

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
1222 Spruce Street  
Room 9.104  
Saint Louis, MO 63103  
Phone: 314-425-4249 Fax: 314-425-4289



## Citation and Notification of Penalty

**To:**  
ST. LOUIS COLD DRAWN INC.  
and its successors  
1060 Pershall Road  
Saint Louis, MO 63137

**Inspection Number:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015

**Inspection Site:**  
1060 Pershall Road  
Saint Louis, MO 63137

*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](http://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](http://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 12/24/2015. The conference will be held by telephone or at the OSHA office located at 1222 Spruce Street, Room 9.104, Saint Louis, MO 63103 on \_\_\_\_\_ at

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

**CERTIFICATION OF CORRECTIVE ACTION WORKSHEET**

**Inspection Number: 1077467**

Company Name: ST. LOUIS COLD DRAWN INC.  
Inspection Site: 1060 Pershall Road, Saint Louis, MO 63137  
Issuance Date: 12/24/2015

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 1222 Spruce Street, Room 9.104, Saint Louis, MO 63103**

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:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

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

OSH ACT of 1970 Section (5)(a)(1):

Section 5(a)(1) of the Occupational Safety and Health Act of 1970: The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause death or serious physical harm to employee(s) in that employee(s) were exposed to the hazard of being struck-by:

a/ The last periodic inspection of a P & H 5T Underslung Crane (DL-8 South) did not include a thorough examination of the suspension pins. A suspension pin sheared off on or about July 02, 2015 resulting in the total collapse of the hoist and its suspended load.

One method of abatement to correct this apparent hazard is to inspect for loose or missing fasteners, such as bolts, nuts, pins, or rivets as required by ANSI B11.30-2010, paragraph 11-2.1.5.

**DISCLAIMER:**

- a/ The employer is not limited to the abatement method(s) suggested by OSHA.
- b/ The employer is responsible for selecting and implementing an effective abatement method.

**ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.**

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$6930.00

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:** ST. LOUIS COLD DRAWN INC.  
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**Citation 1 Item 1 b** Type of Violation: **Serious**

29 CFR 1910.179(j)(3): A complete periodic inspection of crane(s) had not been conducted in the past 12 months:

Complete inspections of the following cranes were not performed:

- a/ P & H 5T Overhead Crane a.k.a. KR North.
- b/ P & H 5T Overhead Crane a.k.a. KR Center.
- c/ P & H 5T Overhead Crane a.k.a. KR South.
- d/ Demag 5T Overhead Crane a.k.a. SEC North.
- e/ Demag 5T Overhead Crane a.k.a. SEC South.
- f/ Demag 7T Overhead Crane a.k.a. DL20 North.
- g/ P & H 5T Overhead Crane a.k.a. DL20 Center.
- h/ P & H 5T Overhead Crane a.k.a. DL20 South.
- i/ Demag 7T Overhead Crane a.k.a. DB West.
- j/ P & H 7T Overhead Crane a.k.a. DB Center.
- k/ P & H 7T Overhead Crane a.k.a. DB East.

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**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

02/12/2016

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**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
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The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

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

29 CFR 1910.22(a)(3): To facilitate cleaning, every floor, working place, and passageway were not kept free from protruding nails, splinters, holes, or loose boards:

a/ At the Danieli Line, the metal grating at the foot of the stairway leading over this machine was protruding approximately one half inch.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$4950.00

**U.S. Department of Labor**  
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**Citation 1 Item 2 b** Type of Violation: **Serious**

29 CFR 1910.37(a)(3): Exit routes were not free and unobstructed:

a/ Inside of Building #2, specifically the Drawing Line Unit, the pedestrian exit route was partially obstructed by large pieces of steel supported by wooden dunnage.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

02/12/2016

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

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

29 CFR 1910.22(c): Covers and/or guardrails were not provided to protect personnel from the hazards of open pits:

a/ Inside of Building #2, specifically along the west side of the gear box adjacent to a designated aisleway, an open pit that measured approximately 23"W X 17"D X 162"L was not provided with a cover and/or a standard guardrail system.

**ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.**

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$4950.00

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

29 CFR 1910.23(d)(1)(iii): Stairway(s) less than 44 inches wide having both sides open, did not have one stair railing on each side:

a/ At the Kieserling Line, a flight of metal stairs four risers high was not equipped with stair railings along both open sides. The width of the tread was approximately 28 inches wide. The fall distance into moving machine parts was approximately 38 inches.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

02/12/2016

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**Company Name:** ST. LOUIS COLD DRAWN INC.  
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**Citation 1 Item 3 c** Type of Violation: **Serious**

29 CFR 1910.23(e)(1): A standard railing did not consist of top rail, intermediate rail, and posts, and did not have a vertical height of 42 inches nominal from upper surface of top rail to floor, platform, runway, or ramp level:

a/ Inside of Building #2, specifically along the east side of the gear box adjacent to a designated aisleway, an open pit that measured approximately 23"W X 17"D X 62"L was provided with a standard guardrail system that was approximately five feet long. The vertical height of the top rail was approximately 36 inches.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: 02/12/2016

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

29 CFR 1910.23(e)(2): A stair railing was not of construction similar to a standard railing but the vertical height was not more than 34 inches nor less than 30 inches from upper surface of top rail to surface of tread in line with face of riser at forward edge of tread:

a/ Inside of the Main Building, the flight of stairs consisting of 16 risers was equipped with a stair railing that was approximately 28 inches high.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

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

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

29 CFR 1910.101(b): The in-plant handling, storage, and utilization of all compressed gases in cylinders, portable tanks, rail tankcars, or motor vehicle cargo tanks were not in accordance with Compressed Gas Association Pamphlet P-1-1965, which is incorporated by reference as specified in CFR 1910.6:

- a/ Adjacent to the Daneili Line, two compressed gas cylinders in storage marked as containing argon were not secured against falling.
- b/ Adjacent to the Kieserling Line, specifically near the "Wheelabrator", one compressed gas cylinder in storage marked as containing oxygen was not secured against falling.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: 02/12/2016  
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**Citation 1 Item 4 b Type of Violation: **Serious****

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

a/ At the compressed gas cylinder storage area adjacent to the Main Building, one compressed gas cylinder partially containing LPG was not equipped with a valve cap.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

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

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

a/ At the compressed gas cylinder storage area adjacent to the Main Building, one cylinder partially filled with oxygen was stored adjacent to acetylene cylinders.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

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

29 CFR 1910.135(a)(1): The employer did not ensure that each affected employee wear a protective helmet when working in areas where there is a potential for injury to the head from falling objects:

a/ At the Main Building, specifically at the Secondary Processing Area, which consisted of two loading docks at either side of the facility, protective helmets were not provided to employees who operate overhead cranes where the suspended load was at or above their heads.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$4950.00

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

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

Periodic inspections of the following procedures were not performed:

- a/ Kieserling Line.
- b/ Schumag Line.
- c/ Danieli Line.
- d/ Draw Bench Line.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

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

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

29 CFR 1910.184(i)(1): Synthetic web sling(s) were not marked or coded to show rated capacities for each type of hitch and type of synthetic web material:

a/ At the Danieli Line, specifically at the Pay-Off Area, a synthetic web sling used to move spools of rough raw steel product via an unmarked, overhead crane was equipped with an illegible tag.

**ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.**

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$6930.00

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**Company Name:** ST. LOUIS COLD DRAWN INC.  
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**Citation 1 Item 7 b Type of Violation: **Serious****

29 CFR 1910.184(i)(9): Synthetic web sling(s) were not immediately removed from service for having snags, cuts and tears:

a/ At the Danieli Line, specifically at the Pay-Off Area, a synthetic web sling used to move spools of rough raw steel product via an unmarked, overhead crane possessed a hole clear through the material.

b/ Inside of Building #2, the synthetic web sling used to move finished steel product via a Demag 7T Underhung Crane, s/n 79192, was badly ripped in multiple places.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

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

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

29 CFR 1910.219(c)(2)(i): Exposed part(s) of horizontal shafting were not protected by stationary casing(s) enclosing shafting completely or by trough(s) enclosing sides and top or sides and bottom of shafting:

- a/ Inside of the Secondary Building, specifically the Two Roll Straightener, a horizontal shaft approximately four feet above the floor was not guarded.
- b/ Inside of the Main Building, specifically the Danieli Line, Two-Roll Section, a horizontal shaft approximately four feet above the floor was not guarded.
- c/ Inside of the Main Building, specifically the Schumag Line, two, horizontal shafts approximately four feet above the floor were not guarded.
- d/ Inside of the Main Building, specifically the Kieserling Line, two, horizontal shafts approximately four feet above the floor were not guarded.
- e/ Inside of the Main Building, specifically the Kieserling Line, at the Two-Roller Station, a horizontal shaft approximately four feet above the floor was not guarded.

**ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.**

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

29 CFR 1910.219(c)(3): Vertical or inclined shafting was not enclosed with stationary casing(s):

a/ Inside of the Secondary Building, specifically the Two-Roll Straightener, an inclined shaft approximately four feet from the floor was unguarded.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

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Occupational Safety and Health Administration

**Inspection Number:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

29 CFR 1910.219(e)(1)(i): Horizontal belts which had both runs seven feet or less from the floor level were not guarded with a guard that extended to at least fifteen inches above the belt:

a/ Inside of Building #2, specifically along the designated aisleway of the Draw Bench Line, two, horizontal belts approximately 36 inches above the floor were unguarded.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

02/12/2016

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:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

29 CFR 1910.212(b): Machines designed for a fixed location were not securely anchored to prevent walking or moving:

a/ Inside of the Machine Shop, the HDI Heavy-Duty Drill Press, m/n DP-56, s/n 251, was not anchored to the floor to prevent inadvertent movement.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$4950.00

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:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

29 CFR 1910.215(b)(9): The distance between the abrasive wheel periphery(s) and the adjustable tongue or the end of the safety guard peripheral member at the top exceeded one-fourth inch:

a/ Inside of the Maintenance Department, the tongue guard belonging to a Powermatic Pedestal Grinder, m/n 2100-25, s/n 511863, was approximately one inch away from the abrasive wheel.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: 02/12/2016

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:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

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

a/ Inside of the Machine Shop, the compressed air used for cleaning purposes was set at a minimum of 60 p.s.i.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

02/12/2016  
\$4950.00

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:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

29 CFR 1910.252(a)(2)(vii): Where practicable, all combustibles were not relocated at least 35 feet (10.7 m) from the work site. Where relocation was impracticable, combustibles were not protected with flameproofed covers or otherwise shielded with metal or asbestos guards or curtains:

- a/ At the Kieserling Line, combustibles were not relocated or suitably covered whenever arc welding or oxy-fuel cutting work was performed in the aiseways where large quantities of combustible liquids were present. These combustible liquids consisted primarily of NRG AW Hydraulic Fluid, Exxon Petroleum Metalworking Fluid, Anticorit RP 4107 HCL, and Masterdraw.
- b/ At the Schumag Line, combustibles were not relocated or suitably covered whenever arc welding or oxy-fuel cutting work was performed in the aiseways where large quantities of combustible liquids were present. These combustible liquids consisted primarily of NRG AW Hydraulic Fluid, Exxon Petroleum Metalworking Fluid, Anticorit RP 4107 HCL, and Masterdraw.
- c/ At the Danieli Line, combustibles were not relocated or suitably covered whenever whenever arc welding or oxy-fuel cutting work was performed in the aiseways where large quantities of combustible liquids were present. These combustible liquids consisted primarily of NRG AW Hydraulic Fluid, Exxon Petroleum Metalworking Fluid, Anticorit RP 4107 HCL, and Masterdraw. A fire broke out on or about August 11, 2015 at an area of this production line called the Tester Area.
- d/ At Building #2, combustibles were not relocated or suitably covered at the Draw Bench Line whenever arc welding or oxy-fuel cutting work was performed in the aiseways where large quantities of combustible liquids were present. These combustible liquids consisted primarily of NRG AW Hydraulic Fluid, Exxon Petroleum Metalworking Fluid, Anticorit RP 4107 HCL, and Masterdraw.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

02/12/2016

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:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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Proposed Penalty: \$6930.00

