

U.S. Department of Labor

Occupational Safety and Health Administration
200 N. High Street
Room 620
Columbus, OH 43215
Phone: 614-469-5582 Fax: 614-469-6791



Citation and Notification of Penalty

To:

Sancast, Inc. a subsidiary of Wabtec
and its successors
535 Clow Lane
Coshocton, OH 43812

Inspection Number: 946923**Inspection Date(s):** 11/05/2013 - 11/05/2013**Issuance Date:** 05/02/2014**Inspection Site:**

535 Clow Lane
Coshocton, OH 43812

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.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 05/02/2014. The conference will be held by telephone or at the OSHA office located at 200 N. High Street, Room 620, Columbus, OH 43215 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 946923

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812
Issuance Date: 05/02/2014

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, 200 N. High Street, Room 620, Columbus, OH 43215**

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: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

OSH ACT of 1970 Section (5)(a)(1): 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:

a. Located on the Foundry Pangborn Barrel Blast Machine, model number 15 GN-4, a fixed metal ladder was used by maintenance employees to gain access to and from the top of the Pangborn. The fixed ladder had a vertical distance of 45 inches from the floor to the first rung, thereby exposing the employees to a fall hazard from the ladder.

Recommended Abatement Action:

Fabricate a metal extension to the bottom of the ladder with an additional rung that would be evenly spaced so that an employee gaining access to and from would have a step to the first rung within the range of 14 inches from the floor. An acceptable means may be found in ANSI 14.3 2002, 5.1.1 Vertical Spacing: The vertical spacing of the first rung of the climb shall be permitted to be adjusted within the range of 14 inches (from ground level, floor or roof) at the access level.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$5500.00



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

OSH ACT of 1970 Section (5)(a)(1): 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:

- a. Located on the Logan Overhead Trolley Conveyor System, employees were required to operate the trolley system at a control station that was inside of the trolley's radius. The operator was at risk of a struck-by hazard due to a runaway condition that would occur when a link on the drive chain would break, causing the declined part of the trolley system to move down the guiderails uncontrollably where the operator's station was located.
- b. Located on the Logan Overhead Trolley Conveyor System, employees were required to operate the trolley system without an adequate maintenance program, thereby exposing the employees to a struck-by and/or caught-between hazard.

Recommended Abatement Action for Instance a:

- Relocate the control panel so that the employee would be completely removed from the hazard in case of a runaway condition.
- Reduce the amount of casting parts or remove some of the mild steel buckets, in order to significantly reduce the amount of weight on the drive chain to mitigate the tension on each of the links.
- Install additional dogs in the lower level of the system that would be actuated if an employee stepped off of a presence sensing safety device, such as a safety mat that would prevent the runaway condition from occurring. In a runaway condition or while the conveyor was in operation, the employee would be on the mat and not in danger of contact with the buckets.

ASME B20.1 2012 Safety Standards for Conveyors and Related Equipment states in Section 6.18.1 Safety Considerations, 'In areas where the parted chain, cable, or other linkage would permit a runaway condition on an inclined or declined section, and where personnel are present, anti-runaway devices shall be provided. The conveyor path may be arranged so that so that travel of the uncontrolled conveyor will be arrested before it enters an area where personnel are present.'

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

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Company Name: Sancast, Inc. a subsidiary of Wabtec
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Recommended Abatement Action for Instance b:

- Implement a maintenance program so that the lack of maintenance would not constitute a hazard. This maintenance program could include inspections and preventive maintenance to ensure the all parts of the overhead trolley conveyor system would operate effectively without damage and would not result in an unexpected breakage of a part that could result in a runaway condition or present any other hazards to employees.

ASME B20.1 2012 Safety Standard for Conveyors and Related Equipment states in Section 5.2 Maintenance (Repair), 'Where lack of maintenance and service would cause a hazardous condition, the user shall establish a maintenance program to ensure that conveyor components are maintained in a condition that does not constitute a hazard to personnel.'

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/29/2014
Proposed Penalty:	\$5500.00



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

OSH ACT of 1970 Section (5)(a)(1): 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:

a. Located at the pour deck, employees operated a one ton Budgit electrically motorized trolley chain hoist, model number BEHC-0116, in order to hoist and pour approximately 900 pound molten metal pots with use of a below-the-hook lifting device, that did not have an identification plate or any other means to indicate the lifting device's lifting capacity, thereby exposing the employees to a struck-by and/or caught-between hazard.

