

U.S. Department of Labor
Occupational Safety and Health Administration
Suite 203
800 Dolorosa St.
San Antonio, TX 78207
Phone: (210)472-5040 FAX: (210)472-5045



Citation and Notification of Penalty

To:
AA Foundries, Inc.
and its successors
231 Virginia Blvd.
SAN ANTONIO, TX 78210

Inspection Number: 315628503
Inspection Date(s): 10/24/2011-04/24/2012
Issuance Date: 04/24/2012

Inspection Site:
231 Virginia Blvd.
SAN ANTONIO, TX 78210

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 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 page 5 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 are required by 29 CFR 1903.19 to submit an Abatement Certification to the Area Director of the OSHA office issuing the citation and identified above. The certification must be sent by you within 10 calendar days of the abatement date indicated on the citation. For **Willful** and **Repeat** violations, documents (examples: photos, copies of receipts, training records, etc.) demonstrating that abatement is complete must accompany the certification. Where the citation is classified as **Serious** and the citations states that abatement documentation is required, documents such as those described above are required to be submitted along with the abatement certificate. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item.

All abatement verification documents must contain the following information: 1) Your name and address; 2) the inspection number (found on the front page); 3) the citation and citation item number(s) to which the submission relates; 4) a statement that the information is accurate; 5) the signature of the employer or employer's authorized representative; 6) the date the hazard was corrected; 7) a brief statement of how the hazard was corrected; and 8) a statement that affected employees and their representatives have been informed of the abatement.

The law also requires a copy of all abatement verification documents, required by 29 CFR 1903.19 to be sent to OSHA, also be posted at the location where the violation appeared and the corrective action took place.

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.

ABATEMENT CERTIFICATION

Jeff R. Funke, CSP, Area Director
U.S. Department of Labor - OSHA
Suite 203
800 Dolorosa St.
San Antonio, TX 78207
Phone: (210)472-5040 FAX: (210)472-5045

AA Foundries, Inc. 315628503
231 Virginia Blvd.
SAN ANTONIO, TX 78210

The hazard referenced in Inspection Number _____ for the violation identified as
Citation _____ and Item _____ was corrected on _____
by _____.

The hazard referenced in Inspection Number _____ for the violation identified as
Citation _____ and Item _____ was corrected on _____
by _____.

The hazard referenced in Inspection Number _____ for the violation identified as
Citation _____ and Item _____ was corrected on _____
by _____.

The hazard referenced in Inspection Number _____ for the violation identified as
Citation _____ and Item _____ was corrected on _____
by _____.

The hazard referenced in Inspection Number _____ for the violation identified as
Citation _____ and Item _____ was corrected on _____
by _____.

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

Signature

Typed or Printed Name



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 04/24/2012. The conference will be held at the OSHA office located at Suite 203, 800 Dolorosa St., San Antonio, TX 78207 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.95(c)(1): The employer failed to implement an effective hearing conservation program as described in paragraph (c) through (o) of this section, whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response) or equivalently, a dose of fifty percent:

- a) Silica Molding Area: The employer does not institute an effective hearing conservation program for the Silica Molder Operator who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 465 minutes indicated that employees were exposed to a 151% noise dose which is equivalent to approximately 93.0 dbA. Zero exposure was assumed for the 15 minutes not sampled.
- b) Olivine Molding Area: The employer does not institute an effective hearing conservation program for the Olivine Molder Operator who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 452 minutes indicated that employees were exposed to a 98.7% noise dose which is equivalent to approximately 89.9 dbA. Zero exposure was assumed for the 28 minutes not sampled.
- c) Iron Pour Area: The employer does not institute an effective hearing conservation program for the Iron Pour Furnace Operator who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 452 minutes indicated that employees were exposed to a 70.7% noise dose which is equivalent to approximately 87.5 dbA. Zero exposure was assumed for the 28 minutes not sampled.
- d) Grinding Area: The employer does not institute an effective hearing conservation program for the Grinder Operator who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 447 minutes indicated that employees were exposed to a 227% noise dose which is equivalent to approximately 95.9 dbA. Zero exposure was assumed for the 33 minutes not sampled.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
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- e) **Shake-Out Area:** The employer does not institute an effective hearing conservation program for the Shaker who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 451 minutes indicated that employees were exposed to a 88% noise dose which is equivalent to approximately 89.1 dbA. Zero exposure was assumed for the 29 minutes not sampled.

Pursuant to 29 C.F.R. 1903.19, within thirty (30) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that an effective hearing conservation program is established in the workplace.

Date By Which Violation Must be Abated:	06/08/2012
Proposed Penalty:	\$ 4200.00



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

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

29 CFR 1910.132(a): Protective equipment was not used when necessary whenever hazards capable of causing injury and impairment were encountered:

- a) Iron pour: Employee(s) are not using heat-resistant protective aprons while pouring hot molten metal. This violation was observed, on or about October 24, 2011 where employees were pouring hot molten metal into molds.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that operators and operator assistants are provided and wear heat-resistant aprons while operating furnaces and pouring hot molten metal into the forms.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/11/2012
\$ 3600.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.132(d)(2): The employer did not verify that the required workplace hazard assessment has been performed through a written certification which included the requirements as outlined in 29 CFR 1910.132(d)(2):

- a) AA Foundries: The employer does not verify that a workplace hazard assessment is performed by completing a written certification that an evaluation was conducted. This violation was observed, on or about October 24, 2011, where the company had not prepared a written certification verifying a workplace assessment was performed which identified hazards such as hot surfaces, heavy and hot metal castings, burns, and flying metal particles.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that a written certification of a workplace hazard assessment is conducted.

Date By Which Violation Must be Abated:

05/11/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

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

- a) Iron Furnace and Pour Area: Employee(s) pouring molten iron metal is not being protected by a face shield while pouring and assisting with molten metal pour. This violation was observed on or about 10/24/2011, where the employee was assisting with molten metal pour and not wearing a face shield or other appropriate eye and face protection.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that each employee exposed to molten metal pour uses appropriate eye or face protection.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/11/2012
\$ 2400.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.134(d)(1)(iii): The employer did not identify and evaluate the respiratory hazard(s) in the workplace; including a reasonable estimate of employee exposures to respiratory hazards and identification of the contaminant's chemical state and physical form:

- a) Silica Mold Area: The employer is not evaluating the respiratory hazards to determine the exposure levels of the molders to respirable silica. This violation was observed on or about October 24, 2011 where the employee(s) were exposed to silica at an 8-hour TWA of 0.33 mg/m³ under the PEL of 1.28 mg/m³. The mold operator and helper may also be exposed to copper, lead, and iron.
- b) Olivine Mold Area: The employer is not evaluating the respiratory hazards to determine the exposure levels of the molders to airborne total and respirable dust. This violation was observed on or about October 24, 2011 where the employee(s) were exposed to respirable dust at an 8-hour TWA of 0.25 mg/m³ under the PEL of 5.0 mg/m³. The mold machine operator may also be exposed to copper, lead, and iron.
- c) Iron Furnace Area: The employer is not evaluating the respiratory hazards to determine exposure levels to airborne metal fumes. The employee(s) in the furnace area are exposed to lead fume at an 8-hour TWA of 0.0582 mg/m³, approximately 1.16 times the PEL. The employee(s) in the pour area are exposed to lead fume at an 8-hour TWA of 0.0547 mg/m³, approximately 1.09 times the PEL. The employee(s) were wearing filtering facepieces which were not NIOSH certified. The iron furnace operator and helper are also exposed to copper, iron, manganese and zinc.
- d) Bronze Furnace and Pour Area: The employer is not evaluating the respiratory hazards to determine the exposure levels to airborne metal dusts and fumes. The employee(s) are exposed to lead fume at an 8-hour TWA of 0.18 mg/m³, approximately 3.6 times the PEL of 0.050 mg/m³. The bronze furnace operator and helper are also exposed to copper, iron, manganese and zinc.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that all processes are evaluated to determine respiratory hazards and to determine if effective engineering controls are required, and to ensure employees are protected with adequate respiratory protection.

Date By Which Violation Must be Abated: 05/11/2012
Proposed Penalty: \$ 4200.00



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

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

29 CFR 1910.1000(a)(2): Employee(s) 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 mg/m³ for copper fume and 1.0 mg/m³ for copper dust.

- a) Grinding area: The employer is not evaluating the exposure levels to airborne copper dust. Employee exposures exceed the 8-hour time weighted average (TWA) permissible exposure limit (PEL) of 1.0 mg/m³ for copper dust. This violation was observed on or about January 20, 2012, employee(s) grinding bronze castings were exposed to an 8-hour TWA concentration of copper dust of 7.08 mg/m³, approximately 7.1 times the PEL. The exposure was derived from samples collected over a 444 minute period. Zero exposure was assumed for the 36 minutes not sampled.
- b) Bronze Furnace Area: The employer is not evaluating the exposure levels to airborne copper fume. Employee exposures exceed the 8-hour time weighted average (TWA) permissible exposure limit (PEL) of 0.1 mg/m³ for copper fume. This violation was observed on or about January 20, 2012, the bronze furnace operator was exposed to an 8-hour TWA concentration of copper fume of 0.183 mg/m³, approximately 1.83 times the PEL. The exposure was derived from samples collected over a 457 minute period. Zero exposure was assumed for the 23 minutes not sampled.

