

U.S. Department of Labor

Occupational Safety and Health Administration
36 Triangle Park Drive
Cincinnati, OH 45246
Phone: 513-841-4132 Fax: 513-841-4114



Citation and Notification of Penalty

To:
American Showa, Inc.
960 Cherry St.
Blanchester, OH 45107

Inspection Number: 107658
Inspection Date(s): 10/12/2011 - 03/14/2012
Issuance Date: 03/27/2012

Inspection Site:
960 Cherry St.
Blanchester, OH 45107

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. **The penalty dollar amounts need not be posted and may be marked out or covered up prior to posting.**

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment

to the citation(s) and/or penalty(ies).

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

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

Right to Contest – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance.

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

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

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

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

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to

the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation, but not sooner than 30 calendar days after the citation issuance date. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 03/27/2012. The conference will be held at the OSHA office located at 36 Triangle Park Drive, Cincinnati, OH 45246 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 107658

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107
Issuance Date: 03/27/2012

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 36 Triangle Park Drive, Cincinnati, OH 45246**

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

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

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

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

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

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

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

Signature

Date

Typed or Printed Name

Title

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

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



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

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

29 CFR 1910.157(c)(1): Portable fire extinguishers were not mounted, located and identified so that they were readily accessible without subjecting the employees to injuries:

- (a) A portable fire extinguisher was sitting on the floor, partially blocking the eyewash and shower station in the casting area where molten aluminum metal sometimes caused small fires, and was not mounted, located and identified so it was readily accessible for employees to use, on October 13, 2011.
- (b) A portable fire extinguisher was sitting on the floor and another was up on a shelf along the wall between die maintenance and casting, near a fire extinguisher sign and a hook to hang an extinguisher, on October 13, 2011.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET)

Date by which Violation must be Abated: 04/17/2012
Proposed Penalty: \$1100.00



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

Citation 1 Item 2 Type of Violation: **Other-than-Serious**

29 CFR 1910.1200(f)(5)(i): The employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged or marked with the identity of the hazardous chemical(s) contained therein:

- (a) An unlabeled spray bottle of Atlantic Kleen Green Cleaner (Kleen 3414 on MSDS), which was an irritant and was combustible, was found in the buffing area on October 13, 2011.
- (b) An unlabeled spray bottle of Atlantic Kleen Green Cleaner (Kleen 3414 on MSDS), which was an irritant and was combustible, was found on top of a cabinet between the casting and die maintenance areas on October 13, 2011.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET)

Date by which Violation must be Abated:
Proposed Penalty:

04/03/2012
\$1100.00



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

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

29 CFR 1910.1200(f)(5)(ii): The employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged or marked with the appropriate hazard warnings:

- (a) An unlabeled spray bottle of Atlantic Kleen Green Cleaner (Kleen 3414 on MSDS), which was an irritant and was combustible, was found in the buffing area on October 13, 2011.
- (b) An unlabeled spray bottle of Atlantic Kleen Green Cleaner (Kleen 3414 on MSDS), which was an irritant and was combustible, was found on top of a cabinet between the casting and die maintenance areas on October 13, 2011.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET)

Date by which Violation must be Abated: 04/03/2012
Proposed Penalty: \$1100.00

A handwritten signature in black ink that reads "William Wilkerson".

William Wilkerson
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
36 Triangle Park Drive
Cincinnati, OH 45246
Phone: 513-841-4132 Fax: 513-841-4114



INVOICE / DEBT COLLECTION NOTICE

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107
Issuance Date: 03/27/2012

Summary of Penalties for Inspection Number	107658
Citation 1, Other-than-Serious	\$3300.00
TOTAL PROPOSED PENALTIES	\$3300.00

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

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

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

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

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount

becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

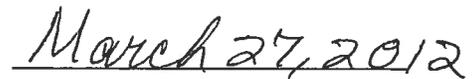
Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per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

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



William Wilkerson

Area Director



Date

U.S. Department of Labor
Occupational Safety and Health Administration
36 Triangle Park Drive
Cincinnati, OH 45246
Phone: 513-841-4132 Fax: 513-841-4114



Citation and Notification of Penalty

To:
American Showa, Inc.
960 Cherry St.
Blanchester, OH 45107

Inspection Number: 107482
Inspection Date(s): 10/07/2011 - 11/15/2011
Issuance Date: 03/27/2012

Inspection Site:
960 Cherry St.
Blanchester, OH 45107

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. **The penalty dollar amounts need not be posted and may be marked out or covered up prior to posting.**

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment

to the citation(s) and/or penalty(ies).

