

U.S. Department of Labor
Occupational Safety and Health Administration
401 New Kamer Road
Suite 300
Albany, NY 12205
Phone: 518-464-4338 Fax: 518-464-4337



Citation and Notification of Penalty

To:
Olivet Management LLC
73 Wheeler Road
Wingdale, NY 12594

Inspection Number: 945519
Inspection Date(s): 10/23/2013 - 03/27/2014
Issuance Date: 03/31/2014

Inspection Site:
Route 22
Wingdale, NY 12594

Violation described in this Citation of Penalty is (are) alleged to have occurred on or about the date(s) listed above. 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 (051-IA 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.-OSI-IA". 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:

www.pay.gov/forms/formli Pa enc Formid---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 \$50,000 or more require a Transaction ID, and also must be paid using ACT-I. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

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

Employer Discrimination Unlawful — The law prohibits discrimination by an employer against an

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

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

Notice to Employees — The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 03/31/2014. The conference will be held by telephone or at the OSHA office located at 401 New Karner Road, Suite 300, Albany, NY 12205 on **at**

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 945519

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594
Issuance Date: 03/31/2014

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, 401 New Karner Road, Suite 300, Albany, NY 12205

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

29 CFR 1926.1101(k)(2)(ii)(C): The building owner and/or facility owner did not notify all employers of employees who work within or adjacent to the areas containing asbestos containing materials (ACM) and presumed asbestos containing materials of the presence, location and quantity:

a) On or about October 4-25, 2013, at the site, Olivet Management LLC failed to inform Royal Carting Service and Winter Bros Waste Systems CT about the presence, location and quantity of asbestos containing material or presumed asbestos containing material including but not limited to floor tiles and mastic, carpet mastic, window caulking, glazing compound, mudded joints and thermal system insulation, when they worked in or adjacent to areas, in buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85.

Employees of these waste haulers worked adjacent to or around buildings placing dumpsters where employees of other contractors had demolished bathrooms, disturbed asbestos insulation, dry swept floors and removed asbestos floor tiles, Employees of these waste haulers placed dumpsters and hauled dumpsters to transfer stations or landfills.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$7000,00

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: Olivet Management LLC

Inspection Site: Route 22, Wingdale, NY 12594

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

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

29 CFR 1926.62(d)(2)(v)(F): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with training in accordance with 29 CFR 1926.21, Safety training and education:

(a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee A was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014

Proposed Penalty:

\$42000.00

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

29 CFR 1926.21(b)(2): The employer did not instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her environment to control or eliminate any hazards or other exposure to illness or injury:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee A was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

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

29 CFR 1926.62(d)(2)(v)(F): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with training in accordance with 29 CFR 1926.21, Safety training and education:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee B was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$42000.00

U.S. Department of Labor

Occupational Safety and Health Administration

Inspection Number: 945519

Inspection Date(s): 10/23/2013 - 03/27/2014

Issuance Date: 03/31/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC

Inspection Site: Route 22, Wingdale, NY 12594

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

29 CFR 1926.21(b)(2): The employer did not instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her environment to control or eliminate any hazards or other exposure to illness or injury:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee **B** was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

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

29 CFR 1926.62(d)(2)(v)(F): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with training in accordance with 29 CFR 1926.21, Safety training and education:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee C was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$42000.00

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: Olivet Management LLC

Inspection Site: Route 22, Wingdale, NY 12594

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

29 CFR 1926.21(b)(2): The employer did not instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her environment to control or eliminate any hazards or other exposure to illness or injury:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee C was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

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

29 CFR 1926.62(d)(2)(v)(F): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with training in accordance with 29 CFR 1926.21, Safety training and education:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee D was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$42000.00

U.S. Department of Labor

Occupational Safety and Health Administration

Inspection Number: 945519

Inspection Date(s): 10/23/2013 - 03/27/2014

Issuance Date: 03/31/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC

Inspection Site: Route 22, Wingdale, NY 12594

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

29 CFR 1926.21(b)(2): The employer did not instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her environment to control or eliminate any hazards or other exposure to illness or injury:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee D was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014

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: Olivet Management LLC

Inspection Site: Route 22, Wingdale, NY 12594

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

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

29 CFR 1926.62(d)(2)(v)(F): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with training in accordance with 29 CFR 1926.21, Safety training and education:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee E was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

- Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$42000,00

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

29 CFR 1926.21(b)(2): The employer did not instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her environment to control or eliminate any hazards or other exposure to illness or injury:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee E was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/30/2014

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

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

29 CFR 1926.62(d)(2)(v)(F): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with training in accordance with 29 CFR 1926.21, Safety training and education:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee F was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/30/2014
Proposed Penalty: \$42000.00



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

29 CFR 1926.21(b)(2): The employer did not instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her environment to control or eliminate any hazards or other exposure to illness or injury:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee F was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

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

29 CFR 1926.62(d)(2)(v)(F): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with training in accordance with 29 CFR 1926.21, Safety training and education:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee G was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$42000.00

