U.S. Department of Labor
Occupational Safety and Health Administration
420 Madison Ave
Suite 600
Toledo, OH 43604
Phone: 419-259-7542 Fax: 419-259-6355

Citation and Notification of Penalty

To:
Republic Steel
and its successors
1807 E. 28TH ST.
Lorain, OH 44055

Inspection Number: 941464
Inspection Date(s): 09/16/2013 - 12/17/2013
Issuance Date: 03/10/2014

Inspection Site:
1807 E. 28TH ST.
Lorain, OH 44055

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 $50,000 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.

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

NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 03/10/2014. The conference will be held by telephone or at the OSHA office located at 420 Madison Ave, Suite 600, Toledo, OH 43604 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 941464

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055
Issuance Date: 03/10/2014

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, 420 Madison Ave, Suite 600, Toledo, OH 43604**

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: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

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

Section (5)(a)(1) of the Occupational Safety and Health Act of 1970: The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to crushing injuries from falling equipment due to the lack of safety latches present on the wire rope rigging equipment.

a) On or about September 18, 2013, the employer did not ensure that employees were protected from struck by and crushing hazards while using wire rope lifting devices that were not equipped with safety latches when performing roll change outs in the Rolling Mill.

Among other methods, a feasible method to correct this hazard would be to follow the American Society of Mechanical Engineers (ASME) B30.10-2009 "Hooks"- Section 10 - Hooks: Selection, Use and Maintenance as applicable.

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:	03/17/2014
Proposed Penalty:	$5,500.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

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):

a) The employer does not ensure that employees are protected from fall hazards while accessing overhead cranes. This violation was most recently observed on September 18, 2013 on the boarding platform for crane B-3 in the billet yard. The operator boarding platform has gaps on the side guardrails of 13 1/2 inches, exposing the operator to a fall hazard of approximately 18 feet, 8 inches while accessing the crane.

b) The employer does not ensure that employees are protected from fall hazards while accessing overhead cranes. This violation was most recently observed on September 19, 2013 on the boarding platform for crane C-1 in the Shipping Department (Coil Bay). The operator boarding platform has gaps on the side guardrails of 14 - 15 inches, exposing the operator to a fall hazard of approximately 28 feet while accessing the crane.

c) The employer does not ensure that employees are protected from fall hazards while accessing overhead cranes. This violation was most recently observed on September 18, 2013 on the boarding platform for crane N-1 in the Shipping Department. The operator boarding platform has gaps on the side guardrails of 16 1/2 inches, exposing the operator to a fall hazard of approximately 19 feet, 3 inches while accessing the crane.

To abate this violation, the employer must ensure that fall protection is in place for employees accessing overhead cranes.

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/17/2014
Proposed Penalty:	$7,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

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

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

a) The employer does not ensure that personal protective equipment for the forearms is worn. This violation was most recently observed on September 26, 2013 by employees using the large pneumatic cutting gun to cut small diameter coils at the 10 inch coil line area. Employees are exposed to laceration and puncture hazards while manually breaking the coil after using the cutting gun to partially cut through the coil.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from laceration and puncture hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/31/2014
Proposed Penalty:	$3,300.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

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

29 CFR 1910.184(f)(1): The employer did not use only wire-rope slings that had permanently affixed and legible identification markings as prescribed by the manufacturer, and that indicated the recommended safe working load for the type(s) of hitch(es) used, the angle upon which it was based, and the number of legs if more than one.

a) On or about September 18, 2013, the employer did not ensure that employees were using wire rope slings which were marked as to the safe working load based on the type of hitch being used, the angle it was used, and the number of legs, while performing roll changes on the 20 inch roll stands in the Rolling Mill.

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:	03/17/2014
Proposed Penalty:	$5,500.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

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

29 CFR 1910.212(a)(3)(ii): The points of operation of machines whose operation exposes an employee to injury, are not guarded:

a) The employer does not ensure that employees are protected from amputation injuries. This violation was most recently observed on September 19, 2013, from the hydraulic crop shear on the east side of the Bar Mill in front of the operator's pulpit.

