

Este documento es muy importante. Si ud. habla inglés,
busque un traductor o llame al (708) 891-3800.

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

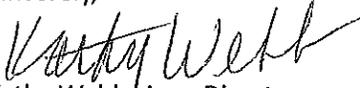


September 22, 2015

Dear James Beckett,

On 03/26/2015, an OSHA compliance officer met with you or your representative as part of an inspection at 13543 SOUTH US HWY 30 Plainfield, IL 60544. 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,


Kathy Webb, Area Director

Your Citation Summary
Kuusakoski US LLC
Inspection Number: 1049225

Total Amount Due: \$114800.00
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 : 35
Your First Correction Deadline is:
11/09/2015

**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 (708) 891-3800.

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: Kathy Webb, Area Director, at (708) 891-3800 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
1600 167th Street
Suite 9
Calumet City, IL 60409
Phone: 708-891-3800 Fax: 708-862-9659



Citation and Notification of Penalty

To:
Kuusakoski US LLC
and its successors
13543 SOUTH US HWY 30
Plainfield, IL 60544

Inspection Number: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015

Inspection Site:
13543 SOUTH US HWY 30
Plainfield, IL 60544

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 09/22/2015. The conference will be held by telephone or at the OSHA office located at 1600 167th Street, Suite 9, Calumet City, IL 60409 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1049225

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544
Issuance Date: 09/22/2015

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, 1600 167th Street, Suite 9, Calumet City, IL 60409**

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

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

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

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

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

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

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

Signature

Date

Typed or Printed Name

Title

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

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

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

Inspection Number: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

- (3) Procurement, installation and operation of selected control measures; and
- (4) Testing and acceptance or modification/redesign of controls.

Note: All proposed measures shall be approved for each particular use by a competent industrial hygienist or other qualified person. Ninety (90) day progress reports are required during the abatement period.

Date by Which Abatement is Due (60 days):

Step 3: Abatement shall have been completed by the implementation of feasible engineering and/or administrative controls upon verification of their effectiveness in achieving compliance.

Date by Which Abatement is Due (90 days):

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

02/08/2016

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: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.134(k)(1): This paragraph requires the employer to provide effective training to employees who are required to use respirators. The employer shall ensure that each employee can demonstrate knowledge of at least the following:

- (i) Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator;
- (ii) What the limitations and capabilities of the respirator are;
- (iii) How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions;
- (iv) How to inspect, put on and remove, use, and check the seals of the respirator;
- (v) What the procedures are for maintenance and storage of the respirator;
- (vi) How to recognize medical signs and symptoms that may limit or prevent the effective use of the respirators; and
- (vii) The general requirements of this section

a. On or about May 27, 2015, in the Zorba area, two employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit and one employee exposed to lead at 1.3 times the permissible exposure limit and were provided N95 dust masks. The employer did not ensure that each employee was provided with the required training.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/09/2015

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

Inspection Number: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(c)(1): The employer shall assure that no employee is exposed to lead at concentrations greater than fifty micrograms per cubic meter of air (50 ug/m(3)) averaged over an 8-hour period.

a. On or about May 27, 2015, in the Zorba area, an employee required to perform circuit board separation tasks was exposed to airborne lead at an 8-hour time-weighted average level of 66.6 micrograms per cubic meter of air, approximately 1.3 times the permissible exposure limit of 50 micrograms per cubic meter of air (8-hour TWA) during a 355 minutes sampling period. Zero exposure assumed for the 125 minutes not sampled.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(e)(1): Engineering and work practice controls (including administrative controls) were not implemented to reduce employee exposure to or below the permissible exposure limit:

a. On or about May 27, 2015, in the Zorba area, an employee exposed to lead at 1.3 times the permissible exposure limit. Feasible engineering and work practice controls (including administrative controls) were not implemented to reduce employee exposure to or below the permissible exposure limit.

General methods of control that may be applicable to the process include, but are not limited to, the following:

1. Engineering controls such as additional local ventilation.
2. Administrative controls such as limiting employees exposure to below that of the permissible exposure limit

Abatement:

Step 1: Effective respirator protection shall be provided and used by the exposed employees as an interim protective measure until engineering and/or administrative controls can be implemented, or whenever such controls fail to reduce employee exposure to within permissible exposure limits.

Date by Which Abatement is Due (30 days):

Step 2: Submit to the Area Director a written detailed plan of abatement outlining a schedule for the implementation of engineering and/or administrative measures to control employee exposure to the hazardous substances referred in this citation. The plan shall include, at minimum, target dates for the following actions which must be consistent with abatement dates required by this citation.

