

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
299 Cherry Hill Road  
Suite 103  
Parsippany, NJ 07054  
Phone: 973-263-1003 Fax: 973-299-7161



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## Citation and Notification of Penalty

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**To:**  
United Continental Holdings, Inc.,  
dba United Airlines, Inc.  
233 South Wacker Drive  
Chicago, IL 60606

**Inspection Number:** 954623  
**Inspection Date(s):** 01/15/2014 - 07/08/2014  
**Issuance Date:** 07/10/2014

**Inspection Site:**  
Newark Liberty Airport  
Terminal C  
Newark, NJ 07114

*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.*

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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.



## NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 07/10/2014. The conference will be held by telephone or at the OSHA office located at 299 Cherry Hill Road, Suite 103, Parsippany, NJ 07054 on \_\_\_\_\_ at

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

**CERTIFICATION OF CORRECTIVE ACTION WORKSHEET**

**Inspection Number: 954623**

Company Name: United Continental Holdings, Inc., dba United Airlines, Inc.  
Inspection Site: Newark Liberty Airport, Terminal C, Newark, NJ 07114  
Issuance Date: 07/10/2014

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, 299 Cherry Hill Road, Suite 103, Parsippany, NJ 07054**

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:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to fall hazards when working from a ML50-30 Maintenance Lift without the use of guardrails or a body harness.

a. Newark Liberty Int'l Airport - Hangar 55

Aircraft Maintenance Bay Employees performing aircraft maintenance were exposed to fall hazards from a TESCO ML50-30 Airline Ground Support Vehicle - Mounted Vertical Lift Device. Employees performing repairs to a Boeing 757-200 Aircraft Horizontal Stabilizer were not protected from fall hazards by use of a personal fall arrest system due to removed guardrails, guardrails positioned incorrectly, and safety chains being too short to connect to the guardrail posts on the lift truck.

Violation observed on or about February 10, 2014

**ABATEMENT NOTE:**

Among other methods, two acceptable means of abatement would be:

a.) Adhere to the TESCO ML50-30 Operators Manual (Page 13) Caution: "A body harness should be worn when disconnecting the chain rails."

b.) Adhere to ANSI/SAIA A92.7-2014: Airline Ground Support Vehicle-Mounted Vertical Lift Devices.

1. Page 34, Paragraph 7.10: Operator Warnings and Instructions, Paragraph 7.10(1) Fall Protection, Paragraph 7.10(4) Guardrail System, and Paragraph 7.10(8) pertaining to Personal Protective Equipment.

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:** 954623  
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**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
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2. Page 34, Paragraph 8.10: User Warnings and Instructions, Paragraph 8.10(1) Fall Protection, Paragraph 8.10(4) Guardrail System, and Paragraph 8.10(8) pertaining to Personal Protective Equipment.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	07/29/2014
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.



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which was free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to struck by hazards created by damaged racking systems.

a. Newark Liberty International Airport, Building 101, Stores - Second level parts storage

Employees were exposed to struck by hazards of collapsing racks of the metal storage racking system while the employees warehoused merchandise. Rolled steel storage racks were not anchored in a manner to prevent tipping by accidental contact by employees. Parts storage racks were not anchored to one another or to the wall in a manner which would prevent tipping or collapse.

Violation observed on or about February 4, 2014

b. Newark Liberty International Airport, Hangar 55 Tool Checkout - Second & Third level tool storage

Employees were exposed to struck by hazards of collapsing racks of the metal storage racking system while the employees warehoused merchandise. Rolled steel storage racks which were bent or damaged were used to warehouse tools and other materials.

Violation observed on or about February 4, 2014



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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c. Newark Liberty International Airport, Building 157, Chelsea Food Services

Employees were exposed to struck by hazards of collapsing racks of the metal storage racking system while the employees warehoused merchandise. Industrial steel storage racks which were bent or damaged were used to warehouse food and other supplies. Racking system had damage to several stanchions held pallets of food products to include large pallets of carbonated soft drinks.