Abatement Note: To abate this violation, the employer must guard all points of operation and take steps to ensure that the guards remain in place while employees are in the area.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including a description of the actions it is taking to guard all points of operation and to ensure that guards remain in place.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/17/2014
Proposed Penalty:	$7,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

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

29 CFR 1910.23(a)(3): Every hatchway and chute floor opening is not guarded:

a) The employer does not ensure that employees are protected from fall hazards. The lack of fall protection was most recently observed on September 19, 2013 at the scrap chute located just north of the crop shear in front of the operator's pulpit in the Bar Mill. This unguarded floor opening exposes employees to fall hazards of approximately 9 feet, 4 inches down the scrap chute.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees working around open chutes and floor openings.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/17/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

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 2 a Type of Violation: **Willful**

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

a) The employer does not ensure that employees are protected from fall hazards. The lack of fall protection was most recently observed on September 19, 2013 in the area around the furnace load table in the billet yard. Fall hazards are approximately 76 inches to the pit below the table.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees working in the Bar Mill.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/11/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

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

29 CFR 1910.23(e)(1): Standard railing(s) do not consist of top rail, intermediate rail and/or posts and/or do not have a vertical height of 42 inches (106.7 cm) nominal from upper surface of top rail to floor, platform runway, or ramp level:

a) The employer does not ensure that employees are protected from fall hazards. The lack of fall protection was most recently observed on September 19, 2013 in the area around the furnace load table in the billet yard. Fall hazards are approximately 76 inches to the pit below the table.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees working in the Bar Mill.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 03/11/2014

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

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

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) The employer does not ensure that employees are protected from fall hazards associated with open-sided floors. The lack of fall protection was most recently observed on September 26, 2013 in the south hook to hook area. Employees in this area are exposed to fall hazards into an open-sided floor approximately 86 inches deep. The open-sided floor is along a pedestrian walkway and next to an operator's station.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees exposed to open-sided floor hazards.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/12/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

Citation 2 Item 4 Type of Violation: **Willful**

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

a) The employer does not ensure that employees are protected from fall hazards while accessing overhead cranes. The lack of fall protection was most recently observed on the catwalk for crane 10-3, just inside the east outside billet door in the Bar Mill, on September 18, 2013. This hazard exposes employees to fall hazards of approximately 26 feet, 8 inches.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees accessing overhead cranes.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/11/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

Citation 2 Item 5 Type of Violation: **Willful**

29 CFR 1910.23(c)(1): Every open-sided floor or platform 4 feet or more above adjacent floor or ground level are not guarded by a standard railings (or equivalent) and toeboards.

a) The employer does not ensure that employees are protected from fall hazards. The lack of fall protection was most recently observed on September 23, 2013, in the area around the 20 inch mill test man station located in the Rolling Mill. Fall hazards are approximately 9 feet 6 inches to the crop pit below the crop conveyor.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees working in the Rolling Mill.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/17/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

Citation 2 Item 6 Type of Violation: **Willful**

29 CFR 1910.23(c)(1): Open-sided floors and/or platforms 4 feet or more above adjacent floor or ground level are not guarded by a standard railing (or equivalent) and toeboards.

a) The employer does not ensure that crane operators are protected from fall hazards. The lack of fall protection was most recently observed on September 24, 2013, on the south scarfing crane also known as crane #22 located in the Rolling Mill. Fall hazards are approximately 24 feet 11 inches to the concrete below as crane operators access the steps on the end truck of the crane.

b) The employer does not ensure that maintenance employees are protected from fall hazards. The lack of fall protection was most recently observed on September 23, 2013, on the south scarfing crane also known as crane #22 located in the Rolling Mill. Fall hazards are approximately 24 feet 11 inches to the concrete below as maintenance employees access the steps on the end truck of the crane.

c) The employer does not ensure that maintenance employees are protected from fall hazards. The lack of fall protection was most recently observed on September 23, 2013, on the south scarfing crane also known as crane #22 located in the Rolling Mill. Fall hazards are approximately 24 feet 11 inches to the concrete below as maintenance employees walk down the bridge walkway of the crane to access the opposite end truck.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees working in the Rolling Mill.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/17/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

