

**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:**  
Rockville Construction, LLC  
and its successors  
61 Tolland Turnpike  
Manchester, CT 06042

**Inspection Number:** 974849  
**Inspection Date(s):** 04/30/2014 - 10/07/2014  
**Issuance Date:** 10/07/2014

**Inspection Site:**  
100 W Main Street  
Vernon Rockville, CT 06066

*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](http://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](http://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 10/07/2014. 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: 974849**

Company Name: Rockville Construction, LLC  
Inspection Site: 100 W Main Street, Vernon Rockville, CT 06066  
Issuance Date: 10/07/2014

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

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

Inspection Number: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
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**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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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 1 a** Type of Violation: **Serious**

29 CFR 1910.134(c)(1): A written respiratory protection program that included the provisions in 29 CFR 1910.134(c)(1)(i) - (ix) with worksite specific procedures was not established and implemented for required respirator use (Construction Reference 1926.103):

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to establish and implement a written respiratory protection program for employees who were required to wear North 6600-30L. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
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**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1910.134(d)(3)(i)(A): The employer did not select a respirator that meets or exceeds the required level of employee protection: (Construction Reference 1926.103)

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, the employer failed to provide employees with respirators that met or exceeded employee permissible exposure limits. Employees wore 3M 6600-30L, negative pressure respirators, which had a protection factor of 10 and employees were exposed to lead dust at levels of up to 40 times the permissible exposure limit. Employees were exposed to lead dust while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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: 974849  
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**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1926.62(f)(3)(i)(A): The employer did not select, and provide to employees, the appropriate respirators as specified in 29 CFR 1910.134(d)(3)(i)(A):

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, the employer failed to provide employees with full facepiece respirators. Employees wore 3M 6600-30L, negative pressure respirators. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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: 974849  
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### Citation and Notification of Penalty

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1910.134(e)(1): The employer did not provide a medical evaluation to determine the employee's ability to use a respirator, before the employee was fit tested or required to use the respirator in the workplace (Construction Reference 1926.103):

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to medically evaluate employees who were required to wear 3M 6600-30L, negative pressure respirators, prior to requiring its use. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

#### **ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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Occupational Safety and Health Administration

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**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
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**Citation 1 Item 3** Type of Violation: **Serious**

29 CFR 1910.134(f)(2): Employee(s) using tight-fitting facepiece respirators were not fit tested prior to initial use of the respirator: (Construction Reference 1926.103)

Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to fit test employees who were required to wear 3M 6600-30L, negative pressure respirators, prior to requiring its use. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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Occupational Safety and Health Administration

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**Company Name:** Rockville Construction, LLC  
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**Citation 1 Item 4** Type of Violation: **Serious**

29 CFR 1910.134(h)(1): Respirators were not cleaned and disinfected using the procedures in Appendix B-2 of 29 CFR 1910.134 or equivalent procedures recommended by the respirator manufacturer: (Construction Reference 1926.103)

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to ensure that respirators worn by employees were cleaned and disinfected properly. A hose, located outside of building was supplied for employees to rinse their respirators. Warm water was not available. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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: 974849  
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**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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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 5 a** Type of Violation: **Serious**

29 CFR 1910.134(k)(3): Training was not provided prior to requiring employees to use a respirator in the workplace: (Construction Reference 1926.103)

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to train employees who were required to wear 3M 6600-30L, negative pressure respirators, on the proper use, care, storage and respirator limitations prior to requiring respirator use. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
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**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1926.62(l)(2)(iii): The employer did not ensure that each employee was trained in the purpose, proper selection, fitting, use, and limitations of respirators:

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, the employer failed to train each employee in the purpose, proper selection, fitting, use and limitations of respirators. Employees wore 3M 6600-30L, negative pressure respirators, which had a protection factor of 10. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
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**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
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**Citation 1 Item 6** Type of Violation: **Serious**

29 CFR 1910.1018(e)(2): Initial monitoring was not performed for each workplace, or work operation covered by 29 CFR 1910.1018 to accurately determine the airborne concentration of inorganic arsenic to which employees may be exposed: (Construction Reference: 1926.1118)

(a) Hockanum Mill, Rockville, Ct - On or about April 30, 2014, and at times prior to, the employer failed to perform initial monitoring to determine employee exposure to airborne concentrations of inorganic arsenic. Employees were exposed to arsenic while manually scraping paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

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

29 CFR 1910.1200(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: (Construction Reference: 1926.59)

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to implement and maintain a written hazard communication program. Employee chemical exposure included, but was not limited to sodium hypochlorite, used to clean mold off of building surfaces, denatured alcohol, used as a paint thinner and Marine Clean, which contained potassium hydroxide and was used as a parts cleaner.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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

