

**Michigan Department of Licensing and Regulatory Affairs  
Michigan Occupational Safety and Health Administration (MIOSHA)**

MIOSHA General Industry Safety & Health Division  
530 West Allegan Street  
P.O. Box 30644  
Lansing, MI 48909  
Phone: (517) 284-7750 Fax: (517) 284-7755



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## Citation and Notification of Penalty

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**To:**

Packaging Specialties Inc dba PackSpec  
and its successors  
8111 Middlebelt Rd  
Romulus, MI 48174

**Inspection Number:** 1310692  
**Inspection Date(s):** 04/23/2018 - 06/05/2018  
**Issuance Date:** 08/10/2018

**Inspection Site:**

8111 Middlebelt Rd  
Romulus, MI 48174

**Reporting ID:** 0552652  
**CSHO ID:** P7844  
**Optional Report Number:**

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**SUMMARY:** An inspection at the site noted above has revealed conditions we believe do not comply with the provisions of the Michigan Occupational Safety and Health Act, Act 154, of the P.A. of 1974, as amended (MIOSH Act). The nature of such alleged violation(s) is described on the citation(s) with reference to the applicable standards, rules, regulations, orders and provisions of the Act. Following is a list of items the employer must consider carefully, to resolve the issues alleged in the citation(s). Following this numbered summary is a more detailed explanation of the requirements.

1. The violation(s) alleged in the citation(s) must be corrected on or before the date(s) shown in the line marked "Date By Which Violation Must Be Abated". If the line is marked "Immediately Upon Receipt," the violation must be corrected on or before the date that the citation is received by the employer. If the violation was corrected during the inspection, the line will be marked "Abated." or "Corrected during inspection." Correcting a violation does not eliminate the requirement to pay the penalty nor does payment of the penalty negate having to correct the violation.
2. A copy of the citation(s) must be posted at or near the location of the violation(s) for a minimum of 3 days or until the item(s) have been corrected, whichever is later.
3. Documentation of abatement must be provided to the issuing division. Failure to provide such documentation may result in a follow-up inspection.
4. The employer may enter into a Penalty Reduction Agreement (PRA) that can result in a 50% reduction in any assessed penalties. The employer should apply for a PRA online at [www.michigan.gov/mioshapra](http://www.michigan.gov/mioshapra) within 5 workdays upon receiving a citation(s) if interested. An employer without access to a computer may contact the issuing division to request a PRA.
5. The employer may file a first appeal for modification or dismissal of a citation item and/or any proposed penalty or request an extension of time for abatement. **The appeal must be in writing and be postmarked within 15 workdays of receipt (workday is defined below).** The first appeal can also result in a penalty reduction of up to 50%. If an appeal is untimely, the citation(s) become a Final Order of the Board of Health and Safety Compliance and Appeals (Board) and is no longer subject to review by the issuing division. An employee or employee representative may appeal abatement dates.
6. Except under a PRA monetary penalties must be paid within 15 workdays of a citation becoming a Final Order of the Board.
7. The employer may file a request for an extension of time to abate a citation(s) that has become a Final Order of the Board. Such a request must be in writing and received or post marked no later than 1 working day following the abatement date.
8. It is unlawful to discriminate against an employee for exercising any of their rights under MIOSHA.

Note: As defined in statutes, “workday” or “working day” means any day other than a Saturday, Sunday, or state legal holiday. The state legal holidays are:

January 1, New Year’s Day  
The third Monday in January, Martin Luther King, Jr. Day  
February 12, Lincoln’s birthday  
The third Monday of February, Washington’s birthday  
The last Monday of May, Memorial or Decoration Day  
July 4, Independence Day  
The first Monday in September, Labor Day  
The second Monday in October, Columbus Day  
November 11, Veterans’ Day  
The fourth Thursday of November, Thanksgiving Day  
December 25, Christmas Day

Please note whenever January 1; February 12; July 4; November 11; or December 25 fall on a Sunday, the next Monday following is deemed a public holiday (non-working day) for appeal purposes. However, there is no compensating day when one of the five dated holidays falls on a Saturday. Also, when computing the 15 working days, you do not count the date on which it is received; you start with the next working day. Additionally, the count is based on when the citation was received at the employer’s location, not when it got to any particular person or office at the employer’s location.