- (1) Evaluation of engineering/administrative control options;
- (2) Selection of optimum control methods and completion of design;

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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.134(g)(1)(i)(A): The employer shall not permit respirators with tight-fitting facepieces to be worn by employees who have facial hair that comes between the sealing surface of the facepiece and the face or that interferes with valve function:

a. On or about May 27, 2015, in the Zorba area, an employee was exposed to cadmium at 1.6 times the permissible exposure limit and to lead at 1.3 times the permissible exposure limit and was provided a N95 dust mask. The employer permitted a respirator with a tight-fitting facepiece to be worn by employees who have facial hair that comes between the sealing surface of the facepiece and the face.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/09/2015

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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.134(f)(2): The employer shall ensure that an employee using a tight-fitting facepiece respirator is fit tested prior to initial use of the respirator, whenever a different respirator facepiece (size, style, model or make) is used, and at least annually thereafter.

a. On or about May 27, 2015, in the Zorba area, two employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit and one employee exposed to lead at 1.3 times the permissible exposure limit and were provided N95 dust masks. The employer did not ensure that the employees using a respirator was fit tested prior to initial use of the respirator and at least annually thereafter.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/09/2015

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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.134(e)(1): General. The employer shall provide a medical evaluation to determine the employee's ability to use a respirator, before the employee is fit tested or required to use the respirator in the workplace. The employer may discontinue an employee's medical evaluations when the employee is no longer required to use a respirator.

a. On or about May 27, 2015, in the Zorba area, two employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit and one employee exposed to lead at 1.3 times the permissible exposure limit and were provided N95 dust masks. The employer did not provide a medical evaluation to determine the employee's ability to use a respirator.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/09/2015

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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

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

a. On or about May 27, 2015, in the Zorba area, two employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit and one employee exposed to lead at 1.3 times the permissible exposure limit and were provided N95 dust masks. The employer did not establish and implement an adequate written respiratory program that was appropriate for the employees' overexposure to lead and cadmium including, but not limited to, medical evaluation, fit testing and training.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.95(c)(1): The employer shall administer a continuing, effective hearing conservation program, as described in paragraphs (c) through (o) of this section, whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response) or, equivalently, a dose of fifty percent. For purposes of the hearing conservation program, employee noise exposures shall be computed in accordance with appendix A and Table G-16a, and without regard to any attenuation provided by the use of personal protective equipment.

a. An employee in the production area was exposed to continuous noise at 69.6 % of the permissible daily dose level, when measured with a 80 dB threshold, or equivalent sound level of approximately 87.4 dBA for the 364 minute sampling time on May 27, 2015. Exposure calculation included a zero increment for the 116 minutes not sampled.

The employer had not implemented a continuing, effective hearing conservation program.

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$2800.00

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

Inspection Number: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(e)(3)(i): Each employer shall establish and implement a written compliance program to reduce exposures to or below the permissible exposure limit, and interim levels if applicable, solely by means of engineering and work practice controls in accordance with the implementation schedule in paragraph (e)(1).

a. On or about May 27, 2015, in the Zorba area, an employee was exposed to lead at 1.3 times the permissible exposure limit. The employer did not establish and implement a written lead compliance program to reduce exposures to or below the permissible exposure limit, and interim levels if applicable, solely by means of engineering and work practice controls.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(g)(1): Provision and use. If an employee is exposed to lead above the PEL, without regard to the use of respirators or where the possibility of skin or eye irritation exists, the employer shall provide at no cost to the employee and assure that the employee uses appropriate protective work clothing and equipment such as, but not limited to:

a. On or about May 27, 2015, in the Zorba area, an employee was exposed to lead at 1.3 times the permissible exposure limit. The employer did not provide work clothing or coveralls for employees who work in areas where their airborne exposure to lead is above the PEL, without regard to the use of respirators.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(g)(2)(iv): The employer shall assure that all protective clothing is removed at the completion of a work shift only in change rooms provided for that purpose as prescribed in paragraph (i)(2) of this section.

a. On or about May 27, 2015, in the Zorba area, an employee was exposed to lead at 1.3 times the permissible exposure limit. The employer did not ensure contaminated clothing was removed at the end of the shift where employees who work in areas where their airborne exposure to lead is above the PEL, without regard to the use of respirators.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(h)(1): Surfaces. All surfaces shall be maintained as free as practicable of accumulations of lead.

a. On or about May 27, 2015, all surfaces were not maintained as free as practicable of accumulations of lead in the lunchroom and locker room as indicated by results of surface wipe samples of 14-37 micrograms.

