

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:
Scapa North America, LLC
and its successors
111 Great Pond Drive
Windsor, CT 06095

Inspection Number: 1119628
Inspection Date(s): 01/15/2016 - 07/07/2016
Issuance Date: 07/13/2016

Inspection Site:
111 Great Pond Drive
Windsor, CT 06095

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 \$25,000 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.

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 07/13/2016. 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: 1119628

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095
Issuance Date: 07/13/2016

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

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

Citation 3 Item 1 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, February 3, 2016, rags that had been used with solvents, such as but not limited to, Methyl Ethyl Ketone, a Category 2 flammable liquid with a flashpoint of 25 degrees, F, were disposed of into an open plastic bag instead of a closed metal container.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$4000.00

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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Company Name: Scapa North America, LLC
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Citation 3 Item 2 Type of Violation: **Serious**

29 CFR 1910.125(e)(1)(ii): Flames, spark-producing devices, or other surfaces that were hot enough to ignite vapors were not controlled in each vapor area and any adjacent area:

Coating Department: On, or about, February 3, a set of allen wrenches was provided for use by employees when changing over the wet end of Coater 2. Flammable liquids such as, but not limited to toluene, a Category 2 flammable liquid with a flashpoint of 39 degrees F, were used. The allen wrenches were not of the non-sparking type.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$4000.00

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Company Name: Scapa North America, LLC
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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 3 Item 3 a Type of Violation: **Serious**

29 CFR 1910.132(d)(1): The employer did not assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE):

Warehouse: On, or about, January 27, 2016, the Personal Protective Hazard Assessment/Job Hazard Analysis did not include specific face and hand protection to be used by employees when servicing forklift batteries.

Date By Which Violation Must be Abated:

08/29/2016

Proposed Penalty:

\$4000.00

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

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

Warehouse: On, or about, January 27, 2016, employees wore safety glasses when opening forkltruck batteries instead of either safety glasses and a faceshield or chemical splash goggles.

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: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

29 CFR 1910.138(a): The employer did not select and require employees to use appropriate hand protection when employees hands were exposed to hazardous condition(s):

Warehouse: On, or about, January 27, 2016, employees wore fabric work gloves instead of chemical resistant gloves when opening forktruck batteries.

Date By Which Violation Must be Abated:

Corrected During Inspection

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
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Citation 3 Item 4 Type of Violation: **Serious**

29 CFR 1910.184(e)(3)(i): Thorough periodic inspections of alloy steel chain slings in use were not made on a regular basis:

Maintenance Shop: On, or about, February 3, 2016, chain alloy slings used for plant maintenance activities were not subject to periodic, documented inspections.

Date By Which Violation Must be Abated:
Proposed Penalty:

08/29/2016
\$4000.00

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: Scapa North America, LLC
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Citation 3 Item 5 Type of Violation: **Serious**

29 CFR 1910.253(b)(4)(iii): Oxygen cylinders in storage were not separated from fuel-gas cylinders or combustible materials (especially oil or grease), a minimum distance of 20 feet (6.1 m) or by a noncombustible barrier at least 5 feet (1.5 m) high having a fire-resistance rating of at least one half hour:

On or about, February 3, 2016, in the following locations, oxygen cylinders were stored next to cylinders that contained flammable gas:

- A. Maintenance Shop: An oxygen cylinder was stored next to an acetylene cylinder on a welding cart. The cylinders were capped and had not been used for approximately five years.
- B. Loading Dock: Two oxygen cylinders were stored six feet away from four hydrogen cylinders.

Date By Which Violation Must be Abated: 08/29/2016
Proposed Penalty: \$4000.00

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: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

29 CFR 1910.303(b)(1)(i): Suitability for installation and use of electrical equipment was not evidenced by listing, labeling or other means for the identified purpose:

Mezzanine Electrical Room: On, or about, January 15, 2016, the following electrical equipment had not been examined and listed for use in accordance with Underwriter's Laboratory Standard 508, Industrial Control Equipment:

A. Square D contactor labeled CR-2 mounted next to Pilot Coater Main Disconnect: This specific purpose contactor was not contained in a control panel and therefore had not been properly applied and installed in that it was required to be installed in a control panel per the manufacturer.