See pages I 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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

29 CFR 1926.21(b)(2): The employer did not instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her environment to control or eliminate any hazards or other exposure to illness or injury:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee G was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

Citation 2 Item 8 a Type of Violation: **Willful**

29 CFR 1926.62(d)(2)(v)(F): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with training in accordance with 29 CFR 1926.21, Safety training and education:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee H was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$42000.00



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 8 b Type of Violation: **Willful**

29 CFR 1926.21(b)(2): The employer did not instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her environment to control or eliminate any hazards or other exposure to illness or injury:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee H was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

Citation 2 Item 9 a Type of Violation: **Willful**

29 CFR 1926.62(d)(2)(v)(F): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with training in accordance with 29 CFR 1926.21, Safety training and education:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee I was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$42000.00



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 9 b Type of Violation: **Willful**

29 CFR 1926.21(b)(2): The employer did not instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her environment to control or eliminate any hazards or other exposure to illness or injury:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee I was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 10 b Type of Violation: **Willful**

29 CFR 1926.21(b)(2): The employer did not instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her environment to control or eliminate any hazards or other exposure to illness or injury:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee ,1 was exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, exterior windows in buildings, including but not limited to Buildings 3, 11, 12, 14, 17, 23, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **04/30/2014**



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 11 Type of Violation: **Willful**

29 CFR 1926.1101(k)(9)(i): The employer did not institute, at no cost to employees, a training program for each employee who was likely to be exposed in excess of the permissible exposure limit (PEL) and for each employee who performed Class I through IV asbestos operations:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric' Center worksite, employee A disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and performed demolition in bathrooms and worked inside buildings with disturbed thermal system insulation including but not limited to Buildings 12 ; 14, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$42000.00

U.S. Department of Labor

Occupational Safety and Health Administration

Inspection Number: 945519

Inspection Date(s): 10/23/2013 - 03/27/2014

Issuance Date: 03/31/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC

Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 12 Type of Violation: **Willful**

29 CFR 1926.1101(k)(9)(i): The employer did not institute, at no cost to employees, a training program for each employee who was likely to be exposed in excess of the permissible exposure limit (PEL) and for each employee who performed Class I through IV asbestos operations:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee C disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and performed demolition in bathrooms and worked inside buildings with disturbed thermal system insulation including but not limited to Buildings 12, 14, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014

Proposed Penalty:

\$42000.00

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 13 Type of Violation: **Willful**

29 CFR 1926.1101(k)(9)(i): The employer did not institute, at no cost to employees, a training program for each employee who was likely to be exposed in excess of the permissible exposure limit (PEL) and for each employee who performed Class I through IV asbestos operations:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee G disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and performed demolition in bathrooms and worked inside buildings with disturbed thermal system insulation including but not limited to Buildings 12, 14, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$42000.00

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 14 Type of Violation: **Willful**

29 CFR 1926.1101(k)(9)(i): The employer did not institute, at no cost to employees, a training program for each employee who was likely to be exposed in excess of the permissible exposure limit (PEL) and for each employee who performed Class I through IV asbestos operations:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee H disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and performed demolition in bathrooms and worked inside buildings with disturbed thermal system insulation including but not limited to Buildings 12, 14, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$42000.00

U.S. Department of Labor

Occupational Safety and Health Administration

Inspection Number: 945519

Inspection Date(s): 10/23/2013 - 03/27/2014

Issuance Date: 03/31/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC

Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 15 Type of Violation: **Willful**

29 CFR 1926.1101(k)(9)(i): The employer did not institute, at no cost to employees, a training program for each employee who was likely to be exposed in excess of the permissible exposure limit (PEL) and for each employee who performed Class I through IV asbestos operations:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee I disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and performed demolition in bathrooms and worked inside buildings with disturbed thermal system insulation including but not limited to Buildings 12, 14, 35, 85, and **107**.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014

Proposed Penalty:

\$42000.00

See pages I 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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 16 Type of Violation: **Willful**

29 CFR 1926.1101(k)(9)(i): The employer did not institute, at no cost to employees, a training program for each employee who was likely to be exposed in excess of the permissible exposure limit (PEL) and for each employee who performed Class I through IV asbestos operations:

a) On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employee J disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and performed demolition in bathrooms and worked inside buildings with disturbed thermal system insulation including but not limited to Buildings 12, 14, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	42000.00



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

Citation 2 Item 17 a Type of Violation: **Willful**

29 CFR 1926.1101(k)(2)(ii)(A): Building and/or facility owners failed to notify prospective employers applying for or bidding for work whose employees can reasonably be expected to work in or adjacent to areas containing asbestos containing material or presumed asbestos containing material of the presence, location and quantity:

a) On or about October 11, 2013, at the site, Olivet Management LLC failed to inform K & P Facilities Maintenance Inc., when they applied for work of the presence, location and quantity of asbestos containing material or presumed asbestos containing material, including but not limited to floor tiles and mastic, carpet mastic, window caulking, glazing compound, mudded joints and thermal system insulation in buildings 3, 11, 12, 14, 17 and 35,

