U.S. Department of Labor
Occupational Safety and Health Administration
200 N. High Street
Room 620
Columbus, OH 43215
Phone: 614-469-5582 Fax: 614-469-6791

Citation and Notification of Penalty

To:
International Technical Coatings Inc., dba ITC Manufacturing
and its successors
110 S 41st Ave
Phoenix, AZ 85009

Inspection Site:
845 E. Markison Avenue
Columbus, OH 43215

7012 2210 0001 2080 3416

Inspection Number: 1069945
Inspection Date(s): 06/10/2015 - 12/09/2015
Issuance Date: 12/09/2015

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 12/09/2015. The conference will be held by telephone or at the OSHA office located at 200 N. High Street, Room 620, Columbus, OH 43215 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1069945

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215
Issuance Date: 12/09/2015

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, 200 N. High Street, Room 620, Columbus, OH 43215**

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: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.23(a)(8): Every floor hole into which persons can accidentally walk shall be guarded:

a. At the workplace, by the east wall, near the output side of the fence line, was an approximately 9 inches by 14 inches unprotected floor hole, exposing employees to a tripping hazard.

Date By Which Violation Must be Abated: Corrected During Inspection
Proposed Penalty: $3000.00

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: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

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

29 CFR 1910.23(c)(1): Every open-sided floor or platform 4 feet or more above adjacent floor or ground level shall be guarded by a standard railing (or the equivalent as specified in paragraph (e)(3) of this section) on all open sides except where there is entrance to a ramp, stairway, or fixed ladder:

a. At the workplace, in the processing area, on the West wall, a double bay loading area that was used to bring materials from the lower level material storage to the processing area had an open sided floor that was not guarded by a standard railing when loading was not taking place, thereby exposing employees to a seven foot fall hazard.

b. At the workplace, in the processing area, on the West wall, a single bay loading area that was used to bring materials from the lower level material storage to the processing area had an open sided floor that was not guarded by a standard railing when loading was not taking place, thereby exposing employees to a seven foot fall hazard.

c. At the workplace, in the wire room, the GCR platform had an intermediate rail missing, thereby exposing employees to a five foot fall hazard.

d. At the workplace, in the powder coating area, employees were required to perform maintenance on fans located on top of the oven without fall protection, thereby exposing employees to an twelve foot fall hazard.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/13/2016
Proposed Penalty:	$5000.00

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: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.24(h): "Railings and handrails." Standard railings shall be provided on the open sides of all exposed stairways and stair platforms. Handrails shall be provided on at least one side of closed stairways preferably on the right side descending. Stair railings and handrails shall be installed in accordance with the provisions of 1910.23:

a. At the workplace, in the wire room, the fixed stairs leading up to the GCR platform had an intermediate rail missing on both open sides, thereby exposing employees to a fall hazard.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 01/13/2016

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.147(c)(4)(i): Procedures shall be developed, documented and utilized for the control of potentially hazardous energy when employees are engaged in the activities covered by this section:

a. At the workplace located at 845 E. Markison Ave., Columbus, Ohio, the employer did not develop or document energy control procedures for employees that were engaged in activities on equipment, such as, but not limited to, automatic resistance welding machines, roll forming machines, and wire drawing machines, where the unexpected energizing, start up or release of stored energy could occur and cause injury.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/13/2016
Proposed Penalty:	$7000.00

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.151(c): Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use:
[63 FR 33450, June 18, 1998]

a. At the workplace, in the processing area, the employer did not ensure facilities were provided for eye flushing near the battery charging station.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/13/2016
Proposed Penalty:	$5000.00

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: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.178(a)(4): Modifications and additions which affect capacity and safe operation shall not be performed by the customer or user without manufacturers prior written approval. Capacity, operation, and maintenance instruction plates, tags, or decals shall be changed accordingly:

a. At the workplace, in the wire room, employees used a GMP Slovakia below-the-tines lifting device, type LD-3881, attached to a Toyota forklift, model 7FGCU45-BCS, Serial # 63121, to transport metal wire spools throughout the facility without the prior written approval of the forklift manufacturer.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/13/2016
Proposed Penalty:	$4000.00

