

U.S. Department of Labor

Occupational Safety and Health Administration
299 Cherry Hill Road
Suite 103
Parsippany, NJ 07054
Phone: 973-263-1003 Fax: 973-299-7161



Citation and Notification of Penalty

To:
NATIONAL MANUFACTURING CO., INC
and its successors
12 RIVER ROAD
Chatham, NJ 07928

Inspection Number: 1122937
Inspection Date(s): 02/01/2016 - 02/01/2016
Issuance Date: 07/25/2016

Inspection Site:
12 RIVER ROAD
Chatham, NJ 07928

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

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

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

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

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

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

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

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically on 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. 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 07/25/2016. The conference will be held by telephone or at the OSHA office located at 299 Cherry Hill Road, Suite 103, Parsippany, NJ 07054 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1122937

Company Name: NATIONAL MANUFACTURING CO., INC

Inspection Site: 12 RIVER ROAD, Chatham, NJ 07928

Issuance Date: 07/25/2016

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 299 Cherry Hill Road, Suite 103, Parsippany, NJ 07054**

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

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

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

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

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

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

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

Signature

Date

Typed or Printed Name

Title

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

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



Citation and Notification of Penalty

Company Name: NATIONAL MANUFACTURING CO., INC
Inspection Site: 12 RIVER ROAD, Chatham, NJ 07928

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

29 CFR 1910.22(a)(2): Floor(s) of workroom(s) were not maintained in a clean and, so far as possible, a dry condition.

a) Work site was located at 12 River Road, Chatham, NJ 07928

Employees were exposed to slip / fall hazards in that the production area identified as the Small Transfer Area - Power Press Room had oil on the floor in the work spaces around the presses.

Violation was observed on or about 2/3/2016.

b) Work site was located at 12 River Road, Chatham, NJ 07928

Employees were exposed to slip / fall hazards in that the production area identified as H15 had a leak containment system that was leaking water on the production floor.

Violation was observed on or about 2/3/2016.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$5400.00



Citation and Notification of Penalty

Company Name: NATIONAL MANUFACTURING CO., INC
Inspection Site: 12 RIVER ROAD, Chatham, NJ 07928

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

29 CFR 1910.23(c)(1): Open-sided floors and/or platforms four feet or more above adjacent floor or ground level were not guarded with standard railings (or equivalent) and toeboards.

a) Work site was located at 12 River Road, Chatham, NJ 07928.

Employees were exposed to fall hazards in the area of H15 where the heater control unit is located on top of a utility room. The filters have to be changed on the unit and there are no guardrails to protect employees who work in that area from the 8 foot fall exposure.

Violation was observed on or about 2/3/2016.

b) Work site was located at 12 River Road, Chatham, NJ 07928.

Employees were exposed to fall hazards in the degreaser room next to the D4 where an elevated platform used for material storage had a floor height that was 5 feet above ground level and the platform had no guardrails in place exposing employees to a fall to the concrete floor below.

Violation was observed on or about 2/3/2016.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

08/04/2016
\$6300.00



Citation and Notification of Penalty

Company Name: NATIONAL MANUFACTURING CO., INC
Inspection Site: 12 RIVER ROAD, Chatham, NJ 07928

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

29 CFR 1910.124(i)(2): An employee was permitted to clean the interior of the dip tank before pockets where hazardous vapors may have accumulated were ventilated and cleared.

a) Work site was located at 12 River Road, Chatham, NJ 07928.

Employees were exposed to fire hazards as a result of a flash fire that occurred while an employee was cleaning out the still of Degreaser D1 when a drop light broke causing vapors to ignite and burn the employee.

Violation occurred on or about 1/29/2016.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

08/04/2016
\$7000.00



Citation and Notification of Penalty

Company Name: NATIONAL MANUFACTURING CO., INC

Inspection Site: 12 RIVER ROAD, Chatham, NJ 07928

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

29 CFR 1910.125(e)(1)(ii): Flames, spark-producing devices, or other surfaces that were hot enough to ignite vapors were not controlled in each vapor area and any adjacent area.

a) Work site was located at 12 River Road, Chatham, NJ 07928.

Employees were exposed to fire hazards as a result of a fire that occurred during a forced cycle on the carbon filter of the Degreaser D1 system. Regular maintenance on the carbon filter failed to identify and correct the corrosion issues that created the vent holes in the system that eventually failed igniting the system on fire.

Violation occurred on or about 2/9/2016.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

08/04/2016

Proposed Penalty:

\$7000.00



Citation and Notification of Penalty

Company Name: NATIONAL MANUFACTURING CO., INC
Inspection Site: 12 RIVER ROAD, Chatham, NJ 07928

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

29 CFR 1910.141(g)(4): Food or beverages were stored in area(s) exposed to toxic material.

a) Work site was located at 12 River Road, Chatham, NJ 07928.

Employees were exposed to chemical hazards in that they were being allowed to store their lunch bags, thermoses and personal effects such as cell phones on the ALMCO Vibratory Deburring Finishing Machine Tumblers, Model SR-2, in the Degreaser Room. The Tumblers use Chemtrol 224 to finish the parts and Chemtrol lists first aid measures for skin contact, inhalation and ingestion.

