

U.S. Department of Labor

Occupational Safety and Health Administration
450 Mall Boulevard
Suite J
Savannah, GA 31406
Phone: 912-652-4393 Fax: 912-652-4329



Citation and Notification of Penalty

To:
Atlas Steel Coatings, Inc
and its successors
19063 Yontz Road
Brooksville, FL 34601

Inspection Number: 986792
Inspection Date(s): 07/22/2014 - 07/23/2014
Issuance Date: 01/20/2015

Inspection Site:
129 Philema Road
Albany, GA 31702

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 \$50,000 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 01/20/2015. The conference will be held by telephone or at the OSHA office located at 450 Mall Boulevard, Suite J, Savannah, GA 31406 on _____ at

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 986792

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702
Issuance Date: 01/20/2015

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, 450 Mall Boulevard, Suite J, Savannah, GA 31406**

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: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(d)(1)(i): Each employer who had a workplace or operation covered by 29 CFR 1926.62 did not initially determine if any employee was exposed to lead at or above the action level of 30 micrograms per cubic meter of air (30 ug/m³) calculated as an 8-hour time-weighted average (TWA):

(a) In the Abrasive Blasting containment, on or at times prior to, July 23, 2014, an initial determination for lead exposures was not conducted where employees were performing abrasive blasting operations to remove lead based paint.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/13/2015
Proposed Penalty:	\$4900.00

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: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

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

29 CFR 1926.62(d)(2)(v)(A): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with appropriate respiratory protection in accordance with 29 CFR 1926.62(f):

(a) In the Abrasive Blasting containment, on or about and at times prior to, July 23, 2014, employees were utilizing a half mask respirator which had an insufficient assigned protection factor while cleaning up lead-containing abrasive blasting residue; and no respirator while moving the lead contaminated containment enclosure.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/13/2015
Proposed Penalty:	\$4900.00



Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(f)(1)(iv): Respirators were not used during periods when respirators were required to provide interim protection for employees while they performed the operations specified in 29 CFR 1926.62(d)(2):

(a) In the Abrasive Blasting containment, on or about and at times prior to, July 23, 2014, employees were utilizing a half mask respirator which had an insufficient assigned protection factor while cleaning up lead-containing abrasive blasting residue while shoveling lead residue from floor of containment into totes.

(b) In the Abrasive Blasting containment, on or about and at times prior to, July 23, 2014, employees were not utilizing respiratory protection while moving the lead contaminated containment.

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Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(f)(2)(i): The employer did not implement a respiratory protection program in accordance with 29 CFR 1910.134(b) through (d) (except (d)(1)(iii)), and (f) through (m) for each employee required by 29 CFR 1926.62 to use a respirator:

(a) In the Abrasive Blasting containment, on or about and at times prior to, July 23, 2014, the employer did not implement their respiratory protection program in that employees were required to provide their own half mask respirator; employees were utilizing a half mask respirator which had an insufficient assigned protection factor while cleaning up lead-containing abrasive blasting residue; fit testing, cleaning supplies, and training was not provided; and effective carbon monoxide monitoring was not utilized for supplied air respirators used during abrasive blasting operations, resulting in lead and carbon monoxide related health hazards.

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Company Name: Atlas Steel Coatings, Inc
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Citation 1 Item 2 d 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: (Construction Reference 1926.103):

(a) Bridge renovation site, a written respiratory protection program with work site specific procedures had not been established for employees engaged in painting operations when using an elastomeric half mask cartridge respirator was required on or about July 23, 2014.

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Company Name: Atlas Steel Coatings, Inc
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Citation 1 Item 2 e 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 fit tested or required to use the respirator in the workplace: (Construction Reference 1926.103):

(a) Bridge renovation site, a medical evaluation had not been conducted for employees engaged in painting operations when using an elastomeric half mask cartridge respirator.

