

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
690 S. Loop 336 West  
Suite 400  
Conroe, TX 77304



## Citation and Notification of Penalty

**To:**  
Genan Inc.  
and its successors  
P.O. Box 24187  
Houston, TX 77229

**Inspection Number:** 1291035  
**Inspection Date(s):** 01/27/2018 - 05/11/2018  
**Issuance Date:** 07/11/2018

**Inspection Site:**  
18038 Beaumont Hwy.  
Houston, TX 77049

*The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.*

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty **you either call to schedule an informal conference (see paragraph below) or** you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

**Posting** - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

**Informal Conference** - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling 936-760-3800. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

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

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

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

**Penalty Payment** – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically on [www.pay.gov](http://www.pay.gov). On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>.

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

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

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

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

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

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



## NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 07/11/2018. The conference will be held by telephone or at the OSHA office located at 690 S. Loop 336 West, Suite 400, Conroe, TX 77304 on \_\_\_\_\_ at \_\_\_\_\_.

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

## CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

**Inspection Number: 1291035**

Company Name: Genan Inc.

Inspection Site: 18038 Beaumont Hwy., Houston, TX 77049

Issuance Date: 07/11/2018

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, 690 S. Loop 336 West, Suite 400, Conroe, TX 77304**

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:** Genan Inc.

**Inspection Site:** 18038 Beaumont Hwy., Houston, TX 77049

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

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish to each of his employees employment and a place of employment which are free from the recognized hazards which are causing or likely to cause death or serious physical harm to employees in that employees were exposed to dust explosion, deflagration and fire hazards caused by equipment used to recycle tires:

- a) On or about January 26, 2018, at the facility where employees were exposed to dust explosion, deflagration and fire hazards when the air material separators (filters) located inside the building were not protected from explosion hazards.
- b) On or about January 26, 2018, at the facility where employees were exposed to dust explosion, deflagration and fire hazards when the granulators did not have isolation devices to prevent deflagration.
- c) On or about January 26, 2018, at the facility where employees were exposed to dust explosion deflagration, and fire hazards when the air material separators (filters) did not have an isolation device to prevent a deflagration from traveling upstream.
- a) Among feasible methods to correct the identified hazard, one method would be to protect the air material separators by containment, suppression, or explosion venting per 2013 NFPA 654: Standard for the Prevention of Fire and Dust Explosions from the Manufacturing, Processing, and Handling of Combustible Particulate Solids, Section 7.1.4.1.
- b) Among feasible methods to correct the identified hazard, one method would be to install isolation devices between connected equipment in accordance with NFPA 69, Standard on Explosion Prevention System per 2013 NFPA 654: Standard for the Prevention of Fire and Dust Explosions from the Manufacturing, Processing, and Handling of Combustible Particulate Solids, Section 7.1.6., and 7.1.7.

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

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- c) Among feasible methods to correct the identified hazard, one method would be to install an isolation device per 2013 NFPA 654: Standard for the Prevention of Fire and Dust Explosions from the Manufacturing, Processing, and Handling of Combustible Particulate Solids, Section 7.13.1.4.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

**Date By Which Violation Must be Abated:**

**08/27/2018**

**Proposed Penalty:**

**\$11641.00**

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

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**Company Name:** Genan Inc.

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

29 CFR 1910.28(b)(1)(i): The employer did not ensure that each employee on a walking-working surface with an unprotected side or edge that was 4 feet (1.2 m) or more above a lower level was protected from falling by one or more of the following: Guardrail systems, safety net systems, or personal fall arrest systems:

On or about January 26, 2018, and times thereafter, in the granulating area where employees were exposed to a fall hazard greater than 4 feet without a fall protection system on the granulator metal separators.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

**Date By Which Violation Must be Abated:**

**08/06/2018**

**Proposed Penalty:**

**\$11641.00**

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

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

29 CFR 1910.29(b)(1): The top edge height of top rails, or equivalent guardrail system members, were not 42 inches, plus or minus 3 inches, above the walking-working surface:

On or about January 18, 2018, between filter #2 and filter #3 where employees were exposed to a fall hazard when the guardrail system between the filters had a top rail less than 42 inches in height.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	08/06/2018
Proposed Penalty:	\$11641.00

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

29 CFR 1910.29(b)(2): Midrails, screens, mesh, intermediate vertical members, solid panels or equivalent intermediate members were not installed between the walking/working surface and the top edge of the guardrail system as follows when there is not a wall or a parapet that is at least 21 inches.