Violation was observed on or about 2/1/2016.

Date By Which Violation Must be Abated:
Proposed Penalty:

08/04/2016
\$5400.00



Citation and Notification of Penalty

Company Name: NATIONAL MANUFACTURING CO., INC
Inspection Site: 12 RIVER ROAD, Chatham, NJ 07928

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

29 CFR 1910.151(c): Where employees were exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body were not provided within the work area for immediate emergency use.

a) Work site was located at 12 River Road, Chatham, NJ 07928.

Employees were exposed to physical hazards in that there was no eye wash in the eye wash station in the tool room. Corrosive chemicals such as Dynamatic are present in the facility.

Violation was observed on or about 2/3/2016.

b) Work site was located at 12 River Road, Chatham, NJ 07928.

Employees were exposed to physical hazards as a result of exposure to a hand pump used to transfer the chemical Dynamatic to smaller containers that was covered in Dynamatic which is highly corrosive material. A decontamination shower is not readily available for employee use.

Violation was observed on or about 2/3/2016.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

08/04/2016
\$6300.00



Citation and Notification of Penalty

Company Name: NATIONAL MANUFACTURING CO., INC
Inspection Site: 12 RIVER ROAD, Chatham, NJ 07928

Citation 1 Item 7 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).

a) Work site was located at 12 River Road, Chatham, NJ 07928.

Employees were exposed to caught in hazards in the form of a LeBlond Engine Lathe in the Power Press Room identified by the designator L2 that was missing its guard at the point of operation.

Violation was observed on or about 2/3/2016.

Date By Which Violation Must be Abated:
Proposed Penalty:

08/04/2016
\$5400.00



Citation and Notification of Penalty

Company Name: NATIONAL MANUFACTURING CO., INC
Inspection Site: 12 RIVER ROAD, Chatham, NJ 07928

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

29 CFR 1910.303(g)(2)(i): Except as elsewhere required or permitted by Subpart S of Part 1910, live parts of electric equipment operating at 50 volts or more were not guarded against accidental contact by use of approved cabinets or other forms of approved enclosures or by any of the means identified in paragraphs (A), (B), (C), and (D) of 29 CFR 1910.303(g)(2)(i).

a) Work site was located at 12 River Road, Chatham, NJ 07928.

Employees were exposed to electrical hazards as an electrical junction box on the D1 Degreaser had a cover that did not fit the enclosure on it exposing live wiring to incidental contact.

Violation was observed on or about 2/1/2016.

b) Work site was located at 12 River Road, Chatham, NJ 07928.

Employees were exposed to electrical hazards as electrical wiring between the D4 Degreaser and equipment storage riser in the Degreaser Room had no conduit to protect the wiring exposing live wiring to incidental contact.

Violation was observed on or about 2/1/2016.

c) Work site was located at 12 River Road, Chatham, NJ 07928.

Employees were exposed to electrical hazards as the electrical outlet box on the ALMCO VB - 1631 Batch Vibratory Tub, S/N 079118 and designated as VF - 4, was not properly secured and could easily be opened exposing the live contacts.

Violation was observed on or about 2/1/2016.

Date By Which Violation Must be Abated:
Proposed Penalty:

08/04/2016
\$3600.00

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: 1122937
Inspection Date(s): 02/01/2016 - 02/01/2016
Issuance Date: 07/25/2016



Citation and Notification of Penalty

Company Name: NATIONAL MANUFACTURING CO., INC
Inspection Site: 12 RIVER ROAD, Chatham, NJ 07928

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

29 CFR 1910.304(b)(3)(ii)(C)(3): Each cord set, attachment cap, plug, and receptacle of cord sets, and any equipment connected by cord and plug, except cord sets and receptacles which are fixed and not exposed to damage, shall be visually inspected before each day's use for external defects, such as deformed or missing pins or insulation damage, and for indications of possible internal damage. Equipment found damaged or defective shall not be used until repaired.

a) Work site was located at 12 River Road, Chatham, NJ 07928.

Employees were exposed to electrical hazards in that a recirculation fan being used on the work platform of the D1 Degreaser was missing its ground pin in its plug.

Violation was observed on or about 2/1/2016.

Date By Which Violation Must be Abated:
Proposed Penalty:

08/04/2016
\$3600.00

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

Kris Hoffman
Area Director

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
299 Cherry Hill Road
Suite 103
Parsippany, NJ 07054
Phone: 973-263-1003 Fax: 973-299-7161



INVOICE / DEBT COLLECTION NOTICE

Company Name: NATIONAL MANUFACTURING CO., INC
Inspection Site: 12 RIVER ROAD, Chatham, NJ 07928
Issuance Date: 07/25/2016

Summary of Penalties for Inspection Number	1122937
Citation 1, Serious	\$50000.00
TOTAL PROPOSED PENALTIES	\$50000.00

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. You can also make your payment electronically on 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 cash the check or money order as if these restrictions or conditions do not exist.

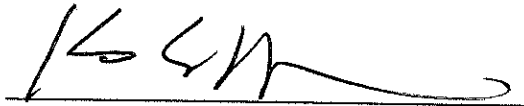
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 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.



Kris Hoffman

Area Director

7/25/2016
Date