

Este documento es muy importante. Si ud. No habla inglés,
busque un traductor o llame al (267) 429-7542.

U.S. Department of Labor Occupational Safety and Health Administration
3477 Corporate Parkway Suite 120
Center Valley, PA 18034
Phone: (267) 429-7542 Fax: (267) 429-7567

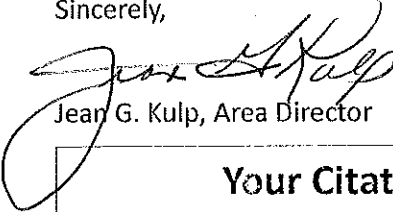


February 2, 2017

Dear Sam Saxton,

On 10/20/2016, an OSHA compliance officer met with you or your representative as part of an inspection at 105 GP Clement Dr Collegeville, PA 19426. This letter includes the citations for the violations that were found (see summary below). Please choose one of the three options from the box to the right and complete the associated steps found on the following page **within 15 working days**. Please call us if you have any questions about the enclosed citation and/or penalties; we are here to help you choose the best option to resolve your citation as quickly as possible.

Sincerely,


Jean G. Kulp, Area Director

Your Citation Summary
SS Industries, LLC
Inspection Number: 1185446

Total Amount Due: \$100450.00
Payment Due Date: 15 working days
after receipt of
this letter

You must correct each violation by the date listed in the Citation and Notification of Penalty. Please see the violations and the correction deadline for each violation starting on page 6.

Total Number of Violations : 30
Your First Correction Deadline is: 2-6-17

**Step 1 – Choose a Response
Option and
Act within 15 working days**

Respond now before you lose the ability to discuss potential adjustments to penalty amounts and/or due dates. Please choose one option below and complete the steps on the next page.

Option #1 – Discuss with OSHA

I would like to discuss the citation with an OSHA representative. This may lead to changes in the penalty amount, due date or correction deadlines (if appropriate).

Option #2 – Correct and Pay

I agree with the citation, penalties, and correction deadlines, and do not contest.

Option #3 – Contest the Citation

I do not agree with the citation, penalties, and/or correction deadlines, and would like to contest.

Questions or Concerns?

If you have any questions or concerns regarding the citation, penalties, and/or correction deadlines, please call us at (267) 429-7542.

Step 2 – Complete One Option Checklist

Please post a copy of the citation at or near the place where each violation occurred, even if you plan to contest. You can use the checklist to the right to help plan your next steps. Please do not send in your checklist.

Option #1 – Discuss with OSHA

I will complete by:



1. Call: Jean G. Kulp, Area Director, at (267) 429-7542 as soon as possible to schedule a meeting with an OSHA representative that must occur **within 15 working days** of receiving this citation. Bring supporting documentation of existing conditions and corrections done thus far. If necessary, you can still contest the citation after this meeting. ****This meeting does NOT extend your 15 working day deadline to contest the citation.****

 ___ / ___

2. Fill in and post the attached "Notice to Employees OSHA Informal Conference" after scheduling meeting.

 ___ / ___

Option #2 – Correct Violations and Pay Penalty

I will complete by:



1. Correct violations, then complete and mail the attached "Certification of Corrective Action Worksheet" along with the appropriate evidence of repair (e.g. photos, purchase orders, etc.) to the OSHA office listed on the first page, **postmarked within 10 calendar days after each violation's correction deadline and include any required evidence. If these documents are transmitted by means other than mailing, the date the Agency received the documents is the date of submission.**

 ___ / ___

2. Pay the **Total Penalty** by using one of the following methods:
****Include your Inspection Number (see first page) on the payment.****

 ___ / ___

Pay Online: Search "OSHA" on www.pay.gov and complete the "OSHA Penalty Payment Form." Pay by debit, credit or Automated Clearing House (ACH) **within 15 working days**. Penalties over \$25,000 must be paid by ACH and require a Transaction ID (Call 202-693-2170 to obtain one).

Pay by Check: Mail check or money order payable to "DOL-OSHA" for the Total Penalty to the OSHA office listed on the first page **within 15 working days**.

Option #3 – Contest the Citation

I will complete by:



Mail a letter of intent to legally contest to the OSHA office listed on the first page, **postmarked within 15 working days**.