Citation 2 Item 7 Type of Violation: **Willful**

29 CFR 1910.23(c)(1): Open-sided floors and/or platforms 4 feet or more above adjacent floor or ground level are not guarded by a standard railing (or the equivalent) and toeboards.

a) The employer does not ensure that crane operators are protected from fall hazards. The lack of fall protection was most recently observed on September 19, 2013, on the east product crane located in the Rolling Mill. Fall hazards are approximately 28 feet from the crane access platform to the concrete below as employees access the end truck of the crane.

b) The employer does not ensure that crane maintenance employees are protected from fall hazards. The lack of fall protection was most recently observed on September 12, 2013, on the east product crane located in the Rolling Mill. Fall hazards are approximately 28 feet from the crane access platform to the concrete below as employees access the end truck of the crane.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees working in the Rolling Mill.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/17/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

Citation 2 Item 8 Type of Violation: **Willful**

29 CFR 1910.23(c)(1): Open-sided floors and/or platforms 4 feet or more above adjacent floor or ground level are not guarded by a standard railing (or the equivalent) and toeboards.

a) The employer does not ensure that crane operators are protected from fall hazards. The lack of fall protection was most recently observed on September 23, 2013, on the #6 wire crane located in the #6 building. Fall hazards are approximately 32 feet from the crane access platform to the concrete below as employees access the end truck of the crane.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees working in the #6 building.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/17/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

Citation 2 Item 9 Type of Violation: **Willful**

29 CFR 1910.23(c)(1): Open-sided floors and/or platforms 4 feet or more above adjacent floor or ground level are not guarded by a standard railing (or the equivalent) and toeboards.

a) The employer does not ensure that crane operators are protected from fall hazards. The lack of fall protection was most recently observed on September 23, 2013, on the #4 wire crane parked at the middle boarding station located in the Conditioning Building. Fall hazards are approximately 28 feet from the crane access platform to the concrete below as employees access the end truck of the crane.

b) The employer does not ensure that crane maintenance employees are protected from fall hazards. The lack of fall protection was most recently observed on September 24, 2013, on the #4 wire crane parked at the middle boarding station located in the Conditioning Building. Fall hazards are approximately 28 feet from the crane access platform to the concrete below as employees access the end truck of the crane.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees working in the Conditioning Building.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/17/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

Citation 2 Item 10 Type of Violation: **Willful**

29 CFR 1910.23(c)(1): Open-sided floors and/or platforms 4 feet or more above adjacent floor or ground level are not guarded by a standard railing (or the equivalent) and toeboards.

a) The employer does not ensure that crane operators are protected from fall hazards. The lack of fall protection was most recently observed on September 26, 2013, on the #4 wire crane parked at the east boarding station located in the Conditioning Building. Fall hazards are approximately 28 feet from the crane access platform to the concrete below as employees access the end truck of the crane.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees working in the Conditioning Building.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/17/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

Citation 2 Item 11 Type of Violation: **Willful**

29 CFR 1910.23(c)(1): Open-sided floors and/or platforms 4 feet or more above adjacent floor or ground level are not guarded by a standard railing (or the equivalent) and toeboards.

a) The employer does not ensure that crane operators are protected from fall hazards. The lack of fall protection was most recently observed on September 15, 2013, on the #5 wire crane located in the Conditioning Building. Fall hazards are approximately 28 feet from the crane runway to the concrete below as employees step off the crane access stairs.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees working in the Conditioning Building.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/17/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

Citation 2 Item 12 Type of Violation: **Willful**

29 CFR 1910.23(c)(1): Open-sided floors and/or platforms 4 feet or more above adjacent floor or ground level are not guarded by a standard railing (or the equivalent) and toeboards.

a) The employer does not ensure that crane operators are protected from fall hazards. The lack of fall protection was most recently observed on September 18, 2013, on the #3 wire crane located in the Conditioning Building. Fall hazards are approximately 28 feet from the crane runway to the concrete below as employees access the end truck on the crane.