B. Square D combination motor controllers provided for the Smith Incinerator: The combination motor controllers provided for the Purge Fan and Hydraulic Pump were not installed in the configuration that had been examined and listed to meet UL standards per the manufacturer as per the National Electric Code -2014, Article 430, Motors, Motor Circuits, and Controllers.

Date By Which Violation Must be Abated: 08/29/2016
Proposed Penalty: \$5000.00

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: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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 7 a Type of Violation: **Serious**

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

A. Warehouse, UPS Table: On, or about, January 27, 2016, a scale was energized through a relocatable power tap that was energized through another relocatable power tap.

B. Coater 4: On, or about, February 3, 2016, a knockout box designed for permanent wiring was used in an extension cord assembly to energize a Graco displacement pump.

C. Mezzanine Electrical Room:

1. On, or about, January 15, 2016, Square D 120/240 volt panelboard identified as Coater #2 Control Power: The box was mounted on shop-made standoffs.

2. On, or about, January 15, 2016, Square D 120/240 volt panelboard identified as Coater 1 Power Distribution: The box was mounted on shop-made standoffs.

3. On, or about, January 15, 2016, Square D disconnect switch labeled as Pilot Coater Main Disconnect: The handle provided on the switch had been taken off discarded electrical equipment and was welded onto the lever mechanism. According to the manufacturer, the modification of the switch was not in accordance with instructions or listing for the equipment.

4. On, or about, January 15, 2016, Square D I-Line panelboards installed for power distribution for Coating Lines #1, #2 and #3: Each panelboard assembly was not installed with the enclosure that was provided by the manufacturer.

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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Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

Date By Which Violation Must be Abated:
Proposed Penalty:

08/29/2016
\$5000.00

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

Citation 3 Item 7 b Type of Violation: **Serious**

29 CFR 1910.305(d)(2): Panelboards were not mounted in cabinets, cutout boxes, or enclosures designed for the purpose and/or were not dead front:

Mezzanine Electrical Room: On, or about, January 15, 2016, unqualified employees accessed the electrical room to trouble shoot, reset and repair electrical distribution equipment related to the Coating Equipment. The room contained numerous Square D I-Line panelboards for power distribution to Coating Lines #1, #2 and #3 that were not provided with enclosures.

Date By Which Violation Must be Abated:

08/29/2016

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: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

Citation 3 Item 8 Type of Violation: **Serious**

29 CFR 1910.303(f)(2): Each service, feeder, and branch circuit, at its disconnecting means or overcurrent device, was not legibly marked to indicate its purpose, nor located and arranged so the purpose was evident:

Mezzanine Electrical Room: On, or about, January 15, 2016; the following Square D panelboards were not provided with labels or markings to indicate the purpose of all of the circuit breakers:

- A. Coater #3: Control Panel mounted sideways.
- B. Coater #2: Distribution Panel mounted sideways.

Date By Which Violation Must be Abated:
Proposed Penalty:

08/29/2016
\$4000.00

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

Citation 3 Item 9 Type of Violation: **Serious**

29 CFR 1910.303(g)(2)(i)(A): Except as elsewhere required or permitted by Subpart S of Part 1910, live parts of electric equipment operating at 50 volts or more were not guarded against accidental contact by use of approved cabinets or by location in a room, vault, or similar enclosure that is accessible only to qualified persons:

Mezzanine Electrical Room: On, or about, January 15, 2016, unqualified employees accessed the electrical room to trouble shoot, reset and repair electrical distribution equipment related to the Coating Equipment. The room contained electrical equipment such as, but not limited to, circuit breaker panels installed without enclosures, circuit breakers mounted directly on control boards, open fuse holders and exposed fuses, live terminal strips, open disconnect switches, open motor starters, open relays and timers and open snap switches.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 08/29/2016
Proposed Penalty: \$7000.00

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

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

Citation 3, Item 10 Type of Violation: **Serious**

29 CFR 1910.303(g)(2)(ii): In locations where electric equipment was likely to be exposed to physical damage, enclosures or guards were not so arranged and of such strength as to prevent such damage:

Mezzanine Electrical Room: On, or about, January 15, 2016, employees routinely calibrated LEL (lower explosive limit) sensors located in incinerator ductwork that ran through the room. Employees worked above live, exposed electrical equipment for Coater #2 that was not protected from physical damage in the event that either a hand tool or calibration gas cylinder was accidentally dropped.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

08/29/2016
\$7000.00

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: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