Inspection Number: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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**Citation 1 Item 7 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: (Construction Reference: 1926.59)

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to ensure that a small spray bottle of Marine Clean, which contained potassium hydroxide, was labeled with its contents contained therein. Marine Clean is used as a cleaner and degreaser to prepare metal prior to painting.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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**Citation 1 Item 7 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: (Construction Reference: 1926.59)

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to ensure that a small spray bottle of Marine Clean, which contained potassium hydroxide, was marked, or labeled with and appropriate hazard warning. Marine Clean is used as a cleaner and degreaser to prepare metal for painting.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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: 974849  
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**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1910.1200(g)(8): The employer did not maintain copies of the required material safety data sheets for each hazardous chemical in the workplace: (Construction Reference: 1926.59)

(a) Hockanum Mill, Rockville, Ct - On or about April 30, 2014, and at times prior to, the employer failed to maintain copies of the required material safety data sheets for hazardous chemicals used in the workplace. Material safety data sheets were not available for any chemicals located at the facility, including, but not limited to Marine Clean. Marine Clean contains potassium hydroxide and was used as a cleaner and degreaser to prepare metal for painting.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

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 as required under 29 CFR 1926.62(l)(1)(i) regarding 29 CFR 1926.59, Hazard Communication:

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to ensure that employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3, were trained in lead hazards, hazard communication and respiratory protection training.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
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**Citation 1 Item 8** Type of Violation: **Serious**

29 CFR 1926.50(g): Where employees were exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body were not provided within the work area for immediate emergency use:

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to ensure that quick drenching facilities were available when employees worked with, bleach which contained sodium hypochlorite and has a pH of 12.9. Employees used bleach to clean mold from interior surfaces of the mill.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$2800.00

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:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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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 9 a Type of Violation: **Serious**

29 CFR 1926.62(c)(1): The employer did not ensure that no employees were exposed to lead at concentrations greater than fifty micrograms per cubic meter of air (50 ug/m<sup>3</sup>) averaged over an 8-hour period:

Hockanum Mill, Rockville, Ct - On or about April 30, 2014, and at times prior to, the employer failed to ensure that no employee was exposed to lead at concentrations greater than fifty micrograms per cubic meter of air averaged over an 8-hour period. Employees were exposed to lead, at concentrations greater to the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

(a) Employee 1 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1712 micrograms per cubic meter, which is 34.24 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 298 minute sampling period on May 8, 2014. Zero exposure was assumed for the 182 minutes not sampled.

(b) Employee 2 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1176 micrograms per cubic meter, which is 23.52 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(c) Employee 3 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1982 micrograms per cubic meter, which is 39.64 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(d) Employee 4 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 2045

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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micrograms per cubic meter, which is 40.9 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 287 minute sampling period on May 8, 2014. Zero exposure was assumed for the 193 minutes not sampled.

All employees monitored were manually scraping paint from the interior walls of the mill inside building 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

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):

Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to initially determine if any employee was exposed to lead at or above the action levels. Employees were exposed to lead while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

(a) Employee 1 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1712 micrograms per cubic meter, which is 34.24 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 298 minute sampling period on May 8, 2014. Zero exposure was assumed for the 182 minutes not sampled.

(b) Employee 2 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1176 micrograms per cubic meter, which is 23.52 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(c) Employee 3 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1982 micrograms per cubic meter, which is 39.64 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(d) Employee 4 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 2045 micrograms per cubic meter, which is 40.9 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 287 minute sampling period on May 8, 2014. Zero exposure was assumed for the 193 minutes not sampled.

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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All employees monitored were manually scraping paint from the interior walls of the mill inside building 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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:** Rockville Construction, LLC

**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1926.62(d)(1)(iii): The employer did not collect personal samples representative of a full shift, including at least one sample for each job classification in each work area, either for each shift or for the shift with the highest exposure level:

Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to initially determine if any employee was exposed to lead at or above the action levels for each job task and work area. Employees were exposed to lead while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, painting, and performing carpentry work in buildings, including, but not limited to, buildings 1 and 3.

(a) Employee 1 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1712 micrograms per cubic meter, which is 34.24 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 298 minute sampling period on May 8, 2014. Zero exposure was assumed for the 182 minutes not sampled.

(b) Employee 2 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1176 micrograms per cubic meter, which is 23.52 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(c) Employee 3 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1982 micrograms per cubic meter, which is 39.64 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(d) Employee 4 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 2045 micrograms per cubic meter, which is 40.9 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 287 minute sampling period on May 8, 2014. Zero exposure was assumed for the 193 minutes not sampled.

