

U.S. Department of Labor

Occupational Safety and Health Administration
William Cotter Federal Building
135 High Street, Suite 361
Hartford, CT 06103
Phone: 860-240-3152 Fax: 860-240-3155



Citation and Notification of Penalty

To:
Radeliff Wire Inc.
and its successors
P.O Box 603
Bristol, CT 06011

Inspection Number: 923569
Inspection Date(s): 07/24/2013 - 08/28/2013
Issuance Date: 01/23/2014

Inspection Site:
97 Ronzo Road
Bristol, CT 06010

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

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

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

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

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

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

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

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type “OSHA” and click Go. From the results, click on OSHA Penalty Payment Form. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>.

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$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 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 01/23/2014. The conference will be held by telephone or at the OSHA office located at William Cotter Federal Building, 135 High Street, Suite 361, Hartford, CT 06103 on

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 923569

Company Name: Radcliff Wire Inc.
Inspection Site: 97 RONZO ROAD, Bristol, CT 06010
Issuance Date: 01/23/2014

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, William Cotter Federal Building, 135 High Street, Suite 361, Hartford, CT 06103**

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: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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

Section (5)(a)(1) of the Occupational Safety and Health Act of 1970: The employer did not furnish employment and a place of employment which was free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to fire and explosion hazards:

Annealing Department: On, or about, July 24, 2013, the company had not developed and implemented a program to inspect the hydrogen piping system that conveyed hydrogen gas from the storage tank to the annealing furnaces. At the time of the inspection, sections of the piping system, including copper tube drops, were observed to have oxidation of the surface of the pipes and were not properly supported.

Among other methods, one feasible and acceptable method to correct this hazard is to develop and implement an inspection program in accordance with industry practices to ensure that the hydrogen piping system is properly installed and maintained.

Date By Which Violation Must be Abated: 03/12/2014
Proposed Penalty: \$3850.00



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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

29 CFR 1910.106(e)(2)(ii)(b)(2): The quantity of liquid that was located outside of an inside storage room or storage cabinet exceeded 120 gallons of Category 2, 3 or 4 flammable liquids in containers:

Annealing Department: On, or about, July 24, 2013, more than 120 gallons of Category 2, 3 and/or 4 flammable liquids were stored in the chemical storage area. At the time of the inspection, there was one fifty five gallon drum of each of the following materials:

- A. Mobilarma 245, a Category 3 flammable liquid.
- B. Varsol-18, a Category 3 flammable liquid.
- C. Coppershield 870, a Category 3 flammable liquid.
- D. Lab 2246, a Category 4 flammable liquid.
- E. Wilcut (PM 3224), a Category 2 flammable liquid.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3850.00



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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

29 CFR 1910.106(e)(2)(iv)(d): Flammable or combustible liquids were not drawn from or transferred into vessels, containers, or portable tanks within a building only through a closed piping system, from safety cans, by means of a device drawing through the top, or from a container or portable tanks by gravity through an approved self-closing valve:

Annealing Department: On, or about, July 24, 2013, the following containers of flammable liquids were not provided with self-closing valves:

- A. Mobilarma 245, a Category 3 flammable liquid.
- B. Varsol-18, a Category 3 flammable liquid.
- C. Lab 2246, a Category 4 flammable liquid.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3850.00



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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

29 CFR 1910.106(e)(6)(i): Adequate precautions were not taken to prevent the ignition of flammable vapors:

Annealing Department: On, or about, July 24, 2013, the following containers of flammable liquids were not grounded to the building structure:

- A. Mobilarma 245, a Category 3 flammable liquid.
- B. Varsol-18, a Category 3 flammable liquid.
- C. Coppershield 870, a Category 3 flammable liquid.
- D. Lab 2246, a Category 4 flammable liquid.
- E. Wilcut (PM 3224), a Category 2 flammable liquid.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3850.00

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

Inspection Number: 923569
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Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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: **Serious**