Pursuant to 29 C.F.R. 1903.19, within ninety (90) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that all processes are evaluated.

ABATEMENT:

STEP 1: EFFECTIVE RESPIRATORY PROTECTION SHALL BE PROVIDED AND USED BY EXPOSED EMPLOYEES AS AN INTERIM PROTECTIVE MEASURE UNTIL FEASIBLE ENGINEERING CONTROLS AND OR ADMINISTRATIVE CONTROLS CAN BE IMPLEMENTED OR WHENEVER SUCH CONTROLS FAIL TO REDUCE EMPLOYEE EXPOSURE TO WITHIN PERMISSIBLE EXPOSURE LIMITS.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

STEP 2: A WRITTEN DETAILED PLAN OF ABATEMENT SHALL BE SUBMITTED TO THE AREA DIRECTOR OUTLINING A SCHEDULE FOR THE IMPLEMENTATION OF ENGINEERING AND OR ADMINISTRATIVE MEASURES TO CONTROL EMPLOYEE EXPOSURES TO HAZARDOUS SUBSTANCES AS REFERENCED IN THIS CITATION. THIS PLAN SHALL INCLUDE, AT A MINIMUM, TARGET DATES FOR THE FOLLOWING ACTIONS WHICH MUST BE CONSISTENT WITH ABATEMENT DATES REQUIRED BY THIS CITATION:

1. EVALUATION OF ENGINEERING CONTROL OPTIONS;
2. SELECTION OF OPTIMUM CONTROL METHODS AND COMPLETION OF DESIGNS;
3. PROCUREMENT, INSTALLATION, AND OPERATION OF SELECTED CONTROL MEASURES; AND
4. TESTING AND ACCEPTANCE OR MODIFICATION/REDESIGN OF CONTROLS.

NOTE: ALL PROPOSED CONTROL MEASURES SHALL BE APPROVED FOR EACH PARTICULAR USE BY A COMPETENT INDUSTRIAL HYGIENIST OR OTHER TECHNICALLY QUALIFIED PERSON.

Date By Which Violation Must be Abated: 08/31/2012
Proposed Penalty: \$ 4200.00



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1000(e): Feasible administrative or engineering controls were not determined and implemented to reduce employee exposure:

- a) Grinding area: The employer does not ensure that feasible engineering controls are implemented in the grinding area to reduce employee exposure levels below the permissible exposure limit. Employee exposures exceeded the 8-hour time weighted average (TWA) permissible exposure limit (PEL) of 1.0 mg/m³ for copper dust. This violation was observed on or about January 20, 2012 employee(s) were exposed to an 8-hour TWA concentration of copper dust of 7.08 mg/m³ while grinding on bronze castings. The exposure was derived from samples collected over a 444 minute period. Zero exposure was assumed for the 36 minutes not sampled.
- b) Bronze furnace area: The employer does not ensure that feasible engineering controls are implemented in the bronze furnace area to reduce employee exposure levels below the permissible exposure limit. Employee exposures exceeded the 8-hour time weighted average (TWA) permissible exposure limit (PEL) of 0.1 mg/m³ for copper fume. This violation was observed on or about January 20, 2012, the bronze furnace operator was exposed to an 8-hour TWA concentration of copper fume of 0.183 mg/m³. The exposure was derived from samples collected over a 457 minute period. Zero exposure was assumed for the 23 minutes not sampled.

Pursuant to 29 C.F.R. 1903.19, within ninety (90) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that each employee is not exposed above the permissible exposure limit.

ABATEMENT:

STEP 1: EFFECTIVE RESPIRATORY PROTECTION SHALL BE PROVIDED AND USED BY EXPOSED EMPLOYEES AS AN INTERIM PROTECTIVE MEASURE UNTIL FEASIBLE ENGINEERING CONTROLS AND OR ADMINISTRATIVE CONTROLS CAN BE IMPLEMENTED OR WHENEVER SUCH CONTROLS FAIL TO REDUCE EMPLOYEE EXPOSURE TO WITHIN PERMISSIBLE EXPOSURE LIMITS.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

STEP 2: A WRITTEN DETAILED PLAN OF ABATEMENT SHALL BE SUBMITTED TO THE AREA DIRECTOR OUTLINING A SCHEDULE FOR THE IMPLEMENTATION OF ENGINEERING AND OR ADMINISTRATIVE MEASURES TO CONTROL EMPLOYEE EXPOSURES TO HAZARDOUS SUBSTANCES AS REFERENCED IN THIS CITATION. THIS PLAN SHALL INCLUDE, AT A MINIMUM, TARGET DATES FOR THE FOLLOWING ACTIONS WHICH MUST BE CONSISTENT WITH ABATEMENT DATES REQUIRED BY THIS CITATION:

1. EVALUATION OF ENGINEERING CONTROL OPTIONS;
2. SELECTION OF OPTIMUM CONTROL METHODS AND COMPLETION OF DESIGNS;
3. PROCUREMENT, INSTALLATION, AND OPERATION OF SELECTED CONTROL MEASURES; AND
4. TESTING AND ACCEPTANCE OR MODIFICATION/REDESIGN OF CONTROLS.

NOTE: ALL PROPOSED CONTROL MEASURES SHALL BE APPROVED FOR EACH PARTICULAR USE BY A COMPETENT INDUSTRIAL HYGIENIST OR OTHER TECHNICALLY QUALIFIED PERSON.

Date By Which Violation Must be Abated:

08/31/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

Citation 1 Item 5c 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:

- a) AA Foundries: The employer is not preparing a written respirator program including all the elements in 1910.134(c)(1)(i)- 1910.134(c)(1)(ix). Employees in the grinding area and the bronze furnace area were overexposed to lead and copper. The grinders and the bronze furnace operator were wearing powered-air purifying respirators (PAPR) air helmets. Among the elements missing from the respirator program are the provisions to provide medical evaluations and annual training for employees required to wear respirators.

Pursuant to 29 C.F.R. 1903.19, within thirty (30) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that a written respiratory protection program is established and implemented including the appropriate provisions of 1910.134(c)(1)(i)-(ix).

Date By Which Violation Must be Abated:

06/08/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.134(c)(3): The employer did not designate a program administrator who was qualified by appropriate training or experience to administer or oversee the respiratory protection program and to conduct the required evaluations of program effectiveness:

- a) AA Foundries: The employer is not designating a qualified program administrator to oversee the respiratory protection program. This violation was observed on or about October 24, 2011 where the employer had not designated a qualified program administrator to oversee the respiratory protection program and evaluate its effectiveness for employees exposed to copper, nickel, lead, cadmium, zinc, tin, iron and silica.

Pursuant to 29 C.F.R. 1903.19, within thirty (30) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that an effective respiratory protection program administrator is established and periodically evaluates the program.

Date By Which Violation Must be Abated:

06/08/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.134(d)(1)(ii): The employer did not select and use a NIOSH-certified respirator in compliance with the conditions of its certification:

- a) Shaker: Employee(s) are wearing employer provided respirators which are not NIOSH certified, while shaking out metal forms from olivine sand. This violation was observed on or about October 24, 2011, where the employee(s) were exposed to lead, copper, nickel, zinc, and tin.
- b) Iron Furnace Operator: Employee(s) are wearing employer provided respirators which are not NIOSH certified, while melting iron in the iron furnace area. This violation was observed on or about October 24, 2011, where the employee(s) were exposed to iron, cadmium, and lead.
- c) Silica Sand Mold Area: Employee(s) are wearing employer provided respirators which are not NIOSH certified, while performing molding operations in the silica sand mold area. This violation was observed on or about October 24, 2011, where employee(s) were exposed to silica.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that only NIOSH certified respirators are purchased and used by employees exposed to airborne hazards which may exceed the PEL.

Date By Which Violation Must be Abated:

05/11/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

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

- a) Bronze Furnace Operator Area: The employee(s) are exposed to copper fume at an 8-hour TWA of 0.183 mg/m³, approximately 1.83 times the PEL of 0.10 mg/m³; this limit was established to prevent metal fume fever, irritation, and gastrointestinal diseases. The exposure was derived from two samples collected over a 457 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 23 minutes. This violation was observed on or about 01/20/2012, where the employee(s) were exposed to copper while melting bronze materials and required to wear respiratory protection without a medical evaluation.
- b) Grinding Area: The employee(s) are exposed to copper dust at an 8-hour TWA of 7.08 mg/m³, approximately 7.08 times the PEL of 1.0 mg/m³; this limit was established to prevent metal fume fever, irritation, and gastrointestinal disease. The exposure was derived from three samples collected over a 444 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 36 minutes. This violation was observed on or about 01/20/12, where the employee(s) were exposed to copper dust and required to wear respiratory protection without a medical evaluation.

