

U.S. Department of Labor Occupational Safety and Health Administration
3477 Corporate Parkway,
Suite 120
Center Valley, PA 18034
Phone: 267-429-7542 Fax: 267-429-7567



05/11/2015

LLOYD INDUSTRIES, INC.
231 COMMERCE DRIVE
Montgomeryville, PA 18936

Dear Employer,

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

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

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

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

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

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean G. Kulp". The signature is stylized with a large, sweeping initial "J" and "K".

Jean G. Kulp
Area Director

Enclosures

U.S. Department of Labor
Occupational Safety and Health Administration
3477 Corporate Parkway
Suite 120
Center Valley, PA 18034
Phone: 267-429-7542 Fax: 267-429-7567



Citation and Notification of Penalty

To:
LLOYD INDUSTRIES, INC.
231 COMMERCE DRIVE
Montgomeryville, PA 18936

Inspection Number: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015

Inspection Site:
231 COMMERCE DRIVE
Montgomeryville, PA 18936

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.

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 05/11/2015. The conference will be held by telephone or at the OSHA office located at 3477

Corporate Parkway, Suite 120, Center Valley, PA 18034 on _____ at

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1008085

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936
Issuance Date: 05/11/2015

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 3477 Corporate Parkway, Suite 120, Center Valley, PA 18034**

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: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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

29 CFR 1910.212(a)(1): One or more methods of machine guarding was not provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks:

a) Lloyd Industries Inc. - On or about November 13, 2014, an unused portion of a blade of the Jet Company, VBS 400 vertical band saw was not properly guarded to protect employees from injury.

No abatement certification or documentation required.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$4000.00



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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 2 a Type of Violation: **Serious**

29 CFR 1910.213(h)(1): The sides of the lower exposed portion of the blade of radial saw(s) were not guarded to the full diameter of the blade by a device that automatically adjusted itself to the thickness of the stock and remained in contact with the stock being cut.

a) Lloyd Industries Inc. Shipping Department - On or about November 13, 2014, the sides of the lower exposed portion of the blade of a Skill brand radial saw were not guarded to the full diameter of the blade and the device was not self-adjusting to the thickness of the stock being cut.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated: 05/29/2015
Proposed Penalty: \$5000.00

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

Inspection Number: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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

29 CFR 1910.213(h)(4): Radial saw(s) were not installed in a manner so as to cause the cutting head to return gently to the starting position when released by the operator:

a) Lloyd Industries Inc., Shipping Department - On or about November 13, 2014, a Skill brand radial saw was not installed in a manner so as to cause the cutting head to return gently to the starting position when released by the operator.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:

05/29/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.

Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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 3 a Type of Violation: **Serious**

29 CFR 1910.219(b)(1): Flywheel(s) with parts seven feet or less above floor(s) or platform(s) were not guarded in accordance with the requirements specified in 29 CFR 1910.219(b)(1)(i) through (b)(1)(iv)(iv).

a) Lloyd Industries Inc. - On or about November 13, 2014, the flywheel of the Niagara brand, Model IB-3-4 Press brake was not guarded in accordance with the requirements specified in 29 CFR 1910.219(b)(1)(i) through (b)(1)(iv)(iv).

b) Lloyd Industries Inc. - On or about November 13, 2014, the flywheel of Milford brand Model 305 #1 Rivet machine was not guarded in accordance with the requirements specified in 29 CFR 1910.219(b)(1)(i) through (b)(1)(iv)(iv).

c) Lloyd Industries Inc. - On or about November 13, 2014, the flywheel of Milford brand Model 305 #2 Rivet machine was not guarded in accordance with the requirements specified in 29 CFR 1910.219(b)(1)(i) through (b)(1)(iv)(iv).

d) Lloyd Industries Inc. - On or about November 13, 2014, the flywheel of Milford brand Model 305 #3 Rivet machine was not guarded in accordance with the requirements specified in 29 CFR 1910.219(b)(1)(i) through (b)(1)(iv)(iv).

