

U.S. Department of Labor
Occupational Safety and Health Administration
William Cotter Federal Building
135 High Street, Suite 361
Hartford, CT 06103
Phone: 860-240-3152 Fax: 860-240-3155



Citation and Notification of Penalty

To:
Scapa North America, LLC
and its successors
111 Great Pond Drive
Windsor, CT 06095

Inspection Number: 1119628
Inspection Date(s): 01/15/2016 - 03/08/2016
Issuance Date: 03/16/2016

Inspection Site:
111 Great Pond Drive
Windsor, CT 06095

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

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

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

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

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

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

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

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

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

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

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

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

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an

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

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

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

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

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 03/16/2016. The conference will be held by telephone or at the OSHA office located at William Cotter Federal Building, 135 High Street, Suite 361, Hartford, CT 06103 on

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1119628

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095
Issuance Date: 03/16/2016

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: U.S. Department of Labor – Occupational Safety and Health Administration, William Cotter Federal Building, 135 High Street, Suite 361, Hartford, CT 06103

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

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

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

29 CFR 1910.23(a)(4): Every skylight floor opening and hole shall be guarded by a standard skylight screen or a fixed standard railing on all exposed sides:

Roof: On, or about, January 27, 2016, thirteen roof mounted skylights were not provided with either standard guardrails or skylight screens. Employees accessed the roof at least monthly to maintain equipment on the roof.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$5000.00

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

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

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

A. Roof: On, or about, January 27, 2016, employees performing maintenance activities on the roof of the building were not provided with fall protection equipment or the equivalent. The fall distance from the roof was estimated to be between 24-25 feet.

B. Coating Department: On, or about, January 30, 2016, employees performing preventative maintenance on the Coater three oven cover hydraulic units were not provided with safe access and fall protection equipment while servicing the equipment that was located on a building ledge approximately 15 feet above the floor.

C. Oxidizer Pad: On, or about, February 4, 2016, employees performing trouble-shooting and/or maintenance on the top of the Smith incinerator were not provided with safe access and fall protection equipment when they had to step off the access platform and up onto the incinerator housing. The fall distance was approximately 29 feet.

D. Oxidizer Pad: On, or about, February 4, 2016, employees who calibrated and replaced thermocouple sensors on the ARI incinerator were not provided with fall protection equipment when they accessed the top of the ductwork to access the side of the unit. The fall distance was approximately 7 feet.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/02/2016
\$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
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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

29 CFR 1910.146(d)(9): The employer did not develop and implement procedures for summoning rescue and emergency services, for rescuing entrants from permit spaces, for providing necessary emergency services to rescued employees, and/or for preventing unauthorized entry:

Oxidizer Pad: On, or about, September 23, 2015, the company had not developed and implemented adequate rescue procedures for employees who entered confined spaces. Maintenance staff entered the Smith Incinerator to reposition a damper that had misaligned due to a broken weld. The Confined Space Entry Permit Form instructed employees to call 911, however, the volunteer fire department was neither manned nor equipped to respond to confined space emergencies.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/02/2016
\$5000.00

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

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

29 CFR 1910.146(f): The entry permit that documents compliance with this section and authorizes entry did not identify the required information listed in (f)(1)-(f)(15):

Oxidizer Pad: On, or about, September 23, 2015, the Confined Space Entry Permit Form did not include the purpose of the entry into the Smith Incinerator, the name of the employee acted as the Attendant, the name of the employee acted as the Entry Supervisor and specific methods and equipment used to control/eliminate the hazards in the space.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/02/2016
\$4000.00

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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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
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Citation 1 Item 5 Type of Violation: **Serious**

29 CFR 1910.147(c)(4)(i): Procedures were not developed, documented and utilized for the control of potentially hazardous energy when employees were engaged in activities covered by this section:

Coating Department: On, or about, January 18, 2016, specific procedures had not been developed to identify all of the power sources that fed the control consoles for Coaters 1, 2, 3 and 4. Each console was fed by multiple circuits.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

05/02/2016
\$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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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

29 CFR 1910.178(a)(4): Modifications and additions which affect capacity and safe operation of powered industrial truck were performed by the employer without the manufacturer's prior written approval and capacity, operation, and maintenance instruction plates, tags or decals of the powered industrial truck were not changed accordingly:

Incinerator: On, or about, December 1, 2015, the CAT model GC25K forklift was not provided with a revised/amended identification plate to show the reduced capacity of the vehicle when the PIV JIB lifting boom was used to lift machines and equipment during maintenance activities. The capacity of the forklift was listed as 5,000 pounds on the identification plate. The estimated reduced capacity of the truck when used with the boom lift at the position observed at the time of the inspection was 1,644 pounds.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/02/2016
\$5000.00