**I–CITATIONS:** The nature of the alleged violation(s) is described on the enclosed citation(s). These conditions must be corrected on or before the date(s) shown in the line marked “Date By Which Violation Must Be Abated.” The issuing division may be contacted by telephone at the number indicated on the front of the citation for the purpose of discussing any issues related to the inspection or citation(s).

A copy of the citation(s) must be posted at or near the location of the violation for a minimum of 3 days or until the items have been corrected, whichever is later. The MIOSH Act provides for civil penalties of up to \$7,000 for each violation for failure to comply with posting requirements.

When compliance is achieved, a copy of the citation must be signed and returned to the issuing division along with documentation of abatement.

Documentation of abatement for citation items originally classified as “serious,” “repeat,” “fail-to-abate,” “willful,” or “instance-by-instance,” require documentation as deemed appropriate by the issuing division. Examples of documentation for these violation classifications are:

- (a) A detailed description of how the violation was abated.
- (b) Work orders or an invoice indicating the corrective work that has been done.
- (c) Photographs of the abated conditions.
- (d) Other forms of conclusive evidence that your employees are no longer exposed to the hazard.

For citation items classified as “other,” submitting to the issuing division a signed copy of the citation item indicating the item has been abated is acceptable documentation of abatement. Submitting a document in writing, certifying abatement of the particular citation item is also acceptable for citation items classified as “other.”

If the employer does not provide adequate documentation of abatement, a re-inspection may be conducted. Failure to correct an alleged violation within the abatement period may result in new or additional proposed penalties.

Correcting a violation prior to the expiration of the abatement date does not eliminate the requirement to pay the penalty. Payment of the penalty does not eliminate the requirement of correcting the violation.

**II–PENALTY REDUCTION:** In addition to the appeal rights afforded by the MIOSH Act, the Michigan Occupational Safety and Health Administration has implemented a program for negotiating an expedited settlement of penalties with the employers known as a Penalty Reduction Agreement (PRA). This is a program designed to reach abatement of the hazard at the earliest possible opportunity and reduce the need for formal appeals. The penalty reduction (PRA) can result in a penalty reduction of 50% provided the issuing division and the employer agree to a number of specified conditions. These conditions include an agreement by the employer to accept all of the citations issued and to:

- (a) Not appeal further.
- (b) Abate all items within the abatement period.
- (c) Provide proof of abatement.
- (d) Pay all agreed upon penalties as required (within 15 working days of approval of the PRA.)
- (e) Abide by any other mutually agreed upon actions.

Inspections involving a fatality, the Severe Violator Enforcement Program (SVEP), or willful citations are not eligible for the program. Construction citations must be confirmed as corrected by the issuing division before a penalty reduction agreement can be approved.

If you are interested in pursuing a PRA, you should apply online at [www.michigan.gov/mioshapra](http://www.michigan.gov/mioshapra) **within 5 workdays upon receipt of the citation(s)**, but no later than the 15th workday beyond receipt of the citation(s). If you do not have access to a computer, you should contact the issuing division within the same timeframe to request a PRA. If the employer wishes to accept the conditions stated above and the process can be completed within 15 workdays from receipt, then no appeal need be filed.

**III–CITATION APPEAL:** An employer may file a first appeal to the issuing division in writing for modification or dismissal of a citation item and/or any proposed penalty or an extension of time for abatement. The first appeal can also result in a penalty reduction of up to 50% providing the issuing division and the employer agree to the conditions (a) through (e) as stated in Section II, PENALTY REDUCTION (above).

An employee or employee representative may appeal in writing the reasonableness of the abatement date(s). The envelope containing an appeal must be postmarked no later than the 15th workday following receipt of the citation.

If a citation is not appealed within 15 workdays of receipt, then the citation becomes a Final Order of the Board of Health and Safety Compliance and Appeals (Board). Final Order citations are not subject to review by the issuing division unless the Bureau of Hearings establishes good cause for the late appeal.

An appeal must specify the item(s) appealed and that portion of the item (e.g., violation, abatement date, penalty) which is being appealed and include a certification that the appeal has been posted or given to affected employees or their representatives. If the issuing division meets with the employer to discuss an appeal, the issuing division will notify the employee representative and allow attendance at the meeting.