Employees of K & P Facilities Maintenance Inc. removed floor tiles and mastic containing asbestos, dry swept floors that had contained asbestos tiles, dry swept in basements that had asbestos containing or presumed asbestos containing thermal system insulation in deteriorated condition, performed general cleanup and removal of unwanted items in basements containing asbestos or presumed asbestos containing thermal system insulation in deteriorated condition, and worked where plumbers were performing work on piping insulated with thermal system insulation in deteriorated condition.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/30/2014
Proposed Penalty: \$70000.00



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 17 b Type of Violation: **Willful**

29 CFR 1926.1101(k)(2)(ii)(C): The building owner and/or facility owner did not notify all employers of employees who work within or adjacent to the areas containing asbestos containing materials (ACM) and presumed asbestos containing materials of the presence, location and quantity:

a) On or about October 11, 2013, at the site, Olivet Management LLC failed to inform K & P Facilities Maintenance Inc., when they applied for work of the presence, location and quantity of asbestos containing material or presumed asbestos containing material, including but not limited to floor tiles and mastic, carpet mastic, window caulking, glazing compound, mudded joints and thermal system insulation in buildings 3, 11, 12, 14, 17 and 35.

Employees of K & P Facilities Maintenance Inc. removed floor tiles and mastic containing asbestos, dry swept floors that had contained asbestos tiles, dry swept in basements that had asbestos containing or presumed asbestos containing thermal system insulation in deteriorated condition, performed general cleanup and removal of unwanted items in basements containing asbestos or presumed asbestos containing thermal system insulation in deteriorated condition, and worked where plumbers were performing work on piping insulated with thermal system insulation in deteriorated condition.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

Citation 2 Item 18 a Type of Violation: **Willful**

29 CFR 1926.1101(k)(2)(ii)(A): Building and/or facility owners failed to notify prospective employers applying for or bidding for work whose employees can reasonably be expected to work in or adjacent to areas containing asbestos containing material or presumed asbestos containing material of the presence, location and quantity:

a) On or about October 11, 2013, at the site, Olivet Management LLC failed to inform Marino Logistical Solutions Inc., when they applied for work of the presence, location and quantity of asbestos containing material or presumed asbestos containing material, including but not limited to floor tiles and mastic, carpet mastic, window caulking, glazing compound, mudded joints and thermal system insulation in buildings 11, 12, 14, 19, 20, 29-32 and 85,

Employees of Marino Logistical Solutions Inc. removed floor tiles and mastic containing asbestos, dry swept floors that had contained asbestos tiles, dry swept in basements that had asbestos containing or presumed asbestos containing thermal system insulation in deteriorated condition, performed general cleanup and removal of unwanted items in basements containing asbestos or presumed asbestos containing thermal system insulation in deteriorated condition, pulled up and removed carpet, walked through buildings with thermal system insulation on the ground to access upper levels and to retrieve necessary supplies.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$70000.00

See pages I 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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 18 b Type of Violation: **Willful**

29 CFR 1926.1101(k)(2)(ii)(C): The building owner and/or facility owner did not notify all employers of employees who work within or adjacent to the areas containing asbestos containing materials (ACM) and presumed asbestos containing materials of the presence, location and quantity:

a) On or about October 5, 2013, at the site, Olivet Management LLC failed to inform Marino Logistical Solutions Inc., of the presence, location and quantity of asbestos containing material or presumed asbestos containing material, including but not limited to floor tiles and mastic, carpet mastic, window caulking, glazing compound, mudded joints and thermal system insulation in buildings 11, 12, 14, 19, 20, 29-32 and 85,

Employees of Marino Logistical Solutions Inc. removed floor tiles and mastic containing asbestos, dry swept floors that had contained asbestos tiles, dry swept in basements that had asbestos containing or presumed asbestos containing thermal system insulation in deteriorated condition, performed general cleanup and removal of unwanted items in basements containing asbestos or presumed asbestos containing thermal system insulation in deteriorated condition, pulled up and removed carpet, walked through buildings with thermal system insulation on the ground to access upper levels and to retrieve necessary supplies.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

Citation 2 Item 19 a Type of Violation: **Willful**

29 CFR 1926.1101(k)(2)(ii)(A): Building and/or facility owners failed to notify prospective employers applying for or bidding for work whose employees can reasonably be expected to work in or adjacent to areas containing asbestos containing material or presumed asbestos containing material of the presence, location and quantity:

(a) On or about October 7, 2013, at the site, Olivet Management LLC failed to inform Third Dimension, of the presence, location and quantity of asbestos containing material or presumed asbestos containing material, including but not limited to floor tiles, mastic and thermal system insulation, when they bid or applied for work, which was in or adjacent to areas, in building 107.