 ___ / ___

U.S. Department of Labor
Occupational Safety and Health Administration
3477 Corporate Parkway
Suite 120
Center Valley, PA 18034
Phone: 267-429-7542 Fax: 267-429-7567



Citation and Notification of Penalty

To:
SS Industries, LLC
and its successors
105 GP Clement Dr.
Collegeville, PA 19426

Inspection Number: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017

Inspection Site:
105 GP Clement Dr
Collegeville, PA 19426

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.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 02/02/2017. The conference will be held by telephone or at the OSHA office located at 3477 Corporate Parkway, Suite 120, Center Valley, PA 18034 on _____ at

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1185446

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426
Issuance Date: 02/02/2017

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, 3477 Corporate Parkway, Suite 120, Center Valley, PA 18034**

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: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

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 1 a Type of Violation: **Serious**

29 CFR 1910.95(d)(1): When information indicated that any employee's exposure equaled or exceeded the 8-hour time-weighted average of 85 decibels, the employer did not develop and implement a monitoring program:

a) SS Industries - Grinding Area - A Grinder Operator using handheld electric grinders to clean steel was exposed to continuous noise at 151.6% of the exposure level of 90 dBA or an 8 hour time weighted average of 93.0 dBA. This exposure was observed over a 425 minute sampling period. A zero exposure was assumed for the 55 minutes not sampled. The employer did not develop and implement a representative monitoring program for those employees exposed over the action level of 85 dBA, on or about November 9, 2016.

b) SS Industries - Woodworking Area - A CNC Woodworking Machine Operator operating the CNC woodworking table was exposed to continuous noise at 86.4 % of the exposure level of 90 dBA or an 8 hour time weighted average of 88.9 dBA. This exposure was observed over a 438 minute sampling period. A zero exposure was assumed for the 42 minutes not sampled. The employer did not develop and implement a representative monitoring program for those employees exposed over the action level of 85 dBA, on or about November 9, 2016.

c) SS Industries - Woodworking Area - A Wood Shop Supervisor who operates various pieces of woodworking equipment while supervising was exposed to continuous noise at 78.8% of the exposure level of 90 dBA or an 8 hour time weighted average of 88.2 dBA. This exposure was observed over a 436 minute sampling period. A zero exposure was assumed for the 44 minutes not sampled. The employer did not develop and implement a representative monitoring program for those employees exposed over the action level of 85 dBA, on or about November 9, 2016.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement.

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

Date By Which Violation Must be Abated:
Proposed Penalty:

02/22/2017
\$6338.00

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: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

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

29 CFR 1910.95(g)(1): The employer did not establish and maintain an audiometric testing program as provided by 29 CFR 1910.95(g) by making audiometric testing available to all employees whose exposures equal or exceed an 8-hour time-weighted average of 85 decibels:

a) SS Industries - Grinding Area - A Grinder Operator using handheld electric grinders to clean steel was exposed to continuous noise at 151.6% of the exposure level of 90 dBA or an 8 hour time weighted average of 93.0 dBA. This exposure was observed over a 425 minute sampling period. A zero exposure was assumed for the 55 minutes not sampled. The employer did not provide audiometric testing for an employee exposed over the action level of 85 dBA, on or about November 9, 2016.

b) SS Industries - Woodworking Area - A CNC Woodworking Machine Operator operating the CNC woodworking table was exposed to continuous noise at 86.4 % of the exposure level of 90 dBA or an 8 hour time weighted average of 88.9 dBA. This exposure was observed over a 438 minute sampling period. A zero exposure was assumed for the 42 minutes not sampled. The employer did not provide audiometric testing for an employee exposed over the action level of 85 dBA, on or about November 9, 2016.

c) SS Industries - Woodworking Area - A Wood Shop Supervisor who operates various pieces of woodworking equipment while supervising was exposed to continuous noise at 78.8% of the exposure level of 90 dBA or an 8 hour time weighted average of 88.2 dBA. This exposure was observed over a 436 minute sampling period. A zero exposure was assumed for the 44 minutes not sampled. The employer did not provide audiometric testing for an employee exposed over the action level of 85 dBA, on or about November 9, 2016.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:

02/22/2017

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

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: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426

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

29 CFR 1910.95(k)(1): The employer did not train each employee who is exposed to noise at or above an 8-hour time-weighted average of 85 decibels in accordance with the requirements of 29 CFR 1910.95(k). The employer did not institute a training program and ensure employee participation in the program:

- a) SS Industries - Grinding Area - A Grinder Operator using handheld electric grinders to clean steel was exposed to continuous noise at 151.6% of the exposure level of 90 dBA or an 8 hour time weighted average of 93.0 dBA. This exposure was observed over a 425 minute sampling period. A zero exposure was assumed for the 55 minutes not sampled. The employer did not institute a training program for employees exposed over the action level of 85 dBA, on or about November 9, 2016.
- b) SS Industries - Woodworking Area - A CNC Woodworking Machine Operator operating the CNC woodworking table was exposed to continuous noise at 86.4 % of the exposure level of 90 dBA or an 8 hour time weighted average of 88.9 dBA. This exposure was observed over a 438 minute sampling period. A zero exposure was assumed for the 42 minutes not sampled. The employer did not institute a training program for employees exposed over the action level of 85 dBA, on or about November 9, 2016.
- c) SS Industries - Woodworking Area - A Wood Shop Supervisor who operates various pieces of woodworking equipment while supervising was exposed to continuous noise at 78.8% of the exposure level of 90 dBA or an 8 hour time weighted average of 88.2 dBA. This exposure was observed over a 436 minute sampling period. A zero exposure was assumed for the 44 minutes not sampled. The employer did not institute a training program for employees exposed over the action level of 85 dBA, on or about November 9, 2016.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

ABATEMENT NOTE:

Employees shall be provided copies of 29 CFR 1910.95 standard and post a copy in the workplace.

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

Employees shall be informed of the following:

1. The effects of noise on hearing.
2. The purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use, and care.
3. The purpose of audiometric testing and an explanation of the test procedures.

Date By Which Violation Must be Abated:

02/22/2017

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: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426

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

29 CFR 1910.95(i)(2)(ii)(A): The employer did not ensure that hearing protectors are worn by any employee who is exposed to an 8-hour time-weighted average of 85 decibels or greater and has not yet had a baseline audiogram established pursuant to 29 CFR 1910.95(g)(5)(ii):

a) SS Industries - Grinding Area - A Grinder Operator using handheld electric grinders to clean steel was exposed to continuous noise at 151.6% of the exposure level of 90 dBA or an 8 hour time weighted average of 93.0 dBA. This exposure was observed over a 425 minute sampling period. A zero exposure was assumed for the 55 minutes not sampled. The employer did not require the use of hearing protection for those employees exposed over the action level of 85 dBA who had been working at the plant for more than six months and who had not been provided audiometric testing, on or about November 9, 2016.

b) SS Industries - Woodworking Area - A CNC Woodworking Machine Operator operating the CNC woodworking table was exposed to continuous noise at 86.4 % of the exposure level of 90 dBA or an 8 hour time weighted average of 88.9 dBA. This exposure was observed over a 438 minute sampling period. A zero exposure was assumed for the 42 minutes not sampled. The employer did not require the use of hearing protection for those employees exposed over the action level of 85 dBA who had been working at the plant for more than six months and who had not been provided audiometric testing, on or about November 9, 2016.

c) SS Industries - Woodworking Area - A Wood Shop Supervisor who operates various pieces of woodworking equipment while supervising was exposed to continuous noise at 78.8% of the exposure level of 90 dBA or an 8 hour time weighted average of 88.2 dBA. This exposure was observed over a 436 minute sampling period. A zero exposure was assumed for the 44 minutes not sampled. The employer did not require the use of hearing protection for those employees exposed over the action level of 85 dBA who had been working at the plant for more than six months and who had not been provided audiometric testing, on or about November 9, 2016.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

their representatives were informed of this abatement.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

03/09/2017
\$6338.00

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

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 1910.132(a): Protective equipment, including personal protective equipment for eyes, face, head, and extremities, was not provided as necessary by reason of chemical hazards encountered in a manner capable of causing injury or impairment in the function of any part of the body through physical contact:

a) SS Industries - On or about October 20, 2016, an employee pouring concentrated Brightener, a corrosive, into 5 gallon buckets for cleaning metal handrails, was exposed to chemical burns to the head, arms, torso, and legs.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/22/2017
\$5070.00

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426

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

29 CFR 1910.132(f)(1): The employer did not provide training to each employee who is required by this section to use personal protective equipment:

a) SS Industries - On or about November 1, 2016, employees performing work activities such as welding and use of corrosives, that require protection to the eyes, face, and other bodily extremities were not provided training on what personal protective equipment was necessary to protect them during this work, nor on how to properly use the equipment.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:

03/01/2017

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: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426

Citation 1 Item 4 Type of Violation: **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, acids, or potentially injurious light radiation:

- a) SS Industries - On or about October 20, 2016, an employee pouring concentrated Brightener, a corrosive, into 5 gallon buckets for cleaning metal handrails, was exposed to chemical burns to the face and eyes.
- b) SS Industries - On or about November 1, 2016, an employee tack welding was exposed to eye injuries from flying sparks and ultraviolet radiation.
- c) SS Industries - On or about November 1, 2016, employees were exposed to injuries to the face and eyes while using handheld grinders and disc sanders on metal parts.
- d) SS Industries - On or about November 1, 2016, an employee, operating the Ajan plasma cutting table was exposed to eye injuries from flying sparks and ultraviolet radiation.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/22/2017
\$7605.00

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

Inspection Number: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426

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

29 CFR 1910.147(c)(1): The employer did not establish a program consisting of an energy control procedures, employee training, and periodic inspections, to ensure that before any employee performed any servicing or maintenance on a machine or equipment where the unexpected energizing, start up or release of stored energy could occur and cause injury, the machine or equipment would be isolated, and rendered inoperative in accordance with 29 CFR 1910.147(c)(4):

a) SS Industries - On or about November 1, 2016, an employee of the weld shop was changing out the saw blade on a Hyd-Mech horizontal band saw and while doing so had the protective guards in the open position exposing the drive pulleys and saw blade. The employer did not have an established energy control program to ensure that the machine could not unexpectedly energize, exposing the employee to amputation hazards.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:
Proposed Penalty:

03/09/2017
\$6338.00

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

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

29 CFR 1910.151(c): Where employees were exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body were not provided within the work area for immediate emergency use:

a) SS Industries - On or about October 20, 2016, an employee pouring concentrated Brightener, a corrosive, into 5 gallon buckets for cleaning metal handrails, was exposed to chemical burns to the eyes and body and the employer did not have suitable equipment to provide for quick drenching or flushing of eyes and body.

No abatement certification or documentation required.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$5070.00

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

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

29 CFR 1910.157(g)(1): An educational program was not provided for all employees to familiarize them with the general principles of fire extinguisher use and the hazards involved with incipient stage fire fighting.

a) SS Industries - On or about October 20, 2016, employees who perform welding and woodworking, were provided fire extinguishers in their departments to use during incipient stage fire fighting, and the employer did not provide an educational program as required.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

ABATEMENT NOTE: By this date the employer must either correct the alleged violation or implement a Fire Safety Policy, as outlined in 29 CFR 1910.38(a) and (b) which included the evacuation requirement of 29 CFR 1910.157(b).

Date By Which Violation Must be Abated:
Proposed Penalty:

02/22/2017
\$3802.00

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: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

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 1910.212(a): One or more methods of machine guarding were not provided to protect the operator and other employees in the machine area from hazards such as those created by ingoing nip points at the point of operation:

a) SS Industries - On or about November 1, 2016, an employee operating a power driven pipe bender was exposed to amputation hazards created by ingoing nip points where the power drive and guide rollers meet the metal pipe.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photograph or video evidence of abatement or other written records.

1. Consult with Manufactures for guidance in guarding point of operation of these machines in accordance with the following ANSI Std B11.15 for Pipe Benders.
2. Or, as an alternative, locate operational controls at a fixed location beyond operator's reach with instantaneous stop if controls button is released.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

03/09/2017

Proposed Penalty:

\$8873.00

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

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

29 CFR 1910.215(a)(1): Abrasive wheel(s) used on grinding machinery were not used with safety guard(s)

(a) SS Industries - On or about November 1, 2106, an employee operating a center-less grinder for grinding metal pipe was exposed to hand injuries created by ingoing nip points wheel the power driven roller and sanding roller meet the pipe.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentations hall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photograph or video evidence of abatement or other written records.

1. Consult with manufacturer for guidance in guarding point of operation of these machines in accordance with the following ANSI Std B11.9 for Grinding Machines.
2. Or, as an alternative, locate operational controls at a fixed location beyond operator's reach with instantaneous stop if control button is released.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

02/22/2017

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426

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

29 CFR 1910.213(d)(1): Circular handfed crosscut table saw(s) were not guarded by an automatically adjusting hood which completely enclosed that portion of the saw above the table and above the material being cut:

a) SS Industries - On or about November 9, 2016, an employee cutting wood for spiral staircases was using a circular handfed crosscut table saw that was not guarded by an automatic adjusting hood that completely enclosed the portion of the saw above the table, exposing the employee to severe laceration and amputation hazards.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/22/2017
\$6338.00