The issuing division will notify an employer of its decision within 15 workdays of the receipt of the employer's written appeal. The decision must be posted at the location of the subject citation.

If an employer, employee or employee representative is not satisfied with this decision then they may file a second appeal. The appeal must be in writing and the envelope containing the second appeal must be postmarked within 15 workdays of the receipt of the issuing division's decision on the first appeal. If the issuing division's decision is not appealed then the citation becomes a Final Order of the Board.

**IV–PAYMENT OF MONETARY PENALTIES:** Unless subject to a PRA, payment must be made within 15 workdays of the date a proposed penalty of a citation becomes a Final Order of the Board. This would be the 30th workday after receipt of each citation item that is not appealed. For payment of a penalty, make a check or money order payable to the "State of Michigan" and remit to the issuing division at the address shown on the citation. Please record the inspection number, citation and item number on the check, money order or transmittal letter.

**V–EXTENSION OF TIME TO ABATE:** An employer may file a petition for modification of abatement date(s) (PMA) on an item of a citation, which has become a Final Order of the Board. The PMA must be submitted to the issuing division in writing by personal delivery or postmarked no later than one day following the abatement date, and a copy posted near the place the citation was posted. An employer must have made a good faith effort to correct the violation by the abatement date, and has or will not be successful because of factors beyond the employer's reasonable control. A PMA must include:

- (a) Steps taken to achieve compliance.
- (b) The specific additional abatement time necessary.
- (c) The reasons the additional time is needed.
- (d) Available interim steps being taken to safeguard the employees against the cited hazard during the abatement period.
- (e) A certification that a copy of the PMA has been posted for employees at the location of the subject citation.

The posted copy must remain posted for a minimum of 10 workdays.

If the issuing division or affected employees file an objection to the PMA within 10 workdays of the employer's filing date, the Board will schedule a hearing and advise the employer of the date, time, and place of the hearing.

**VI–EMPLOYEE DISCRIMINATION:** Section 65 of the MIOSH Act, prohibits discrimination by an employer against an employee for filing a complaint or exercising any rights under the MIOSH Act, as amended. If an employee believes that he or she was discharged or otherwise discriminated against as a result of filing a complaint, they may file a complaint with the MIOSHA Employee Discrimination Section within 30 days after the violation occurs.

**VII-STATE CONSULTATION EDUCATION AND TRAINING SERVICES:** The MIOSHA Consultation Education and Training (CET) Division offers a wide range of services to help businesses with their health and safety practices. CET services include: helping employers create a Safety and Health Management System, seminars and workshops, onsite consultations, hazard surveys, an equipment loan program and information material. The majority of CET services are provided free of charge to Michigan employers and employees. For information on these services, contact the CET Division at (517) 284-7720 or visit their web site at [www.mi.gov/miosha](http://www.mi.gov/miosha).

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**Issuance Date:** 08/10/2018  
**Optional Reporting Number:**

**Citation and Notification of Penalty**

**Company Name:** Packaging Specialties Inc dba PackSpec  
**Inspection Site:** 8111 Middlebelt Rd, Romulus, MI 48174

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**Citation 1 Item 1**

Type of Violation: **Serious**

**408.10034(3): GI PART 1, GENERAL PROVISIONS**

A point of operation guard or device shall be as prescribed in a specific standard, or, in the absence of a specific standard, shall be designed and constructed, when required, to prevent the machine operator exposed to the hazard from having any part of his or her body in the hazardous area during the operating cycle. A guard or device for the point of operation of a nonproduction arbor press or straightening press is not required if the machine is equipped with a hand control that is designed to stop the ram action or return the ram to the up position when released.

(a. There was no guard on the point of operation on the Diamond Guillotine Cardboard Cutter in the Design Lab. There was a single hand activation control that was not constant pressure to cycle the machine leaving two hands free during the cycle with exposure to the guillotine blade. This sub item was corrected during the inspection.

b. There was no guard on the point of operation on the Flexo Folder Gluer Machine Number 146 in the Converting Area.)