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.178(g)(2): Facilities shall be provided for flushing and neutralizing spilled electrolyte, for fire protection, for protecting charging apparatus from damage by trucks, and for adequate ventilation for dispersal of fumes from gassing batteries:

a. At the workplace, in the processing area, near Schlatter machine #4, a MAC battery charging apparatus was not protected from damage by electric pallet jacks.

b. At the workplace, in the processing area, near Schlatter machine #4, a Schumacher ProSeries battery charging apparatus was not protected from damage by electric pallet jacks.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/13/2016
Proposed Penalty:	$5000.00

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.178(l)(1)(ii): Prior to permitting an employee to operate a powered industrial truck (except for training purposes), the employer shall ensure that each operator has successfully completed the training required by this paragraph (l), except as permitted by paragraph (l)(5):

a. At the workplace, the employer did not ensure each operator was trained on the safe operation of motorized hand trucks prior to being permitted to operate them.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/13/2016
Proposed Penalty:	$4000.00

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: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.179(g)(1)(v): Pendant control boxes shall be constructed to prevent electrical shock and shall be clearly marked for identification of functions:

a. At the workplace, in the roll form area, a Budgit, 2 ton, overhead crane had a pendant control box with none of the buttons marked to identify the functions, thereby exposing employees to a struck-by hazard.

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	$4000.00

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.212(a)(1): Types of guarding. One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks. Examples of guarding methods are-barrier guards, two-hand tripping devices, electronic safety devices, etc.:

a. At the workplace, in the maintenance shop, a Cutmaster, model YCL-1236GH, did not have a guard to prevent accidental contact with the rotating chuck, exposing employees to a caught-in hazard.

b. At the workplace, in the roll form area, roll form #1 had a rotating payout uncoiler and moving sharp metal coil material that was not guarded to prevent accidental contact, exposing employees to a struck-by hazard.

c. At the workplace, in the roll form area, roll form #1 had a pneumatic cutting assembly that had a pinch point between the cylinder and fixture as a cutting cycle was conducted, that was not adequately guarded, thereby exposing employees to an amputation hazard.

d. At the workplace, in the roll form area, roll form #2 had a rotating payout uncoiler and moving sharp metal coil material that was not guarded to prevent accidental contact, exposing employees to a struck-by hazard.

e. At the workplace, in the roll form area, roll form #3 had a rotating payout uncoiler and moving sharp metal coil material that was not guarded to prevent accidental contact, exposing employees to a struck-by hazard.

f. At the workplace, in the basement, the OMCG, serial # 16626, wire bending machine, had an eccentric bending head with an interlocked door disabled and missing section on the lower portion of the barrier guard, exposing employees to a struck-by hazard..

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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g. At the workplace, in the wire room, the GCR line had continuously drawn wire that was not guarded from accidental contact, exposing employees to a caught-in hazard.

h. At the workplace, in the processing area, a Powermatic band saw had an unused portion of the blade unguarded below and above the cutting table, exposing employees to an amputation hazard.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/13/2016
Proposed Penalty:	$7000.00

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.212(a)(3)(ii): The point of operation of machines whose operation exposes an employee to injury, shall be guarded. The guarding device shall be in conformity with any appropriate standards therefor, or, in the absence of applicable specific standards, shall be so designed and constructed as to prevent the operator from having any part of his body in the danger zone during the operating cycle:

a. At the workplace, the Accurshear, model 625010, serial # 5376, had a barrier guard with a gap beneath the guard allowing access to the point of operation, thereby exposing employees to an amputation hazard.

b. At the workplace, the Accurpress #1, model 7608, serial # 5238, did not have the point of operation adequately guarded, thereby exposing employees to an amputation hazard.

c. At the workplace, the Accurpress #2, model 7608, serial # 4639 , did not have the point of operation adequately guarded, thereby exposing employees to an amputation hazard.

d. At the workplace, the Accurpress, model 7606, serial # 5737, did not have the point of operation adequately guarded, thereby exposing employees to an amputation hazard.

e. At the workplace, the Accurpress, model 76010, serial # 7385, did not have the point of operation adequately guarded, thereby exposing employees to an amputation hazard.

f. At the workplace, on the ingoing side of roll form #1, the flattening rollers did not have the point of operation guarded, thereby exposing employees to a caught-in hazard.

g. At the workplace, on roll form #1, employees were not protected from the point of operation while making machine adjustments, thereby exposing employees to a caught-in hazard.