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/24/2015

Proposed Penalty:

\$5000.00

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: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.

Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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

29 CFR 1910.219(d)(1): Pulley(s) with part(s) seven feet or less from the floor or work platform were not guarded in accordance with the requirements specified in 29 CFR 1910.219(m) and (o):

a) Lloyd Industries Inc. - On or about November 13, 2014, the pulleys for the motor and clutch flywheel of the Niagara brand, Model IB-3-4 Press brake were not guarded to protect employees from the rotating parts.

b) Lloyd Industries Inc. - On or about November 13, 2014, the pulleys for the motor and clutch flywheel of Milford brand Model 305 #1 Rivet machine were not guarded to protect employees from the rotating parts.

c) Lloyd Industries Inc. - On or about November 13, 2014, the pulleys for the motor and clutch flywheel of Milford brand Model 305 #2 Rivet machine were not guarded to protect employees from the rotating parts.

d) Lloyd Industries Inc. - On or about November 13, 2014, the pulleys for the motor and clutch flywheel of Milford brand Model 305 #3 Rivet machine were not guarded to protect employees from the rotating parts.

e) Lloyd Industries Inc. - On or about November 13, 2014, the motor and drive pulley of the Roll Former machine were not guarded to protect employees from the rotating parts.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/24/2015

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

Inspection Number: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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

29 CFR 1910.219(e)(1)(i): Horizontal belts which had both runs seven feet or less from the floor level were not guarded with a guard that extended to at least fifteen inches above the belt:

a) Lloyd Industries Inc. - On or about November 13, 2014, a horizontal belt connected to the motor and clutch flywheel of Niagara brand, Model IB-3-4 Press brake was not guarded.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/24/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.

Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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

29 CFR 1910.219(e)(3)(i): Vertical or inclined belt(s) were not enclosed by guard(s) conforming to the requirements specified at 29 CFR 1910.219(m) and (o):

a) Lloyd Industries Inc. - On or about November 13, 2014, the vertical belt for the motor and clutch flywheel of Milford brand Model 305 #1 Rivet machine were not guarded to protect employees from ingoing nip points.

b) Lloyd Industries Inc. - On or about November 13, 2014, the vertical belt for the motor and clutch flywheel of Milford brand Model 305 #2 Rivet machine were not guarded to protect employees from ingoing nip points.

c) Lloyd Industries Inc. - On or about November 13, 2014, the vertical belt for the motor and clutch flywheel of Milford brand Model 305 #3 Rivet machine were not guarded to protect employees from ingoing nip points.

d) Lloyd Industries Inc. - On or about November 13, 2014, the double inclined belts for the motor and drive pulley of the Roll Former Machine were not guarded to protect employees from ingoing nip points.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/24/2015

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

Inspection Number: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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

29 CFR 1910.305(b)(1)(ii): Unused openings in boxes, cabinets, or fittings were not effectively closed:

- a) Lloyd Industries Inc. Shipping Department - On or about November 13, 2014, a Square D brand switch gear box mounted to the table of a Skill Brand, Model 450 radial saw had a knock out opening on the left side that was not effectively closed:
- b) Lloyd Industries Inc. Shipping Department - On or about November 13, 2014, a Square D brand switch gear box mounted to the table of a Skill Brand, Model 450 radial saw had a rectangular shape opening on the front that was not effectively closed:
- c) Lloyd Industries Inc. Sleeve Department, Area 5 - On or about November 13, 2014, a Square D brand switch gear box mounted to the Flange Machine had a knock out opening on the left side that was not effectively closed:

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/24/2015
Proposed Penalty:	\$3000.00



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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

OSH ACT of 1970 Section (5)(a)(1): Section 5(a)(1) of the Occupational Safety and Health Act of 1970: The employer does not furnish employment and a place of employment which are free from recognized hazards that are causing or likely to cause death or serious physical harm to employees in that employees are allowed to operate a Niagara Press Brake with an unprotected foot pedal actuator. Employees are exposed to unexpected machine operation and amputation.

a) Lloyd Industries Inc. - The employer allows operation of machinery with an unprotected machine actuator. On or about November 13, 2014, the mechanical foot pedal for the Niagara Model IB-15-3-4 Press Brake was not guarded to prevent accidental operation of the upper die with the employee's hands in the point of operation. The employer's ongoing obligation is to ensure machine actuators are protected and unexpected machine operation does not occur.

