

**Este documento es muy importante. Si ud. No habla inglés,
busque un traductor o llame al (770) 493-6644.**

U.S. Department of Labor Occupational Safety and Health Administration
2183 Northlake Parkway Building 7, Suite 110
Tucker, GA 30084
Phone: (770) 493-6644 Fax: (770) 493-7725

June 24, 2015

Dear Sirs,

On 01/28/2015, an OSHA compliance officer met with you or your representative as part of an inspection at 1533 South Broad St. Monroe, GA 30655. 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,


William C. Fletcher, Area Director

Your Citation Summary
Elite Storage Solutions, LLC
Inspection Number: 1021840

Total Amount Due: \$125,165.00
**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:
July 21, 2015**

**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 (770) 493-6644.

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: William C. Fulcher, Area Director, at (770) 493-6644 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
2183 Northlake Parkway
Building 7, Suite 110
Tucker, GA 30084
Phone: 770-493-6644 Fax: 770-493-7725



Citation and Notification of Penalty

To:
Elite Storage Solutions, LLC
and its successors
1118 W. Spring Street
Monroe, GA 30655

Inspection Number: 1021840
Inspection Date(s): 01/28/2015 - 02/05/2015
Issuance Date: 06/24/2015

Inspection Site:
1533 South Broad St.
Monroe, GA 30655

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 06/24/2015. The conference will be held by telephone or at the OSHA office located at 2183 Northlake Parkway, Building 7, Suite 110, Tucker, GA 30084 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1021840

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655
Issuance Date: 06/24/2015

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, 2183 Northlake Parkway, Building 7, Suite 110, Tucker, GA 30084**

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

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

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

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

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

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

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

Signature

Date

Typed or Printed Name

Title

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

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

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

Inspection Number: 1021840
Inspection Date(s): 01/28/2015 - 02/05/2015
Issuance Date: 06/24/2015



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.23(c)(1): Open-sided floors and/or platforms four feet or more above adjacent floor or ground level were not guarded with standard railings (or equivalent) and toeboards.

On 1/28/15, at the Plant 4 facility, employees were exposed to fall hazards ranging from 4 to 10 feet in various locations of the facility including:

- 1 - Paint Prep Area Platform - 4' fall hazard
- 2 - Maintenance Shop Area -- 10' fall hazard

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

Date By Which Violation Must be Abated:
Proposed Penalty:

07/21/2015
\$5500.00

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

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

Inspection Number: 1021840
Inspection Date(s): 01/28/2015 - 02/05/2015
Issuance Date: 06/24/2015



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.24(b): Fixed stairs were not provided for access from one structure level to another where operations necessitated regular travel between levels, and for access to operating platforms at any equipment which requires attention routinely during operations.

On 1/28/15, in the paint prep area of Plant 4, employees were not provided stairs so as to access the paint prep platform.

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

| | |
|--|-------------------|
| Date By Which Violation Must be Abated: | 07/21/2015 |
| Proposed Penalty: | \$3300.00 |

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: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.36(d)(1): Employee(s) were not able to open an exit route door from the inside at all times without keys, tools, or special knowledge:

On 1/28/15, in Plant 4, the employer did not ensure emergency exit doors were not equipped with dead bolt locks. Three doors were equipped with dead bolt locks in the facility in the following locations:

- 1 - Paint Prep Area - spray painting operations
- 2 - Press Area - various press operations
- 3 - Maintenance Shop - various operations including welding/cutting operations

No abatement certification or documentation is required for this item.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3300.00



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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 4 a Type of Violation: **Serious**

29 CFR 1910.37(a)(3): Exit route(s) were not kept free and unobstructed.

On 1/28//15, at Plant 4, the employer did not ensure the emergency egress discharge leading outdoors from the paint area would be kept free and unobstructed as the employee parking lot was not marked in such a way that vehicles would not park in front of the emergency exit door.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

| | |
|---|------------|
| Date By Which Violation Must be Abated: | 07/21/2015 |
| Proposed Penalty: | \$7000.00 |

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

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

Inspection Number: 1021840
Inspection Date(s): 01/28/2015 - 02/05/2015
Issuance Date: 06/24/2015



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.36(h)(3): Outdoor exit route(s) were not reasonably straight and did not have smooth, solid, substantially level walkways.