29 CFR 1910.106(e)(9)(iii): Combustible waste material and residues in a building or unit operating area were not kept to a minimum, stored in covered metal receptacles and disposed of daily:

Maintenance Shop: On, or about, July 25, 2013, rags used with Varsol-18, a Category 3 flammable liquid, were thrown into regular, non-covered waste cans for disposal.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3080.00

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: 923569
Inspection Date(s): 07/24/2013 - 08/28/2013
Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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

29 CFR 1910.125(e)(4)(ii): Rags and other material contaminated with liquids from dipping or coating operations were not placed in approved waste cans immediately after use:

Annealing Department: On, or about July 24, 2013, rags used with Coppershield 870, a Category 3 flammable liquid, were disposed of into an open, five gallon plastic bucket.

Date By Which Violation Must be Abated:

Corrected During Inspection

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

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Inspection Date(s): 07/24/2013 - 08/28/2013
Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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: **Serious**

29 CFR 1910.132(d)(1)(i): The employer did not select and have each affected employee use the type of PPE that will protect the affected employee (s) from hazards identified in the hazard assessment:

Annealing Department: On, or about, July 24, 2013, the Personal Protective Equipment Hazard Assessments for work areas in the plant such as, but not limited to, the Annealing Department and Tin Line did not include a requirement for eye protection such as safety glasses with side shields or goggles to be worn when employees used compressed air for cleaning.

Date By Which Violation Must be Abated:
Proposed Penalty:

03/12/2014
\$3080.00

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: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 2 Item 6 b 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 personal protective equipment was not used:

A. Annealing Department: On, or about, July 24, 2013, a compressed air nozzle used for cleaning at the Tin Line was measured to be 40 p.s.i., dead-ended. Also, the employee who regularly used the nozzle wore regular street glasses without side shields instead of safety glasses with side shields.

B. Die Room: On, or about, July 24, 2013, a compressed air nozzle used for cleaning was measured to be 50 p.s.i., dead-ended.

Date By Which Violation Must be Abated:

Corrected During Inspection

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

Inspection Number: 923569
Inspection Date(s): 07/24/2013 - 08/28/2013
Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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

29 CFR 1910.133(a)(1): Protective eye equipment was not required where there was a reasonable probability of injury that could be prevented by such equipment:

Annealing Department: On, or about, July 24, 2013, chemical splash goggles provided for use by employees who added Super Detox to the Tin Lin reservoir were broken and could not be used. The ph of Super Detox, a corrosive acid solution, less than or equal to 1.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3850.00

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: 923569
Inspection Date(s): 07/24/2013 - 08/28/2013
Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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: **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:

Production Area: On, or about, July 24, 2013, chain alloy slings provided at Turks Head machines 8, 9, 10 and 11 were not provided with identification tags.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3850.00

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
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Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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

29 CFR 1910.184(e)(2)(ii): Makeshift link(s) or fastener(s) formed from bolts, or other such attachment(s) were used to connect links or fastenings on alloy steel chain sling(s):

Production Area: On, or about, July 24, 2013, a common bolt was used with a shackle to shorten the two-legged chain alloy sling provided at Turks Head machine #9.

Date By Which Violation Must be Abated:

Corrected During Inspection

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
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Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 2 Item 8 c Type of Violation: **Serious**

29 CFR 1910.184(e)(3)(i): A thorough periodic inspection of alloy steel chain slings was not made on a regular basis and/or were done at intervals greater than once every 12 months:

Production Area: On, or about, July 24, 2013, chain alloy slings used at Turks Head machines 8, 9, 10 and 11 were not subject to annual, documented inspections.