Employees of Third Dimension worked in the church performing work such as but not limited to removal of old church belongings, general cleanup; repairing, sanding, priming and painting walls throughout chapel, stripping and waxing chapel floor and painting and/or staining exterior doors. Employees of Olivet Management LLC removed asbestos containing or presumed asbestos containing tiles in the entrance to the church and in the bathroom behind the altar. Asbestos containing thermal system insulation was disturbed in the basement and found dispersed on the carpet below the disturbance.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$70000.00

See pages I 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: 945519

Inspection Date(s): 10/23/2013 - 03/27/2014

Issuance Date: 03/31/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC

Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 19 b

Type of Violation: **Willful**

29 CFR 1926.1101(k)(2)(ii)(C): The building owner and/or facility owner did not notify all employers of employees who work within or adjacent to the areas containing asbestos containing materials (ACM) and presumed asbestos containing materials of the presence, location and quantity:

a) On or about October 7, 2013, at the site, Olivet Management LLC failed to inform Third Dimension, of the presence, location and quantity of asbestos containing material or presumed asbestos containing material, including but not limited to floor tiles, mastic and thermal system insulation, when they worked in or adjacent to areas, in building 107.

Employees of Third Dimension worked in the church performing work such as but not limited to removal of old church belongings, general cleanup, repairing, sanding, priming and painting walls throughout chapel, stripping and waxing chapel floor and painting and/or staining exterior doors. Employees of Olivet Management LLC removed asbestos containing or presumed asbestos containing tiles in the entrance to the church and in the bathroom behind the altar. Asbestos containing thermal system insulation was disturbed in the basement and found dispersed on the carpet below the disturbance.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

Citation 2 Item 20 a Type of Violation: **Willful**

29 CFR 1926.1101(k)(2)(ii)(A): Building and/or facility owners failed to notify prospective employers applying for or bidding for work whose employees can reasonably be expected to work in or adjacent to areas containing asbestos containing material or presumed asbestos containing material of the presence, location and quantity:

a) On or about October 11, 2013, at the site, Olivet Management LLC failed to inform Benderer Green Solutions Inc., of the presence, location and quantity of asbestos containing material or presumed asbestos containing material, including but not limited to floor tiles and mastic and thermal system insulation in building 85, when submitted a bid to repair roof drains.

Employees of the Benderer Green Solutions Inc. worked in buildings where employees of other contractors had removed floor tiles and mastic containing asbestos, dry swept floors that had contained asbestos tiles, dry swept in basements that had asbestos containing or presumed asbestos containing thermal system insulation in deteriorated condition, performed general cleanup and removal of unwanted items in basements containing asbestos or presumed asbestos containing thermal system insulation in deteriorated condition and disturbed thermal system insulation on piping. Employees of this firm were capping off sinks, tubs and fixtures in bathrooms, fixing water leaks, capping off drains, repairing roof drains and preparing to install new fixtures.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/12/2014
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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 20 b Type of Violation: **Willful**

29 CFR 1926.1101(k)(2)(ii)(C): The building owner and/or facility owner did not notify all employers of employees who work within or adjacent to the areas containing asbestos containing materials (ACM) and presumed asbestos containing materials of the presence, location and quantity:

a) On or about October 4-25, 2013, at the site, Olivet Management LLC failed to inform Benderer Green Solutions Inc. of location and quantity of asbestos containing material or presumed asbestos containing material including but not limited to floor tiles and mastic, carpet mastic, window caulking, glazing compound, mudded joints and thermal system insulation, when they worked in or adjacent to areas, in buildings 14,35 and 107.

Employees of the Benderer Green Solutions Inc. worked in buildings where employees of other contractors had removed floor tiles and mastic containing asbestos, dry swept floors that had contained asbestos tiles, dry swept in basements that had asbestos containing or presumed asbestos containing thermal system insulation in deteriorated condition, performed general cleanup and removal of unwanted items in basements containing asbestos or presumed asbestos containing thermal system insulation in deteriorated condition and disturbed thermal system insulation on piping. Employees of this firm were capping off sinks, tubs and fixtures in bathrooms, fixing water leaks, capping off drains, repairing roof drains and preparing to install new fixtures.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 21 Type of Violation:

29 CFR 1926.1101(k)(2)(ii)(C): The building owner and/or facility owner did not notify all employers of employees who work within or adjacent to the areas containing asbestos containing materials (ACM) and presumed asbestos containing materials of the presence, location and quantity:

a) On or about October 4-25, 2013, at the site, Olivet Management LLC failed to inform The Small Job Specialist, of the presence, location and quantity of asbestos containing material or presumed asbestos containing material including but not limited to floor tiles and mastic, carpet mastic, window caulking, glazing compound, mudded joints and thermal system insulation, when they worked in or adjacent to areas, in buildings 11, 12, 14, 17,21 and 107.