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:** 974849  
**Inspection Date(s):** 04/30/2014 - 10/07/2014  
**Issuance Date:** 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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All employees monitored were manually scraping paint from the interior walls of the mill inside building 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1926.62(e)(1): The employer did not implement all feasible engineering and work practice controls, including administrative controls, to reduce and maintain employee exposure to lead to or below the permissible exposure limit:

Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to implement feasible engineering and work practice controls, including administrative controls, to reduce and maintain employee exposure to or below the permissible exposure limit. Employees were exposed to lead concentrations above the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

(a) Employee 1 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1712 micrograms per cubic meter, which is 34.24 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 298 minute sampling period on May 8, 2014. Zero exposure was assumed for the 182 minutes not sampled.

(b) Employee 2 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1176 micrograms per cubic meter, which is 23.52 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(c) Employee 3 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1982 micrograms per cubic meter, which is 39.64 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(d) Employee 4 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 2045 micrograms per cubic meter, which is 40.9 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 287 minute sampling period on May 8, 2014. Zero exposure was assumed for the 193 minutes not sampled.

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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All employees monitored were manually scraping paint from the interior walls of the mill inside building 3.

One feasible means of abatement would be to use wet methods, or administrative controls.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1926.62(e)(2)(i): The employer did not establish and implement a written compliance program to achieve compliance with 29 CFR 1926.62(c) prior to commencement of the job:

Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to establish and implement a written compliance program designed to reduce employee exposure to lead. Employees were exposed to lead while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

(a) Employee 1 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1712 micrograms per cubic meter, which is 34.24 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 298 minute sampling period on May 8, 2014. Zero exposure was assumed for the 182 minutes not sampled.

(b) Employee 2 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1176 micrograms per cubic meter, which is 23.52 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(c) Employee 3 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1982 micrograms per cubic meter, which is 39.64 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(d) Employee 4 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 2045 micrograms per cubic meter, which is 40.9 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 287 minute sampling period on May 8, 2014. Zero exposure was assumed for the 193 minutes not sampled.

All employees monitored were manually scraping paint from the interior walls of the mill inside

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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building 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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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 10 a      Type of Violation: **Serious**

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):

Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to provide a clean change area for employees exposed to lead. Painters and other laborers were exposed to lead while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

(a) Employee 1 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1712 micrograms per cubic meter, which is 34.24 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 298 minute sampling period on May 8, 2014. Zero exposure was assumed for the 182 minutes not sampled.

(b) Employee 2 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1176 micrograms per cubic meter, which is 23.52 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(c) Employee 3 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1982 micrograms per cubic meter, which is 39.64 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(d) Employee 4 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 2045 micrograms per cubic meter, which is 40.9 times the permissible exposure limit (PEL) of 50

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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micrograms per cubic meter. The exposure level was derived from a sample collected over a 287 minute sampling period on May 8, 2014. Zero exposure was assumed for the 193 minutes not sampled.

All employees monitored were manually scraping paint from the interior walls of the mill inside building 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

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) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to provide a clean change area for employees exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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:** Rockville Construction, LLC

**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

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 ensure that each employee used appropriate protective work clothing and equipment that prevented contamination of the employee and the employee's garments:

Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to ensure that employees used protective work clothing to prevent the contamination of employee's garments. Employees were exposed to lead while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

(a) Employee 1 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1712 micrograms per cubic meter, which is 34.24 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 298 minute sampling period on May 8, 2014. Zero exposure was assumed for the 182 minutes not sampled.

(b) Employee 2 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1176 micrograms per cubic meter, which is 23.52 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(c) Employee 3 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 1982 micrograms per cubic meter, which is 39.64 times the permissible exposure limit (PEL) of 50 micrograms per cubic meter. The exposure level was derived from a sample collected over a 311 minute sampling period on May 8, 2014. Zero exposure was assumed for the 169 minutes not sampled.

(d) Employee 4 was exposed to airborne lead at an 8-hour time weighted average (TWA) of 2045 micrograms per cubic meter, which is 40.9 times the permissible exposure limit (PEL) of 50

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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micrograms per cubic meter. The exposure level was derived from a sample collected over a 287 minute sampling period on May 8, 2014. Zero exposure was assumed for the 193 minutes not sampled.