ABATEMENT NOTE: Among other methods, one feasible and acceptable abatement method to correct this hazard is to guard the foot pedal in accordance with American National Standard ANSI B11.3-2012.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photograph or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/24/2015
Proposed Penalty:	\$70000.00



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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

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

a) Lloyd Industries Inc. - The employer does not ensure that points of operation of machinery are guarded. On or about November 13, 2014, the point of operation for the Niagara brand, Model IB-15-3-4 Press Brake was not guarded by physical barriers, physical devices, or by restricting access to prevent employees from having their fingers in the danger zone during operating cycles. The employer's ongoing obligation is to ensure that points of operation of machinery are guarded.

ABATEMENT NOTE: Among other methods, one feasible and acceptable abatement method to correct this hazard is to guard the point of operation hazards in accordance with American National Standard ANSI B11.3-2012.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photograph or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 05/24/2015
Proposed Penalty: \$70000.00

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

Inspection Number: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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

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

a) Lloyd Industries Inc. - The employer does not ensure that points of operation of machinery are guarded. On or about November 13, 2014, the point of operation for the Accurpress brand, Model 7606 Press Brake was not guarded by physical barriers, physical devices, or by restricting access to prevent employees from having their fingers in the danger zone during operating cycles. The employer's ongoing obligation is to ensure that points of operation of machinery are guarded.

ABATEMENT NOTE: Among other methods, one feasible and acceptable abatement method to correct this hazard is to guard the point of operation hazards in accordance with American National Standard ANSI B11.3-2012.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photograph or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/24/2015
Proposed Penalty:	\$70000.00

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: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

Citation 2 Item 4 Type of Violation: **Willful**

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

a) Lloyd Industries Inc. - The employer does not ensure that points of operation of machinery are guarded. On or about November 13, 2014, the point of operation for the Niagara brand, Model 18 Mechanical Shear Machine was not guarded by physical barriers, physical devices, or by restricting access to prevent employees from having their fingers in the danger zone of the hold down pins and the shear blades during operating cycles. The employer's ongoing obligation is to ensure that points of operation of machinery are guarded.

ABATEMENT NOTE: Among other methods, one feasible and acceptable abatement method to correct this hazard is to guard the point of operation hazards in accordance with American National Standard ANSI B11.4-2003.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photograph or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 05/24/2015
Proposed Penalty: \$70000.00

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

Inspection Number: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

Citation 2 Item 5 Type of Violation: **Willful**

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

a) Lloyd Industries Inc. - The employer does not ensure that points of operation of machinery are guarded. On or about November 13, 2014, the point of operation for the Niagara brand, Model 1R10 Pneumatic Powered Shear Machine was not guarded by physical barriers, physical devices, or by restricting access to prevent employees from having their fingers in the danger zone of the hold down pins and the shear blades during operating cycles. The employer's ongoing obligation is to ensure that points of operation of machinery are guarded.

