

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



July 31, 2013

SPECTRUM MACHINE INC.
1668 FROST ROAD
Streetsboro, OH 44241

Dear Employer:

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

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

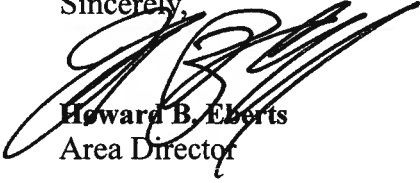
As indicated on page 8 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take 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 the citation. The running of this contest period is not interrupted by an informal conference.

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

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to 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.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Eberts", is written over the typed name and title.

Howard B. Eberts
Area Director

Enclosures

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



Citation and Notification of Penalty

To:
SPECTRUM MACHINE INC.
1668 FROST ROAD
Streetsboro, OH 44241

Inspection Number: 858103
Inspection Date(s): 01/31/2013 - 04/17/2013
Issuance Date: 07/31/2013

Inspection Site:
7071 Peck Rd
Ravenna, OH 44266

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.

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

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

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

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

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

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 07/31/2013. The conference will be held by telephone or at the OSHA office located at 1240 East 9th Street, Room 899, Cleveland, OH 44199 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 858103

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266
Issuance Date: 07/31/2013

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

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.95(d)(1): A representative monitoring program was not developed and implemented when information indicated that an employee's exposure may equal or exceed an 8 hour time weighted average of 85 DBA:

Employees were required to wear earplugs while working on the furnace deck and no noise monitoring was conducted to determine if a comprehensive hearing conservation program was required.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/04/2013
Proposed Penalty:	\$3500.00

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

Inspection Number: 858103
Inspection Date(s): 01/31/2013 - 04/17/2013
Issuance Date: 07/31/2013



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

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

No written program was developed for employees who were overexposed to lead and copper and who are required to wear respirators while working on the casting deck.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/04/2013
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: 858103
Inspection Date(s): 01/31/2013 - 04/17/2013
Issuance Date: 07/31/2013



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

Citation 1 Item 3 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 is fit-tested or required to use the respirator in the workplace:

At least three employees who were required to use respiratory protection while working in the casting and pouring department were not provided a medical evaluation.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/04/2013
Proposed Penalty:	\$3500.00

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: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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 4 a Type of Violation: **Serious**

29 CFR 1910.134(f)(1): The employer did not ensure that employees using a tight-fitting facepiece respirator pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT) as stated in 29 CFR 1910(f):

No fit testing was done for employees who were overexposed to lead and copper and who are required to wear respirators while working on the casting deck.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/04/2013
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: 858103
Inspection Date(s): 01/31/2013 - 04/17/2013
Issuance Date: 07/31/2013



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.134(g)(1)(i)(A): Respirators with tight-fitting facepieces were worn by employees who had facial hair that came between the sealing surface of the facepiece and the face or that interfered with valve function:

Two employees, who wore half mask 3M respirators, had beards which interfered with the face seal.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **09/04/2013**

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: 858103
Inspection Date(s): 01/31/2013 - 04/17/2013
Issuance Date: 07/31/2013



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.134(k)(1): The employer did not ensure that each employee can demonstrate knowledge of at least 29 CFR 1910.134(h)(1)(i) through(vii):

At least three employees who were required to use respiratory protection while working in the casting and pouring department were not trained in the use of respirators.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 09/04/2013
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: 858103
Inspection Date(s): 01/31/2013 - 04/17/2013
Issuance Date: 07/31/2013



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.147(c)(1): The employer did not establish a program consisting of an energy control procedure and employee training to ensure that before any employee performed any servicing or maintenance on a machine or equipment where the unexpected energizing, start up or release of stored energy could occur and cause injury, the machine or equipment would be isolated, and rendered inoperative in accordance with 29 CFR 1910.147(c)(4):

No energy control program was developed for employees who work on equipment including, but not limited to, the furnaces.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/04/2013
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: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.157(g)(1): An educational program was not provided for all employees to familiarize them with the general principles of fire extinguisher use and the hazards involved with incipient stage firefighting:

Although portable fire extinguishers were available for employee use, neither initial, nor annual retraining was provided.

Note: Employer may exercise one of the following options.

1. Provide portable fire extinguishers as specified in 29 CFR 1910.157(c)(1), meet the distribution requirements per 29 CFR 1910.157(d) (75' to the nearest extinguisher for Class A fires and 50' to the nearest unit for Class B fires), and provide training and education for all employees in the use of such equipment and the hazards associated with incipient stage firefighting as required in 29 CFR 1910.157(g). The other sections of 29 CFR also apply.
2. Provide extinguishers as specified in 29 CFR 1910.157(c)(1), designate certain employees to be the only employees authorized to use such equipment and require all other employees to immediately evacuate upon the sounding of the fire alarm, establish this in writing in an emergency action plan as outlined in 29 CFR 1910.38(a) and train/educate designated employees per 1910.157(g). Utilizing this option exempts the employer from distribution requirements of 29 CFR 1910.157(d).