Date By Which Violation Must be Abated:

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Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
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The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

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

29 CFR 1926.62(d)(2)(v)(B): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with appropriate personal protective clothing and equipment in accordance with 29 CFR 1926.62(g):

(a) In the Abrasive Blasting containment, on or about and at times prior to, July 23, 2014, the employer did not provide gloves and coveralls for employees who were abrasive blasting lead containing paint, cleaning up the blasting residue, and moving the containment enclosure.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/13/2015
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Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(g)(1): Where employees were exposed to lead above the permissible exposure limit, without regard to the use of respirators; where employees were exposed to lead compounds which may cause skin or eye irritation (e.g. lead arsenate, lead azide); and as interim protection for employees performing tasks as specified in 29 CFR 1926.62(d)(2), the employer did not provide at no cost to the employee and ensure that each employee used appropriate protective work clothing and equipment that prevented contamination of the employee and the employee's garments:

(a) In the Abrasive Blasting containment, on or about and at times prior to, July 23, 2014, the employer did not provide gloves and coveralls for employees who were abrasive blasting lead containing paint, cleaning up the blasting residue, and moving the containment enclosure.

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Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(g)(2)(ii): The employer did not provide for the cleaning, laundering, and disposal of protective clothing and equipment required by 29 CFR 1926.62(g)(1):

(a) In the Abrasive Blasting containment, on or about and at times prior to, July 23, 2014, The employer did not ensure that employee-provided protective clothing worn when abrasive blasting, shoveling, and moving lead contaminated containment, was laundered or replaced, resulting in lead related health hazards.

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Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(g)(2)(iv): The employer did not ensure that all protective clothing was removed at the completion of a work shift only in change areas provided for that purpose as prescribed in 29 CFR 1926.62(i)(2):

(a) In the Abrasive Blasting containment, on or about and at times prior to, July 23, 2014, the employer did not ensure that employee-provided protective clothing was removed at the completion of the work shift, resulting in lead related health hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

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Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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 1926.62(d)(2)(v)(C): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with change areas in accordance with 29 CFR 1926.62(i)(2):

(a) At the site, on or about and at times prior to July 23, 2014, a change area was not provided for employees conducting abrasive blasting activities, clean-up operations by shoveling lead blasting residue and moving the containment enclosure.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 02/13/2015
Proposed Penalty: \$4900.00

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

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Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(i)(2): The employer did not provide clean change areas for employee(s) whose airborne exposure to Lead was above the PEL, and as interim protection for employee(s) performing tasks as specified in paragraph (d)(2) of this section, without regard to the use of respirators.

(a) At the site, on or about and at times preceding to July 23, 2014, a change area was not provided for employees conducting abrasive blasting activities, clean-up operations by shoveling lead blasting residue and moving the containment enclosure.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(i)(2)(iii): The employer did not ensure that employees did not leave the workplace wearing any protective clothing or equipment that was required to be worn during the work shift:

(a) At the site, on or about and at times preceding to July 23, 2014, employees were not restricted from leaving wearing lead contaminated clothing and equipment when conducting abrasive blasting activities, clean-up operations by shoveling lead blasting residue and moving the containment enclosure.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

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Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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 5 a Type of Violation: **Serious**

29 CFR 1926.62(d)(2)(v)(D): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with hand washing facilities in accordance with 29 CFR 1926.62(j)(5):

(a) In the Abrasive Blasting containment, on or about and at times prior to July 23, 2014, adequate hand washing facilities were not provided in that soap and towels were not available for employee use for abrasive blasting activities, clean-up operations by shoveling lead blasting residue and moving the containment enclosure, resulting in lead related health hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/13/2015
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Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(i)(5)(i): The employer did not provide adequate handwashing facilities in accordance with 29 CFR 1926.51(f), for use by employees exposed to lead:

(a) In the Abrasive Blasting containment, on or about and at times prior to July 23, 2014, adequate hand washing facilities, were not provided in that soap and towels were not available for employees who were conducting abrasive blasting activities, clean-up operations by shoveling lead blasting residue and moving the containment enclosure, resulting in lead related health hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

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Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(i)(4)(iii): The employer did not ensure that employees whose airborne exposure to lead was above the permissible exposure limit, without regard to the use of a respirator, washed their hands and face prior to eating, drinking, smoking or applying cosmetics:

(a) In the Abrasive Blasting containment, on or at times prior to July 23, 2014, employees did not wash hands and face prior to smoking and drinking water when engaged in abrasive blasting of lead containing paint.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

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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: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

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

29 CFR 1926.62(d)(2)(v)(E): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with biological monitoring in accordance with 1926.62(j)(1)(i), to consist of blood sampling and analysis for lead and zinc protoporphyrin levels:

(a) In the Abrasive Blasting containment, on or at times preceding to July 23, 2014, biological monitoring was not conducted for employees performing abrasive blasting activities, shoveling of lead residue from inside containment, and when moving lead contaminated containment enclosure.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/13/2015
Proposed Penalty:	\$4900.00



Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(j)(1)(i): The employer did not make available initial medical surveillance, consisting of biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels, to employees occupationally exposed on any day to lead at or above the action level:

(a) In the Abrasive Blasting containment, on or at times prior to July 23, 2014, biological monitoring was not conducted for employees performing abrasive blasting activities, shoveling of lead residue from inside containment, and when moving lead contaminated containment enclosure.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
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The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

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

29 CFR 1926.62(d)(2)(v)(F): Until the employer performed an employee exposure assessment as required under 29 CFR 1926.62(d) and determined actual employee exposure, the employer did not provide to employees performing the tasks described in 29 CFR 1926.62(d)(2)(i), (d)(2)(ii), (d)(2)(iii), and (d)(2)(iv) with training as required under 29 CFR 1926.62(l)(1)(i) regarding 29 CFR 1926.59, Hazard Communication and with training as required under 29 CFR 1926.62(l)(2)(iii) regarding use of respirators:

(a) In the Abrasive Blasting containment, on or prior to July 23, 2014, employee training was not conducted to ensure that employees were provided training on the hazard of lead exposures and the use and limitations of the respirators for employees who were abrasive blasting lead containing paint, cleaning up the blasting residue, and moving the containment enclosure, resulting in lead related health hazards.

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

29 CFR 1926.62(l)(1)(i): The employer did not ensure that at least the following Lead hazards were communicated to employee(s): reproductive/developmental toxicity; central nervous system effects; kidney effects; blood effects; and acute toxicity effects.

(a) In the Abrasive Blasting containment, on or at times prior to, July 23, 2014 employee training was not provided on the hazards of exposure to lead, including toxicological effects and the means to protect themselves from exposures to lead, resulting in lead related health hazards.

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

29 CFR 1926.62(1)(1)(iii): The employer did not provide the training program required under 29 CFR 1926.62(1)(2) as initial training prior to the time of job assignment:

a) Lead Containment Area, on or about and at times preceding to July 23, 2014, employees did not receive initial training as to the hazards that they would be exposed to during the lead removal project.

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

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

29 CFR 1926.62(e)(1): The employer did not implement all feasible engineering and work practice controls, including administrative controls, to reduce and maintain employee exposure to lead at or below the permissible exposure limit:

(a) In the Abrasive Blasting containment, on or about and at times prior to July 23, 2014, for employees who were exposed above the permissible exposure limit during abrasive blasting activities, the employer did not implement engineering controls such as but not limited to vacuuming spent materials, wet blasting, or administrative controls such as job rotation to reduce exposures, resulting in lead related health hazards.

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

29 CFR 1926.62(h)(3): Shoveling, dry or wet sweeping, and brushing were used when vacuuming or other equally effective methods were effective:

(a) In the Abrasive Blasting containment, on or about and at times prior to, July 23, 2014, the employer had employees engage in shoveling and did not provide vacuuming or other equally effective methods to remove lead contaminated residue from inside of the abrasive blasting enclosure, resulting in lead related health hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

02/13/2015

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: 986792
Inspection Date(s): 07/22/2014 - 07/23/2014
Issuance Date: 01/20/2015



Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(e)(2)(ii)(A): The written compliance program established by the employer did not include a description of each activity in which lead was emitted, for example, equipment used, material involved, controls in place, crew size, employee job responsibilities, operating procedures, and maintenance practices:

(a) In the Abrasive Blasting containment, on or about and at times prior to July 23, 2014, for employees abrasive blasting, the employer did not implement a compliance program, exposing employees to lead hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/13/2015
Proposed Penalty:	\$4900.00

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: 986792
Inspection Date(s): 07/22/2014 - 07/23/2014
Issuance Date: 01/20/2015



Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(i)(3)(i): The employer did not provide shower facilities, where feasible, for use by employees whose airborne exposure to lead was above the permissible exposure limit:

a) In the Abrasive Blasting containment, on or at times prior to July 23, 2014, employees were not provided shower facilities when engaged in abrasive blasting of lead containing paint.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/13/2015
Proposed Penalty:	\$4900.00

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: 986792
Inspection Date(s): 07/22/2014 - 07/23/2014
Issuance Date: 01/20/2015



Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(i)(4)(i): The employer did not provide lunchroom facilities or eating areas for employees whose airborne exposure to lead was above the permissible exposure limit, without regard to the use of respirators:

(a) In the Abrasive Blasting containment, on and at times prior to July 23, 2014, lunchroom facilities and eating areas were not provided for employees whose airborne concentrations exceed the permissible exposure levels when conducting abrasive blasting of lead containing paint.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/13/2015
\$4900.00

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: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(j)(2)(i): The employer did not make available biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels to each employee covered under paragraphs (j)(1)(i) and (ii) of this section

(a) Site facility, on or at times prior to August 11 to August 21, 2014, zinc protoporphyrin (ZPP) sampling and analysis was not conducted for employees performing abrasive blasting activities.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	02/13/2015
Proposed Penalty:	\$2100.00

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

Inspection Number: 986792
Inspection Date(s): 07/22/2014 - 07/23/2014
Issuance Date: 01/20/2015



Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.62(m)(2)(i): The employer did not post the following warning signs in each work area where an employee exposure to lead was above the permissible exposure limit:

(a) In the Abrasive Blasting containment, on or at times prior to July 23, 2014, warning signs for lead were not posted in areas where employees were engaged in abrasive blasting lead containing paint operations, resulting and lead related health hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/13/2015
\$2100.00

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: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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 1926.100(a): Employees were not protected by protective helmets while working in areas where there was a possible danger of head injury from impact, or from falling or flying objects, or from electrical shock and burns:

(a) Albany Bridge site, on or about and at times preceding to July 23, 2014, hard hats were not provided by employer where equipment was lifted overhead or equipment was operated overhead and conditions warranted their use to prevent injuries.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/13/2015
\$0.00



Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1926.102(a)(1): Eye and face protective equipment were not provided when machines or operations presented potential eye or face injury from physical, chemical, or radiation agents.

(a) Albany Bridge site, on or about and at times preceding to July 23, 2014, safety glasses were not provided by employer where dusty conditions warranted their use to prevent injuries.

Date By Which Violation Must be Abated:

02/13/2015

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

Inspection Number: 986792
Inspection Date(s): 07/22/2014 - 07/23/2014
Issuance Date: 01/20/2015



Citation and Notification of Penalty

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

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

29 CFR 1910.178(l)(1)(ii): The employer did not ensure that each operator had successfully completed the training required by paragraph (l), except as permitted by paragraph (l)(5), prior to permitting an employee to operate a Genie GHH-644 #1196967 all terrain powered industrial truck.

a) Albany Bridge worksite, on or about July 23, 2014, for employees operating Genie GHH-644 #1196967 all terrain powered industrial truck to move sand and transport equipment and tools at jobsite.

Date By Which Violation Must be Abated:
Proposed Penalty:

02/13/2015
\$700.00

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: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702

Citation 2 Item 3 Type of Violation: **Other-than-Serious**

29 CFR 1926.62(j)(2)(iv)(A): The employer did not notify each employee in writing of his or her blood lead level within five working days after the receipt of biological monitoring results:

(a) In the Abrasive Blasting containment, on or at times prior to August 29, 2014, employees were not notified in writing as to the results of the biological monitoring conducted on August 11 - 22, 2014, exposing employees to lead related health hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/13/2015
\$0.00

A handwritten signature in black ink, appearing to read "Robert E. Vazzi", written over a horizontal line.

Robert E. Vazzi
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
450 Mall Boulevard
Suite J
Savannah, GA 31406
Phone: 912-652-4393 Fax: 912-652-4329



INVOICE / DEBT COLLECTION NOTICE

Company Name: Atlas Steel Coatings, Inc
Inspection Site: 129 Philema Road, Albany, GA 31702
Issuance Date: 01/20/2015

Summary of Penalties for Inspection Number	986792
Citation 1, Serious	\$58100.00
Citation 2, Other-than-Serious	\$700.00
TOTAL PROPOSED PENALTIES	\$58800.00

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 \$50,000 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

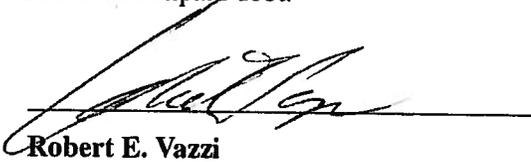
account, the bank will attempt to make the transfer up to 2 times.

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.



Robert E. Vazzi

Area Director

1-20-15
Date