Date By Which Violation Must be Abated:

Corrected During Inspection

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 2 Item 9 Type of Violation: **Serious**

29 CFR 1910.219(f)(3): Sprocket wheels and chains which were seven 7 feet or less above floors or platforms were not enclosed:

Annealing: On, or about, July 24, 2013, a guard was not provided to cover the chain and sprocket drive provided on Take-Up #5, which was in use at the Steel Furnace.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3850.00

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
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Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 2 Item 10 Type of Violation: **Serious**

29 CFR 1910.303(b)(7)(iv): There were damaged parts that adversely affected safe operation or mechanical strength of the equipment, such as parts that were broken, bent, cut, or deteriorated by corrosion, chemical action, or overheating:

Annealing Department: On, or about, July 24, 2013, the outer insulation provided on the electrical drop cord used to energize Take-up #7 was cut and wrapped with electrical tape.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3080.00

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

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Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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

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

Annealing Department: On, or about, July 24, 2013, the power cord provided on the wall mounted Patton fan was spliced.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3850.00

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: 923569
Inspection Date(s): 07/24/2013 - 08/28/2013
Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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

29 CFR 1910.305(j)(2)(i): Receptacles were installed so as to require an energized attachment plug as its source of supply:

Die Room: On, or about, July 24, 2013, two receptacles were energized through a cord and plug connection. The receptacles were used to energize equipment used at the work bench.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3080.00

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: 923569
Inspection Date(s): 07/24/2013 - 08/28/2013
Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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 13 a Type of Violation: **Serious**

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

Company: On, or about July 29, 2013, the company had not developed a written Hazard Communication Program. Employees worked with hazardous chemicals, such as, but not limited to, hydrochloric acid, which was a component of Super Detox, a corrosive liquid.

Abatement Note: The written Hazard Communication program has to address the hazards of chemicals in unlabeled pipes or chemical piping systems such as, but not limited to, the hydrogen piping system, or the pipes must be labeled.

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$3080.00

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: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 2 Item 13 b Type of Violation: **Serious**

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

In the following locations, containers were not provided with an identity label:

A. Annealing Department: On, or about, July 24, 2013, a dip tank and red "gas" can that contained Coppershield 870, a Category 3 flammable liquid that contained petroleum distillates.

B. Die Room: On, or about, July 24, 2013, a plastic pail and ultrasonic cleaning unit that contained Lusterclean 38D, an irritant that contained triethanolamine, were not provided with a hazard warning label.

C. Maintenance Shop: On, or about, July 25, 2013, a small metal pail containing Varsol-18, a Category 3 flammable liquid that contained petroleum distillates, was not provided with a hazard warning label.

Date By Which Violation Must be Abated:

Corrected During Inspection



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 2 Item 13 c Type of Violation: **Serious**

29 CFR 1910.1200(f)(5)(ii): The employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged or marked with the appropriate hazard warnings:

A. Annealing Department: On, or about, July 24, 2013, the following containers were not provided with an appropriate hazard warning:

1. A spray bottle containing Varsol-18, a Category 3 flammable liquid that contained petroleum hydrocarbons.
2. A dip tank and red "gas" can that contained Coppershield 870, a Category 3 flammable liquid that contained petroleum distillates.

B. Die Room: On, or about, July 24, 2013, a plastic pail and ultrasonic cleaning unit that contained Lusterclean 38D, an irritant that contained triethanolamine, were not provided with a hazard warning label.

C. Maintenance Shop: On, or about, July 25, 2013, a small metal pail containing Varsol-18, a Category 3 flammable liquid that contained petroleum distillates, was not provided with a hazard warning label.

Date By Which Violation Must be Abated:

Corrected During Inspection

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Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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

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

Company: On, or about, July 25, 2013, the company had not conducted periodic reviews of the lockout procedures for equipment and machinery in the plant.

Radcliff Wire, Inc. was previously cited for a violation of an equivalent safety and health standard [1910.147(c)(6)(ii)], which was contained in OSHA inspection number 311767149, citation number 2, item number 1 and was affirmed as a final order on November 20, 2009, with respect to a workplace located at Bristol, Connecticut.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$7700.00

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

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Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 3 Item 2 Type of Violation: Repeat

29 CFR 1910.157(g)(4): Employees who have been designated to use firefighting equipment as a part of the emergency action plan were not provided training in the use of appropriate equipment upon initial assignment and at least annually thereafter:

Company: On, or about, August 6, 2013, annual, hands-on fire extinguisher training was not provided to employees designated to use fire extinguishers in the event of a small fire.