**Date By Which Violation Must be Abated:** **September 13, 2018**  
**Proposed Penalty:** **\$4,500.00**

**Citation 1 Item 2**

Type of Violation: **Serious**

**408.12176(1): GI PART 21, POWERED INDUSTRIAL TRUCKS**

An employer shall ensure that a highway truck and trailer shall not be boarded by a powered industrial truck before the highway truck and trailer has its brakes set and not less than 2 wheels blocked or be restrained by other mechanical means installed in a manner that will hold the trailer from movement.

(There were no wheel chocks or other mechanical means installed when an employee boarded a highway trailer with a powered industrial truck to unload pallets of material on Loading Dock Six in the Receiving Area.)

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**Date By Which Violation Must be Abated:** **September 13, 2018**  
**Proposed Penalty:** **\$4,500.00**

**Citation 1 Item 3a**

Type of Violation: **Serious**

408.13309(1): GI PART 33, PERSONAL PROTECTIVE EQUIPMENT

An employer shall provide training to each employee who is required by these rules to use personal protective equipment. The training shall include all of the following:

- (a) When personal protective equipment is necessary.
- (b) What personal protective equipment is necessary.
- (c) How to properly don, doff, adjust, and wear the personal protective equipment.
- (d) The limitations of the personal protective equipment.
- (e) The proper care, maintenance, useful life, and disposal of the personal protective equipment.

(There was no training provided per (a) through (e) on the use of personal protective equipment during the following:

- a. Prior to cleaning out scrap from under the Rotary Die Cutting Machine 122 in the Converting Area with exposure to flying objects and particles. This sub item was corrected during the inspection.
- b. Prior to cleaning scrap and debris from under the Slot cutting Machine 119 in the Partition Area with exposure to flying objects and particles. This sub item was corrected during the inspection.
- c. Prior to operating grinders, air tools, blow guns and performing maintenance and repairs on machinery and equipment. This sub item was corrected during the inspection.)

**Date By Which Violation Must be Abated:** **Corrected During Inspection**  
**Proposed Penalty:** **\$5,400.00**

**Citation 1 Item 3b**

Type of Violation: **Serious**

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408.13312(1): GI PART 33, PERSONAL PROTECTIVE EQUIPMENT

An employer shall ensure that each affected employee uses appropriate eye or face protection, when exposed to eye or face hazards from any of the following:

- (a) Flying objects or particles.
- (b) Harmful contacts.
- (c) Exposures.
- (d) Molten metal.
- (e) Liquid chemicals.
- (f) Acids or caustic liquids.
- (g) Chemical fumes, gases or vapors.
- (h) Glare.
- (i) Injurious radiation.
- (j) Electrical flash.
- (k) A combination of these hazards

- (a. Safety glasses were not worn while cleaning out scrap from under the Rotary Die Cutting Machine 122 in the Converting Area with exposure to flying objects and particles. This item was corrected during the inspection.
- b. Safety glasses were not worn while cleaning scrap and debris from under the Slot cutting Machine 119 in the Partition Area with an air blow gun with exposure to flying objects and particles. This item was corrected during the inspection.
- c. Prescription glasses with no side protection were worn while operating grinders, air tools, blow guns and performing maintenance and repairs on machinery and equipment. This item was corrected during the inspection.)

<b>Date By Which Violation Must be Abated:</b>	<b>Corrected During Inspection</b>
<b>Proposed Penalty:</b>	<b>\$0.00</b>

Citation 1 Item 4

Type of Violation: **Serious**

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**Issuance Date:** 08/10/2018  
**Optional Reporting Number:**

**Citation and Notification of Penalty**

**Company Name:** Packaging Specialties Inc dba PackSpec  
**Inspection Site:** 8111 Middlebelt Rd, Romulus, MI 48174

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408.15815(1): GI PART 58, AERIAL WORK PLATFORMS

An employer shall provide each employee who will operate the aerial work platform with instruction and training regarding the equipment before a permit is issued or reissued. Such instruction and training shall include the following:

- (a) Instruction by a qualified person in the intended purpose and function of each of the controls.
- (b) Training by a qualified person or reading and understanding the manufacturer's or owner's operating instructions and safety rules.
- (c) Understanding by reading or by having a qualified person explain, all decals, warnings, and instructions displayed on the aerial work platform.
- (d) Reading and understanding the provisions of this subrule and subrules (1) to (9) of this rule or be trained by a qualified person on their content.