Violation observed on or about February 12, 2014

d. Newark Liberty International Airport, Building 154, GSE, Parts Storage Area

Employees were exposed to struck by hazards of collapsing racks of a metal storage racking system while the employees warehoused or retrieved parts. Rolled steel storage racks which were bent or damaged were used to warehouse automotive parts and other supplies. Racking system had damage to several shelves.

Violation observed on or about February 12, 2014

e. Newark Liberty International Airport, Building 330, Chelsea Food Services, Row E, Station E-1-07, E-3-17, and other areas

Employees were exposed to struck by hazards of collapsing racks of the metal storage racking system while the employees warehoused merchandise. Industrial steel storage racks which were bent or damaged were used to warehouse food and other supplies. Racking system had damage to several stanchions and had broken anchor bolts from being struck and held pallets of food products to include large pallets of carbonated soft drinks. .

Violation observed on or about February 19, 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:** 954623  
**Inspection Date(s):** 01/15/2014 - 07/08/2014  
**Issuance Date:** 07/10/2014



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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**Among other methods, all of the following are feasible and acceptable means of abatement:**

1. Adhere to the ANSI standard MH16.1-2008, and the Rack Manufacturers Institute specifications for anchoring storage racks and repair and/or replace racks with damaged components.
2. Adhere to ANSI Standard MH16.2-1984 Manual of Safety Practices: A Code Of Safety Practices for the Use of Industrial and Commercial Steel Storage Racks, repair and/or replace racks with damaged components.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	08/05/2014
Proposed Penalty:	\$5500.00

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:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to struck by hazards and caught between hazards from rollover of Ground Service Equipment which included, but was not limited to TUG MA50-1 Tow Tractors, TUG MA60-1 Tow Tractors, and TUG 660E Mobile Electric Conveyors.

a. Newark Liberty Int'l Airport, Terminal C Ramp, Gate 90

Ground Service Equipment (Powered Industrial Equipment) Ground Service Equipment which included, but was not limited to TUG MA50-1 Tow Tractors, TUG MA60-1 Tow Tractors, and TUG 660E Mobile Electric Conveyors, which was equipped with operator restraint devices or seat belts were not used. Employees were observed operating GSE vehicles used to tow cargo and baggage dollies to and from the aircraft (outside the aircraft footprint) without the use of seat belts.

Violation observed on or about March 12, 2014

b. Newark Liberty Int'l Airport, Terminal B, International Arrivals

Ground Service Equipment (Powered Industrial Equipment), which included, but was not limited to TUG MA50-1 Tow Tractors, TUG MA60-1 Tow Tractors, and TUG 660E Mobile Electric Conveyors, which was equipped with operator restraint devices or seat belts were not used. Employees were observed operating GSE used to tow cargo and baggage dollies to and from the aircraft (outside the aircraft footprint) without the use of seat belts.

Violation observed on or about March 12, 2014



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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c. Newark Liberty Int'l Airport, Between Terminal B and Terminal C parking ramp

Ground Service Equipment (Powered Industrial Equipment), which included, but was not limited to TUG MA50-1 Tow Tractors, TUG MA60-1 Tow Tractors, and TUG 660E Mobile Electric Conveyors, which was equipped with operator restraint devices or seat belts were not used. Employees were observed operating GSE used to transport cargo and baggage containers to and from aircraft without the use of seat belts.

Violation observed on or about April 9, 2014

d. Newark Liberty Int'l Airport, Terminal A, Outbound Baggage/Oversized Baggage conveyor

Ground Service Equipment (Powered Industrial Equipment), which included, but was not limited to TUG MA50-1 Tow Tractors, TUG MA60-1 Tow Tractors, and TUG 660E Mobile Electric Conveyor, which was equipped with operator restraint devices or seat belts were not used. An employee was observed operating GSE used to tow/transport cargo and baggage carts to and from an aircraft without the use of seat belts.