Pursuant to 29 C.F.R. 1903.19, within thirty (30) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that each employee required to wear a respirator is medically evaluated prior to wearing the respirator.

Date By Which Violation Must be Abated:

06/08/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.134(k)(1): Effective and comprehensive training was not provided to employees who are required to wear respirators at least annually:

- a) AA Foundries: The employer does not ensure that employees receive effective and comprehensive training at least annually. On or about October 24, 2011, employees in the grinding area, bronze furnace, and bronze pour area are required to wear powered air purifying respirators and filtering face piece respirators without receiving comprehensive annual training which includes the elements of 1901.134(k)(1)(i)-1910.134(k)(1)(vii).

Pursuant to 29 C.F.R. 1903.19, within thirty (30) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that each employee required to wear a respirator is trained effectively prior to wearing the respirator.

Date By Which Violation Must be Abated:

06/08/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

Citation 1 Item 6a 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) **Iron Furnace Operator Area:** Employee(s) are exposed to lead fume above the 8-hour time weighted average (TWA) permissible exposure limit (PEL) of 0.050 mg/m³. This violation was observed on or about November 1, 2011, where employee(s) were exposed to lead fume while melting scrap steel at an 8-hour TWA of 0.058 mg/m³, approximately 1.16 times the PEL. The exposure was derived from samples collected over a 445 minute period. Zero exposure was assumed for the period of 35 minutes not sampled.
- b) **Iron Pour Area:** The iron pour helper was exposed to lead fume which exceeded the 8-hour time weighted average (TWA) permissible exposure limit (PEL) for lead of 0.050 mg/m³. On or about November 1, 2011 employee(s) were exposed to lead fume at an 8-hour TWA of 0.055 mg/m³, approximately 1.09 times the PEL, while pouring molten scrap steel. The exposure was derived from one sample collected over a 453 minute period. Zero exposure was assumed for the 27 minutes not sampled.
- c) **Grinding Area:** Employee(s) are exposed to lead dust which exceeded 8-hour time weighted average (TWA) permissible exposure limit (PEL) for lead of 0.050 mg/m³. This violation was observed on or about January 20, 2012 where employee(s) were exposed to lead dust at an 8-hour TWA of 1.52 mg/m³, approximately 30.3 times the PEL while grinding on steel and bronze castings. The exposure was derived from samples collected over a 444 minute period. Zero exposure was assumed for the 36 minutes not sampled.
- d) **Grinding Area:** Employee(s) are exposed to lead dust which exceeded 8-hour time weighted average (TWA) permissible exposure limit (PEL) for lead of 0.050 mg/m³. This violation was observed on or about January 20, 2012 where employee(s) were exposed to lead dust at an 8-hour TWA of 0.27 mg/m³, approximately 5.24 times the PEL while grinding on steel and bronze castings. The exposure was derived from samples collected over a 451 minute period. Zero exposure was assumed for the 29 minutes not sampled.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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- e) Grinding Area: Employee(s) are exposed to lead dust which exceeded 8-hour time weighted average (TWA) permissible exposure limit (PEL) for lead of 0.050 mg/m³. This violation was observed on or about January 20, 2012 where employee(s) were exposed to lead dust at an 8-hour TWA of 0.321 mg/m³, approximately 6.3 times the PEL while grinding on steel and bronze castings. The exposure was derived from samples collected over a 454 minute period. Zero exposure was assumed for the 26 minutes not sampled.
 - f) Bronze Furnace Operator area: Employee(s) are exposed to lead fume which exceeded 8-hour time weighted average (TWA) permissible exposure limit (PEL) for lead of 0.050 mg/m³. This violation was observed on or about January 20, 2012 where employee(s) were exposed to lead fume at an 8-hour TWA of 0.18 mg/m³, approximately 3.6 times the PEL while melting copper billets and pieces in a furnace. The exposure was derived from samples collected over a 454 minute period. Zero exposure was assumed for the 26 minutes not sampled.
 - g) Bronze pour area: Employee(s) are exposed to lead fume which exceeded 8-hour time weighted average (TWA) permissible exposure limit (PEL) for lead of 0.050 mg/m³. This violation was observed on or about January 20, 2012 where employee(s) were exposed to lead dust at an 8-hour TWA of 0.077 mg/m³, approximately 1.53 times the PEL while pouring molten bronze into molds. The exposure was derived from samples collected over a 418 minute period. Zero exposure was assumed for the 62 minutes not sampled.

Pursuant to 29 C.F.R. 1903.19, within ninety (90) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that each employee is not exposed above the permissible exposure limit.

ABATEMENT:

STEP 1: EFFECTIVE RESPIRATORY PROTECTION SHALL BE PROVIDED AND USED BY EXPOSED EMPLOYEES AS AN INTERIM PROTECTIVE MEASURE UNTIL FEASIBLE ENGINEERING CONTROLS AND OR ADMINISTRATIVE CONTROLS CAN BE IMPLEMENTED OR WHENEVER SUCH CONTROLS FAIL TO REDUCE EMPLOYEE EXPOSURE TO WITHIN PERMISSIBLE EXPOSURE LIMITS.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

STEP 2: A WRITTEN DETAILED PLAN OF ABATEMENT SHALL BE SUBMITTED TO THE AREA DIRECTOR OUTLINING A SCHEDULE FOR THE IMPLEMENTATION OF ENGINEERING AND OR ADMINISTRATIVE MEASURES TO CONTROL EMPLOYEE EXPOSURES TO HAZARDOUS SUBSTANCES AS REFERENCED IN THIS CITATION. THIS PLAN SHALL INCLUDE, AT A MINIMUM, TARGET DATES FOR THE FOLLOWING ACTIONS WHICH MUST BE CONSISTENT WITH ABATEMENT DATES REQUIRED BY THIS CITATION:

1. EVALUATION OF ENGINEERING CONTROL OPTIONS;
2. SELECTION OF OPTIMUM CONTROL METHODS AND COMPLETION OF DESIGNS;
3. PROCUREMENT, INSTALLATION, AND OPERATION OF SELECTED CONTROL MEASURES; AND
4. TESTING AND ACCEPTANCE OR MODIFICATION/REDESIGN OF CONTROLS.

NOTE: ALL PROPOSED CONTROL MEASURES SHALL BE APPROVED FOR EACH PARTICULAR USE BY A COMPETENT INDUSTRIAL HYGIENIST OR OTHER TECHNICALLY QUALIFIED PERSON.

Date By Which Violation Must be Abated: 08/31/2012
Proposed Penalty: \$ 4200.00



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1025(e)(1)(i): Engineering and work practice controls (including administrative controls) were not implemented to reduce and maintain employee exposure to lead in accordance with the schedule in Table I of this paragraph:

- a) **Iron Furnace Area:** The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0582 mg/m³, approximately 1.16 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from samples collected over a 445 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 35 minutes. This violation was observed on or about 10/24/2011 at the worksite where the employee(s) were exposed to lead while melting iron from punch out scrap iron.
- b) **Iron Pour Area:** The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0547 mg/m³, approximately 1.09 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 453 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 27 minutes. This violation was observed on or about 10/24/2011 at the worksite where the employee(s) were exposed to lead while pouring iron melted from punch out scrap iron.
- c) **Grinding Area:** The employee(s) are exposed to lead dust at an 8-hour TWA of 1.52 mg/m³, approximately 30.3 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from samples collected over a 444 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 36 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze castings.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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- d) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.27 mg/m³, approximately 5.24 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from samples collected over a 451 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 29 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze castings.
- e) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.321 mg/m³, approximately 6.3 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from samples collected over a 454 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 26 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze castings.
- f) Bronze Furnace Operator: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.18 mg/m³, approximately 3.6 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from samples collected over a 457 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 23 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while melting bronze ingots.
- g) Bronze Furnace Pour: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.077 mg/m³, approximately 1.53 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from samples collected over a 418 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 62 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while melting bronze ingots.

Pursuant to 29 C.F.R. 1903.19, within ninety (90) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that each employee is not exposed above the permissible exposure limit.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

ABATEMENT:

STEP 1: EFFECTIVE RESPIRATORY PROTECTION SHALL BE PROVIDED AND USED BY EXPOSED EMPLOYEES AS AN INTERIM PROTECTIVE MEASURE UNTIL FEASIBLE ENGINEERING CONTROLS AND OR ADMINISTRATIVE CONTROLS CAN BE IMPLEMENTED OR WHENEVER SUCH CONTROLS FAIL TO REDUCE EMPLOYEE EXPOSURE TO WITHIN PERMISSIBLE EXPOSURE LIMITS.