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

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

29 CFR 1910.213(i)(1): Non-working portion(s) of the blade of bandsaw(s) were not enclosed or guarded:

a) SS Industries - On or about Nov. 1, 2016, employees using a Resaw Master vertical bandsaw to cut wood were exposed to approximately 4 inches of an unguarded portion of the blade below the cutting deck, exposing employees to amputation hazards.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:
Proposed Penalty:

Quick Fix Applied
\$5387.00

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426

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

29 CFR 1910.242(b): Compressed air used for cleaning purposes was not reduced to less than 30 p.s.i.:

a) SS Industries - Powder Coat Dept. - On or about October 20, 2016, a Powder Coat employee was exposed to flying particles and other compressed air hazards during the use of air nozzles for cleaning their protective clothing as well as the interior walls of the powder coat booth at approximately 70 p.s.i. The pressure was not reduced as required.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/22/2017
\$3802.00

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426

Citation 1 Item 12 Type of Violation: **Serious**

29 CFR 1910.243(c)(1): Abrasive wheel(s) were used on portable grinder(s) which were not provided with safety guard(s) meeting the requirements specified in 29 CFR 1910.243(c)(1) through (c)(4)

a) SS Industries - On or about November 9, 2016, an employee was exposed to deep laceration injuries to the hands and forearms, while using a Metabo handheld electric grinder fitted with a 7 inch cutoff disc without the guard in place.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/14/2017
\$5070.00

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

Citation 1 Item 13 Type of Violation: **Serious**

29 CFR 1910.303(b)(2): Listed or labeled electrical equipment was not used or installed in accordance with instructions included in the listing or labeling:

1) SS Industries - Weld Booth #1 - On or about November 1, 2016, two relocatable power taps were connected in series by an extension cord to power multiple industrial tools, such as but not limited to, a 36 inch floor fan, handheld grinder(s), and a 5 foot long overhead fluorescent light ballast, which were not used in accordance with the UL listing or labeling, exposing workers to shock and electrical burns.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/22/2017
\$3802.00

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

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 14 a Type of Violation: **Serious**

29 CFR 1910.305(b)(1)(i): Conductors entering cutout boxes, cabinets, or fittings were not protected from abrasions:

a) SS Industries - Weld booth #5 - On or about November 1, 2016, an employee was operating a portable to 220/480 Volt welding unit which had the power cord entering a disconnect box through an oversized knockout and wired directly to the terminals. The power cord did not have strain relief, nor any abrasion resistant covering on the power cord where it entered the knockout of the disconnect box, exposing the employees to shock and burns.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/22/2017
\$5070.00

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: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

Citation 1 Item 14 b Type of Violation: **Serious**

29 CFR 1910.305(g)(2)(iii): Flexible cords and cables were not connected to devices and fittings so that strain relief was provided that would prevent pull from being directly transmitted to joints or terminal screws:

a) SS Industries - Weld Booth #1 - On or about November 1, 2016, an employee was operating a portable 220/480 Volt portable welding unit which had the power cord entering a disconnect box and wired directly to the terminals. The power cord did not have strain relief where it entered the knockout of the disconnect box, exposing the employees to shock and burns.

b) SS Industries - Weld Booth #9 - On or about November 1, 2016, an employee was operating a portable 220/480 Volt portable welding unit which had a plug in power cord, and the cord did not have strain relief where it entered the plug, exposing the employees to shock and burns.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:

02/22/2017

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

Inspection Number: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

Citation 1 Item 15 Type of Violation: **Serious**

29 CFR 1910.305(g)(1)(iv)(A): Flexible cords and/or cables were used as a substitute for the fixed wiring of a structure:

a) SS Industries - On or about November 1, 2016, a flexible extension cord was used to power two fixed halogen light fixtures that were being used to illuminate the inside of the powder coat oven, exposing employees to shock and fire/electrical burns.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/22/2017
\$3802.00

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: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

Citation 1 Item 16 b Type of Violation: **Serious**

29 CFR 1910.1000(e): Feasible administrative or engineering controls were not determined and implemented to achieve compliance with the limits prescribed in 29 CFR 1910.1000(a) through (d):

a) SS Industries - On or about November 1, 2016, a Powder Coater, while powder coating metal in the powder coat booth, was exposed to Particulates Not Otherwise Regulated (PNOR-total dust) at an eight hour time weighted average of 60 milligrams per cubic meter of air. This exposure is 4.03 times the permissible exposure limit (PEL) of 15 mg per cubic meter of air. This exposure occurred over a 455 minute sampling period. A zero exposure was assumed for the 25 minutes not sampled. Feasible controls were not implemented.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Feasible abatement methods include but are not limited to:

- 1) Improve or redesign the physical structure and/or ventilation draw of the booth to increase CFM and capture velocity. Enclosing sides of booth where product enters on conveyor and closing off other gaps or openings in booth walls/ceiling should increase capture velocity.
- 2) Enable the product to be turned on a swivel so the Powder Coater does not have to place himself between the product and ventilation flow. This will prevent the powder coat dust from traveling back into the employee's breathing zone, essentially keeping the employee "upwind".
- 3) Administratively reduce time employee's work at task with high exposure.

ABATEMENT NORMALLY WILL BE MULTISTEP AS FOLLOWS:

Step 1: SUBMIT TO THE AREA DIRECTOR A WRITTEN, DETAILED PLAN OF ABATEMENT OUTLINING A SCHEDULE FOR THE IMPLEMENTATION OF ENGINEERING AND/OR ADMINISTRATIVE MEASURES TO CONTROL EMPLOYEE EXPOSURE TO HAZARDOUS SUBSTANCES AS REFERENCED IN THIS CITATION. THIS PLAN SHALL INCLUDE, AT A MINIMUM, TARGET DATES FOR THE FOLLOWING ACTIONS WHICH MUST BE CONSISTANT WITH THE ABATEMENT DATES REQUIRED BY THIS CITATION:

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426.

- (1) EVALUATION OF ENGINEERING/ADMINISTRATIVE CONTROL OPTIONS;
- (2) SELECTION OF OPTIMUM CONTROL METHODS AND COMPLETION OF DESIGN;
- (3) PROCUREMENT, INSTALLATION AND OPERATION OF SELECTED CONTROL MEASURES; AND
- (4) TESTING AND ACCEPTANCE OR MODIFICATION/REDESIGN OF CONTROLS.

NINETY- (90) DAY PROGRESS REPORTS ARE REQUIRED DURING THE ABATEMENT PERIOD. (THE 90 DAY REQUIREMENT CAN BE SHORTENED OR LENGTHENED BY THE AREA DIRECTOR DEPENDING ON THE SPECIFIC CIRCUMSTANCES.)

Step2: ABATEMENT SHALL HAVE BEEN COMPLETED BY THE IMPLEMENTATION OF FEASIBLE ENGINEERING AND/OR ADMINISTRATIVE CONTROLS UPON THE VERIFICATION OF THEIR EFFECTIVENESS IN ACHIEVING COMPLIANCE.

Plan05/08/2017

Engineering Controls03/09/2017

Date By Which Violation Must be Abated:

06/07/2017

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: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

Citation 1 Item 16 c Type of Violation: **Serious**

29 CFR 1910.134(c)(1): A written respiratory protection program that included the provisions in 29 CFR 1910.134(c)(1)(i) - (ix) with worksite specific procedures was not established and implemented for required respirator use:

a) SS Industries - On or about November 1, 2016, a Powder Coater, while powder coating metal in the powder coat booth was exposed to Particulates Not Otherwise Regulated (PNOR-total dust) at an eight hour time weighted average of 60 milligrams per cubic meter of air. This exposure is 4.03 times the permissible exposure limit (PEL) of 15 mg per cubic meter of air. This exposure occurred over a 455 minute sampling period. A zero exposure was assumed for the 25 minutes not sampled. The employer did not establish nor implement a worksite specific respiratory protection program as required.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:

03/09/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426

Citation 1 Item 16 d Type of Violation: **Serious**

29 CFR 1910.134(e)(1): The employer did not provide a medical evaluation to determine the employee's ability to use a respirator before the employee was required or permitted to use an elastomeric respirator in the workplace:

a) SS Industries - On or about November 1, 2016, a Powder Coater, while powder coating metal in the powder coat booth was exposed to Particulates Not Otherwise Regulated (PNOR-total dust) at an eight hour time weighted average of 60 milligrams per cubic meter of air. This exposure is 4.03 times the permissible exposure limit (PEL) of 15 mg per cubic meter of air. This exposure occurred over a 455 minute sampling period. A zero exposure was assumed for the 25 minutes not sampled. Employee required to wear respirator due to exposure was not provided a medical examination prior to using the respirator as required.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Note: The employer may discontinue an employee's medical evaluations when the employee is no longer required for permitted to use an elastomeric respirator.