Recommended Abatement Action:

An acceptable method to correct this hazard is outlined in ANSI/ASME B30.20-1.2.1-2003:

- Ensure that the below-the-hook lifting devices are equipped with legible markings that indicate the lifting device's rated load and identification.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$4400.00



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

OSH ACT of 1970 Section (5)(a)(1): 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:

- a. Located at the pour deck, employees operated two, one ton Budgit electrically motorized trolley chain hoist in order to hoist and pour up to approximately 900 pound molten metal ladles, without conducting frequent inspections and periodic inspections with a certification record, thereby exposing the employees to struck-by, caught-between, electrical, and/or burn hazards.
- b. Located at the end of the pour deck, employees operated an one ton Budgit electrically motorized trolley chain hoist, model number, BEHC-0116, with a pendant control box that had been melted and was no longer constructed to prevent electrical shock of 110 volts.
- c. Located at the pour deck, employees operated an one ton Budgit electrically motorized trolley chain hoist, model number BEHC-0116, with a pendant control box that did not have any identification labels for the safe operation of the crane, thereby exposing the employees to a burn, struck-by, and/or caught-between hazard.
- d. Located at the pour deck, employees operated an one ton Budgit electrically motorized trolley chain hoists, model number BEHC-0116, without any indication of the hoists capacity, thereby exposing the employees to a burn, struck-by, and/or caught-between hazard.

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Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

Recommended Abatement Action:

As indicated in ASME B30.11 – 2010, Chapter 11-2 Inspection and Testing, frequent and periodic inspections were required to be performed with inspection intervals being dependent on the amount of use of the hoists. Frequent inspections were divided into normal service - monthly, heavy service - weekly to monthly and severe service - daily to weekly. Periodic inspections were divided into normal service - yearly, heavy service – semi-annually and severe service - quarterly.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/29/2014
Proposed Penalty:	\$7000.00

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

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Occupational Safety and Health Administration

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Inspection Date(s): 11/05/2013 - 11/05/2013
Issuance Date: 05/02/2014



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

29 CFR 1910.27(c)(4): "Clearance in back of ladder." The distance from the centerline of rungs, cleats, or steps to the nearest permanent object in back of the ladder shall be not less than seven inches, except that when unavoidable obstructions are encountered, minimum clearances as shown in figure D-3 shall be provided:

a. Located on the south side of the raw material staging area, there was a fixed metal ladder that allowed employees access to and from a walkway along the raw material bins. There was a piece of channel attached as a support brace for the walkway, which did not allow for the seven inches of clearance for employees to safely ascend or descend the ladder, thereby exposing the employees to a fall hazard of five feet, seven inches.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$5500.00

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: 946923
Inspection Date(s): 11/05/2013 - 11/05/2013
Issuance Date: 05/02/2014



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

29 CFR 1910.147(c)(4)(ii): The procedures shall clearly and specifically outline the scope, purpose, authorization, rules, and techniques to be utilized for the control of hazardous energy, and the means to enforce compliance including, but not limited to, the following:

29 CFR 1910.147(c)(4)(ii)(B): Specific procedural steps for shutting down, isolating, blocking and securing machines or equipment to control hazardous energy:

a. Located on the Foundry Pangborn Barrel Blast Machine's control panel, there were lockout/tagout procedures posted that were not complete. The procedures did not include the control of all the hazardous energy that presented a hazard to employees in the shutting down of equipment, verification of de-energized sources, isolation/securing of the Pangborn's chute, and procedures for safely restoring equipment into service.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$7000.00

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: 946923
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Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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 7 a Type of Violation: **Serious**

29 CFR 1910.179(j)(2): Frequent inspection. The following items shall be inspected for defects at intervals as defined in paragraph (j)(1)(ii) of this section or as specifically indicated, including observation during operation for any defects which might appear between regular inspections. All deficiencies such as listed shall be carefully examined and determination made as to whether they constitute a safety hazard:

- a. Located in the foundry at Sancast, there was a five ton Shepard Niles overhead crane, model number 68768, that employees used to hoist material and equipment that was not inspected daily, thereby exposing the employees to struck-by and/or caught-between hazards.
- b. Located in the foundry at Sancast, there was a three ton overhead crane that employees used to hoist material and equipment that was not inspected daily, thereby exposing the employees to struck-by and/or caught-between hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$5500.00

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
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Issuance Date: 05/02/2014