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

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

Right to Contest – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance.

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

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

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

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

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to

the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation, but not sooner than 30 calendar days after the citation issuance date. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 03/27/2012. The conference will be held at the OSHA office located at 36 Triangle Park Drive, Cincinnati, OH 45246 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 107482

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107
Issuance Date: 03/27/2012

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 36 Triangle Park Drive, Cincinnati, OH 45246**

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

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

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

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

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

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

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

Signature

Date

Typed or Printed Name

Title

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

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



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

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

29 CFR 1910.147(d)(3): All energy isolating devices that were needed to control the energy to the machine or equipment were not physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s):

(a) On or about October 13, 2011, in the Casting area at the #4 500 ton Die Casting Machine, a technician was working inside the robot and trim press guarding enclosures to repair the take out table of the trim press and did not de-energize all energy sources and relied on the gate interlock.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated: 05/08/2012
Proposed Penalty: \$7000.00



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

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

29 CFR 1910.147(d)(4)(i): Lockout or tagout devices were not affixed to each energy isolating device by authorized employees:

(a) On or about October 13, 2011, in the Casting area on #4 500 ton Die Casting Machine, a technician was working inside the robot and trim press guarding enclosure and did not lockout all energy sources.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated:	05/08/2012
Proposed Penalty:	\$7000.00



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

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

29 CFR 1910.212(a)(1): Machine guarding was not provided to protect operator(s) and other employees from hazard(s) created by rotating parts, pinch points, moving parts, etc.:

- (a) In the Casting area, on the backsides of #1 and #2 250 ton Die Casting Machines were inadequately guarded in that there were open areas to the left side of the die guards.
- (b) In the Casting area, on #1 250 ton Die Casting machine, the automatic/robotic pouring arm pinch points were inadequately guarded in that the guard was left open and not interlocked or secured.
- (c) In the Assembly area (Clean room), on the ETO line 2 cylinder end machine, the pinch points created by the nut wrench closing cycle was inadequately guarded in that the two hand buttons were not protected from accidental activation as they were not provided with protective rings or shrouds, plus did not require concurrent activation.
- (d) In the Assembly area (Clean room), on the R/V flare machine #1 and #2, the pinch areas created by the upper clamps were inadequately guarded in that the light curtains would not stop the closing of the upper clamps when the light curtains were broken.
- (e) In the Assembly area (Clean room), on the Vane pump assembly machine, the pinch area created by the upper clamp closing was inadequately guarded in that the light curtain would not stop the closing of the upper clamp when the light curtain was broken.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated:
Proposed Penalty:

05/08/2012
\$7000.00



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

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

29 CFR 1910.304(g)(5): The paths to ground from circuits, equipment, and enclosures were not permanent, continuous, and effective:

- (a) In the Casting area, by the aisle by the 650 ton furnace, there was a floor pedestal fan that was missing the ground prong.
- (b) In the Casting area by Heat Treat, there was a large floor fan that was missing the ground prong.
- (c) In the Casting area by the buffers, there was a pedestal fan plugged into an extension cord that had the ground prong missing and a small floor fan that had the ground prong missing.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated: 05/08/2012
Proposed Penalty: \$5000.00



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

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

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

- (a) In the Casting area, there was a 208 VAC circuit breaker panel box by the 650 ton furnace and press fan that had an opening missing a knockout plus another knockout was part way bent in.
- (b) In the Clean room assembly area on the ETO assembly line #1, the control box for the cylinder end assembly had an unused opening in the top of the box.
- (c) In the Casting area on the side of the Knockout/Shakeout machine, there was an electrical box that had the top knockout pushed in.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated: 05/08/2012
Proposed Penalty: \$4000.00



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

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

29 CFR 1910.305(g)(1)(iv): Flexible cords and/ or cables were used for purposes prohibited by paragraphs (A) through (F) of 29 CFR 1910.305(g)(1)(iv):