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: 1077467  
Inspection Date(s): 07/15/2015 - 12/24/2015  
Issuance Date: 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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 13 a      Type of Violation: **Serious**

29 CFR 1910.303(b)(1)(ii): Electrical equipment was not free from recognized hazards, based on the mechanical strength and durability, including, for parts designed to enclose and protect other equipment, the adequacy of the protection thus provided:

a/ At the Kieserling Line, adjacent to the Collecting Bucket, the conduit supplying 240 volt electrical power to the Crouse Hinds Heavy-Duty Safety Switch, m/n 4, s/n HV362, had physically separated exposing the internal wiring.

b/ At the Kieserling Line, the conduit supplying electrical power to a component of this machine had physically separated exposing the internal wiring.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$6930.00

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:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

29 CFR 1910.303(b)(5): The overcurrent protective devices were not selected and coordinated to permit the circuit protective devices used to clear a fault to do so without the occurrence of extensive damage to the electrical components of the circuit:

a/ Inside of Building #2, a live circuit breaker was taped in the "open" position.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: 02/12/2016



### Citation and Notification of Penalty

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

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

29 CFR 1910.303(c)(3)(i): All splices and joints and the free ends of the conductors were not covered with an insulation equivalent to that of the conductors or with an insulating device identified for the purpose.

a/ At the Kieserling Line, an orange, flexible cord was spliced together without brazing, welding, or soldering with a fusible metal or alloy. The splices and joints and the free ends of conductors were not covered with an insulation equivalent to that of the conductors or with an insulating device identified for the purpose.

b/ At the Schumag Line, a flexible cord was spliced together without brazing, welding, or soldering with a fusible metal or alloy. The splices and joints and the free ends of conductors were not covered with an insulation equivalent to that of the conductors or with an insulating device identified for the purpose. This flexible cord was located between two sections of metal flooring.

c/ At the Schumag Line, a flexible cord was spliced together without brazing, welding, or soldering with a fusible metal or alloy. The splices and joints and the free ends of conductors were not covered with an insulation equivalent to that of the conductors or with an insulating device identified for the purpose. This flexible cord was located on the metal grating running parallel to the line.

d/ At the Schumag line, a flexible cord was spliced together without brazing, welding, or soldering with a fusible metal or alloy. The splices and joints and the free ends of conductors were not covered with an insulation equivalent to that of conductors or with an insulating device identified for the purpose. This flexible cord was used to power a Makita Sander, m/n 9031, unknown s/n.

e/ At Building #2, specifically the rear aisleway, an orange flexible cord was spliced together without brazing, welding, or soldering with a fusible metal or alloy. The splices and joints and the free ends of conductors were not covered with an insulation equivalent to that of the conductors or with an insulating device identified for the purpose. This flexible cord was powering a floor mounted fan.

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:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$6930.00

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:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

29 CFR 1910.305(g)(2)(ii): Flexible cords were not used only in continuous lengths without splice or tap:

a/ At the Kieserling Line, an orange, flexible cord was spliced together without brazing, welding, or soldering with a fusible metal or alloy. The splices and joints and the free ends of conductors were not covered with an insulation equivalent to that of the conductors or with an insulating device identified for the purpose.

b/ At the Schumag Line, a flexible cord was spliced together without brazing, welding, or soldering with a fusible metal or alloy. The splices and joints and the free ends of conductors were not covered with an insulation equivalent to that of the conductors or with an insulating device identified for the purpose. This flexible cord was located between two sections of metal flooring.

c/ At the Schumag Line, a flexible cord was spliced together without brazing, welding, or soldering with a fusible metal or alloy. The splices and joints and the free ends of conductors were not covered with an insulation equivalent to that of the conductors or with an insulating device identified for the purpose. This flexible cord was located on the metal grating running parallel to the line.

d/ At the Schumag line, a flexible cord was spliced together without brazing, welding, or soldering with a fusible metal or alloy. The splices and joints and the free ends of conductors were not covered with an insulation equivalent to that of conductors or with an insulating device identified for the purpose. This flexible cord was used to power a Makita Sander, m/n 9031, unknown s/n.

e/ At Building #2, specifically the rear aisleway, an orange flexible cord was spliced together without brazing, welding, or soldering with a fusible metal or alloy. The splices and joints and the free ends of conductors were not covered with an insulation equivalent to that of the conductors or with an insulating device identified for the purpose. This flexible cord was powering a floor mounted fan.

**ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.**

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

**Inspection Number:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

02/12/2016

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:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

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

29 CFR 1910.303(g)(1)(i)(B): For electric equipment operating at 600 volts, nominal, or less to ground, and likely to require examination, adjustment, servicing, or maintenance while energized, the width of the working space in front of electrical equipment was less than the width of the equipment or 762 mm (30 inches), whichever was greater :

a/ Inside of Building #2, specifically along the rear aisleway of the Draw Bench Line, objects including, but not limited to, a wooden bench and 55-gallon drums were located in the designated aisleway which ran parallel to the 480 volt distribution panel boxes. These objects were generally 20 inches away from the panel boxes.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$6930.00



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

29 CFR 1910.303(g)(1)(ii): The required working space about electric equipment rated 600 volts, nominal, or less to ground, was used for storage:

a/ Inside of Building #2, specifically along the rear aisleway of the Draw Bench Line, objects including, but not limited to, a wooden bench and 55-gallon drums were stored in the designated aisleway which ran parallel to the 480 volt distribution panel boxes. These objects were generally 20 inches away from the panel boxes.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: 02/12/2016

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

**Inspection Number:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

29 CFR 1910.305(b)(1)(i): Conductors entering cutout boxes, cabinets, or fittings were not protected from abrasion, and openings through which conductors enter were not effectively closed:

a/ At the Kieserling Line, a flexible cord entering a motor unit was subjected to abrasion due to the vibration caused by moving machine parts throughout the line. The opening through which this flexible cord entered was not effectively closed.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$6930.00

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:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

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

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

- a/ Inside of Building #2, specifically the Draw Bench Line, on 09/09/15 and 10/07/15, flexible cord sets (extension cords) ran under a hand washing basin. These cord sets were used to supply power to a heating device and served as a substitute for fixed wiring.
- b/ Inside of the Main Building, specifically the locker room, a Type SO flexible cord was used to power a permanently mounted electric hair dryer. This flexible cord was used as a substitute for permanent wiring.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$6930.00





**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

29 CFR 1910.305(g)(1)(iv)(D): Flexible cords and cables were used for purposes prohibited by subparagraphs (a) through (e) of this paragraph:

- a/ At the Kieserling Line, specifically the rear aisleway, an orange, flexible cord was attached to building surfaces.
- b/ Inside of the Main Building, an orange, flexible cord was attached to building surfaces as it ran its way to the roof.
- c/ Inside of the Main Building, specifically in front of the Danieli Line, an orange, flexible cord was attached to building surfaces as it ran its way above the garage door.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: 02/12/2016



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

29 CFR 1910.1200(f)(6): The employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged, or marked with either the identification of its contents or hazard warning:

a/ At the Schumag Line, specifically the main aisleway, a dip tank partially filled with what was believed to be Regular Mineral Spirits was not labeled.

b/ At the Schumag Line, specifically the rear aisleway, a 55-gallon drum partially filled with what was believed to be Petroleum Metalworking Fluid was not labeled.

c/ At the Schumag Line, specifically the rear aisleway, a 55-gallon drum partially filled with what was believed to be a rust preventative was not labeled.

d/ Inside of Building #2, Draw Bench Line, specifically the rear aisleway, four, 55-gallon drums partially filled with what was believed to be a variety of lubricants were unlabeled.

e/ Inside of the Secondary Building, specifically in the aisleway, a black, plastic container partially filled with what was believed to be a rust preventative was not labeled.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

02/12/2016  
\$4950.00



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.