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

29 CFR 1910.179(m)(1): Running ropes. A thorough inspection of all ropes shall be made at least once a month and a certification record which includes the date of inspection, the signature of the person who performed the inspection and an identifier for the ropes which were inspected shall be kept on file where readily available to appointed personnel. Any deterioration, resulting in appreciable loss of original strength, shall be carefully observed and determination made as to whether further use of the rope would constitute a safety hazard. Some of the conditions that could result in an appreciable loss of strength are the following:

29 CFR 1910.179(m)(1)(ii): A number of broken outside wires and the degree of distribution or concentration of such broken wires:

a. Located at the charge material area, employees operated a five ton Shepard Niles overhead crane, model number 68768, with a magnet used to hoist raw material. There were multiple broken outside wires throughout one section of reeving on a running sheave, thereby exposing employees to a struck-by and/or caught-between hazard.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

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Issuance Date: 05/02/2014



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

29 CFR 1910.179(n)(4)(i): At the beginning of each operator's shift, the upper limit switch of each hoist shall be tried out under no load. Extreme care shall be exercised; the block shall be "inched" into the limit or run in at slow speed. If the switch does not operate properly, the appointed person shall be immediately notified:

a. Located at the melt deck, on or about November 5, 2013, employees were required to hoist charge buckets, in order to load furnaces using a three ton overhead crane with a bent limit switch. The limit switch did not prevent the crane's block from coming into contact with the hoist drum, thereby exposing the employees to a struck-by and/or caught-between hazard.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$5500.00

U.S. Department of Labor
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Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

29 CFR 1910.212(a)(4): Barrels, containers, and drums. Revolving drums, barrels, and containers shall be guarded by an enclosure which is interlocked with the drive mechanism, so that the barrel, drum, or container cannot revolve unless the guard enclosure is in place:

a. Located on the back of the Foundry Pangborn Barrel Blast Machine, employees were required to remove casting parts from the back of the Pangborn by opening two, hinged doors by hand. The doors were not interlocked with the drive mechanism, thereby exposing the employees to the ingoing nip point of the revolving barrel of the Pangborn.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$5500.00

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

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Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

29 CFR 1910.303(g)(1): Space about electric equipment. Sufficient access and working space shall be provided and maintained about all electric equipment to permit ready and safe operation and maintenance of such equipment:

a. Located along the wall behind the melt deck, there were three 480 volt disconnects that were used in part to supply electrical power to the furnace and other equipment on the melt deck. The electrical disconnects were blocked by 30 gallon cardboard drums and a Lincoln Electric stick welder, which did not allow for sufficient access to the electrical disconnects if an emergency occurred with the equipment and electrical power had to be immediately removed.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$5500.00

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

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Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

Citation 1 Item 11 Type of Violation: **Serious**

29 CFR 1910.305(b)(1)(ii): Unused openings in cabinets, boxes, and fittings shall be effectively closed:

a. Located on the Foundry Pangborn Barrel Blast Machine, model number 15 GN-4, there was a three-phase, 480volt disconnect box that employees used to shut power on and off on the Pangborn that had two knockouts that were not closed, thereby exposing the employees to an arc flash/arc blast hazard.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$5500.00

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



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

29 CFR 1910.23(c)(1): Every open-sided floor or platform four feet or more above adjacent floor or ground level shall be guarded by a standard railing (or the equivalent as specified in paragraph (e)(3) of this section) on all open sides except where there is entrance to a ramp, stairway, or fixed ladder. The railing shall be provided with a toeboard wherever, beneath the open sides:

- a. Located at the charge material staging area, employees were required to operate a five ton overhead crane from a wired pendant control box, in order to hoist the raw material with a magnet, while being exposed to a fall hazard of a maximum height of seven feet, two inches from the top of a wooden timbered platform to the bottom of the raw material bin.
- b. Located at the charge material staging area, there was an approximately 18 inch wide walkway that was perpendicular to another walkway, that allowed for employees to gain access to a wooden timbered platform, that had an approximately six foot section of guardrail missing, thereby exposing the employees to a fall hazard of eight feet, four inches.

