

## U.S. Department of Labor

Occupational Safety and Health Administration  
2296 Henderson Mill Road  
Suite 200  
Atlanta, GA 30345



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## Citation and Notification of Penalty

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**To:**

Wright Metal Products Crates, LLC, dba WMP Crates  
and its successors  
111 Franklin St  
Lavonia, GA 30553

**Inspection Number:** 1413097

**Inspection Date(s):** 07/02/2019 - 07/03/2019

**Issuance Date:** 12/12/2019

**Inspection Site:**

111 Franklin St  
Lavonia, GA 30553

*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.*

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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 by calling 770-493-6644. 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](http://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](http://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 12/12/2019. The conference will be held by telephone or at the OSHA office located at 2296 Henderson Mill Road, Suite 200, Atlanta, GA 30345 on \_\_\_\_\_ at

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

## CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1413097

Company Name: Wright Metal Products Crates, LLC, dba WMP Crates  
Inspection Site: 111 Franklin St, Lavonia, GA 30553  
Issuance Date: 12/12/2019

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, 2296 Henderson Mill Road, Suite 200, Atlanta, GA 30345**

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 \_\_\_\_\_  
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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

Inspection Number: 1413097  
Inspection Date(s): 07/02/2019 - 07/03/2019  
Issuance Date: 12/12/2019



**Citation and Notification of Penalty**

**Company Name:** Wright Metal Products Crates, LLC, dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553

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

29 CFR 1910.178(n)(6): Industrial truck drivers were not required to look in the direction of, and keep a clear view of the path of travel:

On or about 7/2/2019, in the production area, employees were observed not looking in the direction of travel while operating forklifts. Employees were exposed to struck-by hazards.

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 of abatement, or other written records.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

01/02/2020  
\$9377.00

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:** Wright Metal Products Crates, LLC, dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553

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

29 CFR 1910.253(b)(4)(i): Oxygen cylinders were stored near highly combustible material, especially oil and grease; or near reserve stocks of carbide and acetylene or other fuel-gas cylinders; or near other substance likely to cause or accelerate fire:

On or about 7/2/2019, in the Oxygen storage area, workers were exposed to thermal burns and explosion hazards where the employer failed to maintain separation between the Propylene, Propane, and Oxygen cylinders where foot traffic and vehicular traffic were immediately present.

No abatement required

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$9377.00



**Citation and Notification of Penalty**

**Company Name:** Wright Metal Products Crates, LLC, dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553

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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 3 a** Type of Violation: **Serious**

29 CFR 1910.1200(f)(6): The employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged or marked with the information specified under paragraphs (f)(6)(i) through (ii) of this section:

On or about 7/2/2019, employees were exposed to hazardous chemical products such as but not limited to the Houghton-PS-PS, KL Klean ALC2, and lubricating fluid where proper labeling was not required on secondary containment (Sprite bottle) where labels were missing.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation. (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	01/09/2020
Proposed Penalty:	\$5626.00





**Citation and Notification of Penalty**

**Company Name:** Wright Metal Products Crates, LLC, dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553

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

29 CFR 1910.1200(h)(1): Employees were not provided effective information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard that the employees had not been previously trained about was introduced into their work area:

On or about 7/2/2019, employees hired after February, 2019 were not provided effective information and training as required by the hazard communication standard to include but not limited to the purpose of and information comprised in Safety Data Sheets.

No abatement required

Date By Which Violation Must be Abated:

Corrected During Inspection

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

**Inspection Number:** 1413097  
**Inspection Date(s):** 07/02/2019 - 07/03/2019  
**Issuance Date:** 12/12/2019



**Citation and Notification of Penalty**

**Company Name:** Wright Metal Products Crates, LLC, dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553

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

29 CFR 1910.252(b)(2)(iii): Workers and other persons adjacent to the welding area were not required to wear appropriate goggles to protect them from the rays when noncombustible or flameproof screens or shields were not used:

On or about 7/2/2019, in the welding department, workers were observed performing support operations of the welding that were not protected against eye damage where the employer failed to require the use of welding screens to separate the workers from the hazardous areas resulting in injuries. Additionally, employees performing loading operations did not wear shaded safety glasses.