Violation observed on or about April 9, 2104

**ABATEMENT NOTE:** Among other methods, one acceptable means of abatement would be to require the use of the seat belt in accordance with the Consensus Standard ANSI B56.1-2000, Safety Standard for Powered Industrial Equipment, Section 5.3.19 which states: "An active operator protection device or system, when provided, shall be used."

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	07/29/2014
Proposed Penalty:	\$7000.00



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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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 4 a** Type of Violation: **Serious**

29 CFR 1910.26(c)(2)(vii): Ladders having defects were not marked and taken out of service until repaired.

a. Newark Liberty Int'l Airport, Terminal A, Outbound Baggage Area, Conveyor (Sorter) Access

Maintenance ladders were not maintained in a safe condition. Employees used a ladder to access the baggage conveyor catwalks which was broken/damaged at the base and not removed from service.

Violation observed on or about April 9, 2014

b. Newark Liberty Int'l Airport, Terminal C, Baggage Area, Conveyor Access

Maintenance ladders were not maintained in a safe condition. Employees used a ladder to access the baggage conveyor (sorter) catwalks which was broken/damaged at the base and not removed from service.

Violation observed on or about April 9, 2014

Date By Which Violation Must be Abated:  
Proposed Penalty:

07/29/2014  
\$4400.00



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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

29 CFR 1910.26(c)(3)(vii): Ladders should not be used as a brace, skid, guy or gin pole, gangway, or for other uses than that for which they were intended, unless specifically recommended for use by the manufacturer.

a. Newark Liberty Int'l Airport, Terminal A, Outbound Baggage

The employer modified ladders in a manner not intended by the manufacturer for employees to access the baggage conveyor (sorter) catwalks.

Violation observed on or about April 9, 2014

b. Newark Liberty Int'l Airport, Terminal C, Outbound Baggage

The employer modified ladders in a manner not intended by the manufacturer for employees to access the baggage conveyor (sorter) catwalks.

Violation observed on or about April 9, 2014

Date By Which Violation Must be Abated:

07/29/2014



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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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 1910.36(g)(2): Exit access(es) were not at least 28 inches (71.1 cm) wide at all points.

a. Newark Liberty Int'l Airport, Hangar 54, Tool Check Out

The metal racking system installed in the tool storage area reduced the exit route to approximately 24 inches.

Violation observed on or about February 4, 2014

b. Newark Liberty Int'l Airport, GSE, Building 154, Exit to loading dock

A metal cage installed near the exit door from the parts storage area to the loading docks reduced the emergency exit to approximately 24 inches.

Violation observed on or about February 10, 2014

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	07/29/2014
Proposed Penalty:	\$4400.00



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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

29 CFR 1910.37(a)(3): Exit route(s) were not kept free and unobstructed:

a. Newark Liberty International Airport - Terminal C, Third Floor, Door 6, Group Section exit door

Exit route was not kept free and unobstructed. The exit doors were blocked by stanchions and garbage cans stored in the vestibule between the inner and outer doors, which prevented unobstructed egress for employees working the Group Section.

Violation observed on or about January 16, 2014

b. Newark Liberty International Airport - Terminal C, Baggage area

Exit route was not kept free and unobstructed. The exit route at the west end (at the TT2 E-Stop) of the building was cluttered by construction debris which prevented unobstructed egress from the area for employees.

Violation observed on or about April 9, 2014

c. Newark Liberty Intl Airport, Hangar 54, Tool Checkout

Exit route was not kept free and unobstructed. The tool checkout exit route was obstructed with boxes and a portable ladder, which prevented unobstructed egress from the area for employees.