STEP 2: A WRITTEN DETAILED PLAN OF ABATEMENT SHALL BE SUBMITTED TO THE AREA DIRECTOR OUTLINING A SCHEDULE FOR THE IMPLEMENTATION OF ENGINEERING AND OR ADMINISTRATIVE MEASURES TO CONTROL EMPLOYEE EXPOSURES TO HAZARDOUS SUBSTANCES AS REFERENCED IN THIS CITATION. THIS PLAN SHALL INCLUDE, AT A MINIMUM, TARGET DATES FOR THE FOLLOWING ACTIONS WHICH MUST BE CONSISTENT WITH ABATEMENT DATES REQUIRED BY THIS CITATION:

1. EVALUATION OF ENGINEERING CONTROL OPTIONS;
2. SELECTION OF OPTIMUM CONTROL METHODS AND COMPLETION OF DESIGNS;
3. PROCUREMENT, INSTALLATION, AND OPERATION OF SELECTED CONTROL MEASURES; AND
4. TESTING AND ACCEPTANCE OR MODIFICATION/REDESIGN OF CONTROLS.

NOTE: ALL PROPOSED CONTROL MEASURES SHALL BE APPROVED FOR EACH PARTICULAR USE BY A COMPETENT INDUSTRIAL HYGIENIST OR OTHER TECHNICALLY QUALIFIED PERSON.

Date By Which Violation Must be Abated:

08/31/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

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

29 CFR 1910.1025(d)(1)(ii): Full shift (for at least seven continuous hours) personal samples for lead were not collected including at least one sample for each shift for each job classification in each work area:

- a) **Iron Furnace Operator Area:** The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0582 mg/m³, approximately 1.16 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 445 minute period. Zero exposure was assumed for the unsampled period of 35 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead while melting iron from punch out scrap iron.
- b) **Iron Pour Area:** The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead fume at an 8-hour TWA of 0.055 mg/m³, approximately 1.09 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 453 minute period. Zero exposure was assumed for the unsampled period of 27 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead while melting iron from punch out scrap iron.
- c) **Bronze Furnace Operator:** The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead fume at an 8-hour TWA of 0.18 mg/m³, approximately 3.6 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from samples collected over a 457 minute period. Zero exposure was assumed for the unsampled period of 23 minutes. This violation was observed on or about 01/20/12 at the worksite where the employee(s) were exposed to lead.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- d) **Bronze Pour Area:** The employer is not performing any air sampling to determine the exposure levels to lead. The employee(s) are exposed to lead fume at an 8-hour TWA of 0.077 mg/m³, approximately 1.53 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from samples collected over a 418 minute period. Zero exposure was assumed for the unsampled period of 62 minutes. This violation was observed on or about 01/20/12 at the worksite where the employee(s) were exposed to lead.

- e) **Shake-Out Area:** The employer is not performing any air sampling to determine the exposure levels to lead. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.030 mg/m³, approximately 0.605 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 440 minute period. Zero exposure was assumed for the unsampled period of 40 minutes. This violation was observed on or about 10/24/2011 at the worksite where the employee(s) were exposed to lead.

- f) **Molding Area (Olivine):** The employer is not performing any air sampling to determine the exposure levels to lead. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.0084 mg/m³, approximately 0.17 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 446 minute period. Zero exposure was assumed for the unsampled period of 34 minutes. This violation was observed on or about 10/24/2011 at the worksite where the employee(s) were exposed to lead.

- g) **Bob-Cat Operator:** The employer is not performing any air sampling to determine the exposure levels to lead. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.00804 mg/m³, approximately 0.161 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 424 minute period. Zero exposure was assumed for the unsampled period of 56 minutes. This violation was observed on or about 10/24/2011 at the worksite where the employee(s) were exposed to lead.

See pages 1 through 5 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: 315628503
Inspection Dates: 10/24/2011 - 04/24/2012
Issuance Date: 04/24/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

Pursuant to 29 C.F.R. 1903.19, within ninety (90) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that all processes are evaluated using air monitoring to determine if effective engineering controls are required, and to ensure employees are protected with adequate respiratory protection.

Date By Which Violation Must be Abated: 08/31/2012
Proposed Penalty: \$ 4200.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

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:

- a) **Iron Furnace Operator Area:** The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0582 mg/m³, approximately 1.16 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 445 minute period. Zero exposure was assumed for the unsampled period of 35 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead while melting iron from punch out scrap iron.
- b) **Iron Pour Area:** The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0547 mg/m³, approximately 1.09 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 453 minute period. Zero exposure was assumed for the unsampled period of 27 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead while melting iron from punch out scrap iron.
- c) **Grinding Area:** The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead dust at an 8-hour TWA of 5.4 mg/m³, approximately 108 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 432 minute period. Zero exposure was assumed for the unsampled period of 48 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials.
- d) **Shake-Out Area:** The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.030 mg/m³, approximately 0.605 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 440 minute period. Zero exposure was assumed for the unsampled period of 40 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- e) Grinding Area: The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead dust at an 8-hour TWA of 6.16 mg/m³, approximately 123 times the PEL of 0.050 mg/m³. The exposure was derived from three samples collected over a 452 minute period. Zero exposure was assumed for the unsampled period of 28 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials.
 - f) Grinding Area: The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead dust at an 8-hour TWA of 1.52 mg/m³, approximately 30.3 times the PEL of 0.050 mg/m³. The exposure was derived from three samples collected over a 444 minute period. Zero exposure was assumed for the unsampled period of 36 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials.
 - g) Grinding Area: The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.27 mg/m³, approximately 5.24 times the PEL of 0.050 mg/m³. The exposure was derived from two samples collected over a 451 minute period. Zero exposure was assumed for the unsampled period of 29 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials.
 - h) Grinding Area: The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.321 mg/m³, approximately 6.3 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 454 minute period. Zero exposure was assumed for the unsampled period of 26 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials.
 - i) Bronze Furnace Operator: The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.18 mg/m³, approximately 3.6 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 457 minute period. Zero exposure was assumed for the unsampled period of 23 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while melting bronze materials.
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See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- j) Bronze Furnace Pour: The employer is not performing any air sampling to determine exposure levels to lead. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.077 mg/m³, approximately 1.53 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 418 minute period. Zero exposure was assumed for the unsampled period of 62 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while melting bronze materials.

Pursuant to 29 C.F.R. 1903.19, within thirty (30) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that all processes are evaluated to using air monitoring to determine if effective engineering controls are required, and to ensure employees are protected with adequate respiratory protection.

Date By Which Violation Must be Abated:

06/08/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1025(e)(3)(i): A written compliance program was not established and/or implemented to reduce lead exposures to or below the permissible exposure limit, solely by means of engineering and work practice controls in accordance with the implementation schedule in paragraph (e)(1):

The employer has not established a written compliance program identifying the methods it will use to reduce exposures to at or below the permissible exposure limit for lead.

- a) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 5.4 mg/m³, approximately 108 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 432 minute period. Zero exposure was assumed for the unsampled period of 48 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials and no written compliance plan was established or implemented to reduce lead exposure to or below the permissible exposure limit.
- b) Iron Furnace Area: The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0582 mg/m³, approximately 1.16 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 432 minute period. Zero exposure was assumed for the unsampled period of 48 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead while melting iron from punch out scrap and no written compliance plan was established or implemented to reduce lead exposure to or below the permissible exposure limit.
- c) Iron Pour Area: The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0547 mg/m³, approximately 1.09 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 453 minute period. Zero exposure was assumed for the unsampled period of 27 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead while pouring iron melted from punch out scrap iron and no written compliance plan was established or implemented to reduce lead exposure to or below the permissible exposure limit.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- d) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 6.16 mg/m³, approximately 123 times the PEL of 0.050 mg/m³. The exposure was derived from three samples collected over a 452 minute period. Zero exposure was assumed for the unsampled period of 28 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials and no written compliance plan was established or implemented to reduce lead exposure to or below the permissible exposure limit.
- e) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 1.52 mg/m³, approximately 30.3 times the PEL of 0.050 mg/m³. The exposure was derived from three samples collected over a 444 minute period. Zero exposure was assumed for the unsampled period of 36 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials and no written compliance plan was established or implemented to reduce lead exposure to or below the permissible exposure limit.
- f) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.27 mg/m³, approximately 5.24 times the PEL of 0.050 mg/m³. The exposure was derived from two samples collected over a 451 minute period. Zero exposure was assumed for the unsampled period of 29 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials and no written compliance plan was established or implemented to reduce lead exposure to or below the permissible exposure limit.
- g) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.321 mg/m³, approximately 6.3 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 454 minute period. Zero exposure was assumed for the unsampled period of 26 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials and no written compliance plan was established or implemented to reduce lead exposure to or below the permissible exposure limit.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- h) **Bronze Furnace Operator:** The employee(s) are exposed to lead dust at an 8-hour TWA of 0.18 mg/m³, approximately 3.6 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 457 minute period. Zero exposure was assumed for the unsampled period of 23 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while melting bronze materials and no written compliance plan was established or implemented to reduce lead exposure to or below the permissible exposure limit.

- i) **Bronze Furnace Pour:** The employee(s) are exposed to lead dust at an 8-hour TWA of 0.077 mg/m³, approximately 1.53 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 418 minute period. Zero exposure was assumed for the unsampled period of 62 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while melting bronze materials and no written compliance plan was established or implemented to reduce lead exposure to or below the permissible exposure limit.

Pursuant to 29 C.F.R. 1903.19, within ninety (90) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to prepare a written compliance program which ensures that each employee is not exposed above the permissible exposure limit.