(a) In the Casting area by #1 500 ton DCM, there was an orange extension cord used to power a fan and the cord was attached to conduit and other building structures with wire ties and used as a substitute for fixed wiring.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated: 05/08/2012
Proposed Penalty: \$3000.00



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

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

29 CFR 1910.333(a)(2): If the exposed live parts are not de-energized (i.e., for reasons of increased or additional hazards or infeasibility), other safety-related work practices shall be used to protect employees who may be exposed to the electrical hazards involved. Such work practices shall protect employees against contact with energized circuit parts directly with any part of their body or indirectly through some other conductive object. The work practices that are used shall be suitable for the conditions under which the work is to be performed and for the voltage level of the exposed electric conductors or circuit parts. Specific work practice requirements are detailed in paragraph(c) of this section.

(a) On October 12, 2011, a maintenance employee performed trouble shooting/voltage testing on the conveyor system for the scrap on #2 (500 ton) Die Cast machine which was 208 VAC and electrical safety-related work practices were not employed such as the use of appropriate personal protective equipment when the tasks required electrical power to be present and could not be de-energized and locked out.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated: 05/08/2012
Proposed Penalty: \$5000.00



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

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

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

29 CFR 1910.332(b)(1): Employees were not trained in and familiar with the safety-related work practices required by 1910.331 through 1910.335 that pertained to their respective job assignments:

(a) Maintenance employees were not trained and not familiar with the appropriate personal protective equipment and special precautionary techniques, insulating and shielding materials, and insulated tools that are necessary when performing tasks such as trouble shooting and voltage testing.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated: 05/08/2012
Proposed Penalty: \$55000.00

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

29 CFR 1910.333(c)(2): Qualified persons were not capable of working safely on energized circuits and were not familiar with the proper use of special precautionary techniques, personal protective equipment, insulating and shielding materials, and insulated tools:

(a) Maintenance employees were not capable of working safely on energized circuits to perform voltage testing and troubleshooting as they were not familiar with the proper use of special precautionary techniques, personal protective equipment, insulating and shielding materials, and insulated tools.



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated: 05/08/2012

Citation 2 Item 2 Type of Violation: **Willful - Serious**

29 CFR 1910.335(a)(1)(i): Employees working in areas where there were potential electrical hazards were not provided with electrical protective equipment that was appropriate for the specific parts of the body that needed to be protected and for the work being performed:

(a) On October 12, 2011 and prior to that time, maintenance employee(s) that performed troubleshooting and voltage testing were not provided with and did not use electrically insulated gloves and arc rated face shields.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date by which Violation must be Abated: 05/08/2012
Proposed Penalty: \$55000.00



Citation and Notification of Penalty

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107

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

29 CFR 1910.146(f): The entry permit that documented compliance with this section and authorized entry into a permit space did not identify the requirements in (f)(1)-(15) of this section:

- (a) The entry permits used confusing wording and personnel categories that are not in the regulation or standard such as, but not limited to, "Person in charge" and "Job Supervisor" instead of "Entry Supervisor" and did not have a space to identify the entrant.
- (b) The entry permit from 2/16/11 for entry into the Broach pit Rack line #2, was erroneously filled out, in that it had the same person listed as "Person in charge", the "Stand-by person", who was also the person who was the entrant. Also, there were no atmospheric checks recorded, only "N/A" with a line marked down below it, when monitoring checks were made with a four gas meter.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET)

Date by which Violation must be Abated: 05/08/2012
Proposed Penalty: \$.00

A handwritten signature in cursive script that reads "William Wilkerson".

William Wilkerson
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
36 Triangle Park Drive
Cincinnati, OH 45246
Phone: 513-841-4132 Fax: 513-841-4114



INVOICE / DEBT COLLECTION NOTICE

Company Name: American Showa, Inc.
Inspection Site: 960 Cherry St., Blanchester, OH 45107
Issuance Date: 03/27/2012

Summary of Penalties for Inspection Number	107482
Citation 1, Serious	\$38000.00
Citation 2, Willful - Serious	\$110000.00
Citation 3, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES	\$148000.00

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

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

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

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

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

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

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

William Wilkerson

William Wilkerson

Area Director

March 27, 2012

Date