Date By Which Violation Must be Abated:
Proposed Penalty:

11/09/2015
\$2100.00

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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(h)(2)(ii): Shoveling, dry or wet sweeping, and brushing may be used only where vacuuming or other equally effective methods have been tried and found not to be effective.

a. On about May 27, 2015, in the ring crusher in feed area, employees were required to dry sweep dust on the floor containing 1.8 % lead.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
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Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(i)(2)(i): The employer shall provide clean change rooms for employees who work in areas where their airborne exposure to lead is above the PEL, without regard to the use of respirators.

a. On or about May 27, 2015, in the Zorba area, an employee was exposed to lead at 1.3 times the permissible exposure limit. The employer did not provide separate clean change rooms for employees who work in areas where their airborne exposure is above the PEL, without regard to the use of respirators.

Date By Which Violation Must be Abated:
Proposed Penalty:

11/09/2015
\$2800.00

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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(i)(3)(i): The employer shall assure that employees who work in areas where their airborne exposure to lead is above the PEL, without regard to the use of respirators, shower at the end of the work shift.

a. On or about May 27, 2015, in the Zorba area, an employee was exposed to lead at 1.3 times the permissible exposure limit and the employer did not require the employee to shower at the end of the work shift to prevent further lead exposure.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(i)(4)(iv): The employer shall assure that employees do not enter lunchroom facilities with protective work clothing or equipment unless surface lead dust has been removed by vacuuming, down draft booth, or other cleaning method.

a. On or about May 27, 2015, in the Zorba area, an employee was exposed to lead at 1.3 times the permissible exposure limit. The employer did not ensure employee vacuumed their clothing before entering the lunchroom.

Date By Which Violation Must be Abated:
Proposed Penalty:

11/09/2015
\$3500.00

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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(j)(2)(i)(A): At least every 6 months to each employee covered under paragraph (j)(1)(i) of this section;

a. On or about May 27, 2015, in the Zorba area, an employee was exposed to lead at 1.3 times the permissible exposure limit. The employer did not provide biological monitoring every six months for all employees who were exposed to lead at or above the action level for more than 30 days.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(j)(3)(i)(B): Prior to assignment for each employee being assigned for the first time to an area in which airborne concentrations of lead are at or above the action level;

a. On or about May 27, 2015, in the Zorba area, an employee was exposed to lead at 1.3 times the permissible exposure limit. The employer did not make available medical examinations and consultation to each employee who are or may be exposed to lead at or above the action level for more than 30 days per year.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/09/2015

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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(l)(1)(i): Each employer who has a workplace in which there is a potential exposure to airborne lead at any level shall inform employees of the content of Appendices A and B of this regulation.

On or about March 26, 2015, in the facility, employees were exposed to lead from approximately 9.5 micrograms per cubic meter to 66.6 micrograms per cubic meter in the facility. The employer did not establish a lead training program to inform all employees of the content of Appendices A and B of the lead standard.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1025(l)(1)(ii): The employer shall train each employee who is subject to exposure to lead at or above the action level, or for whom the possibility of skin or eye irritation exists, in accordance with the requirements of this section. The employer shall institute a training program and ensure employee participation in the program.

a. On or about May 27, 2015, in the Zorba area, an employee was exposed to lead at 1.3 times the permissible exposure limit. The employer did not train each employee exposed to lead over the action level in the hazards associated with lead in accordance with the requirements of this section.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/09/2015

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: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1027(c): "Permissible Exposure Limit (PEL)." The employer shall assure that no employee is exposed to an airborne concentration of cadmium in excess of five micrograms per cubic meter of air (5 ug/m(3)), calculated as an eight-hour time-weighted average exposure (TWA).

a. On or about May 27, 2015, in the Zorba area, an employee required to perform circuit board separation tasks was exposed to airborne cadmium at an 8-hour time-weighted average level of 8.1 micrograms per cubic meter of air, approximately 1.6 times the permissible exposure limit of 5 micrograms per cubic meter of air (8-hour TWA) during a 355 minutes sampling period. Zero exposure assumed for the 125 minutes not sampled.

b. On or about May 27, 2015, in the Zorba area, an employee required to perform circuit board separation tasks was exposed to airborne cadmium at an 8-hour time-weighted average level of 6.1 micrograms per cubic meter of air, approximately 1.2 times the permissible exposure limit of 5 micrograms per cubic meter of air (8-hour TWA) during a 355 minutes sampling period. Zero exposure assumed for the 125 minutes not sampled.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
Proposed Penalty:	\$4900.00



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1027(f)(1)(i): Except as specified in paragraphs (f)(1)(ii), (iii) and (iv) of this section the employer shall implement engineering and work practice controls to reduce and maintain employee exposure to cadmium at or below the PEL, except to the extent that the employer can demonstrate that such controls are not feasible.