ABATEMENT:

STEP 1: EFFECTIVE RESPIRATORY PROTECTION SHALL BE PROVIDED AND USED BY EXPOSED EMPLOYEES AS AN INTERIM PROTECTIVE MEASURE UNTIL FEASIBLE ENGINEERING CONTROLS AND OR ADMINISTRATIVE CONTROLS CAN BE IMPLEMENTED OR WHENEVER SUCH CONTROLS FAIL TO REDUCE EMPLOYEE EXPOSURE TO WITHIN PERMISSIBLE EXPOSURE LIMITS.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

STEP 2: A WRITTEN DETAILED PLAN OF ABATEMENT SHALL BE SUBMITTED TO THE AREA DIRECTOR OUTLINING A SCHEDULE OR THE IMPLEMENTATION OF ENGINEERING AND OR ADMINISTRATIVE MEASURES TO CONTROL EMPLOYEE EXPOSURES TO HAZARDOUS SUBSTANCES AS REFERENCED IN THIS CITATION. THIS PLAN SHALL INCLUDE, AT A MINIMUM, TARGET DATES FOR THE FOLLOWING ACTIONS WHICH MUST BE CONSISTENT WITH ABATEMENT DATES REQUIRED BY THIS CITATION:

1. EVALUATION OF ENGINEERING CONTROL OPTIONS;
2. SELECTION OF OPTIMUM CONTROL METHODS AND COMPLETION OF DESIGNS;
3. PROCUREMENT, INSTALLATION, AND OPERATION OF SELECTED CONTROL MEASURES; AND
4. TESTING AND ACCEPTANCE OR MODIFICATION/REDESIGN OF CONTROLS.

NOTE: ALL PROPOSED CONTROL MEASURES SHALL BE APPROVED FOR EACH PARTICULAR USE BY A COMPETENT INDUSTRIAL HYGIENIST OR OTHER TECHNICALLY QUALIFIED PERSON.

Date By Which Violation Must be Abated: 08/31/2012
Proposed Penalty: \$ 3600.00



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1025(g)(1): Appropriate protective work clothing and equipment were not provided at no cost to employees whenever employee(s) were exposed to lead above the permissible exposure limit (PEL), without regard to the use of respirators:

The employer does not provide protective clothing such as coveralls/or similar full-body work clothing, gloves, shoes/or disposable shoe coverlets at no cost to employees whenever employee(s) are exposed to lead above the permissible exposure limit (PEL), without regard to the use of respirators. AA foundries does not provide protective clothing and safety shoes to new employees who will be working in the grinding area; where airborne concentrations of lead are presumed to exceed the PEL and where powered-air purifying respirators are provided by the company.

- a) Iron Furnace Area: The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0582 mg/m³, approximately 1.16 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 432 minute period. Zero exposure was assumed for the unsampled period of 48 minutes. This violation was observed on or about 10/24/2011 at the worksite where the employee(s) were exposed to lead while melting iron from punch out scrap and no work uniforms were provided to new employees of the facility.
- b) Iron Pour Area: The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0547 mg/m³, approximately 1.09 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 453 minute period. Zero exposure was assumed for the unsampled period of 27 minutes. This violation was observed on or about 10/24/2011 at the worksite where the employee(s) were exposed to lead while pouring iron melted from punch out scrap iron and no work uniforms were provided to new employees of the facility.
- c) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 1.52 mg/m³, approximately 30.3 times the PEL of 0.050 mg/m³. The exposure was derived from three samples collected over a 444 minute period. Zero exposure was assumed for the unsampled period of 36 minutes. This violation was observed on or about 10/24/2011 at the worksite where the employee(s) were exposed to lead while grinding on steel and bronze castings.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- d) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.27 mg/m³, approximately 5.24 times the PEL of 0.050 mg/m³. The exposure was derived from two samples collected over a 451 minute period. Zero exposure was assumed for the unsampled period of 29 minutes. This violation was observed on or about 10/24/2011 at the worksite where the employee(s) were exposed to lead while grinding on steel and bronze castings.
- e) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.321 mg/m³, approximately 6.3 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 454 minute period. Zero exposure was assumed for the unsampled period of 26 minutes. This violation was observed on or about 10/24/2011 at the worksite where the employee(s) were exposed to lead while grinding on steel and bronze castings.
- f) Bronze Furnace Operator: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.18 mg/m³, approximately 3.6 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 457 minute period. Zero exposure was assumed for the unsampled period of 23 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while melting bronze ingots.
- g) Bronze Furnace Pour: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.077 mg/m³, approximately 1.53 times the PEL of 0.050 mg/m³. The exposure was derived from one sample collected over a 418 minute period. Zero exposure was assumed for the unsampled period of 62 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while pouring molten bronze into molds.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that each employee is provided the appropriate personal protective equipment at no cost to the employees.

Date By Which Violation Must be Abated: 05/11/2012
Proposed Penalty: \$ 3600.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1025(g)(2)(vii): Containers of contaminated protective clothing and equipment required by paragraph (g)(2)(v) were not labeled as follows:

CAUTION: CLOTHING CONTAMINATED WITH LEAD. DO NOT REMOVE DUST BY BLOWING OR SHAKING. DISPOSE OF LEAD CONTAMINATED WASH WATER IN ACCORDANCE WITH APPLICABLE LOCAL, STATE, OR FEDERAL REGULATIONS.

- a) **Men's Change Area:** The employer does not ensure that the containers are labeled as required with the caution sign. Employee(s) place contaminated protective clothing into unlabeled containers in the change rooms. This violation was observed on or about 10/24/2011 in the men's change area where the employee(s) were changing out of their protective clothing to shower and change into their street clothes and placing contaminated uniforms into unlabeled containers.

- b) **Woman's Change Area:** The employer does not ensure that the containers are labeled as required with the caution sign. Employee(s) place contaminated protective clothing into unlabeled containers in the change rooms. This violation was observed on or about 10/24/2011 in the women's change area where the employee(s) were changing out of their protective clothing to shower and change into their street clothes and placing contaminated uniforms into unlabeled containers.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that contaminated protective work clothing is placed into appropriately labeled containers for cleaning.

Date By Which Violation Must be Abated: 05/11/2012
Proposed Penalty: \$ 1800.00



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

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

29 CFR 1910.1025(g)(2)(viii): Removal of lead from protective clothing and equipment by blowing, shaking or other means which dispersed lead into the air was not prohibited:

- a) Grinding Area: The employer does not ensure that employee(s) do not remove lead from their protective clothing and equipment using compressed air. On or about November 1, 2011 grinders were exposed to airborne lead while blowing out their lead-contaminated respirator filters with compressed air.
- b) Grinding Area: The employer does not ensure that employee(s) do not remove lead from their protective clothing and equipment using compressed air. On or about January 20, 2012 employees were exposed to airborne lead when removing lead-contaminated dust from their protective clothing using compressed air.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that lead contaminated protective work clothing and equipment is not removed by blowing, shaking or other means which disperses lead into the air.

Date By Which Violation Must be Abated: 05/11/2012
Proposed Penalty: \$ 3000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1025(h)(2)(i): Floors and other surfaces where lead accumulates was cleaned by the use of compressed air:

- a) Grinding area: The employer does not ensure that employee(s) do not remove lead from floors and other surfaces using compressed air. On or about October 24, 2011, grinders were exposed to airborne lead while blowing down lead-contaminated work surfaces with compressed air.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that lead contaminated floors and surfaces are not removed by the use of compressed air.

Date By Which Violation Must be Abated:

05/11/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1025(h)(1): All surfaces were not maintained as free as practicable of accumulations of lead:

- a) Lunchroom: The employer is not conducting adequate cleaning in the lunchroom. This violation was observed on or about 10/24/2011 at the worksite where the lunchroom floor was sampled by wipe method for lead and was found to be contaminated with 119 ug/100 cm² of surface area.
- b) Men's change room: The employer is not conducting adequate cleaning in the men's change room shower area. This violation was observed on or about 10/24/2011 at the worksite where the floor at the shower entry was sampled by wipe method for lead and was found to be contaminated with 1191 ug/100 cm² of surface area.
- c) Men's Change room: The employer is not conducting adequate cleaning in the men's change room sink area. This violation was observed on or about 10/24/2011 at the worksite where the floor at the sink was sampled by wipe method for lead and was found to be contaminated with 987 ug/100 cm² of surface area.
- d) Woman's change room: The employer is not conducting adequate cleaning in the woman's change room sink area. This violation was observed on or about 10/24/2011 at the worksite where the floor at the sink was sampled by wipe method for lead and was found to be contaminated with 850 ug/100 cm² of surface area.
- e) Woman's change room: The employer is not conducting adequate cleaning in the woman's change room locker area. This violation was observed on or about 10/24/2011 at the worksite where the floor at the locker was sampled by wipe method for lead and was found to be contaminated with 426 ug/100 cm² of surface area.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that adequate housekeeping and cleaning is conducted.