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 of abatement, or other written records.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	01/02/2020
Proposed Penalty:	\$131272.00

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:** Wright Metal Products Crates, LLC, dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553

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

29 CFR 1910.147(c)(4)(i): Procedures were utilized for the control of potentially hazardous energy when employees were engaged in activities covered by this section:

On or about 7/2/2019, throughout the production floor, employees were exposed to amputation and struck by injuries while conducting maintenance and troubleshooting activities where Lockout/tagout procedures were not used.

Wright Metal Products Crates, LLC dba WMP Crates was previously cited for a violation of this occupational safety and health standard which was contained in OSHA inspection number 1124310, citation number 1, item number 2 and was affirmed as a final order on 7/18/2019, with respect to a workplace located at 111 Franklin Street Lavonia, GA 30553.

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 of abatement, or other written records.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

01/02/2020  
\$26255.00



**Citation and Notification of Penalty**

**Company Name:** Wright Metal Products Crates, LLC, dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553

**Citation 4 Item 1** Type of Violation: **Other-than-Serious**

29 CFR 1910.107(i)(8): Electrical equipment for electrostatic hand spraying was not so interlocked with the ventilation of the spraying area(s) that the equipment cannot be operated unless the ventilation fan(s) are in operation:

On or about 07/02/2019, in the walking (offset) powder coating booth, employees were performing painting operations were exposed to severe burns, inhalation hazards and potentially death where the equipment for electrostatic hand spraying was not interlocked with the ventilation of the spraying area.

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 of abatement, or other written records.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

01/09/2020

Proposed Penalty:

\$0.00

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

**Inspection Number:** 1413097  
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**Issuance Date:** 12/12/2019



**Citation and Notification of Penalty**

**Company Name:** Wright Metal Products Crates, LLC; dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553

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Citation 4 Item 2    Type of Violation: **Other-than-Serious**

29 CFR 1910.107(l)(4)(iii): "No Smoking" signs in large letters on contrasting color background were not conspicuously posted at all powder coating areas and powder storage rooms:

On or about 07/02/2019, in the walking (offset) powder coating booth, The employer failed to post "No Smoking" signage.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

01/09/2020  
\$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: 1413097  
Inspection Date(s): 07/02/2019 - 07/03/2019  
Issuance Date: 12/12/2019



**Citation and Notification of Penalty**

**Company Name:** Wright Metal Products Crates, LLC, dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553

**Citation 4 Item 3** Type of Violation: **Other-than-Serious**

29 CFR 1910.133(a)(1): The employer did not ensure that each affected employee uses appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation:

On or about 8/2/2019, the employer did not provide employees with the appropriate eye and face protection for use while working with propane when changing the propane tanks of the forklifts-employees did not wear proper eye and face protection.

No abatement required.

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$0.00

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**Citation and Notification of Penalty**

**Company Name:** Wright Metal Products Crates, LLC, dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553

**Citation 4 Item 4** Type of Violation: **Other-than-Serious**

29 CFR 1910.147(f)(3)(ii)(D): Each authorized employee shall affix a personal lockout or tagout device to the group lockout device prior to working on the machine or equipment:

On or about 6/21/2019, at the Cincinatti shears, employees were exposed to amputation and struck by injuries while conducting maintenance activities where the employer failed to require each worker involved to apply their own locks.

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 of abatement, or other written records.

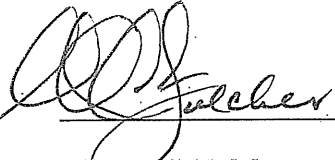
**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

01/02/2020

Proposed Penalty:

\$0.00

  
\_\_\_\_\_  
**William C. Fulcher**  
Area Director

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
2296 Henderson Mill Road  
Suite 200  
Atlanta, GA 30345



## INVOICE / DEBT COLLECTION NOTICE

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**Company Name:** Wright Metal Products Crates, LLC, dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553  
**Issuance Date:** 12/12/2019

<b>Summary of Penalties for Inspection Number</b>	<b>1413097</b>
<b>Citation 1, Serious</b>	<b>\$24380.00</b>
<b>Citation 2, Willful</b>	<b>\$131272.00</b>
<b>Citation 3, Repeat</b>	<b>\$26255.00</b>
<b>Citation 4, Other-than-Serious</b>	<b>\$0.00</b>
<b>TOTAL PROPOSED PENALTIES</b>	<b>\$181907.00</b>

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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](http://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



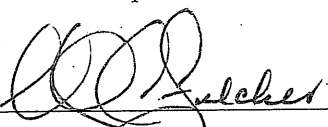
amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of 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.