All employees monitored were manually scraping paint from the interior walls of the mill inside building 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1926.62(i)(3)(i): The employer did not provide shower facilities, where feasible, for use by employees whose airborne exposure to lead was above the permissible exposure limit:

Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to provide showers facilities, for use by employees whose airborne exposure to lead was above the permissible exposure limit. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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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 13 a      Type of Violation: **Serious**

29 CFR 1926.62(i)(4)(iii): The employer did not ensure that employees whose airborne exposure to lead was above the permissible exposure limit, without regard to the use of a respirator, washed their hands and face prior to eating, drinking, smoking or applying cosmetics:

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to assure that employees washed their hands and face prior to eating, drinking or smoking. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1926.62(i)(5)(ii): Where showers are not provided the employer shall assure that employees wash their hands and face at the end of the work-shift:

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to assure that employees washed their hands and face at the end of the work-shift. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1926.62(i)(4)(ii): The employer did not ensure that lunchroom facilities or eating areas were as free as practicable from lead contamination:

(a) Hockanum Mill, Rockville, Ct - On or about April 30, 2014, and at times prior to, the employer failed to ensure that eating areas were as free as practicable from lead contamination. The eating area stored used personal protective equipment and employees stored PPE and food containers on the eating table. The eating table in the lunch room was contaminated with lead and exceeded HUD's level of acceptable decontamination of 200 micrograms of lead per square feet for floor areas. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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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 15 a      Type of Violation: **Serious**

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) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to make available medical surveillance, such as 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. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

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) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, and prior to performing an employee exposure assessment and determining employee lead level exposure, the employer failed to make available biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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

Inspection Number: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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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 16 a      Type of Violation: **Serious**

29 CFR 1926.62(l)(1)(i): The employer did not ensure that at least the following Lead hazards were communicated to employee(s): reproductive/developmental toxicity; central nervous system effects; kidney effects; blood effects; and acute toxicity effects.

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to train employees on health hazards associated with lead exposure, such as, but not limited to reproductive/developmental toxicity; central nervous system effects; kidney effects; blood effects; and acute toxicity effects. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1926.62(l)(1)(ii): The employer did not train each employee who were subject to exposure to lead at or above the action level on any day, or who were subject to exposure to lead compounds which may cause skin or eye irritation (e.g., lead arsenate, lead azide) in accordance with the requirements of 29 CFR 1926.62 and the employer did not institute a training program and ensure employee participation in the program:

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to train employees on the hazards associated with lead exposures, the employer did not implement a lead training program as described in 29 CFR 1926(l)(2) and require employee participation in the training program. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1926.62(1)(1)(iii): The employer did not provide the training program required under 29 CFR 1926.62(1)(2) as initial training prior to the time of job assignment:

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to provide initial training for employees on the hazards associated with lead exposure, the employer did not implement a lead training program and require employee participation in the training program prior to the time of job assignment. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

11/25/2014

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

Inspection Number: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1926.62(m)(1)(i): The employer did not post the following warning signs in each work area where an employee's exposure to lead is above the PEL.

DANGER  
LEAD WORK AREA  
MAY DAMAGE FERTILITY OR THE UNBORN CHILD  
CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEM  
DO NOT EAT, DRINK OR SMOKE IN THIS AREA:

(a) Hockanum Mill, Rockville, Ct. - On or about April 30, 2014, and at times prior to, the employer failed to assure that employees and contractors were made aware of lead work areas and lead health hazards through the posting of appropriate signage. Employees were exposed to lead concentrations that were 23 to 40 times the permissible exposure limit while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping lead paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	11/25/2014
Proposed Penalty:	\$4900.00

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: 974849  
Inspection Date(s): 04/30/2014 - 10/07/2014  
Issuance Date: 10/07/2014



**Citation and Notification of Penalty**

Company Name: Rockville Construction, LLC  
Inspection Site: 100 W Main Street, Vernon Rockville, CT 06066

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

29 CFR 1926.1127(d)(1)(i): The employer did not establish the applicability of this standard by determining whether cadmium was present in the work place and whether there was the possibility that employee exposure will be at or above the action level prior to performance of any construction work and did not designate a competent person to make the determination and did not ensure that the investigation techniques used included a review of relevant plans, past reports, material safety data sheets, and other available records, with consultations with the property owner and discussions with appropriate individuals and agencies:

(a) Hockanum Mill, Rockville, Ct- On or about April 30, 2014, and at times prior to, the employer failed to perform initial monitoring to determine employee exposure to airborne concentrations of cadmium. Employees were exposed to cadmium while manually scraping lead based paint from the interior walls, ceilings, doors and door frames and sweeping paint debris, in buildings, including, but not limited to, buildings 1 and 3.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

11/25/2014  
\$4900.00

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

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**Company Name:** Rockville Construction, LLC  
**Inspection Site:** 100 W Main Street, Vernon Rockville, CT 06066  
**Issuance Date:** 10/07/2014

<b>Summary of Penalties for Inspection Number</b>	<b>974849</b>
<b>Citation 1, Serious</b>	<b>\$86100.00</b>
<b>TOTAL PROPOSED PENALTIES</b>	<b>\$86100.00</b>

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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](http://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

10/07/2014  
Date