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: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

3. Establish a written fire safety policy which requires the immediate and total evacuation of employees from the workplace upon the sounding of a fire alarm signal. This policy shall include an emergency action plan and a fire prevention plan as specified in 29CFR 1910.38(a) and (b). Utilizing this option exempts the employer from the requirements of 29 CFR 1910.157 to include the need for providing portable fire equipment unless a specific standard requires that a portable fire extinguisher be provided (such as those requirements in 29 CFR 1910.106/107 related to use/storage of flammable/combustible liquids). If extinguishers are provided, but not intended for employee use, 29 CFR 1910.157(e) and (f) are still applicable (inspection, maintenance, and testing of equipment).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/04/2013
Proposed Penalty:	\$2100.00

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: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.1000(a)(2): Employees were exposed to an airborne concentration of Copper, listed in Table Z-1 in excess of the 8 hour Time Weighted Average concentration of 0.1 milligrams per cubic meter of air (mg/m³):

a) On 3/13/13, a Casting hand working in the casting department was exposed to copper at an 8 hour time weighted average level of .19 mg/m³, this exposure was approximately 1.9 times the permissible exposure limit (PEL) of 0.1 mg/m³. This exposure was calculated from a sample collected over a 410 minute period; a zero increment was included for the 70 minutes not sampled.

b) On 3/13/13, a Casting hand working in the casting department was exposed to copper at an 8 hour time weighted average level of .20 mg/m³, this exposure was approximately 2 times the permissible exposure limit (PEL) of 0.1 mg/m³. This exposure was calculated from a sample collected over a 425 minute period; a zero increment was included for the 55 minutes not sampled.

c) On 3/13/13, a Lead man working in the casting department was exposed to copper at an 8 hour time weighted average level of .35 mg/m³, this exposure was approximately 3.5 times the permissible exposure limit (PEL) of 0.1 mg/m³. This exposure was calculated from a sample collected over a 397 minute period; a zero increment was included for the 83 minutes not sampled.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 09/04/2013
Proposed Penalty: \$4900.00



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.1000(e): Feasible administrative or engineering controls were not determined and implemented to achieve compliance with the limits prescribed in 29 CFR 1910.1000(a) through (d):

Engineering controls were not implemented to reduce the exposure to employees overexposed to Copper.

Engineering controls usually effective in these circumstances include, but are not limited, to the following:

1. Modification of the existing ventilation system to improve capture velocity at the ventilation hoods.
2. Modification of ventilation hoods to better collect metal fumes,
3. Maintenance of furnace and tundish and other system parts which are subject to flames or high heat and which may be contaminated with metal spills.

Abatement Steps

STEP 1: Effective respirators shall be provided and used by all employee(s) as an interim measure. Abatement must be completed by August 9, 2013.



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

STEP 2: Submit to the Area Director a written detailed plan of abatement outlining a schedule for the implementation of engineering and/or administrative measures to control employee exposures as referenced in this citation. This plan shall include, at a minimum, target dates for the following actions which must be consistent with the dates required by this citation.

- a) Evaluation of the extent and location of the hazard source.
- b) Evaluation of control measure options.
- c) Selection of optimum control method(s).
- d) Determination of control measure design.
- e) Ordering and delivery of equipment and material(s).
- f) Installation of control measures.
- g) Training of employees in proper operation and maintenance of newly-implemented control measures.
- h) Assurance of effective performance of control measures.

All proposed control measures shall be evaluated for each particular use by a technically qualified person. Abatement must be completed by September 16, 2013.

STEP 3: Correction should have been completed by the implementation of feasible engineering and/or administrative controls and air sampling results to verify the effectiveness in achieving compliance. Abatement must be completed by October 29, 2013.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 10/04/2013



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.1025(c)(1): Employee(s) were exposed to lead at concentrations greater than fifty micrograms per cubic meter of air averaged over an eight-hour period:

- a) On 3/13/2013, an employee working on the casting deck was exposed to lead at a level of 753.37 micrograms per cubic meter of air (ug/m3), this exposure was approximately 15.06 times the permissible exposure limit (PEL) of 50 ug/m3. This exposure was calculated from a sample collected over a 410 minute period; a zero increment was included for the 70 minutes not sampled.
- b) On 3/13/2013, an employee working on the casting deck was exposed to lead at a level of 655.21 ug/m3, this exposure was approximately 13.10 times the PEL of 50 ug/m3. This exposure was calculated from a sample collected over a 425 minute period; a zero increment was included for the 55 minutes not sampled.
- c) On 3/13/2013, an employee working as a Lead man was exposed to lead at a level of 670.76 ug/m3, this exposure was approximately 13.42 times the PEL of 50 ug/m3. This exposure was calculated from a sample collected over a 397 minute period; a zero increment was included for the 63 minutes not sampled.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/04/2013
Proposed Penalty:	\$4900.00



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.1025(e)(1)(ii): Where an employee was exposed to lead above the permissible exposure limit, but for 30 days or less per year, engineering controls were not implemented to reduce exposures to 200 ug/m3:

Engineering controls were not implemented to reduce the exposure to employees overexposed to Lead.

