

U.S. Department of Labor
Occupational Safety and Health Administration
701 Route 73 South
Building 2, Suite 120
Marlton, NJ 08053
Phone: 856-596-5200 Fax: 856-596-5201



Citation and Notification of Penalty

To:
PANDROL USA, LP
and its successors
501 SHARPTOWN RD.
Bridgeport, NJ 08014

Inspection Number: 445406
Inspection Date(s): 05/21/2012 - 05/28/2012
Issuance Date: 11/19/2012

Inspection Site:
501 SHARPTOWN RD.
P.O Box 367
Bridgeport, NJ 08014

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

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

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

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

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

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

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

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

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

Notification of Corrective Action – For each violation which you do not contest, you must provide *abatement certification* to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that *abatement documentation* is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days

(excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 11/19/2012. The conference will be held at the OSHA office located at 701 Route 73 South, Building 2, Suite 120, Marlton, NJ 08053 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 445406

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014
Issuance Date: 11/19/2012

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 701 Route 73 South, Building 2, Suite 120, Marlton, NJ 08053**

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

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

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

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

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

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

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

Signature

Date

Typed or Printed Name

Title

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

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



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O. Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.22(b)(1): Aisles and passageways were not kept clear and in good repair, with no obstruction across or in aisles that could create a hazard.

- a) Facility (South End) - The employees passageways were blocked by the Minister No. 6 mechanical press, fan, furnace and metal containers containing clips, on or about 5/21/12.
- b) Clip line 2 - The employees passageways were blocked by two Stamtec GL-60 hydraulic press, auto-former, and fan, on or about 5/21/12.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$2700.00



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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 1910.24(b): Fixed stairs were not provided for access from one structure level to another where operations necessitated regular travel between levels, and for access to operating platforms at any equipment which requires attention routinely during operations:

a) Facility (South End / Furnace conveyor line 1 & 2) : Employees were observed traveling up stacked pallets and sorting through clips without the accessibility of having a fixed stairway, on or about 5/21/12.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:

12/14/2012

Proposed Penalty:

\$3600.00



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.24(h): Standard railings were not provided on the open sides of all exposed stairways and stair platforms:

a) Facility (The Diverter and Bar Machine Conveyor Area): The employer failed to guard the open sided stairways between conveyor belt line between Line 3 and 4, on or about 5/21/12.

b) Facility (South end / Furnace conveyor line): Employees were traveling up stacked pallets that were 4 feet above the ground below. These pallets were not fixed and were observed to be uneven and unsteady, on or about 5/21/12.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:

12/14/2012



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.95(d)(1): When information indicated that any employee's exposure equaled or exceed the 8-hour time-weighted average of 85 decibels, the employer did not develop and implement a monitoring program:

Noise Monitoring was not conducted for employees with the following exposures:

- a) South end of warehouse: A Clip sorter was exposed to continuous noise levels in excess of the action level of 85 dBA as an 8 hour time weighted average. The employee's dosimeter dBA level was 119% of the permissible level (90 dBA) and was equivalent to approximately 91.3 dBA. The sampling was performed for 480 minutes during one shift on 5/24/12.
- b) South end of warehouse: A Clip sorter was exposed to continuous noise levels in excess of the action level of 85 dBA as an 8 hour time weighted average. The employee's dosimeter dBA level was 115% of the permissible level (90 dBA) and was equivalent to approximately 91.1 dBA. The sampling was performed for 480 minutes during one shift on 5/24/12.
- c) South end of warehouse: A Clip sorter was exposed to continuous noise levels in excess of the action level of 85 dBA as an 8 hour time weighted average. The employee's dosimeter dBA level was 107% of the permissible level (90 dBA) and was equivalent to approximately 90.5 dBA. The sampling was performed for 480 minutes during one shift on 5/24/12.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$6300.00



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.95(g)(1): The employer did not establish and maintain an audiometric testing program as provided by 29 CFR 1910.95(g) by making audiometric testing available to all employees whose exposures equal or exceed an 8-hour time-weighted average of 85 decibels:

Audiometric Testing was not conducted for the employees with the following exposures:

- a) South end of warehouse: A Clip sorter was exposed to continuous noise levels in excess of the action level of 85 dBA as an 8 hour time weighted average. The employee's dosimeter dBA level was 119% of the permissible level (90 dBA) and was equivalent to approximately 91.3 dBA. The sampling was performed for 480 minutes during one shift on 5/24/12.
- b) South end of warehouse: A Clip sorter was exposed to continuous noise levels in excess of the action level of 85 dBA as an 8 hour time weighted average. The employee's dosimeter dBA level was 115% of the permissible level (90 dBA) and was equivalent to approximately 91.1 dBA. The sampling was performed for 480 minutes during one shift on 5/24/12.
- c) South end of warehouse: A Clip sorter was exposed to continuous noise levels in excess of the action level of 85 dBA as an 8 hour time weighted average. The employee's dosimeter dBA level was 107% of the permissible level (90 dBA) and was equivalent to approximately 90.5 dBA. The sampling was performed for 480 minutes during one shift on 5/24/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$6300.00