Employees of The Small Job Specialist worked in buildings where employees of other contractors had removed' floor tiles and mastic containing asbestos, dry swept floors that had contained asbestos tiles, dry swept in basements that had asbestos containing or presumed asbestos containing thermal system insulation in deteriorated condition, performed general cleanup and removal of unwanted items in basements containing asbestos or presumed asbestos containing thermal system insulation in deteriorated condition. Employees of this firm were removing broken glass in windows and doors and fitting non-repairable doors and windows with plywood.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/30/2014
Proposed Penalty: \$70000,00



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 22 Type of Violation: **Willful**

29 CFR 1926.1101(k)(2)(ii)(C): The building owner and/or facility owner did not notify all employers of employees who work within or adjacent to the areas containing asbestos containing materials (ACM) and presumed asbestos containing materials of the presence, location and quantity:

a) On or about October 4-22, 2013, at the site, Olivet Management LLC failed to inform JLS Electric Inc. of the location and quantity of asbestos containing material or presumed asbestos containing material including but not limited to floor tiles and mastic, carpet mastic, window caulking, glazing compound, mudded joints and thermal system insulation, when they worked in or adjacent to areas, in buildings 35 and 107.

Employees of JLS Electric Inc. installed two portable power panels in the basement to connect to a portable generator set up outside building 35 on October 21 and 22, 2013, Additionally, employees entered the mechanical room in the basement of the chapel to connect the power for the street lights.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$70000.00



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 23 Type of Violation: **Willful**

29 CFR 1926.1101(k)(2)(ii)(C): The building owner and/or facility owner did not notify all employers of employees who work within or adjacent to the areas containing asbestos containing materials (ACM) and presumed asbestos containing materials of the presence, location and quantity:

a) On or about October 4-25, 2013, at the site, Olivet Management LLC failed to inform A & M Services, Inc. of the presence, location and quantity of asbestos containing material or presumed asbestos containing material including but not limited to floor tiles and mastic, carpet mastic, window caulking, glazing compound, mudded joints and thermal system insulation, when they worked in or adjacent to areas, in buildings 11, 12, 14, and 35.

Employees of A & M Services Inc. sanded and primed interior walls and installed drop ceilings. They worked in buildings where employees of other contractors had demolished a bathroom, disturbed asbestos floor tiles, and dry swept floors.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$70000.00



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 24 Type of Violation: **Willful**

29 CFR 1926.1101(k)(2)(ii)(C): The building owner and/or facility owner did not notify all employers of employees who work within or adjacent to the areas containing asbestos containing materials (ACM) and presumed asbestos containing materials of the presence, location and quantity:

a) On or about October 4-25, 2013, at the site, Olivet Management LLC failed to inform a contractor from Queens, NY who worked in Building 107 of the presence, location and quantity of asbestos containing material or presumed asbestos containing material including but not limited to floor tiles and mastic, carpet mastic, window caulking, glazing compound, mudded joints and thermal system insulation, when they worked in or adjacent to areas, in building 107.

The contractor from Queens, NY was identified by Olivet Management LLC and by other sources as: Queens Flooring, and/or Queens Flooring and Carpeting, and/or HD. FIVAC of NY, Inc. and/or S.J. Total Contractor Corp.

Employees of the contractor from Queens, NY worked in building 107 where employees of other contractors had demolished bathrooms, disturbed asbestos floor tiles, dry swept floors and disturbed asbestos insulation. Employees of the contractor from Queens, NY removed old carpeting, did the plumbing in bathrooms, put new floor tile down, and installed new sinks and toilets.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

Citation 2 Item 25 a Type of Violation: 'Willful'

29 CFR 1926.62(d)(1)(i): Each employer who had a workplace or operation covered by 29 CFR 1926.62 did not initially determine if any employee was exposed to lead at or above the action level of 30 micrograms per cubic meter of air calculated as an 8-hour time-weighted average (TWA):

a) Olivet Management LLC does not protect its employees and subcontractors employees from the hazard of lead toxicity by initially determining if any employee was exposed to lead at or above the action level. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$70000.00



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

Citation 2 Item 26 a Type of Violation: **Willful**

29 CFR 1926.62(d)(2)(v)(A): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with appropriate respiratory protection in accordance with 29 CFR 1926.62(f):

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of lead toxicity by not providing to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with appropriate respiratory protection in accordance with 29 CFR 1926.62(f). On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 26 b Type of Violation: **Willful**

29 CFR 1926.62(f)(1)(iv): The employer did not provide each employee an appropriate respirator that complies with the requirements of this paragraph during periods when respirators are required to provide interim protection of employees while they perform the operations specified in paragraph (d)(2) of this section:

a) Olivet Management LLC does not protect its employees and subcontractors employees from the hazard of lead toxicity by not providing to employees performing the tasks described in 29 CFR 1926.62(d)(2)(0, (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with appropriate respiratory protection in accordance with 29 CFR 1926.62(f). On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014

U.S. Department of Labor

Occupational Safety and Health Administration Inspection Date(s): 10/23/2013 - 03/27/2014
Issuance Date: 03/31/2014

Inspection Number: 945519



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 26 d Type of Violation: **Willful**