b) The employer does not ensure that crane maintenance employees are protected from fall hazards. The lack of fall protection was most recently observed on September 24, 2013, on the #3 wire crane located in the Conditioning Building. Fall hazards are approximately 28 feet from the crane runway to the concrete below as employees access the end truck on the crane.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees working in the Conditioning Building.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/17/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

Citation 2 Item 13 Type of Violation: **Willful**

29 CFR 1910.23(c)(3): Regardless of height, open-sided floors, walkways, platforms, or runways above or adjacent to dangerous equipment, pickling or galvanizing tanks, degreasing units, and similar hazards is not guarded with a standard railing and toe board:

a) The employer does not ensure that employees are protected from the open-sided floors that could lead to contact with hot steel coils or fall hazards into the nose cone tub. The lack of fall protection was most recently observed on September 19, 2013 at the top reformer area in the Bar Mill. There are missing guardrails of approximately 31 inches on the east and west side of the conveyor going into the nose cone tub.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees exposed to open-sided floor hazards.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/12/2014
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

Citation 2 Item 14 Type of Violation: **Willful**

29 CFR 1910.132(c): Personal protective equipment is not of safe design and construction for the work to be performed:

a) The employer does not ensure that horizontal lifelines used in conjunction with personal fall arrest systems are of a safe design, in that, but not limited to, the lines run through structural columns exposing them to abrasion and failure in the event of being engaged, and the lack of shock absorbing devices. This violation was most recently observed on September 16, 2013 on the access platform for Crane 10-3 in the Bar Mill.

b) The employer does not ensure that horizontal lifelines used in conjunction with personal fall arrest systems are of a safe design, in that, but not limited to, the lines run through structural columns exposing them to abrasion and failure in the event of being engaged, and the lack of shock absorbing devices. This violation was most recently observed on September 16, 2013 on the access platform for Crane 12-2 in the Bar Mill.

c) The employer does not ensure that horizontal lifelines used in conjunction with personal fall arrest systems are of a safe design, in that, but not limited to, the lines run through structural columns exposing them to abrasion and failure in the event of being engaged, and the lack of shock absorbing devices. This violation was most recently observed on September 16, 2013 on the access platform for Crane A-2 in the Bar Mill.

d) The employer does not ensure that horizontal lifelines used in conjunction with personal fall arrest systems are of a safe design, in that, but not limited to, the lines run through structural columns exposing them to abrasion and failure in the event of being engaged, and the lack of shock absorbing devices. This violation was most recently observed on September 16, 2013 on the access platform for Crane N-1 in the Bar Mill.

Citation and Notification of Penalty

Company Name: Republic Steel
Inspection Site: 1807 E. 28TH ST., Lorain, OH 44055

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e) The employer does not ensure that horizontal lifelines used in conjunction with personal fall arrest systems are of a safe design, in that, but not limited to, the lines run through structural columns exposing them to abrasion and failure in the event of being engaged, and the lack of shock absorbing devices. This violation was most recently observed on September 16, 2013 on the access platform for Crane W-1 in the Bar Mill.

Abatement Note: To abate this violation, the employer must ensure that fall protection is in place for employees accessing overhead cranes.

Pursuant to 29 CFR 1903.19, the employer must submit documents describing the steps it is taking to ensure compliance, including an explanation of how these steps protect its employees from fall hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/31/2014
Proposed Penalty:	$70,000.00

Kimberly Nelson
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
420 Madison Ave
Suite 600
Toledo, OH 43604
Phone: 419-259-7542 Fax: 419-259-6355

INVOICE / DEBT COLLECTION NOTICE

Company Name: **Republic Steel**
Inspection Site: **1807 E. 28TH ST., Lorain, OH 44055**
Issuance Date: **03/10/2014**

Summary of Penalties for Inspection Number	**941464**
Citation 1, Serious	**$28,300.00**
Citation 2, Willful	**$980,000.00**
TOTAL PROPOSED PENALTIES	**$1,008,300.00**

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 $50,000 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.

Kimberly Nelson
Area Director

March 10, 2012
Date