Violation observed on or about February 4, 2014

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

07/29/2014

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:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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

29 CFR 1910.37(b)(4): Signs were not posted along the exit access indicating the direction of travel to the nearest exit and exit discharge when the direction of travel to the exit or exit discharge was not immediately apparent:

a. Newark Liberty Int'l Airport, Hangar 55, Tool Room

Signs indicating the direction of travel to the nearest exit where the exit was not immediately apparent were not posted. The location of the emergency exit was obscured by a floor to ceiling racking system.

Violation observed on or about February 4, 2014

b. Newark Liberty Int'l Airport, Terminal C, Terminal Stores (Materials)

Signs indicating the direction of travel to the nearest exit where the exit was not immediately apparent were not posted. A small sign with an arrow that was not clearly visible (did not meet minimum signage criteria) was used in lieu of a directional sign to the exit.

Violation observed on or about March 12, 2014

c. Newark Liberty Int'l Airport, Terminal C, Baggage area, exit to airport road

Signs indicating the direction of travel to the exit where the exit was not immediately apparent were not posted. A conveyor system was installed in the exit route and a sign was not posted on the side which would indicate the direction of travel to the exit.

Violation observed on or about April 9, 2014

Date By Which Violation Must be Abated:

07/29/2014

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:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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**Citation 1 Item 6** 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:

a. EWR Airport - Hangar 54, throughout facility

Combustible waste material cans throughout the hangar facility were not disposed of daily. Several waste materials cans were overflowing with debris, rags, and towels which were used to wipe/clean aircraft surfaces and contained products which included, but were not limited to UN1268 Petroleum Distillates NOS, BP Turbo Oil 2197, Jet-A fuel, and Skydrol. Waste cans were clearly marked "Empty Every Night."

Violation observed on or about February 4, 2014

b. EWR Airport - Hangar 55, throughout facility

Combustible waste material cans throughout the hangar facility were not disposed of daily. Several waste materials cans were overflowing with debris, rags, and towels which were used to wipe/clean aircraft surfaces and contained products which included, but were not limited to UN1268 Petroleum Distillates NOS, BP Turbo Oil 2197, Jet-A fuel, and Skydrol. Waste cans were clearly marked "Empty Every Night."

Violation observed on or about February 4, 2014

Date By Which Violation Must be Abated:  
Proposed Penalty:

07/22/2014  
\$3300.00



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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

29 CFR 1910.159(c)(10): The minimum vertical clearance of 18 inches between automatic sprinkler systems sprinklers and the material below was not maintained:

a. Newark Liberty International Airport, Terminal C, Material Services (Stores), Bulk Stores

The minimum vertical clearance of 18 inches between the automatic sprinkler system and the material below was not maintained. Employees stacked boxes of materials on metal shelving systems in a manner which did not allow for 18 inch clearance. Materials were stored approximately 9 inches from sprinkler heads.

Violation observed on or about March 12, 2014

Date By Which Violation Must be Abated:  
Proposed Penalty:

07/29/2014  
\$3300.00



### Citation and Notification of Penalty

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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

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

a. Newark Liberty Int'l Airport, Hangar 55, EBU, Welding shop

Machine guards were not utilized to protect the exposed portion of the saw blade. Employees operating a metal band saw did not engage the adjustable blade guards to the width of the materials being cut, leaving an exposed area of the blade during operation.

Violation observed on or about February 12, 2014

b. Newark Liberty Int'l Airport, Hangar 55, EBU, Welding shop

Guards were not provided on rotating part of the drill press. The employer did not provide machine guards for the drill press chuck.

Violation observed on or about February 12, 2014

c. Newark Liberty Int'l Airport, Building 154, GSE, Welding shop

Machine guards were not utilized to protect the exposed portion of the saw blade. Employees operating a metal band saw did not engage the adjustable blade guards to the width of the materials being cut, leaving an exposed area of the blade during operation.

