

U.S. Department of Labor

Occupational Safety and Health Administration
1600 167th Street, Suite 9
Calumet City, Illinois 60409
PHONE (708) 891-3800 FAX (708) 862-9659
Website www.osha.gov



07/10/2012

Raani Corporation
5202 West 70th Place
Bedford Park, IL 60638
Attention: Muhammed Khalid

Inspection #191970

Dear Mr. Khalid:

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

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

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

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

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

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

Under a law passed by Congress in 1996, the Small Business Administration (SBA) has established an SBA Ombudsman and SBA Regional Fairness Boards to investigate small business complaints about federal agency enforcement actions.

If you are a small business and believe you have been treated unfairly by the Occupational Safety and Health Administration (OSHA), you may file a written, signed complaint with the SBA Ombudsman at:


SBA Office of the National Ombudsman
409 3rd Street, SW
MC 2120
Washington, D.C. 20416

Or, call Toll Free: 1-888-REGFAIR

NOTE: Filing a complaint with the SBA Ombudsman does not affect any obligation you may have to comply with an OSHA citation or other enforcement actions.

You support of occupational safety and health is appreciated.

Sincerely,



Gary J. Anderson
Area Director

Enclosures

U.S. Department of Labor

Occupational Safety and Health Administration
1600 167th Street,
Suite 9,
Calumet City, IL 60409
Phone: 708-891-3800 Fax: 708-862-9659



Citation and Notification of Penalty

To:

Raani Corporation
5202 West 70th Place,
Bedford Park, IL 60638

Inspection Number: 191970**Inspection Date(s):** 02/16/2012 - 05/02/2012**Issuance Date:** 07/10/2012**Inspection Site:**

5202 West 70th Place
Bedford Park, IL 60638

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

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

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

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

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

If you decide to request an informal conference, please complete, remove and post the 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. 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 07/10/2012. The conference will be held at the OSHA office located at 1600 167th Street,, Calumet City, IL 60409 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.

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

Inspection Number: 191970
Inspection Date(s): 02/16/2012 - 05/02/2012
Issuance Date: 07/10/2012



Citation and Notification of Penalty

Company Name: Raani Corporation
Inspection Site: 5202 West 70th Place, Bedford Park, IL 60638

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 1 a Type of Violation: **Serious**

29 CFR 1910.147(c)(6)(i): The employer shall conduct a periodic inspection of the energy control procedure at least annually to ensure that the procedure and the requirements of this standard are being followed.

Throughout facility - On or about February 16, 2012, the employer had not performed periodic inspections to ensure that documented lockout/tagout procedures were being followed by authorized employees.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

| | |
|---|------------|
| Date by which Violation must be Abated: | 07/31/2012 |
| Proposed Penalty: | \$5400.00 |

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

29 CFR 1910.147(c)(7)(i): The employer shall provide training to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees. The training shall include the following:

Throughout facility - On or about February 16, 2012, the employer did not provide effective training to affected, and other (temporary) employees to include all of the elements in (a) through (c), thereby exposing employees to the hazards associated with unexpected re-energization of equipment.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

| | |
|---|------------|
| Date by which Violation must be Abated: | 08/21/2012 |
|---|------------|

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

Inspection Number: 191970
Inspection Date(s): 02/16/2012 - 05/02/2012
Issuance Date: 07/10/2012



Citation and Notification of Penalty

Company Name: Raani Corporation
Inspection Site: 5202 West 70th Place, Bedford Park, IL 60638

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

29 CFR 1910.178(q)(7): Industrial trucks shall be examined before being placed in service, and shall not be placed in service if the examination shows any condition adversely affecting the safety of the vehicle. Such examination shall be made at least daily. Where industrial trucks are used on a round-the-clock basis, they shall be examined after each shift. Defects when found shall be immediately reported and corrected.

Throughout facility - On or about February 16, 2012, the employer did not perform an examination of the power industrial truck to check for defects after each shift, thereby exposing employees to serious struck by hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated: 07/31/2012
Proposed Penalty: \$5400.00

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

29 CFR 1910.212(a)(1): Types of guarding. One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks. Examples of guarding methods are-barrier guards, two-hand tripping devices, electronic safety devices, etc.

a. Maintenance Department - On or about February 16, 2012, machine guarding was not affixed to the Jet horizontal band saw, Serial # RF2929S, thereby exposing employees to the unused portion of the blade.

b. Maintenance Department - On or about February 16, 2012, machine guarding was not affixed to the Powermatic vertical bandsaw, model # 143, serial number 3-1026, thereby exposing employees to the unused portions of the blade at the top and bottom of the equipment.

c. Packaging Department - On or about February 16, 2012, machine guarding was not affixed to the Jet horizontal bandsaw, Serial # WJ2626, thereby exposing employees to the unused portion of the blade.

Date by which Violation must be Abated: Corrected During Inspection
Proposed Penalty: \$6300.00

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

Inspection Number: 191970
Inspection Date(s): 02/16/2012 - 05/02/2012
Issuance Date: 07/10/2012



Citation and Notification of Penalty

Company Name: Raani Corporation
Inspection Site: 5202 West 70th Place, Bedford Park, IL 60638

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

29 CFR 1910.213(d)(1): Each circular crosscut table saw shall be guarded by a hood which shall meet all the requirements of paragraph (c)(1) of this section for hoods for circular ripaws.

