

**U.S. Department of Labor**

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



07/10/2012

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

Inspection #242952

Dear Mr. Khalid:

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

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

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

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

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

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to your inspection will be available 30 calendar days after the Citation Issuance Date. You are encouraged to review the information concerning your establishment at [WWW.OSHA.GOV](http://WWW.OSHA.GOV). If you have any dispute with the accuracy of the information displayed, please contact this office.

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

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

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

Or, call Toll Free: 1-888-REGFAIR

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

Your support of occupational safety and health is appreciated.

Sincerely,



Gary J. Anderson  
Area Director

Enclosures

## U.S. Department of Labor

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



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## Citation and Notification of Penalty

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**To:**

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

**Inspection Number:** 242952**Inspection Date(s):** 03/01/2012 - 05/15/2012**Issuance Date:** 07/10/2012**Inspection Site:**

5202 West 70th Place  
Bedford Park, IL 60638

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

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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 mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

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

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

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this

contest period is not interrupted by an informal conference.

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

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

**Penalty Payment** – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance.

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

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

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

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

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

**Inspection Activity Data** – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at [www.osha.gov](http://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 07/10/2012. The conference will be held at the OSHA office located at 1600 167th Street,, Calumet City, IL 60409 on \_\_\_\_\_ at \_\_\_\_\_. Employees and/or representatives of employees have a right to attend an informal conference.

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

**Inspection Number:** 242952  
**Inspection Date(s):** 03/01/2012 - 05/15/2012  
**Issuance Date:** 07/10/2012



**Citation and Notification of Penalty**

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

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

29 CFR 1910.134(c)(1): In any workplace where respirators are necessary to protect the health of the employee or whenever respirators are required by the employer, the employer shall establish and implement a written respiratory protection program with worksite-specific procedures. The program shall be updated as necessary to reflect those changes in workplace conditions that affect respirator use. The employer shall include in the program the following provisions of this section, as applicable:

a. On or about March 1, 2012, in the facility, employees were required to wear tight fitting respirators when handling chemicals such as but not limited to, nitric acid and ammonia. The employer failed to develop and implement a written respiratory program which included at a minimum annual fit tests, medical evaluations, training and maintenance procedures.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date by which Violation must be Abated:	08/21/2012
Proposed Penalty:	\$5400.00



**Citation and Notification of Penalty**

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

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

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

29 CFR 1910.146(c)(1): The employer shall evaluate the workplace to determine if any spaces are permit-required confined spaces. NOTE: Proper application of the decision flow chart in Appendix A to section 1910.146 would facilitate compliance with this requirement.

a. On or about March 1, 2012, in the facility, the employer did not evaluate the workplace to determine the presence of permit required confined spaces, thereby exposing employees to hazards associated with confined spaces.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date by which Violation must be Abated: 07/31/2012  
Proposed Penalty: \$6300.00

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

29 CFR 1910.146(c)(2): If the workplace contains permit spaces, the employer shall inform exposed employees, by posting danger signs or by any other equally effective means, of the existence and location of and the danger posed by the permit spaces. NOTE: A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language would satisfy the requirement for a sign.

a. On or about March 1, 2012, in the facility, employees were not informed by signs or other equally effective means of the existence, location of, and the danger posed by permit required confined spaces. The permit required confined spaces not labeled included but were not limited to, propylene glycol storage tanks.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

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



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

Inspection Number: 242952  
Inspection Date(s): 03/01/2012 - 05/15/2012  
Issuance Date: 07/10/2012



**Citation and Notification of Penalty**

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

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

29 CFR 1910.146(c)(4): If the employer decides that its employees will enter permit spaces, the employer shall develop and implement a written permit space program that complies with this section. The written program shall be available for inspection by employees and their authorized representatives.

a. On or about March 1, 2012, in the facility, employees were required to enter permit required confined spaces to perform cleaning operations. Employees were exposed to hazards associated with entry into permit required confined spaces when the employer did not develop or implement a permit required confined space program to protect against hazardous atmospheres and any other recognized safety or health hazard such as but not limited to, agitators.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date by which Violation must be Abated:

08/21/2012

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

29 CFR 1910.151(c): Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.

a. On or about March 1, 2012, in the maintenance shop, employees were exposed to battery acid when required to charge and/or service powered industrial vehicle batteries. Employees were not provided with an eyewash for quick and suitable flushing of the eyes.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date by which Violation must be Abated:

08/21/2012

Proposed Penalty:

\$2700.00

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

Inspection Number: 242952  
Inspection Date(s): 03/01/2012 - 05/15/2012  
Issuance Date: 07/10/2012



**Citation and Notification of Penalty**

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

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

29 CFR 1910.254(d)(9)(iii): Cables with damaged insulation or exposed bare conductors shall be replaced. Joining lengths of work and electrode cables shall be done by the use of connecting means specifically intended for the purpose. The connecting means shall have insulation adequate for the service conditions.

a. On or about May 2, 2012, in the maintenance shop, an employee was required to perform arc welding on stainless steel with a Miller Inert Arc Welder, Model number 0092, serial number M6607018. The ground conductor had exposed bare wiring and had not been repaired thereby exposing employees to electrocution hazards.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date by which Violation must be Abated: 07/17/2012  
Proposed Penalty: \$4500.00

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

29 CFR 1910.305(j)(2)(iv): A receptacle installed in a wet or damp location shall be suitable for the location.

a. On or about May 9, 2012, in the production area, a receptacle located in a wet and/or damp location was not suitable for the location due to a missing enclosure, thereby exposing employees to electrical hazards.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date by which Violation must be Abated: 07/17/2012  
Proposed Penalty: \$4500.00



**Citation and Notification of Penalty**

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

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

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

29 CFR 1910.1026(d)(1): General. Each employer who has a workplace or work operation covered by this section shall determine the 8-hour TWA exposure for each employee exposed to chromium (VI). This determination shall be made in accordance with either paragraph (d)(2) or paragraph (d)(3) of this section.

a. On or about May 9, 2012, in the facility, an employee was required to perform welding operations on stainless steel. The employer had not performed initial monitoring to determine the employee exposure to Chromium (VI) when welding operations on stainless steel occurred.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date by which Violation must be Abated:	08/21/2012
Proposed Penalty:	\$6300.00

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

29 CFR 1910.1028(e)(2)(i): Each employer who has a place of employment covered under paragraph (a)(1) of this section shall monitor each of these workplaces and work operations to determine accurately the airborne concentrations of benzene to which employees may be exposed.

a. On or about March 1, 2012, employees were required to work with raw materials which contain benzene. The employer had not monitored the workplace and work operations to determine employee exposure to benzene.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date by which Violation must be Abated:	08/21/2012
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**U.S. Department of Labor**  
Occupational Safety and Health Administration

**Inspection Number:** 242952  
**Inspection Date(s):** 03/01/2012 - 05/15/2012  
**Issuance Date:** 07/10/2012



**Citation and Notification of Penalty**

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

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

29 CFR 1910.1048(d)(1)(i): Each employer who has a workplace covered by this standard shall monitor employees to determine their exposure to formaldehyde.

a. On or about March 1, 2012, employees were required to work with raw materials which contain formaldehyde. The employer had not monitored the workplace and work operations to determine employee exposure to formaldehyde.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

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

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

29 CFR 1910.106(d)(4)(iii): "Wiring." Electrical wiring and equipment located in inside storage rooms used for Class I liquids shall be approved under subpart S of this part for Class I, Division 2 Hazardous Locations; for Class II and Class III liquids, shall be approved for general use.

a. On or about March 1, 2012, in the flammable storage room, the electric wiring in the inside storage room was not of the type approved for Class I, Division 2 hazardous locations, thereby exposing employees to fire hazards.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date by which Violation must be Abated: 08/21/2012  
Proposed Penalty: \$00

A handwritten signature in black ink, appearing to read "Gary J. Anderson".

**Gary J. Anderson**  
Area Director

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



## INVOICE / DEBT COLLECTION NOTICE

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

<b>Summary of Penalties for Inspection Number</b>	<b>242952</b>
<b>Citation 1, Serious</b>	<b>\$29700.00</b>
<b>Citation 2, Other-than-Serious</b>	<b>\$ .00</b>
<b>TOTAL PROPOSED PENALTIES</b>	<b>\$29700.00</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.

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

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.

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

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

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

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



Gary J. Anderson

Area Director



Date

**CERTIFICATION OF CORRECTIVE ACTION WORKSHEET**

**Inspection Number: 242952**

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

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 1600 167th Street,, Suite 9, Calumet City, IL 60409**

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Typed or Printed Name

\_\_\_\_\_  
Title

**NOTE: 29 USC 666.(g)** whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

**POSTING:** A copy of completed Corrective Action Worksheet should be posted for employee review