On 1/28/15, at Plant 4, the employer did not ensure the emergency egress discharge leading outdoors from the paint area had solid and level walkways. Discharge from the area was concrete and dirt path that was broken creating an uneven surface.

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

Date By Which Violation Must be Abated:

07/21/2015

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: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.147(c)(4)(ii): Procedures did not clearly and specifically outline the scope, purpose, authorization, rules, and techniques to be utilized for the control of hazardous energy, and the means to enforce compliance including, but not limited to, 29 CFR 1910.147(c)(4)(ii)(A), (c)(4)(ii)(B), (c)(4)(ii)(C) and (c)(4)(ii)(D).

On 1/28/15, at the Plant 4 facility of Elite Storage Solutions, LLC, the employer did not develop specific written procedures that that included required information for equipment being serviced/maintained. Deficiencies included:

- 1 - A specific statement of the intended use of the procedure
- 2 - Specific procedural steps for shutting down, isolating, blocking and securing machines or equipment to control hazardous energy
- 3 - Specific procedural steps for the placement, removal and transfer of lockout devices or tagout devices and the responsibility for them
- 4 - Specific requirements for testing a machine or equipment to determine and verify the effectiveness of lockout devices, tagout devices, and other energy control measures

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

| | |
|--|-------------------|
| Date By Which Violation Must be Abated: | 08/11/2015 |
| Proposed Penalty: | \$7000.00 |

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



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.147(c)(6)(i): The employer did not conduct a periodic inspection of the energy control procedure at least annually to ensure that the procedure and the requirement of this standard were being followed.

On 1/28/15, at the Plant 4 facility of Elite Storage Solutions, LLC, the employer did not conduct an inspection of the established Lockout/Tagout program at least annually to correct for deficiencies and deviations in the program.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

| | |
|---|------------|
| Date By Which Violation Must be Abated: | 08/11/2015 |
| Proposed Penalty: | \$7000.00 |

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



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.147(c)(7)(i): The employer did not provide training to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees.

On 1/28/15, at the Plant 4 facility of Elite Storage Solutions, LLC, the employer did not ensure "Authorized" employees performing service/maintenance work to equipment and "Affected" employees located near that work were trained in the company's established Lockout/Tagout program.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 08/11/2015
Proposed Penalty: \$7000.00

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



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

Citation 1 Item 8 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) (SPECIFY OPTION CHOSEN) (DESCRIBE CONDITION(S) AND HAZARD(S))Note: Applies where all employees are expected to fight fires.

On 1/28/15, at the Plant 4 facility of Elite Storage Solutions, LLC, when the employer expected employees to use extinguishers to fight incipient level fires, the employer did not implement a training program for the use of fire extinguishers.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET). The employer may abate this violation by complying with either 1910.157(g)(1) or 1910.38(a).

Date By Which Violation Must be Abated: 08/11/2015
Proposed Penalty: \$5500.00

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

Inspection Number: 1021840
Inspection Date(s): 01/28/2015 - 02/05/2015
Issuance Date: 06/24/2015



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.176(b): Material stored in tiers was not stacked, blocked, interlocked or limited in height so that it was stable and secure against sliding and collapse.

On 1/23/15, in Plant 1 at the Structural Beam area, employees were exposed to crushing, struck by and amputation hazards as the employer did not ensure welded beams, that were stored upright after welding, were secured into place when placed up right.

No abatement certification or documentation is required for this item.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$4675.00

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: 1021840
Inspection Date(s): 01/28/2015 - 02/05/2015
Issuance Date: 06/24/2015



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

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

On 1/28/15, at the Plant 4 facility of Elite Storage Solutions, LLC, the employer did not ensure machine guarding covered the unused portion of the blade on the Spartan Horizontal Band Saw used for cutting metal at the facility.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence of abatement, or other written records.

Date By Which Violation Must be Abated:
Proposed Penalty:

Quick Fix Applied
\$4675.00

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: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

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

On 1/28/15, at the Plant 4 facility of Elite Storage Solutions, LLC, the employer did not ensure point of operation guarding was guarded for various presses and machines in operation at the facility. Machines included:

Press 1- No Serial # - Hyd-Press - used as punch press (Holes cut into guards for access to die with blanking rods)

Press 3- Serial #40-6 Press Brake used as punch press (Guard with hole 9x19 opening)

Press 5- Serial #15939 20-10 Press Brake used as punch press

Press 6- Serial #23241.208.65 Press Brake used as punch press

Press 7- Serial #50319 used as punch press (Opening into operation area 3 wide x 17 height opening on both sides)

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

07/21/2015

Proposed Penalty:

\$7000.00

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



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.217(c)(3)(vii)(a): When used in press operations requiring more than one operator, separate two hand controls were not provided for each operator. Controls were not designed to require concurrent application of all operators' controls to activate the slide.