Citation 3 Item 11 Type of Violation: **Serious**

29 CFR 1910.304(b)(4)(ii)(B): Where connected to a branch circuit supplying two or more receptacles or outlets, a receptacle may not supply a total cord- and plug-connected load in excess of the maximum specified in Table S-4:

Maintenance Shop: On, or about, February 3, 2016, a QTech relocatable power tap was used to energize a microwave oven, toaster oven, battery charger and computer. The total load, in amperes, exceeded the allowable limit of 80% of the rating of the relocatable power tap, or 12 amperes.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$4000.00

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
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Citation 3 Item 12 Type of Violation: **Serious**

29 CFR 1910.304(f)(1)(i): Conductors and equipment were not protected from overcurrent in accordance with their ability to safely conduct current:

Mezzanine Electrical Room: On, or about January 15, 2016, Type SOOW flexible cord was wired onto the load side of a 60 ampere Square D circuit breaker in the Square D 480 volt I-Line panelboard provided for Coater 1 in order to energize IR heater used on the Pilot Line. The cord was only rated for a load of 45 amperes.

Date By Which Violation Must be Abated:
Proposed Penalty:

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\$4000.00

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Citation 3 Item 13 Type of Violation: **Serious**

29 CFR 1910.304(f)(1)(v): The employer did not ensure that fuses and circuit breakers were so located or shielded that employees will not be burned or otherwise injured by their operation.

Mezzanine Electrical Room: On, or about, January 15, 2016, fuse holders and cartridge fuses throughout the room were not provided with enclosures or shielding to protect employees from arcs and/or flying objects in the event of the operation of the over-current device.

Date By Which Violation Must be Abated:
Proposed Penalty:

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\$5000.00

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
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Citation 3 Item 14 Type of Violation: **Serious**

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:

A. Maintenance Shop: On, or about, February 3, 2016, a microwave oven and a toaster oven were energized through an extension cord.

B. Coater 4: On, or about, February 3, 2016, a knockout box designed for permanent wiring was used in an extension cord assembly to energize a Graco displacement pump.

Date By Which Violation Must be Abated:
Proposed Penalty:

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\$4000.00

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Company Name: Scapa North America, LLC
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Citation 3 Item 15 Type of Violation: **Serious**

29 CFR 1910.333(c)(6): Conductive materials and equipment that were in contact with an employee's body were not handled in a manner that would prevent them from contacting exposed energized conductors or circuit parts:

Mezzanine Electrical Room: On, or about, January 25, 2016, a table and chairs with metal legs were positioned a few inches from live electrical parts of equipment such as, but not limited to, electrical control boxes for the Turrent Winder Drive and Winder Drive. The equipment appeared to be for Coating Line #4.

Date By Which Violation Must be Abated:
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\$5000.00

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Company Name: Scapa North America, LLC
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Citation 4 Item 1 Type of Violation: **Other-than-Serious**

29 CFR 1910.305(f)(1): Conductors used for general wiring were not insulated:

Warehouse: On, or about, January 27, 2016, the outer jacket provided on the power cord for the Powermatic vertical band saw was split and wrapped with electrical tape.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$0.00

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

Citation 4 Item 2, Type of Violation: **Other-than-Serious**

29 CFR 1910.1200(f)(6)(ii): Except as provided in 29 CFR 1910.1200(f)(7) and 29 CFR 1910.1200(f)(8), the employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged or marked with the product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals and which, in conjunction with the other information immediately available to employees under the hazard communication program, would provide employees with the specific information regarding the physical and health hazards of the hazardous chemical

Coating Department: On, or about, February 3, 2016, a clear bottle that contained toluene, a Category 2 flammable liquid, that was used at Coating Line 2 was not provided with an identity label.

Date By Which Violation Must be Abated:

08/29/2016

Proposed Penalty:

\$0.00

A handwritten signature in black ink, appearing to read "Warren G. Simpson", is 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: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095
Issuance Date: 07/13/2016

Summary of Penalties for Inspection Number	1119628
Citation 3, Serious	\$70000.00
Citation 4, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES	\$70000.00

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 \$25,000 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

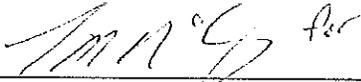
account, the bank will attempt to make the transfer up to 2 times.

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.

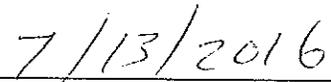
Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per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

Arca Director



Date