

March 15, 2012

Polychem OMS Systems LLC
4 Washington Street
Leetonia, OH 44431

Dear Employer:

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

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

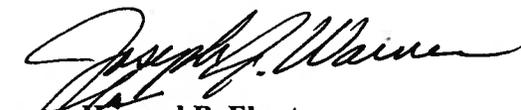
As indicated on page 8 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

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

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

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to your inspection will be available 30 calendar days after the Citation Issuance Date. You are encouraged to review the information concerning your establishment at WWW.OSHA.GOV. If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,



Howard B. Eberts
Area Director

Enclosures

U.S. Department of Labor
Occupational Safety and Health Administration
1240 East 9th Street Room 899
Cleveland, OH 44199
Phone: 216-615-4266 Fax: 216-615-4234



Citation and Notification of Penalty

To:
Polychem OMS Systems LLC
and its successors
4 Washington Street
Leetonia, OH 44431

Inspection Number: 98859
Inspection Date(s): 09/15/2011 -
Issuance Date: 03/15/2012

Inspection Site:
4 Washington Street
Leetonia, OH 44431

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

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

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

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

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

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

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

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

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

Notification of Corrective Action – For each violation which you do not contest, you must provide *abatement certification* to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that *abatement documentation* is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, 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, but not sooner than 30 calendar days after the citation issuance date. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 03/15/2012. The conference will be held at the OSHA office located at 1240 East 9th Street, Cleveland, OH 44199 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 98859

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431
Issuance Date: 03/15/2012

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 1240 East 9th Street, Room 899 Cleveland, OH 44199**

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: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431

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

29 CFR 1910.110(f)(2)(ii): Containers when stored inside shall not be located near exits, stairways, or in areas normally used or intended for the safe exit of people:

There was a propane cylinder free standing and was not secured from being knocked over by the overhead door.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/20/2012
Proposed Penalty: \$3600.00

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

29 CFR 1910.147(c)(1): The employer did not establish a program consisting of an energy control procedure, employee training and periodic inspections to ensure that before any employee performed any servicing or maintenance on a machine or equipment where the unexpected emerging, startup or release of stored energy could occur and cause injury, the machine or equipment shall be isolated from the energy source and rendered inoperative:

The company did not establish a program to protect employees involved with servicing and maintenance of machines and equipment from the unexpected energizing, start up or release of stored energy. Energy sources included, but are not limited to, electrical, pneumatic, hydraulic, etc. The company maintains and services equipment such as, but not limited to, milling machines, lathes, saws, drill presses, etc.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 04/14/2012
Proposed Penalty: \$4500.00



Citation and Notification of Penalty

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431

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

29 CFR 1910.147(f)(3)(ii)(D): Each authorized employee shall affix a personal lockout or tagout device to the group lockout device, group lockbox, or comparable mechanism when he or she begins work, and shall remove those devices when he or she stops working on the machine or equipment being serviced or maintained:

On or before 9/15/11, when one or more employees were required to work on a contactor box for a lathe, each employee did not apply their personal lock to that piece of equipment that was being serviced and/or maintenance was being performed on.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/29/2012
Proposed Penalty: \$4500.00

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

29 CFR 1910.178(l)(1)(i): The employer did not provide training and evaluation for powered industrial truck operators:

Operators were not trained in the safe use of powered industrial trucks. Training shall consist of a combination of formal instruction (e.g., lecture, interactive computer learning, video tape, written material), practical training (demonstrations performed by the trainer and practical exercises performed by the trainee), and evaluation of the operator's performance in the workplace.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 04/14/2012
Proposed Penalty: \$3600.00



Citation and Notification of Penalty

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431

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

29 CFR 1910.178(p)(1): Where powered industrial trucks were found to be in need of repair, defective, or in any way unsafe, the trucks were not taken out of service until they had been restored to safe operating condition:

The Clark propane powered industrial trucks horn was inoperable, and the truck was not removed from service.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/18/2012
Proposed Penalty: \$3600.00