Violation observed on or about February 10, 2014

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

**Inspection Number:** 954623  
**Inspection Date(s):** 01/15/2014 - 07/08/2014  
**Issuance Date:** 07/10/2014



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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d. Newark Liberty Int'l Airport, Building 154, GSE, Welding shop

Guards were not provided on rotating part of the drill press. The employer did not provide machine guards for the drill press chuck.

Violation observed on or about February 10, 2014

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	07/29/2014
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.



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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**Citation 1 Item 9** 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. Newark Liberty Int'l Airport, Hangar 55 toolbox storage area.

An electrical outlet box was not installed in accordance with manufacturer's listing. A galvanized steel, two gang electrical box was mounted to a chain link fence using wire zip ties to secure the box to the chain link.

Violation observed on or about February 4, 2014

b. Newark Liberty Int'l Airport, Hangar 55 toolbox storage area.

A Relocatable Power Tap (RPT), also known as an extension block, power board, power bar, plug board, trailer lead and by many other variations, was not installed in accordance with manufacturer's listing. The power tap was mounted to a chain link fence using wire zip ties in the toolbox storage area.

Violation observed on or about February 4, 2014

c. Newark Liberty Int'l Airport, Hangar 55, EBU Welding shop

An electrical outlet box was not installed in accordance with manufacturer's listing. A galvanized steel, one gang electrical box was used attached to a flexible cable and used as permanent wiring.

Violation observed on or about February 12, 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:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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d. Newark Liberty Int'l Airport, Building 154, Ground Service Equipment (GSE) Shop

Electrical outlet boxes (pendants) were not installed in accordance with manufacturer's listing. One gang, wet location electrical boxes were installed to flexible cords and used as drop pendants. The pendants did not have restraint to prevent them from becoming dislodged and had open holes.

Violation observed on or about February 10, 2014

e. Newark Liberty Int'l Airport, Building 154, Ground Service Equipment (GSE) Shop, Bay 4

A Relocatable Power Tap (RPT), also known as an extension block, power board, power bar, plug board, trailer load and by many other variations, was not installed in accordance with the manufacturer's listing. The power tap was mounted to an employee tool box using wire zip ties.

Violation observed on or about February 4, 2014

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	07/29/2014
Proposed Penalty:	\$4400.00



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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

29 CFR 1910.37(b)(2): Each exit was not clearly visible and marked by a sign reading "Exit":

a. Newark Liberty International Airport, Terminal C, C3 Customer Service Center

Exit door was not marked with a sign reading "exit". Exit doors from behind the customer service counter were not marked with a sign that read "EXIT".

Violation observed on or about February 27, 2014

b. Newark Liberty International Airport, Terminal C, C1 Customer Service Center

Exit doors were not marked with a sign reading "exit". Exit doors from behind the customer service counter were not marked with a sign that read "EXIT".

Violation observed on or about February 27, 2014

c. Newark Liberty Int'l Airport, Terminal A, Facility Maintenance office/break room

Exit doors were not marked with a sign reading "exit". Exit doors from the Facility Maintenance office and break room was not marked with a sign that read "EXIT".

Violation observed on or about April 9, 2014



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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d. Newark Liberty Int'l Airport, Building 154, GSE, Employee Locker room

Exit doors were not marked with a sign reading "exit". Exit doors from the employee locker room was not marked with a sign that read "EXIT".

Violation observed on or about February 10, 2014

United Continental Holdings, Inc. dba United Airlines/Continental Airlines, was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.37(b)(2), which was contained in OSHA inspection number 556359, citation number 002, item number 001 and was affirmed as a final order on January 23, 2013, with respect to a workplace located at 6000 North Terminal Parkway, Atlanta, GA 30320.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	07/29/2014
Proposed Penalty:	\$16500.00



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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

29 CFR 1910.305(b)(1)(ii): Unused openings in boxes, cabinets, or fittings were not effectively closed:

a. Newark Liberty Int'l Airport, Building 154, GSE, Multiple Maintenance Bays

Unused openings in pendant boxes were not effectively closed. The pendant boxes used by employees to power hand held tools had openings at the base of box which were missing the plug.