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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h. At the workplace, in the maintenance shop, a Bridgeport vertical mill, did not have the point of operation adequately guarded, thereby exposing employees to an amputation hazard.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/13/2016
Proposed Penalty:	$7000.00

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.219(c)(3): Guarding vertical and inclined shafting. Vertical and inclined shafting seven (7) feet or less from floor or working platform, excepting maintenance runways, shall be enclosed with a stationary casing in accordance with requirements of paragraphs (m) and (o) of this section:

a. At the workplace, in the powder coating area, the cleaning booth tank had a 25 horsepower Baldor industrial motor, model M4103T, with a vertical shaft not fully guarded to prevent accidental contact, exposing employees to a caught-in hazard. The shaft was approximately three feet from the floor level.

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	$5000.00

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: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.219(d)(1): Guarding. Pulleys, any parts of which are seven (7) feet or less from the floor or working platform, shall be guarded in accordance with the standards specified in paragraphs (m) and (o) of this section. Pulleys serving as balance wheels (e.g., punch presses) on which the point of contact between belt and pulley is more than six feet six inches (6 ft. 6 in.) from the floor or platform may be guarded with a disk covering the spokes:

a. At the workplace, in the wire room, near the coiler on the GCR line had a lower pulley that was not guarded to prevent accidental contact, exposing employees to a caught-in hazard. The pulley was approximately five feet from the floor level.

b. At the workplace, in the wire room, near the coiler on the GCR line had an upper pulley that was not guarded to prevent accidental contact, exposing employees to a caught-in hazard. The pulley was in close proximity to the working platform used by employees.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/13/2016
Proposed Penalty:	$7000.00

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

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.219(f)(3): Sprockets and chains. All sprocket wheels and chains shall be enclosed unless they are more than seven (7) feet above the floor or platform. Where the drive extends over other machine or working areas, protection against falling shall be provided. This subparagraph does not apply to manually operated sprockets:

a. At the workplace, the Accurshear, model 625010, serial # 5376, had chain and sprockets not guarded on the back side of the press, thereby exposing employees to an amputation hazard. The sprocket was approximately 18 inches from the floor level.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/13/2016
Proposed Penalty:	$3000.00

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.242(b): Compressed air used for cleaning. Compressed air shall not be used for cleaning purposes except where reduced to less than 30 p.s.i. and then only with effective chip guarding and personal protective equipment:

a. At the workplace, throughout the facility, employees used compressed air operating between 95 and 105 p.s.i. to clean equipment and themselves, thereby exposing employees to an injection/contact hazard.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/29/2015
Proposed Penalty:	$3000.00

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: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.255(b)(3): Interlocks. All doors and access panels of all resistance welding machines and control panels shall be kept locked and interlocked to prevent access, by unauthorized persons, to live portions of the equipment:

a. At the workplace, in the processing area, resistance welding machine KVA 2, had two access panels on the back of the machine that were not locked or interlocked to prevent unauthorized access to live portions of the machine, exposing employees to an electrocution hazard.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/21/2015
Proposed Penalty:	$5000.00

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: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.255(b)(4): Guarding. All press welding machine operations, where there is a possibility of the operator's fingers being under the point of operation, shall be effectively guarded by the use of a device such as an electronic eye safety circuit, two hand controls or protection similar to that prescribed for punch press operation, 1910.217. All chains, gears, operating bus linkage, and belts shall be protected by adequate guards, in accordance with 1910.219 of this part:

a. At the workplace, in the processing area, KVA #1 resistance welding machine had access to the point of operation below and around the existing barrier guard, thereby exposing employees to an amputation hazard.

b. At the workplace, in the processing area, KVA #2 resistance welding machine had access to the point of operation below, around, and through the existing barrier guard, thereby exposing employees to an amputation hazard.

c. At the workplace, in the processing area, KVA #3 resistance welding machine did not have the point of operation guarded, thereby exposing employees to an amputation hazard.

d. At the workplace, in the processing area, the Niko welding machine did not have the point of operation guarded, thereby exposing employees to an amputation hazard.

e. At the workplace, in the processing area, the Janda welding machine did not have the point of operation guarded, thereby exposing employees to an amputation hazard.

f. At the workplace, in the processing area, the Janda welding machine had an output table with moving components that were not guarded, thereby exposing employees to a caught-in hazard.

g. At the workplace, in the processing area, the Ideal #3 welding machine had an output table with moving components that were not guarded, thereby exposing employees to a caught-in hazard.

h. At the workplace, in the processing area, the Schlatter #3 welding machine did not have the point of operation guarded, thereby exposing employees to an amputation hazard.