29 CFR 1926.62(g)(1): Where employees were exposed to lead above the permissible exposure limit, without regard to the use of respirators; where employees were exposed to lead compounds which may cause skin or eye irritation (e.g. lead arsenate, lead azide); and as interim protection for employees performing tasks as specified in 29 CFR 1926.62(d)(2), the employer did not provide at no cost to the employee and ensure that each employee used appropriate protective work clothing and equipment that prevented contamination of the employee and the employee's garments:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of lead toxicity by not providing at no cost to the employee and not ensuring that each employee used appropriate protective work clothing and equipment that prevented contamination of the employee and the employee's garments. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/30/2014

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

Citation 2 **Item 27 a** Type of Violation: **Willful**

29 CFR 1926.62(d)(2)(v)(E): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with biological monitoring in accordance with 1926.62(j)(1)(i), to consist of blood sampling and analysis for lead and zinc protoporphyrin levels:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of lead toxicity by not providing to employees performing the tasks described in 29 CFR **1926.62(d)(2)(i)**, (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with biological monitoring in accordance with 1926.62(j)(1)(i), to consist of blood sampling and analysis for lead and zinc protoporphyrin levels. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$70000,00

See pages I 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: 945519

Inspection Date(s): 10/23/2013 - 03/27/2014

Issuance Date: 03/31/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC

Inspection Site: Route 22, Wingdalc, NY 12594

Citation 2 Item 27 b

Type of Violation: **'Willful'**

29 CFR 1926.62(j)(1)(i): The employer did not make available initial medical surveillance, consisting of biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels, to employees occupationally exposed on any day to lead at or above the action level:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of lead toxicity by not making available initial medical surveillance, consisting of biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels, to employees occupationally exposed on any day to lead at or above the action level. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014

See pages I 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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 27 C Type of Violation: **Willful**

29 CFR 1926.62(d)(2)(v)(C): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with change areas in accordance with 29 CFR 1926.62(i)(2):

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of lead toxicity by not providing to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with change areas in accordance with 29 CFR 1926.62(i)(2). On or about October 4-25, 2013, at the I-Iarlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17,29,30, 31, 32,35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 27 d Type of Violation: **Willful**

29 CFR 1926.62(i)(2)(i): The employer did not provide clean change areas as an interim protection for employees performing tasks as specified in 29 CFR 1926.62(d)(2), without regard to the use of respirators:

a) Olivet Management LLC does not protect its employees and subcontractors employees from the hazard of lead toxicity by not providing clean change areas as an interim protection for employees performing tasks as specified in 29 CFR 1926.62(d)(2), without regard to the use of respirators. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 27 e Type of Violation: **Willful**

29 CFR 1926.62(d)(2)(v)(D): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with hand washing facilities in accordance with 29 CFR 1926.62(i)(5):

a) Olivet Management LLC does not protect its employees and subcontractors employees from the hazard of lead toxicity by not providing to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with hand washing facilities in accordance with 29 CFR 1926.62(0)(5). On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, **14**, 17, 29, 30, 31, 32, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/30/2014

U.S. Department of Labor

Occupational Safety and Health Administration

Inspection Number: 945519

Inspection Date(s): 10/23/2013 - 03/27/2014

Issuance Date: 03/31/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC

Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 27 fType of Violation: **Willful**

29 CFR 1926.62(i)(5)(i): The employer did not provide adequate hand washing facilities in accordance with 29 CFR 1926.51(1), for use by employees exposed to lead:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of lead toxicity by not providing adequate hand washing facilities in accordance with 29 CFR 1926.51(f) for use by employees exposed to lead. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation 1141.1st be Abated:

04/30/2014

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 Date(s): 10/23/2013 - 03/27/2014
Issuance Date: 03/31/2014

Inspection Number: 945519



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 27 g Type of Violation: **Willful**

29 CFR **1926.62(h)(1)**: All surfaces were not maintained as free as practicable of accumulations of lead:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of lead toxicity by not maintaining all surfaces as free as practicable of accumulations of lead by using vacuums or other methods when cleaning up floors or other surfaces where lead accumulated. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85,

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/30/2014

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: 945519

Inspection Date(s): 10/23/2013 - 03/27/2014

Issuance Date: 03/31/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC

Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 27 h

Type of Violation: **Willful**

29 CFR 1926.62(h)(2): Where possible, clean-up of floors and other surfaces where lead accumulated was not accomplished by vacuuming or other methods that minimized the likelihood of lead becoming airborne:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of lead toxicity by not using vacuums or other methods when cleaning up floors or other surfaces where lead accumulated. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to serape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

Citation 2 Item 28 a Type of Violation: **Willful**

29 CFR 1926.62(d)(2)(v)(F): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with training in accordance with 29 CFR 1926.21, Safety training and education:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of lead toxicity by instructing each employee in the recognition and avoidance of unsafe condition(s) and the regulation(s) applicable to his work environment to control or eliminate any hazard(s) or other exposure to illness or injury. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 28 b Type of Violation: **Willful**