Radcliff Wire Inc. was previously cited for a violation of an equivalent occupational safety and health standard [1910.157(g)(2)], which was contained in OSHA inspection number 311767149, citation number 1, item number 2 and was affirmed as a final order on November 20, 2009, with respect to a workplace located at Bristol, Connecticut.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/12/2014
Proposed Penalty:	\$6160.00

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: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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

Citation 3 Item 3 a Type of Violation: **Repeat**

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. Production Area, Near Side Door: On, or about, July 24, 2013, a sixteen inch white fan that was designed for use in a residential location was used to provide cooling in the work area.

B. Maintenance Shop:

1. Break Area: On, or about, July 25, 2013, a knockout box was used in an extension cord assembly to energize a Black & Decker toaster oven, white refrigerator and radio.

2. Work Bench Area: A series of power taps, extension cords and plug mold was used to energize equipment such as, but not limited to, computers, computer peripheral equipment, work lights and a Comparator.

Radcliff Wire Inc. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 311767149, citation number 1, item number 8 and was affirmed as a final order on November 20, 2009, with respect to a workplace located at Bristol, Connecticut.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$6160.00

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: 923569
Inspection Date(s): 07/24/2013 - 08/28/2013
Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 3 Item 3 b Type of Violation: **Repeat**

29 CFR 1910.305(g)(1)(iv)(A): Flexible cords and/or cables were used as a substitute for the fixed wiring of a structure:

Maintenance Shop: On, or about, July 25, 2013, an extension cord assembly was used in lieu of permanent wiring to energize a toaster oven, refrigerator and a radio.

Radcliff Wire Inc. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 311767149, citation number 1, item number 10 and was affirmed as a final order on November 20, 2013, with respect to a workplace located at Bristol, Connecticut.

Date By Which Violation Must be Abated:

Corrected During Inspection

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: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

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

Citation 3 Item 4 a Type of Violation: Repeat

29 CFR 1910.303(g)(1)(i)(A): For electric equipment operating at 600 volts, nominal, or less to ground, and likely to require examination, adjustment, servicing, or maintenance while energized, the depth of the working space in the direction of access to live parts (as measured from the live parts where they were exposed or from the enclosure front or opening where they were enclosed) was less than indicated in Table S-1 of Subpart S of Part 1910:

Rolling Mill 5: On, or about, July 24, 2013, the take-up unit for Rolling Mill #5 was installed in front of the main service entrance panel for the building. Also, machine parts were stored on the floor in front of the panel.

Radcliff Wire Inc. was previously cited for a violation of an equivalent occupational safety and health standard [1910.303(g)(1)(ii)], which was contained in OSHA inspection number 311767149, citation number 1, item number 9 and was affirmed as a final order on November 20, 2009, with respect to a workplace located at Bristol, Connecticut.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$6160.00



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 3 Item 4 b Type of Violation: **Repeat**

29 CFR 1910.304(f)(1)(iv): Overcurrent devices for circuits rated 600 volts, nominal, or less, were not readily accessible to each employee or authorized building management personnel:

A. Rolling Mill Storage Area: On, or about, July 24, 2013, reels of wire were stored in front of two GE wall mounted panelboards that powered machines and lighting in the work area.

B. Maintenance Shop: On, or about, July 25, 2013, a workbench and Brown & Sharpe OD grinder were located in front of a wall mounted GE panelboard.

Radcliff Wire Inc. was previously cited for a violation of an equivalent occupational safety and health standard [1910.303(g)(1)(ii)], which was contained in OSHA inspection number 311767149, citation number 1, item number 9 and was affirmed as a final order on November 20, 2009, with respect to a workplace located at Bristol, Connecticut.