Date By Which Violation Must be Abated:

02/22/2017

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

Inspection Number: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426

Citation 1 Item 16 e Type of Violation: **Serious**

29 CFR 1910.134(f)(1): The employer did not ensure that employee(s) required to use a tight-fitting face piece respirator passed the appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT):

a) SS Industries - On or about November 1, 2016, a Powder Coater, while powder coating metal in the powder coat booth was exposed to Particulates Not Otherwise Regulated (PNOR-total dust) at an eight hour time weighted average of 60 milligrams per cubic meter of air. This exposure is 4.03 times the permissible exposure limit (PEL) of 15 mg per cubic meter of air. This exposure occurred over a 455 minute sampling period. A zero exposure was assumed for the 25 minutes not sampled. Employee required to wear respirator due to exposure was not provided a respirator fit test.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:

03/09/2017

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: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

Citation 1 Item 16 f Type of Violation: **Serious**

29 CFR 1910.134(k): The employer did not provide comprehensive, understandable, and effective training to employees who were permitted to use elastomeric respirators.

a) SS Industries - On or about October 20, 2016, a Powder Coater was required to wear a full-face elastomeric respirator to protect them from inhalation and skin hazards of powder coatings. The employer did not provide effective training on the required training elements of this section.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

Date By Which Violation Must be Abated:

02/22/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

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 17 a Type of Violation: **Serious**

29 CFR 1910.1000(a)(2): Employee(s) were exposed to an airborne concentration of Particulates Not Otherwise Regulated (total dust) in Table Z-1 in excess of the 8-hour Time Weighted Average (TWA) concentration of 15 mg per cubic meter for that contaminant:

a) SS Industries - On or about November 1, 2016, a Woodworker, while using handheld electric Woodworking tools was exposed to Particulates Not Otherwise Regulated (PNOR-total dust) at an 8 hour time weighted average exposure of 18 milligrams per cubic meter of air. This exposure is 1.19 times the permissible exposure limit (PEL) of 15 milligrams per cubic meter of air. This exposure occurred over a 405 minute sampling period. A zero exposure was assumed for the 75 minutes not sampled.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement..

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

06/07/2017
\$6338.00

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: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

Citation 1 Item 17 b Type of Violation: **Serious**

29 CFR 1910.1000(e): Feasible administrative or engineering controls were not determined and implemented to achieve compliance with the limits prescribed in 29 CFR 1910.1000(a) through (d):

a) SS Industries - On or about November 1, 2016, a Woodworker, while using handheld electric Woodworking tools was exposed to Particulates Not Otherwise Regulated (PNOR-total dust) at an 8 hour time weighted average exposure of 18 milligrams per cubic meter of air. This exposure is 1.19 times the permissible exposure limit (PEL) of 15 milligrams per cubic meter of air. This exposure occurred over a 405 minute sampling period. A zero exposure was assumed for the 75 minutes not sampled. The employer did not determine or implement feasible administrative or engineering controls to achieve compliance with the PEL.

Feasible means of abatement include but are not limited to:

1. Attach local exhaust ventilation to handheld electric hand tools, such as the setup that currently exists for the handheld sander at the work bench in the center of the shop.
2. If local exhaust ventilation is not feasible on all electric hand tools, employees in this area could be rotated to other areas of the Wood Shop to limit the exposure time working on the handrails to no more than 4-5 hours.

Step 1: EFFECTIVE RESPIRATORY PROTECTION SHALL BE PROVIDED AND USED BY EXPOSED EMPLOYEES AS AN INTERIM PROTECTIVE MEASURE UNTIL FEASIBLE ENGINEERING AND/OR ADMINISTRATIVE CONTROLS CAN BE IMPLEMENTED, OR WHENEVER SUCH CONTROLS FAIL TO REDUCE EMPLOYEE EXPOSURE TO WITHIN PERMISSIBLE EXPOSURE LIMITS.