ABATEMENT NOTE: Among other methods, one feasible and acceptable abatement method to correct this hazard is to guard the point of operation hazards in accordance with American National Standard ANSI B11.4-2003.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photograph or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 05/24/2015
Proposed Penalty: \$70000.00

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: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

Citation 2 Item 6 Type of Violation: **Willful**

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

a) Lloyd Industries Inc. - The employer does not ensure that points of operation of machinery are guarded. On or about November 13, 2014, the point of operation for the Roll Former / Frame Maker Machine was not guarded to prevent employees from having their fingers in the danger zone during operating cycles. The employer's ongoing obligation is to ensure that points of operation of machinery are guarded.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photograph or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 05/24/2015
Proposed Penalty: \$70000.00

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

Inspection Number: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

Citation 2 Item 7 Type of Violation: **Willful**

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

a) Lloyd Industries Inc. - The employer does not ensure that points of operation of machinery are guarded. On or about November 13, 2014, the point of operation for the Milford Brand Rivet Machines was not guarded to prevent employees from having their fingers in the danger zone during operating cycles. The employer's ongoing obligation is to ensure that points of operation of machinery are guarded.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photograph or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 05/24/2015
Proposed Penalty: \$70000.00

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

Inspection Number: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.

Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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

29 CFR 1910.217(b)(4)(ii): Mechanical power press(es) using full revolution clutches were not provided with a pad with a nonslip contact area firmly attached to the pedal:

a) Lloyd Industries Inc., Louver Department - On or about November 13, 2014, # 18, Niagara brand mechanical power press was not provided with a pad with a nonslip contact area firmly attached to the pedal:

b) Lloyd Industries Inc., Louver Department - On or about November 13, 2014, # 19, Niagara brand mechanical power press was not provided with a pad with a nonslip contact area firmly attached to the pedal:

No abatement certification or documentation required.

Date By Which Violation Must be Abated:

Corrected During Inspection

Proposed Penalty:

\$0.00

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

Inspection Number: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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

29 CFR 1910.303(b)(2): Listed or labeled electrical equipment was not used or installed in accordance with instructions included in the listing or labeling:

- a) Lloyd Industries Inc. Louver Department - On or about November 13, 2014, a metal knock out type outlet box was being used as a pendant to supply electrical power to the Bliss Brand #23 Mechanical Power Press.
- b) Lloyd Industries Inc. Louver Department - On or about November 13, 2014, a metal knock out type outlet box was being used as a pendant to supply electrical power to the #21 Mechanical Power Press.
- c) Lloyd Industries Inc. Sleeve Department - On or about November 13, 2014, a metal knock out type outlet box with corrugated metal conduit was being used as a pendant to supply electrical power to an air device for the flange machine.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated: 05/24/2015
Proposed Penalty: \$0.00

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

Inspection Number: 1008085
Inspection Date(s): 11/13/2014 - 05/01/2015
Issuance Date: 05/11/2015



Citation and Notification of Penalty

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936

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

29 CFR 1910.304(f)(1)(viii): 29 CFR 1910.304(f)(1)(viii): Circuit breakers used as switches in 120-volt and 277-volt, fluorescent lighting circuits were not listed and marked "SWD."

a) Lloyd Industries Inc., Sleeves Department - On or about November 13, 2014, a circuit panel box with multiple circuit breakers being used as switches for the shop area fluorescent lights were not listed and marked "SWD."

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/24/2015
\$0.00


Jean G. Kulp
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
3477 Corporate Parkway
Suite 120
Center Valley, PA 18034
Phone: 267-429-7542 Fax: 267-429-7567



INVOICE / DEBT COLLECTION NOTICE

Company Name: LLOYD INDUSTRIES, INC.
Inspection Site: 231 COMMERCE DRIVE, Montgomeryville, PA 18936
Issuance Date: 05/11/2015

Summary of Penalties for Inspection Number	1008085
Citation 1, Serious	\$17000.00
Citation 2, Willful	\$490000.00
Citation 3, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES	\$507000.00

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.

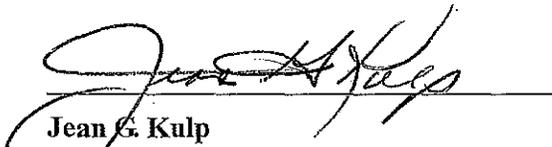
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within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

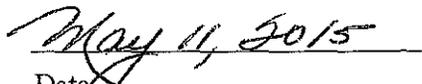
Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (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.



Jean G. Kulp
Area Director



Date