Date By Which Violation Must be Abated: 05/11/2012
Proposed Penalty: \$ 3000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1025(i)(1): The employer did not assure that food or beverage was not present, or consumed; tobacco products were not present, or used and cosmetics were not applied in areas where employees were exposed to lead in excess of the permissible exposure limits (PEL), without regard to the use of respirators:

- a) Shake out Area in front of Iron Furnace: The employer is not ensuring that water is consumed in areas where employees are exposed to lead in excess of the PEL. This violation was observed on or about 10/24/2011 at the worksite where the water fountain was sampled by wipe method for lead and was found to be contaminated with 254 ug/100 cm² of surface area.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that employees are not consuming food or beverage in areas where employees are exposed to lead in excess of the PEL.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/11/2012
\$ 4200.00



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1025(j)(1)(i): A medical surveillance program was not instituted for all employee(s) who were, or could be exposed to lead above the action level for more than thirty (30) days per year:

- a) **Iron Furnace Area:** The employer does not ensure that a medical surveillance program is instituted for all employees who are, or could be exposed to lead above the action level of 0.30 mg/m³ for more than 30 days per year. This violation was observed on or about November 1, 2011, at AA Foundries where the iron furnace operator is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.058 mg/m³, while melting scrap steel. The iron furnace operator does not participate in all aspects of the medical surveillance program as outlined in 1910.1025(j)(3)(ii).
- b) **Iron Pour Area:** The employer does not ensure that a medical surveillance program is instituted for all employees who are or could be exposed to lead above the action level of 0.30 mg/m³ for more than 30 days per year. This violation was observed on or about November 1, 2011, at AA Foundries where the iron pour helper is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.055 mg/m³, while melting scrap steel. The iron pour helper does not participate in all aspects of the medical surveillance program as outlined in 1910.1025(j)(3)(ii).
- c) **Bronze Furnace Area:** The employer does not ensure that a medical surveillance program is instituted for all employees who are or could be exposed to lead above the action level of 0.30 mg/m³ for more than 30 days per year. This violation was observed on or about November 1, 2011, at AA Foundries where the bronze furnace operator is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.180 mg/m³, while melting copper billets and scrap metal. The bronze furnace operator does not participate in all aspects of the medical surveillance program as outlined in 1910.1025(j)(3)(ii).
- d) **Bronze Pour Area:** The employer does not ensure that a medical surveillance program is instituted for all employees who are or could be exposed to lead above the action level of 0.30 mg/m³ for more than 30 days per year. This violation was observed on or about November 1, 2011, at AA Foundries where the bronze pour helper is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.077 mg/m³, while pouring molten metal into molds. The bronze pour helper does not participate in all aspects of the medical surveillance program as outlined in 1910.1025(j)(3)(ii).

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- e) Grinding Area: The employer does not ensure that a medical surveillance program is instituted for all employees who are or could be exposed to lead above the action level of 0.30 mg/m³ for more than 30 days per year. This violation was observed on or about January 20, 2012, at AA Foundries where the grinder operator is exposed to lead dust at an 8-hour time weighted average (TWA) airborne concentration of 1.52 mg/m³, while grinding steel and bronze castings. The grinder operator does not participate in all aspects of the medical surveillance program as outlined in 1910.1025(j)(3)(ii).
- f) Grinding Area: The employer does not ensure that a medical surveillance program is instituted for all employees who are or could be exposed to lead above the action level of 0.30 mg/m³ for more than 30 days per year. This violation was observed on or about November 1, 2011, at AA Foundries where the grinder operator is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.270 mg/m³, while grinding on bronze and steel castings. The grinder operator does not participate in all aspects of the medical surveillance program as outlined in 1910.1025(j)(3)(ii).
- g) Grinding Area: The employer does not ensure that a medical surveillance program is instituted for all employees who are or could be exposed to lead above the action level of 0.30 mg/m³ for more than 30 days per year. This violation was observed on or about November 1, 2011, at AA Foundries where the grinder operator is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.321 mg/m³, while grinding on bronze and steel castings. The grinder operator does not participate in all aspects of the medical surveillance program as outlined in 1910.1025(j)(3)(ii).

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that all processes are evaluated to determine respiratory hazards and to determine if effective engineering controls are required, and to ensure employees are protected with adequate respiratory protection and a medical surveillance program for lead is implemented as required under this standard.

Date By Which Violation Must be Abated: 05/11/2012
Proposed Penalty: \$ 4200.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

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

29 CFR 1910.1025(j)(2)(i)(A): The employer did not make available biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels at least every 6 months to each affected employee who is or may be exposed to lead above the action level for 30 days or more per year:

The employer does not ensure that biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels is made available at least every six months to each employee who is or may be exposed to lead above the action level for 30 days or more per year.

- a) **Iron Furnace Area:** The employer does not ensure that biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels is made available at least every six months to the iron furnace operator. This violation was observed on or about November 1, 2011, where the iron furnace operator is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.058 mg/m³, while melting scrap steel. The iron furnace operator does not receive biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels at least every six months.
- b) **Iron Pour Area:** The employer does not ensure that biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels is made available at least every six months to the iron pour helper. This violation was observed on or about November 1, 2011, where the iron pour helper is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.055 mg/m³, while melting scrap steel. The iron pour helper does not receive biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels at least every six months.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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- c) **Bronze Furnace Area:** The employer does not ensure that biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels is made available at least every six months to the bronze furnace operator. This violation was observed on or about January 20, 2012, where the bronze furnace operator is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.180 mg/m³, while melting copper billets and scrap metal. The bronze furnace operator does not receive biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels at least every six months.
- d) **Bronze Pour Area:** The employer does not ensure that biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels is made available at least every six months to the bronze pour helper. This violation was observed on or about January 20, 2012, where the bronze pour helper is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.077 mg/m³, while pouring molten bronze into molds. The bronze pour helper does not receive biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels at least every six months.
- e) **Grinding Area:** The employer does not ensure that biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels is made available at least every six months to the grinder operator. This violation was observed on or about January 20, 2012, where the grinder operator is exposed to lead dust at an 8-hour time weighted average (TWA) airborne concentration of 1.52 mg/m³, while grinding steel and bronze castings. The grinder operator does not receive biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels at least every six months.
- f) **Grinding Area:** The employer does not ensure that biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels is made available at least every six months to the grinder operator. This violation was observed on or about January 20, 2012, where the grinder operator is exposed to lead dust at an 8-hour time weighted average (TWA) airborne concentration of 0.270 mg/m³, while grinding steel and bronze castings. The grinder operator does not receive biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels at least every six months.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
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- g) **Grinding Area:** The employer does not ensure that biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels is made available at least every six months to the grinder operator. This violation was observed on or about January 20, 2012, where the grinder operator is exposed to lead dust at an 8-hour time weighted average (TWA) airborne concentration of 0.321 mg/m³, while grinding steel and bronze castings. The grinder operator does not receive biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels at least every six months.

Pursuant to 29 C.F.R. 1903.19, within thirty (30) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that biological monitoring is provided to all employees who are exposed at or above the action level for lead.

Date By Which Violation Must be Abated:	06/08/2012
Proposed Penalty:	\$ 4200.00



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1025(j)(2)(i)(B): Required biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin (ZPP) levels were not provided to each employee covered under paragraph (j)(1)(i) of this section at least every two months for each employee whose last blood sampling and analysis indicated a blood lead level at or above 40 mu/100 g of whole blood:

- a) AA Foundries: The employer does not ensure that employees with blood lead level(s) at or above 40 ug/100 g was given biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin at least every two months. A grinding operator with a blood lead level of 50 ug/100 g did not receive the required biological monitoring.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that all processes are evaluated to determine respiratory hazards and to determine if effective engineering controls are required, and to ensure employees are protected with adequate respiratory protection and a medical surveillance program for lead is implemented as required under this standard including sending any employee with a blood level at or above 40 ug/100 g for blood sampling and analysis for lead and zinc protoporphyrin (ZPP) levels at least every two months.