Maintenance Department - On or about February 16, 2012, the employer failed to completely enclose the Delta Arbor Saw Model # 10T, thereby exposing employees to amputation type injuries.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

| | |
|---|------------|
| Date by which Violation must be Abated: | 07/31/2012 |
| Proposed Penalty: | \$5400.00 |

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

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

29 CFR 1910.215(a)(4): Work rests. On offhand grinding machines, work rests shall be used to support the work. They shall be of rigid construction and designed to be adjustable to compensate for wheel wear. Work rests shall be kept adjusted closely to the wheel with a maximum opening of one-eighth inch to prevent the work from being jammed between the wheel and the rest, which may cause wheel breakage. The work rest shall be securely clamped after each adjustment. The adjustment shall not be made with the wheel in motion.

Maintenance Department - On or about February 16, 2012, the distance between the abrasive wheel and the adjustable work rest on the Motor city 8 inch bench grinder, model # SBG 200tl, exceeded one-eighth inch, thereby exposing employees to the hazards associated with rotating abrasive wheels and wheel breakage.

| | |
|---|-----------------------------|
| Date by which Violation must be Abated: | Corrected During Inspection |
| Proposed Penalty: | \$3600.00 |

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

Inspection Number: 191970
Inspection Date(s): 02/16/2012 - 05/02/2012
Issuance Date: 07/10/2012



Citation and Notification of Penalty

Company Name: Raani Corporation
Inspection Site: 5202 West 70th Place, Bedford Park, IL 60638

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

29 CFR 1910.215(b)(9): Exposure adjustment. Safety guards of the types described in Subparagraphs (3) and (4) of this paragraph, where the operator stands in front of the opening, shall be constructed so that the peripheral protecting member can be adjusted to the constantly decreasing diameter of the wheel. The maximum angular exposure above the horizontal plane of the wheel spindle as specified in paragraphs (b)(3) and (4) of this section shall never be exceeded, and the distance between the wheel periphery and the adjustable tongue or the end of the peripheral member at the top shall never exceed one-fourth inch. (See Figures O-18, O-19, O-20, O-21, O-22, and O-23.)

Maintenance Department - On or about February 16, 2012, the distance between the abrasive wheel periphery and the adjustable tongue at the top of the Motor city 8 inch grinder, model # SBG200tl, exceeded one-fourth inch, thereby exposing employees to the hazards associated with wheel breakage.

Date by which Violation must be Abated:

Corrected During Inspection

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 6 a Type of Violation: **Serious**

29 CFR 1910.219(d)(1): Guarding. Pulleys, any parts of which are seven (7) feet or less from the floor or working platform, shall be guarded in accordance with the standards specified in paragraphs (m) and (o) of this section. Pulleys serving as balance wheels (e.g., punch presses) on which the point of contact between belt and pulley is more than six feet six inches (6 ft. 6 in.) from the floor or platform may be guarded with a disk covering the spokes.

Maintenance Department - On or about February 16, 2012, the pulleys on the Delta sander, model # 31340 serial # P9320, were not guarded completely, thereby exposing employees to the hazards associated with moving parts.

Date by which Violation must be Abated:

Corrected During Inspection

Proposed Penalty:

\$3600.00



Citation and Notification of Penalty

Company Name: Raani Corporation

Inspection Site: 5202 West 70th Place, Bedford Park, IL 60638

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

29 CFR 1910.219(e)(1)(i): Where both runs of horizontal belts are seven (7) feet or less from the floor level, the guard shall extend to at least fifteen (15) inches above the belt or to a standard height, except that where both runs of a horizontal belt are 42 inches or less from the floor, the belt shall be fully enclosed in accordance with paragraphs (m) and (o) of this section.

Maintenance Department - On or about February 16, 2012, the belts on the Delta sander, model # 31340 Serial # P9320, were not guarded completely, thereby exposing employees to the hazards associated with moving parts.

Date by which Violation must be Abated:

Corrected During Inspection

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

29 CFR 1904.29(b)(1): A Log of all recordable work-related injuries and illnesses (OSHA Form 300 or equivalent), was not completed in detail as required by the regulation:

Recordkeeping - On or about February 16, 2012, at the above located workplace, the employer's OSHA 300 form for 2012, was not completed in detail as required by 1904.4 through 1904.12. In that:

- a. The OSHA log for 2012 did not include what directly injured or made the person ill.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date by which Violation must be Abated:

07/31/2012

Proposed Penalty:

\$900.00

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

Gary J. Anderson
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
1600 167th Street,
Suite 9,
Calumet City, IL 60409
Phone: 708-891-3800 Fax: 708-862-9659



INVOICE / DEBT COLLECTION NOTICE

Company Name: Raani Corporation
Inspection Site: 5202 West 70th Place, Bedford Park, IL 60638
Issuance Date: 07/10/2012

| | |
|---|-------------------|
| Summary of Penalties for Inspection Number | 191970 |
| Citation 1, Serious | \$29700.00 |
| Citation 2, Other-than-Serious | \$900.00 |
| TOTAL PROPOSED PENALTIES | \$30600.00 |

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.

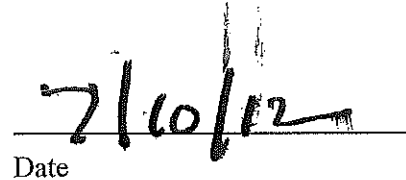
Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per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



Gary J. Anderson

Area Director



Date

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 191970

Company Name: Raani Corporation
Inspection Site: 5202 West 70th Place, Bedford Park, IL 60638
Issuance Date: 07/10/2012

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, 1600 167th Street,, Suite 9, Calumet City, IL 60409**

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