(An employee was not trained on the function of the controls, operating instructions, and the decals and warnings of an aerial work platform scissor lift prior to using it when changing light bulbs in the facility.)

<b>Date By Which Violation Must be Abated:</b>	<b>Corrected During Inspection</b>
<b>Proposed Penalty:</b>	<b>\$4,500.00</b>

Citation 2 Item 1

Type of Violation: **Repeat-Serious**

408.10034(10): GI PART 1, GENERAL PROVISIONS

A band or circular saw shall be guarded as prescribed in General Industry Safety and Health Standard Part 27 "Woodworking Machinery," as referenced in R 408.10002.

Packaging Specialties, Inc. was previously cited for a violation of this Michigan Occupational Safety and Health Standard GI PART 1, GENERAL PROVISIONS 408.10034(10) which was contained in MIOSHA inspection number 1005513, Citation number 1, Item number 2, and was issued on 03-19-2015 with respect to a work place located at 11350 Kaltz, Warren, MI 48089.

Packaging Specialties, Inc. DBA PackSpec was previously cited for a violation of this Michigan Occupational

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Safety and Health Standard GI PART 1, GENERAL PROVISIONS 408.10034(10) which was contained in MIOSHA inspection number 1189020, Citation number 2, Item number 1, and was issued on 01-06-2017 with respect to a work place located at 8111 Middlebelt Rd., Romulus, MI 48174.

(The sliding blade guide was not maintained within 1/4 inch of the piece being cut on the Milwaukee Vertical Band Saw in the Finishing Area as required in GI Part 27. The guard was approximately 1 1/2 inches above the cardboard being cut.)

**Date By Which Violation Must be Abated:**

**September 13, 2018**

**Proposed Penalty:**

**\$50,000.00**

#### Citation 2 Item 2

Type of Violation: **Repeat-Serious**

408.10727(1): GI PART 7, GUARDS FOR POWER TRANSMISSION

A belt and pulley that is 7 feet or less above the floor or platform and that is exposed to contact shall be guarded pursuant to R 408.10751 to R 408.10754. In a power plant or power-development room, a standard barrier and toeboard may be used pursuant to General Industry Safety Standard Part 2 "Floor and Wall Openings, Stairways, and Skylights" as referenced in R 408.10702.

Packaging Specialties, Inc. was previously cited for a violation of this Michigan Occupational Safety and Health Standard GI PART 7, GUARDS FOR POWER TRANSMISSION 408.10727(1) which was contained in MIOSHA inspection number 315398073, Citation number 1, Item number 4A, and was issued on 01-28-2013 with respect to a work place located at 11350 Kaltz, Warren, MI 48089.

Packaging Specialties, Inc. DBA PackSpec was previously cited for a violation of this Michigan Occupational Safety and Health Standard GI PART 7, GUARDS FOR POWER TRANSMISSION 408.10727(1) which was contained in MIOSHA inspection number 1189020, Citation number 2, Item number 2B, and was issued on 01-06-2017 with respect to a work place located at 8111 Middlebelt Rd., Romulus, MI 48174.

(There was no guard on the drive belt and pulley on the Bostitch Wire Stitcher in the Design Lab.)

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<b>Date By Which Violation Must be Abated:</b>	<b>Corrected During Inspection</b>
<b>Proposed Penalty:</b>	<b>\$50,000.00</b>

#### Citation 2 Item 3a

Type of Violation: **Repeat-Serious**

1910.147(c)(4)(i): GI PART 85, THE CONTROL OF HAZARDOUS ENERGY SOURCES  
(LOCKOUT/TAGOUT) [REF 408.18502]

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.

Packaging Specialties, Inc. DBA PackSpec was previously cited for a violation of this Michigan Occupational Safety and Health Standard GI PART 85, THE CONTROL OF HAZARDOUS ENERGY SOURCES (LOCKOUT/TAGOUT) [REF 408.18502] 1910.147(c)(4)(i) which was contained in MIOSHA inspection number 1189020, Citation number 1, Item number 1A, and was issued on 01/06/2017 with respect to a work place located at 8111 Middlebelt Rd. Romulus MI 48174.