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

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

29 CFR 1910.303(g)(1)(ii): The required working space about electric equipment rated 600 volts, nominal, or less to ground, was used for storage:

Main Electrical Room: On, or about, January 20, 2016, pallets of unused equipment were stored in the working space for the main breaker and associated switchgear.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$4000.00

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

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Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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 8 a Type of Violation: **Serious**

29 CFR 1910.333(a)(1): Live parts to which an employee may be exposed were not de-energized before the employee worked on or was near to them:

Company: On, or about, January 18, 2016, the employer routinely assigned employees to work on or near live electrical equipment without de-energizing the equipment. Examples of work that had been performed in plant included, but was not limited to, changing fuses in live fuse holders, installing and removing jumper cables in live terminal strips to bypass the incinerator for Line 4, drilling and tapping screws into the rear doors on the Line 3 Main Console and changing of circuit breakers in live panelboards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/04/2016
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.

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

Inspection Number: 1119628
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Issuance Date: 03/16/2016



Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

29 CFR 1910.335(a)(2)(i): When working near exposed energized conductors or circuit parts, each employee did not use insulated tools or handling equipment when the tools or handling equipment might have made contact with such conductors or parts:

On, or about, January 4, 2016, employees performed tasks on or around exposed energized electrical equipment while using non voltage rated tools. Examples of work performed include, but are not limited to, pulling fuses, removing covers from reset control boxes and opening an exhaust duct to calibrate LEL sensors.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/04/2016

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: 1119628
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Issuance Date: 03/16/2016



Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

29 CFR 1910.334(a)(2)(ii): There was a defect or evidence of damage that could have exposes an employee to injury and the defective or damaged item was not removed from service:

Maintenance Shop: On, or about, February 3, 2016, the power cords on the following portable tools were damaged:

- A. Bosch grinder serial number 589000038.
- B. Milwaukee mag drill.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$4000.00

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: 1119628
Inspection Date(s): 01/15/2016 - 03/08/2016
Issuance Date: 03/16/2016



Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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 10 a Type of Violation: **Serious**

29 CFR 1910.335(a)(1)(i): Employees working in areas where there were potential electrical hazards were not provided with electrical protective equipment that was appropriate for the specific parts of the body that needed to be protected and for the work being performed:

Plant: On, or about, January 15, 2016, employees performed tasks on or near energized electrical equipment were not provided with nor required to wear personal protective equipment such as, but not limited to, fire resistive clothing, voltage-rated gloves, face shields, hard hats, fire resistive balaclavas and hearing protection. Also, employees wore hair nets and polyester blend clothing into the Coating Department electrical room when resetting breakers and controls.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 03/22/2016
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.

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

Inspection Number: 1119628
Inspection Date(s): 01/15/2016 - 03/08/2016
Issuance Date: 03/16/2016



Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

29 CFR 1910.335(a)(1)(ii): Protective equipment was not maintained in a safe, reliable condition and/or was not periodically inspected or tested:

Plant: On, or about, January 15, 2016, a pair of Salisbury Class 0 voltage rated gloves had not been inspected every six months.

Date By Which Violation Must be Abated:

05/02/2016

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: 1119628
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Issuance Date: 03/16/2016



Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

29 CFR 1910.213(b)(3): Provisions were not made to prevent woodworking machine(s) from automatically restarting upon restoration of power after power failure:

Maintenance Shop: On, or about, January 15, 2016, the Delta table saw was not provided with a magnetic starter or the equivalent.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$0.00

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: 1119628
Inspection Date(s): 01/15/2016 - 03/08/2016
Issuance Date: 03/16/2016



Citation and Notification of Penalty

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095

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

29 CFR 1910.303(e)(1)(ii): Electrical equipment was used when the markings giving voltage, current, wattage, or other ratings as necessary were missing:

Maintenance Shop: On, or about, February 3, 2016, the identification plate provided on the Milwaukee angle grinder, Model 6148, was worn.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/02/2016
\$0.00

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

Warren G. Simpson
Area Director

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

U.S. Department of Labor
Occupational Safety and Health Administration
William Cotter Federal Building
135 High Street, Suite 361
Hartford, CT 06103
Phone: 860-240-3152 Fax: 860-240-3155



INVOICE / DEBT COLLECTION NOTICE

Company Name: Scapa North America, LLC
Inspection Site: 111 Great Pond Drive, Windsor, CT 06095
Issuance Date: 03/16/2016

Summary of Penalties for Inspection Number	1119628
Citation 1, Serious	\$55000.00
Citation 2, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES	\$55000.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed

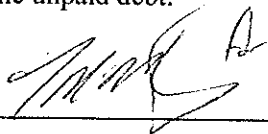
account, the bank will attempt to make the transfer up to 2 times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

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

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



Warren G. Simpson
Area Director

3/16/2016

Date