Date By Which Violation Must be Abated:

05/11/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

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

29 CFR 1910.1025(j)(3)(i)(A): An employee with a blood lead level(s) at or above 40 ug/100 g during the preceding 12 months was not given a medical examination at least annually:

- a) AA Foundries: The employer does not ensure that employees with blood lead level(s) at or above 40 ug/100 g during the preceding 12 months was given a medical examination at least annually. A grinding operator with a blood lead level of 50 ug/100 g did not receive a medical evaluation.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that all processes are evaluated to determine respiratory hazards and to determine if effective engineering controls are required, and to ensure employees are protected with adequate respiratory protection and a medical surveillance program for lead is implemented as required under this standard including sending any employee with a blood level at or above 40 ug/100 g to a medical doctor for a medical examination.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/11/2012
\$ 4200.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1025(j)(3)(i)(B): Medical examinations and consultations were not made available, prior to assignment, for each employee being assigned for the first time to an area in which airborne concentrations of lead are at or above the action level:

- a) Bronze Pour Area: The employer does not make available medical examinations and consultation for the bronze pour helper, prior to these employees being assigned for the first time to an area in which airborne concentrations of lead are at or above the action level. This violation was observed on or about January 20, 2012, where the bronze pour helper is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.077 mg/m³ while pouring molten metal into molds. The bronze pour helper did not receive a medical examination and consultation as outlined in 1910.1025(j)(3)(ii).
- b) Grinding Area: The employer does not make available medical examinations and consultation to the grinder operators, prior to these employees being assigned for the first time to an area in which airborne concentrations of lead are at or above the action level. This violation was observed on or about January 20, 2012, where the grinder operator is exposed to lead dust at an 8-hour time weighted average (TWA) airborne concentration of 1.52 mg/m³ while grinding on bronze and metal castings. The grinder operators did not receive a medical examination and consultation as outlined in 1910.1025(j)(3)(ii).
- c) Grinding Area: The employer does not make available medical examinations and consultation to the grinder operators, prior to these employees being assigned for the first time to an area in which airborne concentrations of lead are at or above the action level. This violation was observed on or about January 20, 2012, where the grinder operator is exposed to lead dust at an 8-hour time weighted average (TWA) airborne concentration of 0.270 mg/m³ while grinding on bronze and metal castings. The grinder operators did not receive a medical examination and consultation as outlined in 1910.1025(j)(3)(ii).
- d) Grinding Area: The employer does not make available medical examinations and consultation to the grinder operators, prior to these employees being assigned for the first time to an area in which airborne concentrations of lead are at or above the action level. This violation was observed on or about January 20, 2012, where the grinder operator is exposed to lead dust at an 8-hour time weighted average (TWA) airborne concentration of 0.321 mg/m³ while grinding on bronze and metal castings. The grinder operators did not receive a medical examination and consultation as outlined in 1910.1025(j)(3)(ii).

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- e) **Iron Furnace Area:** The employer does not make available medical examinations and consultation for the iron furnace operator, prior to these employees being assigned for the first time to an area in which airborne concentrations of lead are at or above the action level. This violation was observed on or about November 1, 2011, where the iron furnace operator is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.058 mg/m³ while melting scrap steel. The iron furnace operator does not receive biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels at least every six months.

- f) **Iron Pour Area:** The employer does not make available medical examinations and consultation for the iron pour helper, prior to these employees being assigned for the first time to an area in which airborne concentrations of lead are at or above the action level. This violation was observed on or about November 1, 2011, where the iron pour helper is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.055 mg/m³ while melting scrap steel. The iron pour helper does not receive biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels at least every six months.

- g) **Bronze Furnace Area:** The employer does not make available medical examinations and consultation for the bronze furnace operator, prior to these employees being assigned for the first time to an area in which airborne concentrations of lead are at or above the action level. This violation was observed on or about January 20, 2012, where the bronze furnace operator is exposed to lead fume at an 8-hour time weighted average (TWA) airborne concentration of 0.180 mg/m³ while melting copper billets and scrap metal. The bronze furnace operator does not receive biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels at least every six months.

Pursuant to 29 C.F.R. 1903.19, within thirty (30) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that all employees prior to assignment are provided with medical examinations and consultations for lead required under this standard.

Date By Which Violation Must be Abated:

06/08/2012

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1025(l)(1)(iv): A training program was not repeated at least annually for each employee subject to lead exposure at or above the action level, or for whom the possibility of skin or eye irritation existed:

- a) **Iron Furnace Operator Area:** The employer is not providing annual training for employees exposed above the action level. The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0582 mg/m³, approximately 1.16 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 445 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 35 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead while melting iron from punch out scrap iron.
- b) **Iron Pour Area:** The employer is not providing annual training for employees exposed above the action level. The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0547 mg/m³, approximately 1.09 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 453 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 27 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead while melting iron from punch out scrap iron.
- c) **Shake-Out Area:** The employer is not providing annual training for employees exposed above the action level. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.030 mg/m³, approximately 0.605 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 440 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 40 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- d) Grinding Area: The employer is not providing annual training for employees exposed above action level. The employee(s) are exposed to lead dust at an 8-hour TWA of 1.52 mg/m³, approximately 30.3 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from three samples collected over a 444 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 36 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials.
- e) Grinding Area: The employer is not providing annual training for employees exposed above the action level. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.27 mg/m³, approximately 5.24 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from two samples collected over a 451 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 29 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials.
- f) Grinding Area: The employer is not providing annual training for employees exposed above the action level. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.321 mg/m³, approximately 6.3 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 454 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 26 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze materials.
- g) Bronze Furnace Operator: The employer is not providing annual training for employees exposed above the action level. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.18 mg/m³, approximately 3.6 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 457 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 23 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while melting bronze materials.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- h) Bronze Furnace Pour: The employer is not providing annual training for employees exposed above the action level. The employee(s) are exposed to lead dust at an 8-hour TWA of 0.077 mg/m³, approximately 1.53 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 418 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 62 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while melting bronze materials.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that all processes are evaluated to determine respiratory hazards and to determine if effective engineering controls are required, and to ensure employees receive lead training at least annually for those employees exposed at or above the action level of 0.030 mg/m³.

Date By Which Violation Must be Abated: 05/11/2012
Proposed Penalty: \$ 4200.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.1025(m)(2)(i): Warning signs bearing the legend: WARNING, LEAD WORK AREA, POISON, NO SMOKING OR EATING, were not posted in each work area where the permissible exposure limit (PEL) was exceeded:

- a) Iron Furnace Operator Area: The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0582 mg/m³, approximately 1.16 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 445 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 35 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead while melting iron from punch out scrap iron and no lead work signs were not posted.
- b) Iron Pour Area: The employee(s) are exposed to lead fume at an 8-hour TWA of 0.0547 mg/m³, approximately 1.09 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 453 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 27 minutes. This violation was observed on or about 11/01/2011 at the worksite where the employee(s) were exposed to lead while pouring iron melted from punch out scrap iron and no lead work signs were not posted.
- c) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 1.52 mg/m³, approximately 30.3 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from three samples collected over a 444 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 36 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze castings and no lead work signs were not posted.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- d) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.27 mg/m³, approximately 5.24 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from two samples collected over a 451 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 29 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze castings and no lead work signs were not posted.
- e) Grinding Area: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.321 mg/m³, approximately 6.3 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 454 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 26 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while grinding on bronze castings and no lead work signs were not posted.
- f) Bronze Furnace Operator: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.18 mg/m³, approximately 3.6 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 457 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 23 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while melting bronze ingots and no lead work signs were not posted.
- g) Bronze Furnace Pour: The employee(s) are exposed to lead dust at an 8-hour TWA of 0.077 mg/m³, approximately 1.53 times the PEL of 0.050 mg/m³; this limit was established to prevent central nervous system impairment, peripheral nervous system impairment, and hematologic effects. The exposure was derived from one sample collected over a 418 minute period. An 8-hour sample period was measured. Zero exposure was assumed for the unsampled period of 62 minutes. This violation was observed on or about 01/20/2012 at the worksite where the employee(s) were exposed to lead while pouring molten bronze and lead work signs were not posted.

See pages 1 through 5 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: 315628503
Inspection Dates: 10/24/2011 - 04/24/2012
Issuance Date: 04/24/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including obtaining and posting the required signs in the areas where the PEL was exceeded.

Date By Which Violation Must be Abated: 05/11/2012
Proposed Penalty: \$ 1800.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

Citation 1 Item 19 Type of Violation: **Serious**

29 CFR 1910.1027(d)(1)(i): Each employer of a workplace or work operation covered by this standard did not determine if any employee could be exposed to cadmium at or above the action level:

- a) **Iron Furnace Area:** The employer does not determine if employees could be exposed to cadmium at or above the action level of 0.0025 mg/m³. The employer has not performed air monitoring to determine the cadmium exposure levels of the iron furnace operator. This violation was observed on or about October 24, 2011, when the iron furnace operator while melting iron from punch out scrap iron was exposed to an 8-hour time-weighted average (TWA) airborne concentration of cadmium fume of 0.00275 mg/m³; which exceeds the action level. The exposure was derived from two samples collected over a 445 minute period. Zero exposure was assumed for the 35 minutes not sampled.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that all processes are evaluated to determine respiratory hazards and to determine if effective engineering controls are required, and to ensure employees are protected with adequate respiratory protection.

Date By Which Violation Must be Abated: 05/11/2012
Proposed Penalty: \$ 3000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

Citation 1 Item 20a Type of Violation: **Serious**

29 CFR 1910.1027(m)(4)(i): The employer did not institute a training program for all employees who are potentially exposed to cadmium, ensure employee participation in the program, and maintain a record of the contents of such program:

- a) **Iron Furnace Area:** The employer does not institute a training program for the iron furnace operator who is potentially exposed to cadmium. This violation was observed on or about November 1, 2011, while melting iron from punch out scrap iron the iron furnace operator was exposed to cadmium fume at an 8-hour TWA concentration of 0.00275 mg/m³ which exceeds the action level of 0.0025 mg/m³. The exposure was derived from samples collected over a 445 minute period. Zero exposure was assumed for the 35 minutes not sampled. Employee(s) in the iron furnace area have not received training related to the health hazards of cadmium exposure.