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. Feasible engineering and work practice controls (including administrative controls) were not implemented to reduce employee exposure to or below the permissible exposure limit.

General methods of control that may be applicable to the process include, but are not limited to, the following:

1. Engineering controls such as additional local ventilation.
2. Administrative controls such as limiting employees exposure to below that of the permissible exposure limit.

Abatement:

Step 1: Effective respirator protection shall be provided and used by the exposed employees as an interim protective measure until engineering and/or administrative controls can be implemented, or whenever such controls fail to reduce employee exposure to within permissible exposure limits.

Date by Which Abatement is Due (30 days):

Step 2: Submit to the Area Director a written detailed plan of abatement outlining a schedule for the implementation of engineering and/or administrative measures to control employee exposure to the hazardous substances referred in this citation. The plan shall include, at minimum, target dates for the following actions which must be consistent with abatement dates required by this citation.

(1) Evaluation of engineering/administrative control options;

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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

- (2) Selection of optimum control methods and completion of design;
- (3) Procurement, installation and operation of selected control measures; and
- (4) Testing and acceptance or modification/redesign of controls.

Note: All proposed measures shall be approved for each particular use by a competent industrial hygienist or other qualified person. Ninety (90) day progress reports are required during the abatement period.

Date by Which Abatement is Due (60 days):

Step 3: Abatement shall have been completed by the implementation of feasible engineering and/or administrative controls upon verification of their effectiveness in achieving compliance.

Date by Which Abatement is Due (90 days):

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

02/08/2016

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: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1027(e)(1): "Establishment." The employer shall establish a regulated area wherever an employee's exposure to airborne concentrations of cadmium is, or can reasonably be expected to be in excess of the permissible exposure limit (PEL).

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. The employer did not establish a regulated area where the employees exposure to airborne cadmium was above the permissible exposure limit.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
Proposed Penalty:	\$4900.00

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

Inspection Number: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1027(e)(2): "Demarcation." Regulated areas shall be demarcated from the rest of the workplace in any manner that adequately establishes and alerts employees of the boundaries of the regulated area.

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. The employer did not provide demarcation to alert employees who work in the area of the boundaries of the regulated area.

Date By Which Violation Must be Abated:

11/09/2015

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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1027(f)(2)(i): Where the PEL is exceeded, the employer shall establish and implement a written compliance program to reduce employee exposure to or below the PEL by means of engineering and work practice controls, as required by paragraph (f)(1) of this section. To the extent that engineering and work practice controls cannot reduce exposures to or below the PEL, the employer shall include in the written compliance program the use of appropriate respiratory protection to achieve compliance with the PEL.

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. The employer did not establish and implement a written cadmium compliance program to reduce exposures to or below the permissible exposure limit, and interim levels if applicable, solely by means of engineering and work practice controls.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1027(i)(1): "Provision and use." If an employee is exposed to airborne cadmium above the PEL or where skin or eye irritation is associated with cadmium exposure at any level, the employer shall provide at no cost to the employee, and assure that the employee uses, appropriate protective work clothing and equipment that prevents contamination of the employee and the employee's garments. Protective work clothing and equipment includes, but is not limited to:

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. The employer did not provide work clothing or coveralls for employees who work in areas where their airborne exposure to cadmium is above the PEL, without regard to the use of respirators.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1027(i)(2)(i): The employer shall assure that employees remove all protective clothing and equipment contaminated with cadmium at the completion of the work shift and do so only in change rooms provided in accordance with paragraph (j)(1) of this section.

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. The employer did not assure the employees that worked in the Zorba area removed their cadmium contaminated clothing at the end of the shift to in a change room to prevent any further contamination.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

Citation 1 Item 19 Type of Violation: **Serious**

29 CFR 1910.1027(i)(2)(ii): The employer shall assure that no employee takes cadmium-contaminated protective clothing or equipment from the workplace, except for employees authorized to do so for purposes of laundering, cleaning, maintaining, or disposing of cadmium contaminated protective clothing and equipment at an appropriate location or facility away from the workplace.