- (a. There was no lockout utilized while cleaning scrap out from under the Rotary Die Cutting Machine 122 in the Converting Area. This sub item was corrected during the inspection.
- b. There was no lockout utilized while clearing jammed cardboard from inside the machine on the 161 Stripping Machine in the Partition Department. This sub item was corrected during the inspection.
- c. There was no lockout utilized while performing maintenance and repairs on the Rotary Die Cutting Machine 122 in the Converting Area.
- d. No lockout procedures were developed or documented for the control of potential hazardous energy while engaged in the maintenance and repairs of the Rotary Cutting Machine 122 in the Converting Area. This sub item was corrected during the inspection.)

<b>Date By Which Violation Must be Abated:</b>	<b>September 13, 2018</b>
<b>Proposed Penalty:</b>	<b>\$25,000.00</b>

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**Citation 2 Item 3b**

Type of Violation: **Repeat-Serious**

1910.147(c)(7)(i)(A): GI PART 85, THE CONTROL OF HAZARDOUS ENERGY SOURCES (LOCKOUT/TAGOUT) [REF 408.18502]

Each authorized employee shall 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.

Packaging Specialties, Inc. DBA PackSpec was previously cited for a violation of this Michigan Occupational Safety and Health Standard GI PART 85, THE CONTROL OF HAZARDOUS ENERGY SOURCES (LOCKOUT/TAGOUT) [REF 408.18502] 1910.147(c)(7)(i)(A) which was contained in MIOSHA inspection number 1189020, Citation number 1, Item number 1B, and was issued on 01/06/2017 with respect to a work place located at 8111 Middlebelt Rd., Romulus, MI 48174.

- (a. An employee that was trained as affected was performing authorized tasks of cleaning scrap out from under the Rotary Die Cutting Machine 122 in the Converting Area. This sub item was corrected during the inspection.
- b. An employee that was trained as affected was performing authorized tasks of clearing jammed cardboard from inside the machine on the 161 Stripping Machine in the Partition Department. This sub item was corrected during the inspection.
- c. An employee that was trained as affected was performing authorized tasks of performing maintenance and repairs on equipment the Rotary Die Cutting Machine 122 in the Converting Area.)

**Date By Which Violation Must be Abated:**

**September 13, 2018**

**Proposed Penalty:**

**\$0.00**

**Citation 3 Item 1**

Type of Violation: **Other-than-Serious**

408.11222(1): GI PART 12, WELDING AND CUTTING

An oxygen cylinder shall be stored not less than 20 feet from fuel gas cylinders or a highly combustible

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material, such as, but not limited to, oil, grease, excelsior, flammable gas, or a source of ignition, or shall be separated from the material by a noncombustible wall, not less than 5 feet (1.6 meters) high, having a fire-resistance rating of 1/2 hour. An oxygen cylinder shall not be stored in an acetylene generator compartment. The underwriters' laboratory fire resistance directory may be used as a guide to determine fire resistance, as adopted in R 408.11202.

(Oxygen gas cylinders and acetylene gas cylinders were stored next to each other in the Maintenance Room.)

<b>Date By Which Violation Must be Abated:</b>	<b>Corrected During Inspection</b>
<b>Proposed Penalty:</b>	<b>\$0.00</b>

Citation 3 Item 2

Type of Violation: **Other-than-Serious**

1910.303(g)(2)(i): GI PART 39, DESIGN SAFETY STANDARDS FOR ELECTRICAL SYSTEMS [REF 408.13902]

Except as elsewhere required or permitted by this standard, live parts of electric equipment operating at 50 volts or more shall be guarded against accidental contact by use of approved cabinets or other forms of approved enclosures or by any of the following means:

- (A) By location in a room, vault, or similar enclosure that is accessible only to qualified persons.
- (B) By suitable permanent, substantial partitions or screens so arranged so that only qualified persons will have access to the space within reach of the live parts. Any openings in such partitions or screens shall be so sized and located that persons are not likely to come into accidental contact with the live parts or to bring conducting objects into contact with them.
- (C) By placement on a suitable balcony, gallery, or platform so elevated and otherwise located as to prevent access by unqualified persons; or
- (D) By elevation of 2.44 m (8.0 ft) or more above the floor or other working surface.

(The door on a 220 volt power disconnect panel was open approximately three inches in the employees work area on the 161 Stripping Machine in the Chip Area.)