Pursuant to 29 C.F.R. 1903.19, within thirty (30) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that all employees have been trained regarding the hazards of cadmium.

Date By Which Violation Must be Abated: 06/08/2012
Proposed Penalty: \$ 4200.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

Citation 1 Item 20b Type of Violation: **Serious**

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

- a) AA Foundries: The employer does not ensure that a written hazard communication program which meets the criteria specified in 29 CFR 1910.1200(f), (g), and (h), is developed, implemented, or maintained at the workplace. This violation was observed on or about October 24, 2011, where the employer had not developed or implemented a written hazard communication program for employees exposed to copper, tin, nickel, zinc, manganese, antimony, magnesium, silica, Refcohol, and isopropyl alcohol.

Pursuant to 29 C.F.R. 1903.19, within thirty (30) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that a written hazard communication program is developed, implemented, and maintained at the facility.

Date By Which Violation Must be Abated:

06/08/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

Citation 1 Item 20c Type of Violation: **Serious**

29 CFR 1910.1200(h)(1): The employer did not provide employees with effective information an training on hazardous chemicals in their work area:

- a) AA Foundries: The employer does not ensure that employees are provided training and information on the hazardous chemical in their work area. This violation was observed on or about October 24, 2011, where the employer had not provided employees any training or information related to the hazards of copper, tin, nickel, zinc, manganese, antimony, magnesium, silica, refcohol, or isopropyl alcohol.

Pursuant to 29 C.F.R. 1903.19, within thirty (30) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that a written hazard communication program is developed, implemented, and maintained at the facility.

Date By Which Violation Must be Abated:

06/08/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

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

29 CFR 1910.95(g)(1): The employer did not maintain an audiometric testing program by making audiometric testing available to all employees whose exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels:

- a) **Silica Molding Area:** The employer does not maintain an audiometric testing program for the Silica Molder Operator who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 465 minutes indicated that employees were exposed to a 151% noise dose which is equivalent to approximately 87.2 dbA. Zero exposure was assumed for the 15 minutes not sampled. Audiometric testing was not made available to the Silica Mold Operator. Employees in this job classification did not receive an audiogram in 2008, 2009, and 2010.
- b) **Olivine Molding Area:** The employer does not maintain an audiometric testing program for the Olivine Molder Operator who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 452 minutes indicated that employees were exposed to a 98.7% noise dose which is equivalent to approximately 89.9 dbA. Zero exposure was assumed for the 28 minutes not sampled. Audiometric testing was not made available to the Olivine Mold Operator. Employees in this job classification did not receive an audiogram in 2008, 2009, and 2010.
- c) **Iron Pour Area:** The employer does not maintain an audiometric testing program for the Iron Furnace Operator who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 452 minutes indicated that employees were exposed to a 70.7% noise dose which is equivalent to approximately 87.5 dbA. Zero exposure was assumed for the 28 minutes not sampled. Audiometric testing was not made available to the Iron Furnace Operator. Employees in this job classification did not receive an audiogram in 2008, 2009, and 2010.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- d) Grinding Area: The employer does not maintain an audiometric testing program for the Grinder Operator who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 447 minutes indicated that employees were exposed to a 227% noise dose which is equivalent to approximately 95.9 dbA. Zero exposure was assumed for the 33 minutes not sampled. Audiometric testing was not made available to the Grinder Operator. Employees in this job classification did not receive an audiogram in 2008, 2009, and 2010.

- e) Shake-Out Area: The employer does not maintain an audiometric testing program for the Shaker who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 451 minutes indicated that employees were exposed to a 88% noise dose which is equivalent to approximately 89.1 dbA. Zero exposure was assumed for the 29 minutes not sampled. Audiometric testing was not made available to the Shaker. Employees in this job classification did not receive an audiogram in 2008, 2009, and 2010.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that an audiometric testing program is established and maintained in the workplace.

Date By Which Violation Must be Abated: 05/11/2012
Proposed Penalty: \$ 35000.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1910.95(g)(6): After obtaining a baseline audiogram, new audiograms were not obtained annually for each employee whose exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels:

- a) Silica Molding Area: The employer does not maintain an annual audiometric testing program for the Silica Molder Operator who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 465 minutes indicated that employees were exposed to a 151% noise dose which is equivalent to approximately 87.2 dbA. Zero exposure was assumed for the 15 minutes not sampled. Audiometric testing was not made available to the Silica Mold Operator. Employees in this job classification did not receive an audiogram in 2008, 2009, and 2010.
- b) Olivine Molding Area: The employer does not maintain an audiometric testing program for the Olivine Molder Operator who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 452 minutes indicated that employees were exposed to a 98.7% noise dose which is equivalent to approximately 89.9 dbA. Zero exposure was assumed for the 28 minutes not sampled. Audiometric testing was not made available to the Olivine Mold Operator. Employees in this job classification did not receive an audiogram in 2008, 2009, and 2010.
- c) Iron Furnace and Pour Area: The employer does not obtain annual audiograms for the Iron Furnace Operator who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 452 minutes indicated that employees were exposed to a 70.7% noise dose which is equivalent to approximately 87.5 dbA. Zero exposure was assumed for the 28 minutes not sampled. Annual audiograms were not made available to the Iron Furnace Operator in 2007, 2008, 2009, and 2010.

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

- d) **Grinding Area:** The employer does not obtain annual audiograms for the Grinder Operators who are exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 447 minutes indicated that employees were exposed to a 227% noise dose which is equivalent to approximately 95.9 dbA. Zero exposure was assumed for the 33 minutes not sampled. Employees in this job classification did not receive an audiogram in 2007, 2008, 2009, and 2010.
- e) **Shake-Out Area:** The employer does not maintain an audiometric testing program for the Shaker who is exposed to continuous noise levels in excess of the allowable 8-hour Time Weighted Average (TWA) sound level of 85 dbA. This violation was observed on or about October 24, 2011, where noise sampling performed for 451 minutes indicated that employees were exposed to a 88% noise dose which is equivalent to approximately 89.1 dbA. Zero exposure was assumed for the 29 minutes not sampled. Audiometric testing was not made available to the Shaker. Employees in this job classification did not receive an audiogram in 2008, 2009, and 2010.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that an audiometric testing program is established and maintained in the workplace.

Date By Which Violation Must be Abated:

05/11/2012



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

29 CFR 1904.04(a): Each recordable injury or illness was not entered on the OSHA 300 Log and/or an incident report (OSHA Form 301 or equivalent) within seven (7) calendar days of receiving information that a recordable injury or illness has occurred:

- a) At the worksite, on or about 10/24/2011, an injury occurred requiring medical care in September 2010 in which an employee was burned during the pouring of molten metal was not recorded which materially impaired the understandability of the nature of the hazards, injuries and illnesses at the workplace.
- b) At the worksite, on or about 10/24/2011, an injury occurred requiring medical care in Aug 2011 in which an employee experienced a chemical allergy that required a change of job classification and was not recorded which materially impaired the understandability of the nature of the hazards, injuries and illnesses at the workplace.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that all OSHA 301, OSHA 300, and OSHA 300A forms are adequately prepared in which all injuries and illnesses at the workplace are recorded as required.

Date By Which Violation Must be Abated: 05/11/2012
Proposed Penalty: \$ 600.00

See pages 1 through 5 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210

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

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

- a) Core Dipping Area: Employees dip sand cores into refcohol containing 99% isopropyl alcohol without wearing any protective gloves. This violation was observed on or about 10/24/2011 in the core dipping area where employees were placing cores into the refcohol drum.

Pursuant to 29 C.F.R. 1903.19, within ten (10) calendar days of the date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that operators receive and wear appropriate dermal protection in the workplace.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/11/2012
\$ 0.00

Jeff R. Funke, CSP
Area Director

A handwritten signature in black ink that reads "Jeff R. Funke". The signature is written in a cursive style and is positioned above a horizontal line.

See pages 1 through 5 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
Suite 203
800 Dolorosa St.
San Antonio, TX 78207
Phone: (210)472-5040 FAX: (210)472-5045



INVOICE/ DEBT COLLECTION NOTICE

Company Name: AA Foundries, Inc.
Inspection Site: 231 Virginia Blvd., SAN ANTONIO, TX 78210
Issuance Date: 04/24/2012

Summary of Penalties for Inspection Number 315628503

Citation 1, Serious	= \$	72000.00
Citation 2, Willful	= \$	35000.00
Citation 3, Other	= \$	600.00
TOTAL PROPOSED PENALTIES	= \$	107600.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above or the amounts agreed to in an Informal Settlement Agreement. 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 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 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. Information on any delinquent claims may be disclosed to commercial credit reporting agencies, private debt collectors, and/or referred to the Internal Revenue Service for collection.

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 second and subsequent demand letters sent in an attempt to collect the unpaid debt. Costs will not be assessed for first demand letters and payment default letters.

Jeff R. Funke, CSP
Area Director



04/24/12