Violation observed on or about February 10, 2014

United Continental Holdings, Inc. dba United Airlines, Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.305(b)(1)(ii), which was contained in OSHA inspection number 314058017, citation number 1, item number 1 and was affirmed as a final order on January 13, 2011, with respect to a workplace located at 4501 Abbot Drive, Omaha, NE.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	07/29/2014
Proposed Penalty:	\$22000.00



### Citation and Notification of Penalty

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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#### Citation 2 Item 3 Type of Violation: **Repeat**

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

a. Newark Liberty Int'l Airport, Hangar 55 toolbox storage area, west wall fences.

Temporary wiring was used in lieu of permanent wiring. Employees used an orange extension (flexible) cord that was permanently affixed to and woven through divider chain link fence in the toolbox storage area using wire ties to attach the cord.

Violation observed on or about February 4, 2014

b. Newark Liberty Int'l Airport, Hangar 55 toolbox storage area, west wall fences.

Temporary wiring was used in lieu of permanent wiring. Employees used a galvanized metal two-gang electrical box permanently affixed to a chain link fence that was electrically connected to an overhead light using temporary wiring.

Violation observed on or about February 4, 2014

c. Newark Liberty Int'l Airport, Hangar 55, EBU Welding Shop

Temporary wiring was used in lieu of permanent wiring. A flexible cord with a galvanized two gang electrical box was used as the power source for a permanently mounted drill press. The box was mounted to the machine.

Violation observed on or about February 12, 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:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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United Continental Holdings, Inc., dba United Airlines, was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.305(g)(1)(iv)(A), which was contained in OSHA inspection number 906807, citation number 1, item number 6b, and was affirmed as a final order November 26, 2013, with respect to a workplace located at 129 Iako Pl., Honolulu, HI 96819.

United Continental Holdings, Inc., dba United Airlines, was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.305(g)(1)(iv)(A), which was contained in OSHA inspection number 556359, citation number 1, item number 5a, and was affirmed as a final order on January 23, 2013, with respect to a workplace located at 6000 North Terminal Parkway, Atlanta, GA.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	07/29/2014
Proposed Penalty:	\$16500.00

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:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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**Citation 3 Item 1** Type of Violation: **Other-than-Serious**

29 CFR 1910.22(a)(1): All places of employment, passageways, storerooms or service rooms were not kept clean and orderly or in a sanitary condition.

a. Newark Liberty Int'l Airport, Terminal C, Baggage Room

The Terminal C baggage room was not kept in a clean and orderly condition. Work areas around the baggage conveyor where employees stood to unload baggage onto the conveyor had debris which included broken and damaged furniture which were missing legs, feet, rollers and arm rests and the GSE battery charging area were cluttered with trash cans and other debris.

Violation observed on or about April 9, 2014

b. Newark Liberty Int'l Airport, Terminal C, Baggage Room Employee Break Area

The Terminal C baggage room break area was not kept in a clean and orderly condition. Break room had debris left on top of the vending machines which included, but was not limited to empty soda bottles, paper change rollers, and other debris.

Violation observed on or about April 9, 2014

c. Newark Liberty Int'l Airport - Building 154, GSE, Maintenance Bay

The employer did not ensure the Ground Support Equipment (Powered Industrial Truck) battery charging station was clear of obstructions to the charging units.

Violation observed on or about February 10, 2014

Date By Which Violation Must be Abated:  
Proposed Penalty:

07/29/2014  
\$0.00



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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**Citation 3 Item 2** Type of Violation: **Other-than-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:

a. Newark Liberty Int'l Airport, Hangar 55, EBU

The employer did not ensure that employees that engaged in welding activities and assigned as fire watch were trained in the use of fire extinguishers.