  
\_\_\_\_\_  
William C. Fulcher  
Area Director

12/12/2019  
\_\_\_\_\_  
Date

## U.S. Department of Labor

Occupational Safety and Health Administration  
2296 Henderson Mill Road  
Suite 200  
Atlanta, GA 30345



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## Citation and Notification of Penalty

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**To:**

Wright Metal Products Crates LLC, dba WMP Crates  
and its successors  
111 Franklin St  
Lavonia, GA 30553

**Inspection Number:** 1418898

**Inspection Date(s):** 07/08/2019 - 07/08/2019

**Issuance Date:** 12/12/2019

**Inspection Site:**

111 Franklin St  
Lavonia, GA 30553

*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.*

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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](http://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 12/12/2019. The conference will be held by telephone or at the OSHA office located at 2296 Henderson Mill Road, Suite 200, Atlanta, GA 30345 on \_\_\_\_\_ at \_\_\_\_\_.

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

## CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1418898

Company Name: Wright Metal Products Crates LLC, dba WMP Crates

Inspection Site: 111 Franklin St, Lavonia, GA 30553

Issuance Date: 12/12/2019

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, 2296 Henderson Mill Road, Suite 200, Atlanta, GA 30345**

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:** Wright Metal Products Crates LLC, dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553

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

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

- a) On or about 07/08/19 and at times prior thereto the Fadal 4020 CNC Vertical Machine Center had a disabled door interlock, and the machine did not stop when the door was opened. (Part of the interlock was missing).
- b) On or about 07/08/19 and at times prior thereto the Fadal C-140 CNC Vertical Machine Center had a disabled door interlock, and the machine did not stop when the door was opened.
- c) On or about 07/08/19 and at times prior thereto the chuck in the Bridgeport Series II Special Milling Machine was not guarded.
- d) On or about 07/08/19 and at times prior thereto, the chuck in the Pedestal Drill (adjacent to the Bridgeport Milling Machine) was not guarded.

Or in the alternative:

29 CFR 1910.212(a)(1): One or more methods of machine guarding was not provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks:

- a) On or about 07/08/19 and at times prior thereto the Fadal 4020 CNC Vertical Machine Center had a disabled door interlock, and the machine did not stop when the door was opened. (Part of the interlock was missing).
- b) On or about 07/08/19 and at times prior thereto the Fadal C-140 CNC Vertical Machine Center had a disabled door interlock, and the machine did not stop when the door was opened.
- c) On or about 07/08/19 and at times prior thereto the chuck in the Bridgeport Series II Special Milling Machine was not guarded.

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:** 1418898

**Inspection Date(s):** 07/08/2019 - 07/08/2019

**Issuance Date:** 12/12/2019



**Citation and Notification of Penalty**

**Company Name:** Wright Metal Products Crates LLC, dba WMP Crates

**Inspection Site:** 111 Franklin St, Lavonia, GA 30553

d) On or about 07/08/19 and at times prior thereto, the chuck in the Pedestal Drill (adjacent to the Bridgeport Milling Machine) was not guarded.

Wright Metal Products Crates, LLC was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.212(a)(3)(ii) or in the alternative 29 CFR 1910.212(a)(1), which was contained in OSHA inspection number 1124310, citation number 1, item number 3 and was affirmed as a final order on 07/28/16, with respect to a workplace located at 111 Franklin St., Lavonia, GA 30553.

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 of abatement, or other written records.

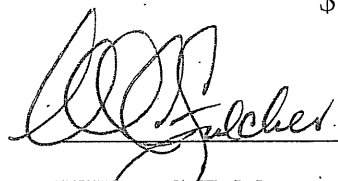
**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

01/16/2020

Proposed Penalty:

\$13127.00

  
\_\_\_\_\_  
**William C. Fulcher**  
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  
2296 Henderson Mill Road  
Suite 200  
Atlanta, GA 30345



## INVOICE / DEBT COLLECTION NOTICE

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**Company Name:** Wright Metal Products Crates LLC, dba WMP Crates  
**Inspection Site:** 111 Franklin St, Lavonia, GA 30553  
**Issuance Date:** 12/12/2019

<b>Summary of Penalties for Inspection Number</b>	<b>1418898</b>
<b>Citation 1, Serious</b>	<b>\$13127.00</b>
<b>TOTAL PROPOSED PENALTIES</b>	<b>\$13127.00</b>

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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](http://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.



William C. Fulcher

Area Director

12/12/2019

Date