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: 445406
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Issuance Date: 11/19/2012



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.95(i)(3): Employees were not given the opportunity to select their hearing protectors from a variety of suitable hearing protectors provided by the employer:

a) Facility: Employees exposed to noise levels in excess of the action level were only provided one form of hearing protection the Moldex Pura fit Disposable foam ear plugs. The employer did not make a variety of hearing protection available, on or about 5/21/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:
Proposed Penalty:

12/14/2012
\$2700.00

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: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.95(k)(1): The employer did not train each employee who is exposed to noise at or above an 8-hour time-weighted average of 85 decibels in accordance with the requirements of 29 CFR 1910.95(k). The employer did not institute a training program and ensure employee participation in the program:

A training program was not instituted for any and all employees with the following exposures:

- a) South end of warehouse: A Clip sorter was exposed to continuous noise levels in excess of the action level of 85 dBA as an 8 hour time weighted average. The employee's dosimeter dBA level was 119% of the permissible level (90 dBA) and was equivalent to approximately 91.3 dBA. The sampling was performed for 480 minutes during one shift on 5/24/12.
- b) South end of warehouse: A Clip sorter was exposed to continuous noise levels in excess of the action level of 85 dBA as an 8 hour time weighted average. The employee's dosimeter dBA level was 115% of the permissible level (90 dBA) and was equivalent to approximately 91.1 dBA. The sampling was performed for 480 minutes during one shift on 5/24/12.
- c) South end of warehouse: A Clip sorter was exposed to continuous noise levels in excess of the action level of 85 dBA as an 8 hour time weighted average. The employee's dosimeter dBA level was 107% of the permissible level (90 dBA) and was equivalent to approximately 90.5 dBA. The sampling was performed for 480 minutes during one shift on 5/24/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$6300.00

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: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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 7 a Type of Violation: **Serious**

29 CFR 1910.138(a): The employer did not select and require employee(s) to use appropriate hand protection when employees' hands were exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasion; punctures; chemical burns; thermal burns; and harmful temperature extremes.

a) Clip lines 1, 2, 3, 4: The employer did not select proper hand protection for employees that were handling metal bars and plates that had temperatures of 1800 degrees, on or about 5/21/12.

IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$6300.00

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

Inspection Number: 445406
Inspection Date(s): 05/21/2012 - 05/28/2012
Issuance Date: 11/19/2012



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.132(a): Protective equipment was not used when necessary whenever hazards capable of causing injury and impairment were encountered:

a) Warehouse: The employer did not provide employees with fire resistant sleeves to protect themselves from the hot ash, on or about 5/21/12.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:

12/14/2012

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: 445406
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Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O. Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.146(c)(2): The employer did not 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:

a) Furnace (Center of the warehouse): The employer did not post danger signs indicating to exposed employees that the furnace was a Permit Required Confined Space, on or about 5/21/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 12/14/2012
Proposed Penalty: \$4500.00

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: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.146(c)(4): When the employer decided that its employees would enter permit spaces, the employer did not develop and implement a written permit space entry program that complied with 29 CFR 1910.146:

a) Furnace (Center of warehouse): The employer did not develop and implement a written permit space entry program for employees that entered the furnace (permit required confined space) to perform maintenance acts, on or about 5/21/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$4500.00



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.146(g)(1): The employer did not provide training so that all employees whose work was regulated by 29 CFR 1910:146 (permit required confined spaces) acquired the understanding, knowledge, and skills necessary for the safe performance of the duties assigned under 29 CFR 1910.146:

a) Furnace (Center of warehouse): The employer did not provide training to employees that entered the furnace to perform maintenance, on or about 5/21/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$4500.00

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

Inspection Number: 445406
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Issuance Date: 11/19/2012



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

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

a) Facility - The employer did not conduct periodic inspections of the of the energy control procedures at least annually for machines, such as but not limited to the Stamtec GL-200 hydraulic press, Stamtec GL-60 hydraulic press, Minister No. 6 mechanical press, and Auto-former, on or about 5/21/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$6300.00

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: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.157(c)(1): Portable fire extinguishers were not mounted, located and identified so that they were readily accessible without subjecting the employees to injuries:

a) Truck Bay Area: A portable fire extinguisher was not mounted, located and identified so it was readily accessible, on or about 5/21/12.

b) Furnace Area: A portable fire extinguisher was not mounted, located and identified so that it was readily accessible, on or about 5/21/12.

c) Clip Line 3 Area: A portable fire extinguisher was not mounted, located and identified so that it was readily accessible, on or about 5/21/12.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated: 12/14/2012
Proposed Penalty: \$2700.00

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

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Citation and Notification of Penalty

Company Name: PANDROL USA, LP
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Citation 1 Item 13 Type of Violation: **Serious**

29 CFR 1910.179(j)(3): Complete inspections of the crane was not being performed at intervals as generally defined in paragraph (j)(1)(ii)(b) of this section:

a) Warehouse: The employer did not conduct annual periodic crane inspections of the 10 ton overhead crane, on or about 5/21/12.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$4500.00

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: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O. Box 367, Bridgeport, NJ 08014