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: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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i. At the workplace, in the processing area, the Schatter #3 welding machine had an output table with moving components that were not guarded, thereby exposing employees to a caught-in hazard.

j. At the workplace, in the processing area, the Schlatter #4 welding machine did not have the point of operation guarded, thereby exposing employees to an amputation hazard.

k. At the workplace, in the processing area, the Schatter #4 welding machine had an output table with moving components that were not guarded, thereby exposing employees to a caught-in hazard.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/13/2016
Proposed Penalty:	$7000.00

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.255(e): Maintenance. Periodic inspection shall be made by qualified maintenance personnel, and a certification record maintained. The certification record shall include the date of inspection, the signature of the person who performed the inspection and the serial number, or other identifier, for the equipment inspected. The operator shall be instructed to report any equipment defects to his supervisor and the use of the equipment shall be discontinued until safety repairs have been completed:
[39 FR 23502, June 27, 1974, as amended at 40 FR 18426, Apr. 28, 1975; 55 FR 13710, Apr. 11, 1990]

a. At the workplace, periodic inspections were not performed or documented for the resistance welding equipment to identify equipment defects and hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/13/2016
Proposed Penalty:	$7000.00

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

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.303(b)(2): Installation and use. Listed or labeled equipment shall be installed and used in accordance with any instructions included in the listing or labeling:

a. At the workplace, in the maintenance shop, a relocatable power tab was used as a substitute for fixed wiring, exposing employees to a fire hazard.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/21/2015
Proposed Penalty:	$4000.00

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.304(g)(5): Grounding path. The path to ground from circuits, equipment, and enclosures shall be permanent, continuous, and effective:

a. At the workplace, located near the Powermatic band saw, a Dayton industrial fan, model 5C040J, used for air circulation, had a plug with a missing grounding pin, thereby exposing the employees to electrical shock hazards.

b. At the workplace, located in the roll form area, a Milwaukee Sawzall, serial # A66D613060439, used to cut strips of sheet metal, had a plug with a missing grounding pin, thereby exposing the employees to electrical shock hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/21/2015
Proposed Penalty:	$5000.00

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: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.305(b)(1)(ii): Unused openings in cabinets, boxes, and fittings shall be effectively closed:

a. At the workplace, in the wire room, on the North side, there was an unused opening on the bottom of the 480 VAC electrical disconnect for the pointer, thereby exposing employees to an electrical hazard.

b. At the workplace, in the wire room, on the West wall, there was an unused opening on the bottom of the 480 VAC electrical disconnect for the lifting magnet, thereby exposing employees to an electrical hazard.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/21/2015
Proposed Penalty:	$5000.00

Citation and Notification of Penalty

Company Name: International Technical Coatings Inc., dba ITC Manufacturing
Inspection Site: 845 E. Markison Avenue, Columbus, OH 43215

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

29 CFR 1910.307(c): Electrical installations. Equipment, wiring methods, and installations of equipment in hazardous (classified) locations shall be intrinsically safe, approved for the hazardous (classified) location, or safe for the hazardous (classified) location:

a. At the workplace, in the powder coating area, electrical equipment including, but not limited to, three duplex receptacle outlets, an electric drinking water cooler and a relocatable power tap in a Class II, Division 2 location were not intrinsically safe, approved for a Class II, Division 2 location, or safe for a Class II, Division 2 location.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 01/13/2016
Proposed Penalty: $5000.00

Deborah J. Zubaty
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
200 N. High Street
Room 620
Columbus, OH 43215
Phone: 614-469-5582 Fax: 614-469-6791

INVOICE / DEBT COLLECTION NOTICE

Company Name:	**International Technical Coatings Inc., dba ITC Manufacturing**
Inspection Site:	**845 E. Markison Avenue, Columbus, OH 43215**
Issuance Date:	**12/09/2015**

Summary of Penalties for Inspection Number	**1069945**
Citation 1, Serious	**$107000.00**
TOTAL PROPOSED PENALTIES	**$107000.00**

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.

Deborah J. Zubaty
Area Director