29 CFR 1926.21(b)(2): The employer did not instruct each employee in the recognition and avoidance of unsafe condition(s) and the regulation(s) applicable to his work environment to control or eliminate any hazard(s) or other exposure to illness or injury:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of lead toxicity by instructing each employee in the recognition and avoidance of unsafe condition(s) and the regulation(s) applicable to his work environment to control or eliminate any hazard(s) or other exposure to illness or injury. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees were exposed to lead while performing manual scraping, including removing lead paint from the interior walls and ceilings of buildings, sweeping lead paint debris, and using tools to scrape lead paint from doors, door frames, and handrails, in and outside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, and 85.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 29 Type of Violation: **Willful**

29 CFR 1926.1101(e)(1): All Class I, II, and III asbestos work was not conducted within regulated areas:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of exposure to asbestos by not establishing regulated areas for all Class 1, II and III asbestos work. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$70000.00

U.S. Department of Labor

Occupational Safety and Health Administration Inspection Date(s): 10/23/2013 - 03/27/2014
Issuance Date: 03/31/2014

Inspection Number: 945519



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 30 Type of Violation: **Willful**

29 CFR 1926.1101(f)(1)(i): Where exposure monitoring was required under 29 CFR 1926.1101, the employer **did** not perform monitoring to determine accurately the airborne concentrations of asbestos to which employees were or potentially were exposed:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of exposure to asbestos by not performing monitoring to determine accurately the airborne concentrations of asbestos to which employees were or potentially were exposed, where exposure monitoring was required under 29 CFR 1926.1101, On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
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: 945519

Inspection Date(s): 10/23/2013 - 03/27/2014

Issuance Date: 03/31/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

Citation 2 Item 31 a Type of Violation: **Willful**

29 CFR 1926.1101(g)(1)(i): The employer did not use engineering controls and work practices in all operations covered by 29 CFR 1926,1101, regardless of the levels of exposure, in the form of vacuum cleaners equipped with high efficiency particulate air (HEPA) filters to collect all debris and dust containing asbestos containing material and presumed asbestos containing material:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of exposure to asbestos by not using engineering controls and work practices in all operations covered by 1926.1101 regardless of the levels of exposure, in the form of vacuum cleaners equipped with high efficiency particulate air (1-1EPA) filters to collect all debris and dust containing asbestos containing material and presumed asbestos containing material. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 31 b Type of Violation: **Willful**

29 CFR 1926.1101(g)(1)(ii): Wet methods, or wetting agents, to control employee exposures during asbestos handling, mixing, removal, cutting, application, and cleanup, except where employers demonstrate that the use of wet methods is infeasible due to for example, the creation of electrical hazards, equipment malfunction, and, in roofing, except as provide in paragraph (g)(8)(ii) of this section.

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of exposure to asbestos by not using wet methods, or wetting agents, to control employee exposures during asbestos handling, mixing, removal, cutting, application, and cleanup. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 31 c Type of Violation: **Willful**

29 CFR 1926.1101(g)(3)(iii): Dry sweeping, shoveling or other dry clean-up of dust and debris containing ACM and PACM was used for work related to asbestos or for work which disturbs ACM or PACM:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of exposure to asbestos by dry sweeping, shoveling or other dry clean-up of dust and debris containing ACM and PACM. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/30/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 32 Type of Violation: **'Willful**

29 CFR 1926.1101(g)(7)(i): All Class II work was not supervised by a competent person as defined in 29 CFR 1926.1101(b):

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of exposure to asbestos by not ensuring that all Class II work was supervised by a competent person as defined in 29 CFR 1926.11(b). On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 33 Type of Violation: **Willful**

29 CFR 1926.1101(g)(8)(0)(G): Floor tiles were not removed intact:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of exposure to asbestos. by not removing floor tiles intact. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107,

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 34 Type of Violation: **Willful**

29 CFR 1926.1101(h)(1): For employees who use respirators required by 29 CFR 1926.1101, the employer did not provide each employee an appropriate respirator that complied with the requirements of 29 CFR 1926.1101(h):

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of exposure to asbestos by not providing an appropriate respirator. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$70000,00



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 35 Type of Violation: **Willful**

29 CFR 1926.1101(i)(1): The employer did not provide and require the use of protective clothing, such as coveralls or similar whole-body clothing, head coverings, gloves and foot coverings for each employee exposed to airborne concentrations of asbestos that exceed the time weighted average and/or excursion limit in 29 CFR 1926.1101(e) or for which a required negative exposure assessment was not provided:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of exposure to asbestos by not providing and requiring the use of protective clothing, such as coveralls or similar whole-body clothing, head coverings, gloves and foot coverings for each employee exposed to airborne concentrations of asbestos that exceed the time weighted average and/or excursion limit in 29 CFR 1926.1101(c) or for which a required negative exposure assessment was not provided. On or about October 4-25, 2013, at the Former Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
Proposed Penalty:	\$70000.00



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 36 Type of Violation: **Willful**

