipment.

- a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure a mechanical integrity program was established and implemented for the inspection and testing of the 18,000 gallon isobutane storage tank.
- b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure a mechanical integrity program was established and implemented for the inspection and testing of the underground low pressure isobutane piping which carries isobutane from the storage tank to the high pressure pumps.
- c. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure a mechanical integrity program was established and implemented for the inspection and testing of the high and low pressure isobutane pumps.
- d. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure a mechanical integrity program was established and implemented for the inspection and testing of the facility's combustible gas detectors located throughout the facility.
- e. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure a mechanical integrity program was established and implemented for the inspection and testing of the pressure relief devices on the isobutane storage tank, low pressure piping, and high pressure piping.
- f. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure a mechanical integrity program was established and implemented for the inspection and testing of the of the isobutane safety shutdown system used to shut down the flow of isobutane from the storage tank in the case of an emergency.

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:** 850603  
**Inspection Date(s):** 01/28/2013 - 06/14/2013  
**Issuance Date:** 07/15/2013



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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g. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure a mechanical integrity program was established and implemented for the inspection and testing of the regenerative thermal oxidizer.

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:	08/14/2013
Proposed Penalty:	\$6,300.00

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:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(j)(4)(i): Inspections and tests were not performed on process equipment.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure the 18,000 gallon isobutane storage tank located at the north end of the facility, received adequate inspections per the National Board Inspection Code.

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:	08/14/2013
Proposed Penalty:	\$4,500.00

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:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.119(l)(1): The employer did not establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures; and, changes to facilities that affect a covered process.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure management of change procedures were developed and implemented prior to installing a second foam extrusion process line and a thermal oxidizer in 2006.

b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure management of change procedures were developed and implemented prior to installing a low pressure isobutane sensor at the isobutane injection point on the extruders in 2007.

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:  
Proposed Penalty:

08/14/2013  
\$6,300.00



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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

29 CFR 1910.132(a): Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, were not provided, used, and maintained in a sanitary and reliable condition wherever it was necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about January 25, 2013, the employer did not ensure employees working around the foam extruders were wearing flame retardant clothing to protect the upper torso, lower torso, and the head from fire and explosion hazards created by the ignition of isobutane gas.

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:	07/31/2013
Proposed Penalty:	\$6,300.00

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:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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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 19 a      Type of Violation: **Serious**

29 CFR 1910.147(c)(4)(i): Procedures shall be developed, documented and utilized for the control of potentially hazardous energy when employees are engaged in the activities covered by this section.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about May 8, 2013, the employer did not ensure lockout procedures were documented when employees were exposed to struck by hazards while entering the line #1 foam winding area to perform servicing operations.

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:	07/24/2013
Proposed Penalty:	\$6,300.00

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:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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**Citation 1 Item 19 b**      Type of Violation: **Serious**

29 CFR 1910.147(d)(2): The machine or equipment was not turned off or shut down using the procedures established for the machine or equipment. An orderly shutdown was not utilized to avoid any additional or increased hazard(s) to employees as a result of the equipment stoppage.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about May 8, 2013, the employer did not ensure employees shut down the foam winder on line #1 prior to performing servicing operations, thereby exposing themselves to struck by hazards and rotating equipment.

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:

07/24/2013



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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**Citation 1 Item 19 c**      Type of Violation: **Serious**

29 CFR 1910.147(d)(3): All energy isolating devices that were needed to control the energy to the machine or equipment were not physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s).

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about May 8, 2013, the employer did not ensure employees isolated the electrical, pneumatic, and potential energy to the foam winder on line #1 prior to performing servicing operations, thereby exposing themselves to struck by hazards and rotating equipment.

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: 07/24/2013



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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Citation 1 Item 19 d      Type of Violation: **Serious**

29 CFR 1910.147(d)(4)(i): Lockout or tagout devices were not affixed to each energy isolating device by authorized employees.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about May 8, 2013, the employer did not ensure employees attached lockout devices to the electrical, pneumatic, and potential energy isolation points on the line #1 foam winder prior to performing servicing operations, thereby exposing themselves to struck by hazards and rotating equipment.