**Michigan Department of Licensing  
and Regulatory Affairs**

530 West Allegan Street  
P.O. Box 30644  
Lansing, MI 48909  
Phone: (517) 284-7750 Fax: (517) 284-7755

**Inspection Number:** 1310692  
**Inspection Date(s):** 04/23/2018 - 06/05/2018  
**Issuance Date:** 08/10/2018  
**Optional Reporting Number:**

**Citation and Notification of Penalty**

**Company Name:** Packaging Specialties Inc dba PackSpec  
**Inspection Site:** 8111 Middlebelt Rd, Romulus, MI 48174

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<b>Date By Which Violation Must be Abated:</b>	<b>Corrected During Inspection</b>
<b>Proposed Penalty:</b>	<b>\$0.00</b>

Citation 3 Item 3

Type of Violation: **Other-than-Serious**

408.15416(2): GI PART 54, POWERED GROUNDSKEEPING EQUIPMENT

A portable container used for refueling shall be an approved safety can with an automatic closing cap and flame arrester.

(Three gasoline cans in the Garage Area did not have self-closing lids or flame arrestors in the nozzles. All three cans contained gasoline and were used to refuel the snow blower approximately two weeks ago.)

<b>Date By Which Violation Must be Abated:</b>	<b>Corrected During Inspection</b>
<b>Proposed Penalty:</b>	<b>\$0.00</b>

Citation 3 Item 4a

Type of Violation: **Other-than-Serious**

1910.146(c)(1): GI PART 90, PERMIT-REQUIRED CONFINED SPACES [REF 408.19002]

The employer shall evaluate the workplace to determine if any spaces are permit-required confined spaces.

(The work place was not evaluated to determine if any spaces are permit-required confined spaces. There are two permit-required confined spaces located at Load Former 140 and Load Former 146 in the Converting Area. The spaces are approximately 91 inches wide, 115 inches in length, and approximately 72 inches deep.)

<b>Date By Which Violation Must be Abated:</b>	<b>September 13, 2018</b>
<b>Proposed Penalty:</b>	<b>\$0.00</b>

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**Citation 3 Item 4b**

Type of Violation: **Other-than-Serious**

1910.146(c)(2): GI PART 90, PERMIT-REQUIRED CONFINED SPACES [REF 408.19002]

If the workplace contains permit spaces, the employer shall inform exposed employees, by posting danger signs or by any other equally effective means, of the existence and location of and the danger posed by the permit spaces.

(The employee was not informed by posted danger signs or by any other equally effective means, of the existence and location of and the danger posed by the permit spaces. There are two permit-required confined spaces located at Load Former 140 and Load Former 146 in the Converting Area. The spaces are approximately 91 inches wide, 115 inches in length, and are approximately 72 inches deep.)

**Date By Which Violation Must be Abated:**

**Corrected During Inspection**

**Proposed Penalty:**

**\$0.00**

**Citation 3 Item 4c**

Type of Violation: **Other-than-Serious**

1910.146(c)(3): GI PART 90, PERMIT-REQUIRED CONFINED SPACES [REF 408.19002]

If the employer decides that its employees will not enter permit spaces, the employer shall take effective measures to prevent its employees from entering the permit spaces and shall comply with paragraphs (c)(1), (c)(2), (c)(6), and (c)(8) of this section.

(There were no effective measures taken to prevent the employee from entering the permit spaces. There are two permit-required confined spaces located at Load Former 140 and Load Former 146 in the Converting Area. The spaces are approximately 91 inches wide, 115 inches in length, and are approximately 72 inches deep.)

**Date By Which Violation Must be Abated:**

**September 13, 2018**

**Proposed Penalty:**

**\$0.00**

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**Citation 4 Item 1**

Type of Violation: **Repeat-Other**

408.10036(1): GI PART 1, GENERAL PROVISIONS

Air pressure at the discharge end of a portable air blow gun or portable air hose shall be less than 30 pounds per square inch gauge when dead-ended.

Packaging Specialties, Inc. was previously cited for a violation of this Michigan Occupational Safety and Health Standard GI PART 1, GENERAL PROVISIONS 408.10036(1) which was contained in MIOSHA inspection number 1005513, Citation number 2, Item number 1, and was issued on 03/19/2015 with respect to a work place located at 11350 Kaltz, Warren, MI 48089.