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

29 CFR 1910.178(q)(7): Industrial trucks were not examined daily before being placed in service:

The Clark propane powered industrial truck was not inspected prior to being placed into service.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/18/2012
Proposed Penalty: \$3600.00



Citation and Notification of Penalty

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431

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

29 CFR 1910.179(g)(2)(i): Electrical equipment was not so located or enclosed that live parts would not be exposed to accidental contact under normal operating conditions:

The 15-ton overhead gantry crane had the shrouds missing for the controls for the up/down that operates the hoist, trolley and bridge.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/22/2012
Proposed Penalty: \$3600.00

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

29 CFR 1910.179(j)(2): An inspection program for cranes in regular use, with an inspection frequency of daily to monthly intervals, was not established:

On or before 9/15/11, the employer did not have a daily to monthly inspection program in place for their 2-ton and 15-ton overhead gantry cranes at the facility.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/29/2012
Proposed Penalty: \$3600.00



Citation and Notification of Penalty

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431

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

29 CFR 1910.184(i)(9)(iii): Synthetic web sling(s) with snags, punctures, tears, or cuts were not immediately removed from service:

There were several synthetic web slings which had tears and punctures, that were not immediately removed from service.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/18/2012
Proposed Penalty: \$3600.00

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

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

- (a) The Enco vertical bandsaw, Model #137-3175, did not have the unused portions of the blade guarded. There was approximately 15 1/4 inches of the blade unguarded;
- (b) The Kalamazoo horizontal bandsaw did not have the unused portions of the blade guarded. There was approximately 22 inches of the blade unguarded on the left side; approximately 2 inches of the blade unguarded in the middle; and approximately 5 inches of the blade unguarded on the right side.
- (c) The hand wheel on the LeBlonde lathe was not guarded.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/22/2012
Proposed Penalty: \$5400.00



Citation and Notification of Penalty

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431

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

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

On or before 9/15/11, machine guarding was not provided for the following equipment:

- (a) The Gishalt lathe did not have a chuck guard;
- (b) The LeBlonde lathe did not have a chuck guard.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/29/2012
Proposed Penalty: \$5400.00

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

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

29 CFR 1910.215(a)(4): Work rest(s) on grinding machinery were not adjusted closely to the wheel with a maximum opening of one eighth inch:

The 10 inch bench grinder did not have the work rest properly adjusted. The opening measured approximately one-half inch.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/22/2012
Proposed Penalty: \$2700.00



Citation and Notification of Penalty

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431

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

29 CFR 1910.215(b)(9): The distance between the abrasive wheel periphery(s) and the adjustable tongue or the end of the safety guard peripheral member at the top exceeded one fourth inch:

- (a) The 10 inch bench grinder did not have any tongue guards. The left side measured approximately one half inch and the right side measured three-quarters inch;
- (b) The Tri-Star 8 inch bench grinder did not have the tongue guard adequately adjusted. The opening measured approximately 2 inches;
- (c) The Bosch bench grinder did not have any tongue guard. The opening measured approximately 1 inch.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/20/2012

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

29 CFR 1910.219(c)(4)(i): Unguarded projecting shaft end(s) did not present a smooth edge and end and projected more than one half the diameter of the shaft:

The LeBlonde lathe had an unguarded projecting shaft end.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/22/2012
Proposed Penalty: \$3600.00



Citation and Notification of Penalty

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431

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

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

The Gishalt lathe did not have the belts fully enclosed.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/22/2012
Proposed Penalty: \$3600.00

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

29 CFR 1910.242(b): Compressed air used for cleaning purposes was not reduced to less than 30 p.s.i. and then used only with effective chip guarding and personal protective equipment:

Compressed air used for cleaning purposes was not reduced to 30 p.s.i. Compressed air measured approximately 80 p.s.i.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/20/2012
Proposed Penalty: \$3600.00



Citation and Notification of Penalty

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431

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

29 CFR 1910.243(c)(1): Abrasive wheel(s) were used on portable grinder(s) which were not provided with safety guard(s) meeting the requirements specified in 29 CFR 1910.243(c)(1) through (c)(4):