Step 2: SUBMIT TO THE AREA DIRECTOR A WRITTEN, DETAILED PLAN OF ABATEMENT OUTLINING A SCHEDULE FOR THE IMPLEMENTATION OF ENGINEERING AND/OR ADMINISTRATIVE MEASURES TO CONTROL EMPLOYEE EXPOSURE TO HAZARDOUS SUBSTANCES AS REFERENCED IN THIS CITATION. THIS PLAN SHALL INCLUDE, AT A MINIMUM, TARGET DATES FOR THE FOLLOWING ACTIONS WHICH MUST BE CONSISTANT WITH THE ABATEMENT DATES REQUIRED BY THIS CITATION:

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426

- (1) EVALUATION OF ENGINEERING/ADMINISTRATIVE CONTROL OPTIONS;
- (2) SELECTION OF OPTIMUM CONTROL METHODS AND COMPLETION OF DESIGN;
- (3) PROCUREMENT, INSTALLATION AND OPERATION OF SELECTED CONTROL MEASURES; AND
- (4) TESTING AND ACCEPTANCE OR MODIFICATION/REDESIGN OF CONTROLS.

Step3: ABATEMENT SHALL HAVE BEEN COMPLETED BY THE IMPLEMENTATION OF FEASIBLE ENGINEERING AND/OR ADMINISTRATIVE CONTROLS UPON THE VERIFICATION OF THEIR EFFECTIVENESS IN ACHIEVING COMPLIANCE.

Plan05/08/2017

PPE02/13/2017

Engineering Controls06/07/2017

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

06/07/2017

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegetown, PA 19426

Citation 1 Item 17 c Type of Violation: **Serious**

29 CFR 1910.134(a)(2): A respirator was not provided by the employer to each employee when such equipment was necessary to protect the health of the employee:

a) SS Industries - On or about November 1, 2016, a Woodworker, while using handheld electric Woodworking tools was exposed to Particulates Not Otherwise Regulated (PNOR-total dust) at an 8 hour time weighted average exposure of 18 milligrams per cubic meter of air. This exposure is 1.19 times the permissible exposure limit (PEL) of 15 milligrams per cubic meter of air. This exposure occurred over a 405 minute sampling period. A zero exposure was assumed for the 75 minutes not sampled. The employee was not provided and required to use a respirator.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement..

Date By Which Violation Must be Abated:

02/13/2017

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: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

Citation 1 Item 18 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:

a) SS Industries - On or about November 1, 2016, employees were exposed to iron oxide, copper fume, corrosive acids and wood dusts while performing work activities such as welding, chemical treatment of metal, and woodworking. The employer did not provide 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.

Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states that employees and their representatives were informed of this abatement.

ABATEMENT NOTE:

Employees shall be informed of the following:

1. The requirements of this section;
2. Any operations where hazardous chemicals are present;
3. The location and availability of the written Hazard Communication Program, list(s) of hazardous chemicals and Safety Data Sheets.

Employee training shall include at least:

1. Methods and observations that may be used to detect the presence or release of hazardous chemical in the work area.
2. The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area.
3. The measures employees can take to protect themselves such as specific procedures and personal, protective equipment to be used.
4. The details of the employer's Hazard Communication Program including an explanation of the labels received on shipped containers and the workplace labeling system used by the employer; Safety Data Sheets, including the order of information and how employees can obtain and use the appropriate

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: 1185446
Inspection Date(s): 10/20/2016 - 01/12/2017
Issuance Date: 02/02/2017



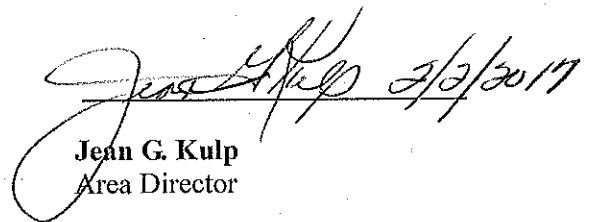
Citation and Notification of Penalty

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426

hazard information.

Date By Which Violation Must be Abated:
Proposed Penalty:

03/01/2017
\$7605.00


Jean G. Kulp
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
3477 Corporate Parkway
Suite 120
Center Valley, PA 18034
Phone: 267-429-7542 Fax: 267-429-7567



INVOICE / DEBT COLLECTION NOTICE

Company Name: SS Industries, LLC
Inspection Site: 105 GP Clement Dr., Collegeville, PA 19426
Issuance Date: 02/02/2017

| | |
|---|--------------------|
| Summary of Penalties for Inspection Number | 1185446 |
| Citation 1, Serious | \$100450.00 |
| TOTAL PROPOSED PENALTIES | \$100450.00 |

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.

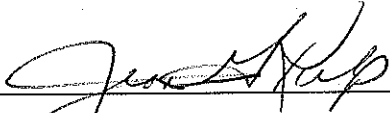
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 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.



Jean G. Kulp
Area Director

February 2, 2017
Date