(a. The portable air blow gun when dead ended at the discharge was approximately 80 pounds per square inch in the Maintenance Area. This item was corrected during the inspection.

b. The portable air blow gun when dead ended at the discharge was approximately 70 pounds per square inch at the Slotting Machine in the Partition Department. This item was corrected during the inspection.)

**Date By Which Violation Must be Abated:**

**Corrected During Inspection**

**Proposed Penalty:**

**\$500.00**

**Citation 4 Item 2**

Type of Violation: **Repeat-Other**

1910.147(c)(6)(i): GI PART 85, THE CONTROL OF HAZARDOUS ENERGY SOURCES  
(LOCKOUT/TAGOUT) [REF 408.18502]

**The employer shall conduct a periodic inspection of the energy control procedure at least annually** to ensure that the procedure and the requirements of this standard are being followed.

Packaging Specialties, Inc. DBA PackSpec **was previously cited for a violation** of this Michigan Occupational Safety and Health Standard GI PART 85, THE CONTROL OF HAZARDOUS ENERGY SOURCES

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(LOCKOUT/TAGOUT) [REF 408.18502] 1910.147(c)(6)(i) which was contained in MIOSHA inspection number 1005513, Citation number 2, Item number 5, and was issued on 3/19/2015 with respect to a work place located at 11350 Kaltz, Warren, MI 48089.

(There were no periodic inspections since 2015 of the energy control procedures conducted while employees perform maintenance, repairs and setup on machinery and equipment in the shop area.)

<b>Date By Which Violation Must be Abated:</b>	<b>September 13, 2018</b>
<b>Proposed Penalty:</b>	<b>\$500.00</b>

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**Authorized Signature**

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**Inspection Number:** 1310692  
**Inspection Date:** 04/23/2018 - 06/05/2018  
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**Optional Reporting Number:**  
**CSHO ID:** P7844

## PROPOSED PENALTY INVOICE

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**Company Name:** Packaging Specialties Inc dba PackSpec  
**Inspection Site:** 8111 Middlebelt Rd  
Romulus, MI 48174

**Summary of Penalties for Inspection Number:** 1310692

Citation 1 Item 1, Serious	\$4,500.00
Citation 1 Item 2, Serious	\$4,500.00
Citation 1 Item 3a, Serious	\$5,400.00
Citation 1 Item 3b, Serious	\$0.00
Citation 1 Item 4, Serious	\$4,500.00
Citation 2 Item 1, Repeat-Serious	\$50,000.00
Citation 2 Item 2, Repeat-Serious	\$50,000.00
Citation 2 Item 3a, Repeat-Serious	\$25,000.00
Citation 2 Item 3b, Repeat-Serious	\$0.00
Citation 3 Item 1, Other-than-Serious	\$0.00
Citation 3 Item 2, Other-than-Serious	\$0.00
Citation 3 Item 3, Other-than-Serious	\$0.00
Citation 3 Item 4a, Other-than-Serious	\$0.00
Citation 3 Item 4b, Other-than-Serious	\$0.00
Citation 3 Item 4c, Other-than-Serious	\$0.00
Citation 4 Item 1, Repeat-Other	\$500.00
Citation 4 Item 2, Repeat-Other	\$500.00

**TOTAL PROPOSED PENALTIES:** **\$144,900.00**

Correcting a violation prior to the expiration of the abatement date does not eliminate the requirement to pay the penalty.  
Payment of the penalty does not eliminate the requirement of correcting the violation.

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

Payment must be made within 15 working days of the date a proposed penalty of a citation item becomes a final order of the board. This would be the thirtieth (30<sup>th</sup>) working day after receipt of each citation item which is not appealed. For the payment of any penalty, make a check or money order payable to the "State of Michigan" and remit to the Department of Licensing and Regulatory Affairs at the address shown on the citation. PLEASE RECORD THE APPLICABLE INSPECTION NUMBER, CITATION NUMBER(S) AND ITEM NUMBER(S) ON THE CHECK, MONEY ORDER OR YOUR TRANSMITTAL LETTER.

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**Issuance Date(s):**

08/10/2018

**Optional Reporting Number:**

**CSHO ID:** P7844

**Enclose this invoice page (or a copy thereof) with your payment.**

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**Authorized Signature**