- (a) A Master hand held portable disc grinder, did not have a guard. The wheel measured approximately 4 1/2 inches.
- (b) A Milwaukee hand held portable disc grinder, did not have a guard. The wheel measured approximately 4 1/2 inches.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/22/2012
Proposed Penalty: \$3600.00

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

29 CFR 1910.303(b)(1): Electrical equipment was not free from recognized hazards that were likely to cause death or serious physical harm to employees:

- (a) A portable floor fan had live wires coming out of the control speed;
- (b) A power test strip had exposed live wires.
- (c) The integrity of the outer sheath on a flexible cord that was used to power a readout on a bridgeport milling machine, was not maintained.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/20/2012
Proposed Penalty: \$2700.00



Citation and Notification of Penalty

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431

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

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

- (a) A metal electrical receptacle box was lying on the floor that was used to power a welder. The box was not fixed in place nor of solid construction;
- (b) A metal receptacle box was lying on a welder used to power a Master hand held portable disc grinder. The box was not fixed in place nor of solid construction;
- (c) Flexible cords were plugged into an outlet that was not approved for industrial use.
- (d) A power strip was used to power a hand grinder, bench grinder and drill. The power strip was not approved for industrial use.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/22/2012
Proposed Penalty: \$3600.00

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

29 CFR 1910.305(b)(2)(i): Each outlet box in completed installations did not have a cover, faceplate, or fixture canopy:

In the paint storage area, the electrical cover was missing for the air compressor.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/20/2012
Proposed Penalty: \$2700.00



Citation and Notification of Penalty

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431

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

29 CFR 1910.305(g)(2)(iii): Flexible cords and cables were not connected to devices and fittings so that strain relief was provided that would prevent pull from being directly transmitted to joints or terminal screws:

- (a) There was no strain relief provided for the Master portable hand held grinder;
- (b) There was no strain relief provided for the extension cord used for a readout on the Bridgeport milling machine.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/22/2012
Proposed Penalty: \$2700.00

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

29 CFR 1910.333(a): Safety-related work practices were not employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts, when work was performed near or on equipment or circuits which were or could be energized:

On or before 9/15/11, there were no safety related work practices established for employees who were exposed to electrical hazards (480V), while testing coil benders.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/29/2012
Proposed Penalty: \$6300.00



Citation and Notification of Penalty

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431

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

29 CFR 1910.335(a)(1)(i): Employees working in areas where there were potential electrical hazards were not provided with electrical protective equipment that was appropriate for the specific parts of the body that needed to be protected and for the work being performed:

Employees were not provided personal protective equipment, including, but not limited to, insulated gloves with leather over gloves, cotton long sleeve shirt and pants, arc rated clothing, arc rated face shield, hard hat, etc., when testing 480V coil benders.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/29/2012

Citation 2 Item 1 Type of Violation: **Other-than-Serious**

29 CFR 1910.184(e)(1): Alloy steel sling(s) did not have permanently affixed durable identification stating size, grade, rated capacity, and reach:

The alloy steel slings, used for the 2-ton and 15-ton overhead gantry cranes, did not have a tag affixed indicating the size, grade, rated capacity and reach.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 03/29/2012
Proposed Penalty: \$.00


Howard B. Eberts
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
1240 East 9th Street Room 899
Cleveland, OH 44199
Phone: 216-615-4266 Fax: 216-615-4234



INVOICE / DEBT COLLECTION NOTICE

Company Name: Polychem OMS Systems LLC
Inspection Site: 4 Washington Street, Leetonia, OH 44431
Issuance Date: 03/15/2012

Summary of Penalties for Inspection Number	98859
Citation 1, Serious	\$80100.00
Citation 2, Other-than-Serious	\$.00
TOTAL PROPOSED PENALTIES	\$80100.00

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

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

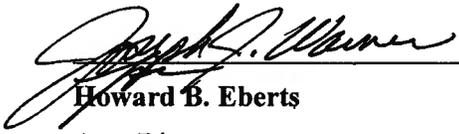
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within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

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

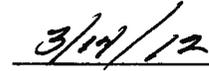
Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent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

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

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



Howard B. Eberts
Area Director



Date