Citation 1 Item 14 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) Facility (Center) - Employees were exposed to the heated metal bar stock on all sides of the Auto-former, because there was no guarding separating employees from the hazards created by flying chips, on or about 5/21/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$6300.00



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

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

a) Clip lines 1 - 4: At the point of operation for employees that operated the Stamtec GL-60 hydraulic press, it was not guarded, on or about 5/21/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$6300.00



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.217(c)(1)(i): The employer did not provide and ensure the usage of point of operation guards or properly applied point of operation devices on every operation performed on mechanical power press(es)

- a) South end of warehouse: Employees were exposed to an unguarded Minster No. 6 mechanical press at the point of operation, on or about 5/21/12.
- b) West end of warehouse: Employees were exposed to an unguarded Minster No. 6 mechanical press at the point of operation, on or about 5/21/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$6300.00

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

Inspection Number: 445406
Inspection Date(s): 05/21/2012 - 05/28/2012
Issuance Date: 11/19/2012



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O. Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.303(b)(8)(i): Electric equipment was not firmly secured to the surface on which it was mounted

a) Facility - South End: A 4X4 metal receptacle, that was used to power a scale, was not secured or mounted to a surface, on or about 5/21/12.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$2700.00

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: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

- a) North side of facility: The shear belt and conveyor belt control panel had unused opening and was observed being operated by an employee, on or about 5/21/12.
- b) Line 1: Employees were exposed to an unused opening that had exposed wiring on a Stamtec GL-60 hydraulic press , on or about 5/21/12.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$3600.00

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

Inspection Number: 445406
Inspection Date(s): 05/21/2012 - 05/28/2012
Issuance Date: 11/19/2012



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.305(b)(2)(i): Pull boxes, junction boxes, and fittings were not provided with covers approved for the purpose:

a) The Diverter and Bar Machine Conveyor Area for Clip Line 3 & 4: A metal receptacle face plate was hanging from the metal receptacle exposing employees to the electrical wiring, on or about 5/21/12.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:

12/14/2012

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: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.305(g)(2)(ii): Flexible cords were not used only in continuous lengths without splice or tap:

a) Maintenance Area: The power cord for a fan in the maintenance area was spliced together in order to work properly, on or about 5/21/12.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$2700.00



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

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

a) Facility - The employer did not utilize procedures for the control of hazardous energy for machines such as but not limited to the Stamtec GL-200 hydraulic press, Stamtec GL-60 hydraulic press, Minister No. 6 mechanical press, and Auto-former, on or about 5/21/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$63000.00



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.147(c)(7)(i)(A): Authorized employee(s) 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) Facility: Employees performing maintenance and repair on machines such as but not limited to Stamtec GL-200 hydraulic press, Stamtec GL-60 hydraulic press, Minister No. 6 mechanical press and Auto-former were not provided training, on or about 5/21/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$63000.00

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

Inspection Number: 445406
Inspection Date(s): 05/21/2012 - 05/28/2012
Issuance Date: 11/19/2012



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.212(a)(3)(ii): The point of operation of machines whose operation exposed an employee to injury, was not guarded:

a) Northwest end of the warehouse: Employees that operated the Stamtec GL-200 hydraulic press were exposed to a hazard at the point of operation, on or about 5/21/12.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$63000.00

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: 445406
Inspection Date(s): 05/21/2012 - 05/28/2012
Issuance Date: 11/19/2012



Citation and Notification of Penalty

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

29 CFR 1910.1200(e)(1): The employer did not develop, implement, and/or maintain at the workplace a written hazard communication program which describes how the criteria specified in 29 CFR 1910.1200(f), (g), and (h) will be met:

a) Warehouse: The employer did not develop a written hazard communication program for employees that were exposed to chemicals, such as but not limited to Orange degreaser, on or about 5/21/12.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:	12/14/2012
Proposed Penalty:	\$.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: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014

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

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

a) North side of the facility / near electrical panels: A plastic spray bottle containing orange degreaser did not have a label identifying its contents, on or about 5/21/12.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$0.00

A handwritten signature in black ink, appearing to read "Paula Dixon-Roderick", written over a horizontal line.

Paula Dixon-Roderick
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
701 Route 73 South
Building 2, Suite 120
Marlton, NJ 08053
Phone: 856-596-5200 Fax: 856-596-5201



INVOICE / DEBT COLLECTION NOTICE

Company Name: PANDROL USA, LP
Inspection Site: 501 SHARPTOWN RD., P.O Box 367, Bridgeport, NJ 08014
Issuance Date: 11/19/2012

Summary of Penalties for Inspection Number	445406
Citation 1, Serious	\$94500.00
Citation 2, Willful	\$189000.00
Citation 3, Other-than-Serious	\$.00
TOTAL PROPOSED PENALTIES	\$283500.00

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

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

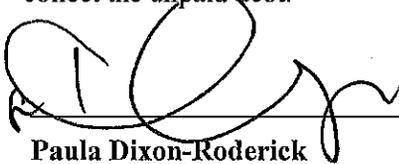
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within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

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

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

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

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



Paula Dixon-Roderick

Area Director

11/19/2012

Date