Date By Which Violation Must be Abated:

Corrected During Inspection

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

Inspection Number: 923569
Inspection Date(s): 07/24/2013 - 08/28/2013
Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 3 Item 5 Type of Violation: Repeat

29 CFR 1910.332(b)(1): Employees were not trained in and familiar with the safety-related work practices required by 1910.331 through 1910.335 that pertained to their respective job assignments:

Company: On, or about, July 25, 2013, maintenance personnel had not been trained regarding what work practices and protective equipment was required to protect them against electric shock, arc flash and arc blast hazards while performing live electrical work, live trouble-shooting and verifying whether or not electrical equipment was properly de-energized. The existing Electrical Safety Related Work Practices program did not contain any specific work practice guidelines to be utilized and did not provide any guidance regarding what levels of personal protective equipment was required to be worn for different voltage classes.

Radcliff Wire Inc. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 311767149, citation number 1, item number 11a and was affirmed as a final order on November 20, 2009, with respect to a workplace located at Bristol, Connecticut.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/12/2014
Proposed Penalty:	\$10780.00

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: 923569
Inspection Date(s): 07/24/2013 - 08/28/2013
Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 3 Item 6 Type of Violation: **Repeat**

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:

Company: On, or about, July 25, 2013, personal protective equipment such as, but not limited to, fire resistive clothing suitable for Category 2* electrical equipment, balaclavas, and hearing protection were not provided to employees who performed live electrical work, including trouble-shooting, or who verified that electrical equipment was properly de-energized.

Radcliff Wire Inc. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 311767149, citation number 1, item number 11c and was affirmed as a final order on November 20, 2013, with respect to a workplace located at Bristol, Connecticut.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/12/2014
Proposed Penalty:	\$10780.00

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: 923569
Inspection Date(s): 07/24/2013 - 08/28/2013
Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 3 Item 7 Type of Violation: Repeat

29 CFR 1910.334(a)(2)(ii): There was a defect or evidence of damage that could have exposes an employee to injury and the defective or damaged item was not removed from service:

Wire Drawing Production Area: On, or about, July 24, 2013, a green extension cord used to energize a King of Fans portable fan had a damaged outer jacket, exposing the inner conductors to damage.

Radcliff Wire Inc. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 311767149, citation number 1, item number 12 and was affirmed as a final order on November 20, 2009, with respect to a workplace located at Bristol, Connecticut.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$6160.00

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: 923569
Inspection Date(s): 07/24/2013 - 08/28/2013
Issuance Date: 01/23/2014



Citation and Notification of Penalty

Company Name: Radcliff Wire Inc.
Inspection Site: 97 Ronzo Road, Bristol, CT 06010

Citation 4 Item 1 Type of Violation: **Other-than-Serious**

29 CFR 1910.305(g)(1)(iv)(B): Flexible cords and/or cables were run through holes in walls, ceilings, or floors:

Maintenance Shop: On, or about, July 25, 2013, flexible cord used to energize the Monarch lathe and Bridgeport Milling machine had been run through a building opening.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$0.00

A handwritten signature in black ink, appearing to read "Warren G. Simpson", written over a horizontal line.

Warren G. Simpson
Area Director

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
William Cotter Federal Building
135 High Street, Suite 361
Hartford, CT 06103
Phone: 860-240-3152 Fax: 860-240-3155



INVOICE / DEBT COLLECTION NOTICE

Company Name: Radcliff Wire Inc.
Inspection Site: 97 RONZO ROAD, Bristol, CT 06010
Issuance Date: 01/23/2014

Summary of Penalties for Inspection Number	923569
Citation 2, Serious	\$46200.00
Citation 3, Repeat	\$53900.00
Citation 4, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES	\$100100.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$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

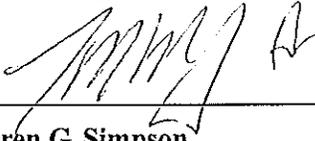
original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.

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.

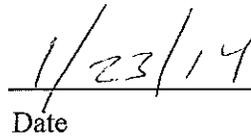
Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per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



Warren G. Simpson

Area Director



Date