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:

07/24/2013



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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**Citation 1 Item 20** Type of Violation: **Serious**

29 CFR 1910.147(c)(7)(i)(A): Each authorized employee did not receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about May 8, 2013, the employer did not ensure foam line operators were properly trained as authorized employees on the company's lockout program. Employees were exposed to struck by hazards when entering the line #1 foam winding area to perform servicing operations and were not locking out the equipment prior to entry.

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:	07/24/2013
Proposed Penalty:	\$6,300.00

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:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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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 21 a      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. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about May 8, 2013, the employer did not ensure the mandrels for line #2 winder were guarded to prevent employees from contacting the rotating mandrel when working in front of and traveling under the mandrel to start a new roll of foam.

b. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about May 8, 2013, the employer did not ensure the mandrels for line #2 winder were guarded to prevent employees from being exposed to ingoing nip points between the rotating mandrel and the foam sheet when tucking foam around the mandrels.

c. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about May 8, 2013, the employer did not ensure the s-wrap machine located on line #2 was properly guarded to prevent employee exposures to the rotating rollers.

d. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about May 8, 2013, the employer did not ensure the pneumatic holding arm on the indexing mandrel for the line #1 winder was guarded to prevent employees from pinch point and struck by hazards created by the holding arm as it moved into position to secure the end of the mandrel.

e. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about May 8, 2013, the employer did not ensure the indexing winder for the line #1 foam winding process was properly guarded to prevent employees from being struck by the winder as it indexed.

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:** 850603  
**Inspection Date(s):** 01/28/2013 - 06/14/2013  
**Issuance Date:** 07/15/2013



**Citation and Notification of Penalty**

**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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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:	08/14/2013
Proposed Penalty:	\$6,300.00

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:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365

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**Citation 1 Item 21 b**      Type of Violation: **Serious**

29 CFR 1910.212(a)(3)(ii): The point of operation of machines whose operation exposes an employee to injury, shall be guarded. The guarding device shall be in conformity with any appropriate standards therefor, or, in the absence of applicable specific standards, shall be so designed and constructed as to prevent the operator from having any part of his body in the danger zone during the operating cycle.

a. IVEX Protective Packaging Inc. located in Sidney, Ohio: On or about May 8, 2013, the employer did not ensure the saw was guarded on line #1 to prevent employees from contacting the rotating 10 inch blade when pulling foam from the extruder and through the saw blade.

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:

07/24/2013

A handwritten signature in black ink, appearing to read "Kimberly Nelson", written over a horizontal line.

**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

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**Company Name:** IVEX Protective Packaging Inc.  
**Inspection Site:** 456 S. Stolle Drive, Sidney, OH 45365  
**Issuance Date:** 07/15/2013

<b>Summary of Penalties for Inspection Number</b>	<b>850603</b>
<b>Citation 1, Serious</b>	<b>\$128,700.00</b>
<b>TOTAL PROPOSED PENALTIES</b>	<b>\$128,700.00</b>

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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.

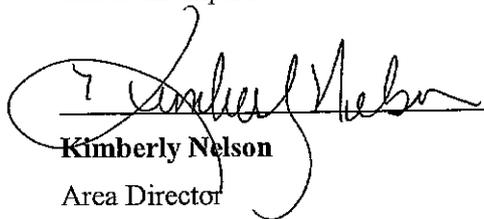
Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts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

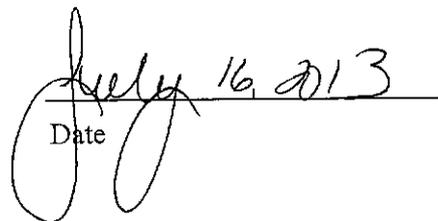
**Interest:** Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount

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