Engineering controls usually effective in these circumstances include, but are not limited to, the following:

1. Modification of the existing ventilation system to improve capture velocity at the ventilation hoods.
2. Modification of ventilation hoods to better collect metal fumes,
3. Maintenance of furnace and tundish and other system parts which are subject to flames or high heat and which may be contaminated with metal spills.

Abatement Steps

STEP 1: Effective respirators shall be provided and used by all employee(s) as an interim measure. Abatement must be completed by August 9, 2013.



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

STEP 2: Submit to the Area Director a written detailed plan of abatement outlining a schedule for the implementation of engineering measures to control employee exposures as referenced in this citation. This plan shall include, at a minimum, target dates for the following actions which must be consistent with the dates required by this citation.

- a) Evaluation of the extent and location of the hazard source.
- b) Evaluation of control measure options.
- c) Selection of optimum control method(s).
- d) Determination of control measure design.
- e) Ordering and delivery of equipment and material(s).
- f) Installation of control measures.
- g) Training of employees in proper operation and maintenance of newly-implemented control measures.
- h) Assurance of effective performance of control measures.

All proposed control measures shall be evaluated for each particular use by a technically qualified person. Abatement must be completed by September 16, 2013.

STEP 3: Correction should have been completed by the implementation of feasible engineering controls and air sampling results to verify the effectiveness in achieving compliance. Abatement must be completed by October 29, 2013.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 10/04/2013

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

Inspection Number: 858103
Inspection Date(s): 01/31/2013 - 04/17/2013
Issuance Date: 07/31/2013



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.1025(f)(3)(i)(A): Respirators required under this section for protection against lead, were not selected as specified in paragraph (d)(3)(i)(A) of 29 CFR 1910.134:

Employees overexposed to lead at more than 15 and 13 times the PEL, were provided only a half mask air purifying respirator which has a protection factor of 10 times the PEL.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/04/2013
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: 858103
Inspection Date(s): 01/31/2013 - 04/17/2013
Issuance Date: 07/31/2013



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.1025(d)(2): An initial determination was not made to determine if any employee may be exposed to lead at or above the action level:

No air sampling was done to determine if employees were over exposed to lead.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/04/2013
Proposed Penalty:	\$49000.00

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: 858103
Inspection Date(s): 01/31/2013 - 04/17/2013
Issuance Date: 07/31/2013



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.1025(l)(1)(i): Employee(s) working in an area where there is potential exposure to airborne lead at any level were not informed of the content of Appendices A and B of this regulation:

No training was done for employees who work on the site casting lead containing alloys.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/04/2013
Proposed Penalty:	\$49000.00

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: 858103
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Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.1025(l)(1)(ii): A training program was not instituted and required for all employees who were subject to lead exposure at or above the action level, or for whom the possibility of skin or eye irritation existed:

No training was done for employees who were overexposed to lead while casting lead containing alloys.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

09/04/2013

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: 858103
Inspection Date(s): 01/31/2013 - 04/17/2013
Issuance Date: 07/31/2013



Citation and Notification of Penalty

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

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:

No written hazard communication program was developed for employees who work on the site and are exposed to hazardous chemicals including, but not limited to, copper, nickel, and tin.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/04/2013
Proposed Penalty:	\$49000.00

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: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266

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

29 CFR 1910.1200(h)(1): Employees were not provided with effective information and training as specified in 29 CFR 1910.1200 (h)(2) and (3) on hazardous substances in their work area at the time of their initial assignment and whenever a new hazard was introduced into their work area:

No training was provided for employees who work on the site and are exposed to hazardous chemicals including, but not limited to, copper, nickel, and tin.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

09/04/2013

A handwritten signature in black ink, appearing to read "H. Eberts", written over a horizontal line.

Howard B. Eberts
Area Director

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



INVOICE / DEBT COLLECTION NOTICE

Company Name: SPECTRUM MACHINE INC.
Inspection Site: 7071 Peck Rd, Ravenna, OH 44266
Issuance Date: 07/31/2013

Summary of Penalties for Inspection Number	858103
Citation 1, Serious	\$41300.00
Citation 2, Willful	\$147000.00
TOTAL PROPOSED PENALTIES	\$188300.00

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

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

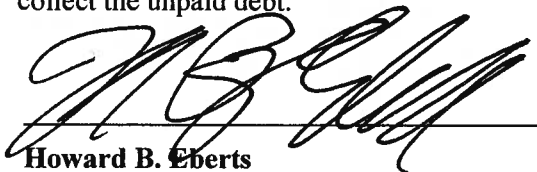
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within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

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

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

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

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



Howard B. Eberts

Area Director

7-31-2013
Date