Sancast was previously cited for a violation of this occupational safety and health standard, contained in OSHA inspection number 910120, citation number 1, item number 1 and was affirmed as a final order on September 25, 2013 with respect to a workplace located at 535 Clow Lane Coshocton, Ohio 43812.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$38500.00

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

Inspection Number: 946923
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Issuance Date: 05/02/2014



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

Citation 2 Item 2 Type of Violation: **Repeat**

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:

a. Located on the foundry Pangborn Barrel Blast Machine 15 GN-4, there was a shaker table that had a 480 volt electric drive motor. The drive motor had a double pulley with $\frac{1}{2}$ inch drive belts that went to a 14 inch flywheel, all of which were not adequately guarded, thereby exposing the employees to the ingoing nip point.

Sancast was previously cited for a violation of this occupational safety and health standard, contained in OSHA inspection number 751141, citation number 1, item number 1a, and was affirmed as a final order on March 16, 2013, with respect to a workplace located at 525 Clow Lane, Coshocton, Ohio 43812.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$27500.00

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

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Issuance Date: 05/02/2014



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

29 CFR 1910.219(f)(3): Sprockets and chains. All sprocket wheels and chains shall be enclosed unless they are more than seven (7) feet above the floor or platform. Where the drive extends over other machine or working areas, protection against falling shall be provided. This subparagraph does not apply to manually operated sprockets:

a. Located on the Foundry Pangborn Barrel Blast Machine 15 GN-4, there was a chain and sprocket used in part to rotate the Pangborn's barrel in order to sandblast casting parts. The chain and sprocket's ingoing nip point was at a height of 81 and $\frac{1}{2}$ inches from the walking surface, which exposed the employees to ingoing nip point hazards.

Sancast was previously cited for a violation of this occupational safety and health standard, contained in OSHA inspection number 751141, citation number 1, item number 2 and was affirmed as a final order on March 16, 2013, with respect to a workplace located at 525 Clow Lane, Coshocton, Ohio 43812.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$27500.00

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

Inspection Number: 946923
Inspection Date(s): 11/05/2013 - 11/05/2013
Issuance Date: 05/02/2014



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

29 CFR 1910.37(b)(6): Each exit sign must be illuminated to a surface value of at least five foot-candles (54 lux) by a reliable light source and be distinctive in color. Self-luminous or electroluminescent signs that have a minimum luminance surface value of at least .06 footlamberts (0.21 cd/m²) are permitted:

a. Located near the raw material delivery rolling steel door, the employer failed to ensure that an exit sign was illuminated for employees to exit in case of an emergency.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$0.00

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

Inspection Number: 946923
Inspection Date(s): 11/05/2013 - 11/05/2013
Issuance Date: 05/02/2014



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

Citation 3 Item 2 Type of Violation: **Other-than-Serious**

29 CFR 1910.178(l)(4)(iii): An evaluation of each powered industrial truck operator's performance shall be conducted at least once every three years:

a. Located throughout the facility, employees operated forklifts for periods longer than three years without an evaluation of the operator's performance.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$0.00

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

Inspection Number: 946923
Inspection Date(s): 11/05/2013 - 11/05/2013
Issuance Date: 05/02/2014



Citation and Notification of Penalty

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812

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

29 CFR 1910.179(j)(1)(ii): Inspection procedure for cranes in regular service is divided into two general classifications based upon the intervals at which inspection should be performed. The intervals in turn are dependent upon the nature of the critical components of the crane and the degree of their exposure to wear, deterioration, or malfunction. The two general classifications are herein designated as "frequent" and "periodic" with respective intervals between inspections as defined below:

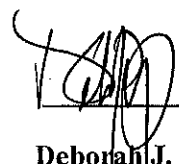
29 CFR 1910.179(j)(1)(ii)(b): Periodic inspection - 1 to 12-month intervals:

- a. Located in the foundry at Sancast, there was a five ton Shepard Niles overhead crane, model number 68768, that employees used to hoist material and equipment which did not have periodic inspections documented.
- b. Located in the foundry at Sancast, there was a three ton overhead crane that employees used to hoist material and equipment which did not have periodic inspections documented.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/29/2014
\$0.00



Deborah J. Zubaty
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
200 N. High Street
Room 620
Columbus, OH 43215
Phone: 614-469-5582 Fax: 614-469-6791



INVOICE / DEBT COLLECTION NOTICE

Company Name: Sancast, Inc. a subsidiary of Wabtec
Inspection Site: 535 Clow Lane, Coshocton, OH 43812
Issuance Date: 05/02/2014

Summary of Penalties for Inspection Number	946923
Citation 1, Serious	\$62400.00
Citation 2, Repeat	\$93500.00
Citation 3, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES	\$155900.00

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.



Deborah J. Zubaty
Area Director