On or about January 18, 2018, between filter #2 and filter #3 where employees were exposed to a fall hazard when the guardrail system between the filters was not equipped with a midrail or equivalent.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

**Date By Which Violation Must be Abated:** 08/06/2018

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

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

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

During February and March 2018, in the granulator area where an employee was required to wear a 3M 6503 half-face respirator with P100 filters while performing cleaning tasks without a medical evaluation.

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$6652.00

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

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**Company Name:** Genan Inc.  
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**Citation 1 Item 4 b Type of Violation: **Serious****

29 CFR 1910.134(f)(2): Employee(s) using tight-fitting facepiece respirators were not fit tested prior to initial use of the respirator:

During February and March 2018, at the facility where employees were required to wear a 3M 6503 half-face respirator with P100 filters while performing cleaning tasks without a respirator fit test.

**Date By Which Violation Must be Abated:**

**08/06/2018**

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**Company Name:** Genan Inc.  
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**Citation 1 Item 5** Type of Violation: **Serious**

29 CFR 1910.146(c)(1): The employer did not evaluate the workplace to determine if any spaces were permit-required confined spaces:

- a) On or about January 26, 2018, in the shredding area where employees were exposed to caught-in hazards when entering the tire shredder without evaluating the shredder as a permit required confined space.
- b) During January 2018, in the shredding area where employees were exposed to caught-in hazards when entering the hopper/wash bay without evaluating the hopper/wash bay as permit required confined space.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	08/06/2018
Proposed Penalty:	\$11641.00

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

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**Company Name:** Genan Inc.  
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**Citation 1 Item 6** Type of Violation: **Serious**

29 CFR 1910.146(d)(2): Under the permit-required confined space program required by 29 CFR 1910.146(c)(4), the employer did not identify and evaluate the hazards of permit spaces before employees entered:

On or about April 21, 2018 and times prior to, at the facility where employees were exposed to inhalation, fire, and fall hazards when entering filters for filter sock replacement without identifying and evaluating the hazards of the space.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

**Date By Which Violation Must be Abated:**  
**Proposed Penalty:**

**08/06/2018**  
**\$11641.00**

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**Company Name:** Genan Inc.  
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**Citation 1 Item 7** Type of Violation: **Serious**

29 CFR 1910.146(d)(3): Under the permit-required confined space program required by 29 CFR 1910.146(c)(4), the employer did not develop and implement the means, procedures, and practices necessary for safe permit space entry operations, including, but not limited to items (3)(i) through (3)(vi) of this paragraph:

On or about April 21, 2018 and times prior to, at the facility where employees were exposed to inhalation, fire, and fall hazards when entering filters for filter sock replacement without developing and implementing procedures for safe entry.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	08/06/2018
Proposed Penalty:	\$11641.00

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

29 CFR 1910.146(d)(6): Under the permit-required confined space program required by 29 CFR 1910.146(c)(4), the employer did not provide at least one attendant outside the permit space into which entry was authorized for the duration of entry operations:

On or about April 21, 2018 and times prior to, at the facility where employees were exposed to inhalation, fire, and fall hazards when entering filters for filter sock replacement without providing an attendant.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	08/06/2018
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**Citation 1 Item 9**    Type of Violation: **Serious**

29 CFR 1910.146(d)(9): Under the permit-required confined space program required by 29 CFR 1910.146(c)(4), the employer did not develop and implement procedures for summoning rescue and emergency services, for rescuing entrants from permit spaces to rescued employees, and for preventing unauthorized personnel from attempting a rescue.

On or about April 21, 2018 and times prior to, at the facility where employees were exposed to inhalation, fire, and fall hazards when entering filters for filter sock replacement without developing procedures for summoning rescue and preventing unauthorized personnel from attempting rescue.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	08/06/2018
Proposed Penalty:	\$11641.00

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

29 CFR 1910.146(h)(1): The employer did not ensure that all authorized entrants knew the hazards that could be faced during entry, including information on the mode, sign or symptoms, and consequences of the exposure:

On or about April 21, 2018 and times prior to, at the facility where employees were exposed to inhalation, fire, and fall hazards when entering filters for filter sock replacement without knowing the hazards that could be faced when entering filters.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

<b>Date By Which Violation Must be Abated:</b>	<b>08/06/2018</b>
<b>Proposed Penalty:</b>	<b>\$11641.00</b>

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

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**Company Name:** Genan Inc.  
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**Citation 1 Item 11** Type of Violation: **Serious**

29 CFR 1910.147(c)(4)(ii)(B): The energy control procedures did not clearly and specifically outline the steps for shutting down, isolating, blocking and securing machines or equipment to control hazardous energy.