Violation occurred on or about February 10, 2014

b. Newark Liberty Int'l Airport, Building 154, GSE

The employer did not ensure that employees that engaged in welding activities and assigned as fire watch were trained in the use of fire extinguishers.

Violation occurred on or about February 10, 2014

Date By Which Violation Must be Abated:  
Proposed Penalty:

07/29/2014  
\$0.00

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

Inspection Number: 954623  
Inspection Date(s): 01/15/2014 - 07/08/2014  
Issuance Date: 07/10/2014



**Citation and Notification of Penalty**

**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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**Citation 3 Item 3** Type of Violation: **Other-than-Serious**

29 CFR 1910.178(a)(3): Approved trucks did not bear a label or some other identifying mark indicating approval by the testing laboratory.

a. Newark Liberty Int'l Airport, Air side between Terminal C and Terminal B

Powered industrial trucks (Ground Service Equipment / TUGS) used to transport baggage carts and other non-powered equipment did not bear a label that could be identified. The identification plate in the vehicle was painted over and unreadable.

Violation observed on or about April 9, 2014

Date By Which Violation Must be Abated:  
Proposed Penalty:

07/22/2014  
\$0.00

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:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114

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Citation 3 Item 4 Type of Violation: **Other-than-Serious**

29 CFR 1910.178(p)(1): Powered industrial truck(s) found to be in need of repair, defective, or in any way unsafe had not been taken out of service until restored to safe operating condition:

a. Newark Liberty Int'l Airport, Building 157, Chelsea Food Services

Employees used an electric forklift for warehousing activities which was found to be in need of repair but was not taken out of service. The Clark, Model NPR17, Electric forklift had a defective control handle where the screws which secured the two sides of the control handle together were missing or broken.

Violation observed on or about February 12, 2014

b. Newark Liberty Int'l Airport, Building 330, Chelsea Food Services Main Line

Employees used an electric forklift for warehousing activities which was found to be in need of repair but was not taken out of service. The Clark, Model NPR17, Electric forklift had a defective control handle where the screws which secured the two sides of the control handle together were missing or broken.

Violation observed on or about February 19, 2014

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$0.00

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

**Kris Hoffman**  
Area Director

U.S. Department of Labor  
Occupational Safety and Health Administration  
299 Cherry Hill Road  
Suite 103  
Parsippany, NJ 07054  
Phone: 973-263-1003 Fax: 973-299-7161



## INVOICE / DEBT COLLECTION NOTICE

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**Company Name:** United Continental Holdings, Inc., dba United Airlines, Inc.  
**Inspection Site:** Newark Liberty Airport, Terminal C, Newark, NJ 07114  
**Issuance Date:** 07/10/2014

<b>Summary of Penalties for Inspection Number</b>	<b>954623</b>
<b>Citation 1, Serious</b>	<b>\$46300.00</b>
<b>Citation 2, Repeat</b>	<b>\$55000.00</b>
<b>Citation 3, Other-than-Serious</b>	<b>\$0.00</b>
<b>TOTAL PROPOSED PENALTIES</b>	<b>\$101300.00</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.

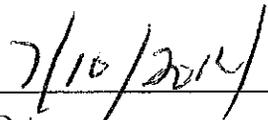
**Administrative Costs:** Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand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



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**Kris Hoffman**

Area Director



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Date

**U.S. Department of Labor** Occupational Safety and Health Administration  
299 Cherry Hill Road,  
Suite 103  
Parsippany, NJ 07054  
Phone: 973-263-1003 Fax: 973-299-7161



07/10/2014

United Continental Holdings, Inc., dba United Airlines, Inc.  
233 South Wacker Drive  
Chicago, IL 60606

Dear Employer,

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

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

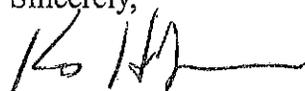
As indicated on page 8 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Kris Hoffman', with a long horizontal stroke extending to the right.

**Kris Hoffman**  
Area Director

Enclosures