On 1/28/15, in Plant 4 at Press 2, two hand controls were not provided for all operators of the E.W. Bliss Part Revolution Press (Serial #H67849). One set of controls were provided for the press when three operators were assigned work at the press.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 07/21/2015

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

Inspection Number: 1021840
Inspection Date(s): 01/28/2015 - 02/05/2015
Issuance Date: 06/24/2015



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.217(c)(3)(vii)(d): Two hand controls used with mechanical power press(es) were not fixed in position so that only a supervisor or safety engineer was capable of relocating the controls.

On 1/28/15, in Plant 4 at Press 8, the two hand control for the Press USI Clearing Part Revolution press (Press 8 - Serial #54 3167 was not in a fixed location and could be moved.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 07/21/2015
Proposed Penalty: \$7000.00

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



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.217(d)(1)(i): The employer did not use dies and operating method(s) designed to control or eliminate hazards to operating personnel on mechanical power press(es).

On 1/28/15, at the Plant 4 facility of Elite Storage Solutions, LLC, the employer did not ensure operators of mechanical power presses used operating methods to prevent entry into and near the point of operation. Presses included:

- 1 USI Clearing Part Revolution press (Press 8 - Serial # 54 3167)
- 2 E.W. Bliss Part Revolution Press (Press 2 Serial #H67849)

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

| | |
|---|------------|
| Date By Which Violation Must be Abated: | 07/21/2015 |
| Proposed Penalty: | \$7000.00 |

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



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.217(e)(1)(i): A program of periodic and regular inspections of mechanical power press(es) was not established and followed to ensure that all parts, auxiliary equipment and safeguards were in a safe operating condition and adjustment.

On 1/28/15, at the Plant 4 facility of Elite Storage Solutions, LLC, the employer did not perform inspections to confirm all safeguards were in place on mechanical power presses, including:

- 1 USI Clearing Part Revolution press (Press 8 - Serial # 54 3167)
- 2 E.W. Bliss Part Revolution Press (Press 2 Serial #H67849)

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

| | |
|---|------------|
| Date By Which Violation Must be Abated: | 08/11/2015 |
| Proposed Penalty: | \$7000.00 |

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



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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 16 a Type of Violation: **Serious**

29 CFR 1910.217(f)(2): Operator(s) were not trained and instructed in the safe method of work before starting work on mechanical power press(es).

On 1/28/15, at the Plant 4 facility of Elite Storage Solutions, LLC, the employer did not ensure operators of mechanical power presses were trained and instructed in safe methods of work before starting work on mechanical power presses. Presses included:

- 1 USI Clearing Part Revolution press (Press 8 - Serial # 54 3167)
- 2 E.W. Bliss Part Revolution Press (Press 2 Serial #H67849)

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 08/11/2015
Proposed Penalty: \$7000.00

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

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

Inspection Number: 1021840
Inspection Date(s): 01/28/2015 - 02/05/2015
Issuance Date: 06/24/2015



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

Citation 1 Item 17 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.

On 1/28/15, in the Plant 4 facility for Elite Storage Solutions LLC, employees used compressed air for cleaning off product in the blast area and the compressed air was measured more than 100 psi.

No abatement certification or documentation is required for this item.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$5610.00

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: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

Citation 1 Item 18 Type of Violation: **Serious**

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

On 1/28/15, in the maintenance area of Plant 4, Oxygen cylinders were stored within 10 feet of Acetylene cylinders.

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

Date By Which Violation Must be Abated:
Proposed Penalty:

07/21/2015
\$3300.00

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

Inspection Number: 1021840
Inspection Date(s): 01/28/2015 - 02/05/2015
Issuance Date: 06/24/2015



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

Citation 1 Item 19 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.

On 1/28/15, at Plant 4 of the employer, electrical extension cords used to power lights at the spray booth area were used in lieu of permanent wiring.