On or about January 26, 2018, at the facility where employees were exposed to amputation and caught-in hazards when performing service and maintenance tasks on equipment such as, but not limited to, the shredders without clearly and specifically identifying the procedural steps for controlling the hazardous energy.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	08/06/2018
Proposed Penalty:	\$11641.00

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

29 CFR 1910.147(c)(6)(i): The employer did not conduct an annual or more frequent inspection of the energy control procedure to ensure that the procedure and requirements of this standard were followed:

On or about January 26, 2018, at the facility where employees were exposed to amputation and caught-in hazards when performing servicing and maintenance tasks on equipment such as, but not limited to, the shredders and granulators without conducting an annual inspection of the energy control procedures.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

<b>Date By Which Violation Must be Abated:</b>	<b>08/06/2018</b>
<b>Proposed Penalty:</b>	<b>\$11641.00</b>

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

29 CFR 1910.147(c)(7)(i)(A): Authorized employee(s) did not receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control:

On or about January 26, 2018, at the facility where a shredder operator was exposed to amputation and caught-in hazards when performing servicing tasks such as, but not limited to, clearing tire jams without receiving elements of authorized employee training.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	08/06/2018
Proposed Penalty:	\$11641.00

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

29 CFR 1910.147(d)(2): The machine or equipment was not turned off or shut down using the procedures established for the machine or equipment:

On or about January 26, 2018, at the facility where employees were exposed to amputation and caught-in hazards while performing service and maintenance tasks on equipment such as, but not limited to, shredders without de-energizing according to established procedures.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

**Date By Which Violation Must be Abated:**

**08/06/2018**

**Proposed Penalty:**

**\$11641.00**

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**Citation 1 Item 15** 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):

On or about February 7, 2018 and times prior to, at the facility where employees were exposed to amputation and caught-in hazards when performing service and maintenance tasks on equipment such as, but not limited to, shredders and granulators without using the energy isolating devices.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	08/06/2018
Proposed Penalty:	\$11641.00

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

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

**Inspection Number:** 1291035  
**Inspection Date(s):** 01/27/2018 - 05/11/2018  
**Issuance Date:** 07/11/2018



**Citation and Notification of Penalty**

**Company Name:** Genan Inc.

**Inspection Site:** 18038 Beaumont Hwy., Houston, TX 77049

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**Citation 1 Item 16** 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:

On or about January 26, 2018 and times prior to, at the facility where employees were exposed to amputation and caught-in hazards when performing service and maintenance tasks on equipment such as, but not limited to, the shredders without affixing a lockout or tagout device at the disconnect.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

08/06/2018

Proposed Penalty:

\$11641.00

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



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

**Inspection Number:** 1291035  
**Inspection Date(s):** 01/27/2018 - 05/11/2018  
**Issuance Date:** 07/11/2018



**Citation and Notification of Penalty**

**Company Name:** Genan Inc.  
**Inspection Site:** 18038 Beaumont Hwy., Houston, TX 77049

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

29 CFR 1910.147(f)(3)(ii)(D): Each authorized employee did not affix a personal lockout or tagout device to the group lockout device before working on the machine or equipment:

On or about January 25, 2018, at the facility where employees were exposed to amputation and caught-in hazards while performing service and maintenance tasks on equipment such as, but not limited to, shredders without each authorized employee affixing a personal lockout or tagout device.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

<b>Date By Which Violation Must be Abated:</b>	<b>08/06/2018</b>
<b>Proposed Penalty:</b>	<b>\$11641.00</b>

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

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

**Inspection Number:** 1291035  
**Inspection Date(s):** 01/27/2018 - 05/11/2018  
**Issuance Date:** 07/11/2018



**Citation and Notification of Penalty**

**Company Name:** Genan Inc.  
**Inspection Site:** 18038 Beaumont Hwy., Houston, TX 77049

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

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

On or about January 26, 2018, in the shredding area where employees were exposed to caught-in hazards while operating tire shredders with the light curtain reset located adjacent to the tire shredders.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/06/2018  
\$11641.00

A handwritten signature in cursive script, reading "Joann J. Figueroa".

**Joann J. Figueroa**  
Area Director

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