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. The employer failed to assure that the employees did not remove the contaminated clothing from the worksite.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1027(j)(2): "Change rooms." The employer shall assure that change rooms are equipped with separate storage facilities for street clothes and for protective clothing and equipment, which are designed to prevent dispersion of cadmium and contamination of the employee's street clothes.

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. The employer did not provide separate clean change rooms for employees who work in areas where their airborne exposure to cadmium was above the PEL, without regard to the use of respirators.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

Citation 1 Item 21 Type of Violation: **Serious**

29 CFR 1910.1027(j)(3)(i): The employer shall assure that employees who are exposed to cadmium above the PEL shower during the end of the work shift.

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. The employer did not require the employees to shower at the end of the work shift to prevent further exposure.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

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

29 CFR 1910.1027(j)(4)(ii): The employer shall assure that employees do not enter lunchroom facilities with protective work clothing or equipment unless surface cadmium has been removed from the clothing and equipment by HEPA vacuuming or some other method that removes cadmium dust without dispersing it.

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. The employer did not assure that employees who work in areas where their airborne exposure to cadmium is above the PEL, entered the lunchroom with their protective clothing.

Date By Which Violation Must be Abated:	11/09/2015
Proposed Penalty:	\$3500.00

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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

Citation 1 Item 23 Type of Violation: **Serious**

29 CFR 1910.1027(k)(5): Shoveling, dry or wet sweeping, and brushing may be used only where vacuuming or other methods that minimize the likelihood of cadmium becoming airborne have been tried and found not to be effective.

a. On about May 27, 2015, in the ring crusher in feed area, employees were required to dry sweep dust on the floor containing 0.0236% cadmium.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoški US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

Citation 1 Item 24 Type of Violation: **Serious**

29 CFR 1910.1027(l)(1)(i)(A): Currently exposed - The employer shall institute a medical surveillance program for all employees who are or may be exposed to cadmium at or above the action level unless the employer demonstrates that the employee is not, and will not be, exposed at or above the action level on 30 or more days per year (twelve consecutive months); and,

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. The employer did not assure that employees who work in areas where their airborne exposure to cadmium is above the PEL, had the appropriate medical surveillance including a preplacement examination and biological monitoring every 6 months.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/09/2015
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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

Citation 1 Item 25 Type of Violation: **Serious**

29 CFR 1910.1027(m)(2)(i): Warning signs shall be provided and displayed in regulated areas. In addition, warning signs shall be posted at all approaches to regulated areas so that an employee may read the signs and take necessary protective steps before entering the area.

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. The employer did not post warning signs prior to entering regulated areas where the employees were exposed to airborne cadmium above the permissible exposure limit.

Date By Which Violation Must be Abated:
Proposed Penalty:

11/09/2015
\$2100.00

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: 1049225
Inspection Date(s): 03/26/2015 - 09/16/2015
Issuance Date: 09/22/2015



Citation and Notification of Penalty

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544

Citation 1 Item 26 Type of Violation: **Serious**

29 CFR 1910.1027(m)(4)(i): The employer shall train each employee who is potentially exposed to cadmium in accordance with the requirements of this section. The employer shall institute a training program, ensure employee participation in the program, and maintain a record of the contents of such program.

a. On or about May 27, 2015, in the Zorba area, employees were exposed to cadmium at 1.2-1.6 times the permissible exposure limit. The employer did not train each employee exposed over the action level in the hazards associated with cadmium in accordance with the requirements of this section.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

11/09/2015
\$4900.00

A handwritten signature in cursive script that reads "Kathy Webb". The signature is written in black ink and is positioned above a horizontal line.

Kathy Webb
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
1600 167th Street
Suite 9
Calumet City, IL 60409
Phone: 708-891-3800 Fax: 708-862-9659



INVOICE / DEBT COLLECTION NOTICE

Company Name: Kuusakoski US LLC
Inspection Site: 13543 SOUTH US HWY 30, Plainfield, IL 60544
Issuance Date: 09/22/2015

Summary of Penalties for Inspection Number	1049225
Citation 1, Serious	\$114800.00
TOTAL PROPOSED PENALTIES	\$114800.00

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.

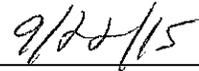
Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per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



Kathy Webb

Area Director



Date