No abatement certification or documentation is required for this item.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$2805.00

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: 1021840
Inspection Date(s): 01/28/2015 - 02/05/2015
Issuance Date: 06/24/2015



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

Citation 1 Item 20 Type of Violation: **Serious**

29 CFR 1910.332(b)(1): Employees were not trained in and familiar with the safety-related work practices required by 1910.331 through 1910.335 that pertained to their respective job assignments.

On 2/4/15, at the Plant 4 facility, employees were exposed to live electrical hazards as the employer had not established a training program for employees assigned to perform electrical work at the facility.

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

Date By Which Violation Must be Abated:
Proposed Penalty:

08/11/2015
\$5500.00

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



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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 21 a Type of Violation: **Serious**

29 CFR 1910.333(a)(1):

"Deenergized parts." Live parts to which an employee may be exposed shall be deenergized before the employee works on or near them, unless the employer can demonstrate that deenergizing introduces additional or increased hazards or is infeasible due to equipment design or operational limitations.

On 2/4/15, at Plant 4, employees working in Press 1 480v electrical panel did not use work practices that were suitable for the conditions under which the work was performed in that, the incoming power supply at the lugs remained energized while employees performed service work.

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

Date By Which Violation Must be Abated:
Proposed Penalty:

08/11/2015
\$5500.00



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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 22 a Type of Violation: **Serious**

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

On or about 2/4/15, at Plant 4, employees were exposed to electrical hazards, as they worked in an energized 480 volt panel without personal protective equipment for such work.

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

Date By Which Violation Must be Abated: 07/21/2015
Proposed Penalty: \$5500.00



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

Citation 1 Item 22 b Type of Violation: **Serious**

29 CFR 1910.335(b)(1): Safety signs, safety symbols, or accident prevention tags were not used where necessary to warn employees about electrical hazards which may endanger them as required by 29 CFR 1910.145.

On 2/4/15, at the Plant 4 facility, where applicable the employer did not ensure safety signs or tags were posted at electrical panels where employees conducted work that may endanger them. i.e. there were no warning signs at Press 1 480 volt electrical panel to indicate live electrical parts in panel.

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

Date By Which Violation Must be Abated:

07/21/2015



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

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

29 CFR 1910.134(k)(1): The employer did not ensure that each employee can demonstrate knowledge of items in (i)-(vii) of the standard.

On 1/28/15, at Plant 4 of the facility, the employer did not provide training in the Respiratory Protection program established at the facility to employees required to wear half mask respirators.

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

| | |
|---|------------|
| Date By Which Violation Must be Abated: | 08/11/2015 |
| Proposed Penalty: | \$0.00 |



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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

29 CFR 1910.134(k)(6): The employer did not provide the basic advisory information on respirators, as presented in Appendix D of 29 CFR 1910.134, in written or oral format to employees who wear respirators when such use was not required by the employer.

On 1/28/15, at the Plant 4 facility, the employer did not ensure employees wearing dust mask respirators on a voluntary basis were provided information in Appendix D of the standard.

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

Date By Which Violation Must be Abated:

08/11/2015

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

Inspection Number: 1021840
Inspection Date(s): 01/28/2015 - 02/05/2015
Issuance Date: 06/24/2015



Citation and Notification of Penalty

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655

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


29 CFR 1910.253(b)(2)(iv): Valve protection caps, where cylinders were designed to accept caps, were not always in place, hand-tight, except when cylinders were in use or connected for use.

On 1/28/15, in the Maintenance shop of Plant 4, an Oxygen cylinder in storage was without a valve protection cap.

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

Date By Which Violation Must be Abated:
Proposed Penalty:

07/21/2015
\$0.00



William C. Fulcher
Area Director

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

U.S. Department of Labor
Occupational Safety and Health Administration
2183 Northlake Parkway
Building 7, Suite 110
Tucker, GA 30084
Phone: 770-493-6644 Fax: 770-493-7725



**INVOICE /
DEBT COLLECTION NOTICE**

Company Name: Elite Storage Solutions, LLC
Inspection Site: 1533 South Broad St., Monroe, GA 30655
Issuance Date: 06/24/2015

| | |
|---|--------------------|
| Summary of Penalties for Inspection Number | 1021840 |
| Citation 1, Serious | \$125165.00 |
| Citation 2, Other-than-Serious | \$0.00 |
| TOTAL PROPOSED PENALTIES | \$125165.00 |

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.



William C. Fulcher

Area Director



Date