29 CFR 1926.1101(j)(2)(i): The employer did not establish a decontamination room or area for employees and equipment, adjacent to the regulated area, consisting of an impermeable drop cloth on the floor or horizontal working surface, for employees engaged in Class I work involving less than 25 linear or 10 square feet of thermal system insulation or surfacing asbestos containing material and for Class II and Class III asbestos work operations where exposures exceed a permissible exposure limit or where there was not negative exposure assessment produced before the operation:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of exposure to asbestos by not establishing a decontamination room or area for employees and equipment, adjacent to the regulated area, consisting of an impermeable drop cloth on the floor or horizontal working surface, for employees engaged in Class I work involving less than 25 linear or 10 square feet of thermal system insulation or surfacing asbestos containing material and for Class II and Class III asbestos work operations where exposures exceed a permissible exposure limit or where there was not negative exposure assessment produced before the operation. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, **14, 17**, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/30/2014
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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 37 Type of Violation: WilifUli

29 CFR 1926.1101(j)(2)(iH): For employees engaged in Class I work involving less than 25 linear or 10 square feet of thermal system insulation or surfacing asbestos containing material and for Class II and Class III asbestos work operations where exposures exceed a permissible exposure limit or where there was not negative exposure assessment produced before the operation, work clothing was not cleaned with a HEPA vacuum before it was removed:

a) Olivet Management LLC does not protect its employees and subcontractors' employees from the hazard of exposure to asbestos in that for employees engaged in Class I work involving less than 25 linear or 10 square feet of thermal system insulation or surfacing asbestos containing material and for Class II and Class III asbestos work operations where exposures exceed a permissible exposure limit or where there was not negative exposure assessment produced before the operation, work clothing was not cleaned with a HEPA vacuum before it was removed. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/30/2014
Proposed Penalty: \$70000.00



Citation and Notification of Penalty

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

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

Citation 2 Item 38 a Type of Violation: **Willful**

29 CFR 1926.1101(k)(6): At the entrance of the mechanical rooms/areas in which employees could reasonably be expected to enter and which contained ACM and/or PACM, the building owner did not post signs identifying the material present, its location, and appropriate work practice which, if followed will ensure that asbestos containing material and/or presumed asbestos containing material will not be disturbed:

a) Olivet Management LLC does not protect its employees and subcontractors employees from the hazard of exposure to asbestos by not posting signs identifying the material present, its location, and appropriate work practice which, if followed will ensure that asbestos containing material and/or presumed asbestos containing material will not be disturbed at the entrance of the mechanical rooms/areas in which employees could reasonably be expected to enter and which contained ACM and/or PACM. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/30/2014
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: 945519

Inspection Date(s): 10/23/2013 - 03/27/2014

Issuance Date: 03/31/2014



Citation and Notification of Penalty

Company Name: Olivet Management LLC

Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 39 Type of Violation: **Willful**

29 CFR 1926.1101(k)(9)(i): The employer did not institute, at no cost to employees, a training program for each employee who was likely to be exposed in excess of the permissible exposure limit (PEL) and for each employee who performed Class 1 through TV asbestos operations:

a) Olivet Management LLC does not protect its subcontractors' employees from the hazard of exposure to asbestos by not instituting, at no cost to employees, a training program for each employee who was likely to be exposed in excess of the permissible exposure limit (PEL) and for each employee who performed Class I through IV asbestos operations. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/30/2014

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: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594

Citation 2 Item 40 Type of Violation: **Willful**

29 CFR 1926.1101(1)(2): Asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing consigned for disposal was not collected and disposed of in sealed, labeled, impermeable bags or other closed, labeled, impermeable containers:

a) Olivet Management LLC does not protect its employees and subcontractors employees from the hazard of exposure to asbestos by not collecting and disposing of asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing consigned for disposal in sealed, labeled, impermeable bags or other closed, labeled, impermeable containers. On or about October 4-25, 2013, at the Harlem Valley Psychiatric Center worksite, employees disturbed, removed, and swept up debris from asbestos-containing tile, carpet with asbestos-containing mastic, and thermal systems insulation, inside buildings including but not limited to Buildings 3, 11, 12, 14, 17, 29, 30, 31, 32, 35, 85, and 107.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/30/2014
Proposed Penalty: \$70000.00

A handwritten signature in black ink, appearing to read "Kim C '6147' TCU". The signature is written over a horizontal line.

Kimberly Castillon, CIII
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
401 New Karner Road
Suite 300
Albany, NY 12205
Phone: 518-464-4338 Fax: 518-464-4337



INVOICE / DEBT COLLECTION NOTICE

Company Name: Olivet Management LLC
Inspection Site: Route 22, Wingdale, NY 12594
Issuance Date: 03/31/2014

Summary of Penalties for Inspection Number	945519
Citation 1, Serious	\$7000.00
Citation 2, Willful	\$2352000.00
TOTAL PROPOSED PENALTIES	\$2359000.00

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 <http://www.dhs.gov/for> 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 \$50,000 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.



Kimberly Castillon, CHI

Area Director

3/30v

Date