**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

29 CFR 1910.22(a)(2): Where wet processes were used, drainage was not maintained, and false floors, platforms, mats, or other dry standing places were not provided when practicable:

a/ At the Kieserling Line, large quantities of of dust composed of Steel Shot Grit and Special Bar Quality were mixed with Anticorit RP 4107 HCL, a liquid rust preventer, and located along the "Wheelabrator" and the designated aisleways in general. A variety of other lubricants were also present on the designated aisleways paralleling this line making walking extremely difficult.

b/ At the Schumag Line, large quantities of of dust composed of Steel Shot Grit and Special Bar Quality were mixed with Anticorit RP 4107 HCL, a liquid rust preventer, and located along the "Wheelabrator" and the designated aisleways in general. A variety of other lubricants were also present on the designated aisleways paralleling this line making walking extremely difficult.

c/ At the Danieli Line, large quantities of of dust composed of Steel Shot Grit and Special Bar Quality were mixed with Anticorit RP 4107 HCL, a liquid rust preventer, and located along the "Wheelabrator" and the designated aisleways in general. A variety of other lubricants were also present on the designated aisleways paralleling this line making walking extremely difficult.

d/ At Building #2, large quantities of of dust composed of Steel Shot Grit and Special Bar Quality were mixed with Anticorit RP 4107 HCL, a liquid rust preventer, and located along the "Wheelabrator" and the designated aisleways in general. A variety of other lubricants were also present on the designated aisleways paralleling the Drawing Unit Line making walking extremely difficult.

e/ At the Twenty Ton Line, large quantities of of dust composed of Steel Shot Grit and Special Bar Quality were mixed with Anticorit RP 4107 HCL, a liquid rust preventer, and located along the "Wheelabrator" and the designated aisleways in general.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

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:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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Date By Which Violation Must be Abated:  
Proposed Penalty:

02/12/2016  
\$69300.00

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:** ST. LOUIS COLD DRAWN INC.

**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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**Citation 2 Item 2** Type of Violation: **Willful**

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

Inside of the Main Building, the two, vertical, rotating feeders providing rough raw steel product to the following production machines were not guarded:

a/ Kieserling Line.

b/ Schumag Line.

c/ Danieli Line.

Inside of the Main Building, the reciprocating machine parts at various locations throughout the lengths of the following production machines where the operators and other employees work were inadequately guarded or not at all:

a/ Kieserling Line.

b/ Schumag Line.

c/ Danieli Line.

Inside of the Main Building, the in-running nip points at various locations throughout the lengths of the following production machines where the operators and other employees work were inadequately guarded or not at all:

a/ Kieserling Line.

b/ Schumag Line.

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:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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c/ Danieli Line.

Inside Building #2, specifically at the base of the "Wheelabrator" the rotating parts of the following machine were unguarded:

a/ Auger.

Inside of the Tool & Die Room, the rotating parts belonging to the following machines were not guarded:

a/ Die Quip Lathe, m/n DQB66, s/n B06-223.

b/ Schuer Speed Lathe, m/n LAZB, s/n 40674M.

c/ Schuer Speed Lathe, unknown m/n or s/n.

Inside of the Machine Shop, the rotating parts belonging to the following machines were not guarded:

a/ JET Manual Lathe, s/n GH-1460ZX.

b/ HDI Heavy-Duty Drill Press, m/n DP-56, s/n 251.

c/ Kalamazoo Horizontal Band Saw, m/n H9AW, s/n 8865.

d/ OOYA Radial Arm Drill, m/n RE-1225M, s/n 69-9543.

Inside of the Twenty Ton Line, two, vertical, rotating feeders providing rough raw steel product were unguarded.

Inside of the Twenty Ton Line, the robotic arm feeding rough raw steel product into this production line was inadequately guarded.

Inside of the Twenty Ton Line, five, vertical, in-running nip points were inadequately guarded.

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:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$69300.00

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:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

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

a/ Inside of the Maintenance Department, the unguarded P.O.O. belonging to the Uni-Hydra Ironworker, m/n 5074, s/n 3PE322A, was approximately one inch wide. The unguarded P.O.O. was the structural shear on this machine.

St. Louis Cold Drawn Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard, 29 CFR 1910.219(e)(3)(i), which was contained in OSHA inspection number 908320, citation 1, item 7, and was affirmed as a final order on 09/10/14, with respect to a workplace located at 1060 Pershall Road, St. Louis, Missouri 63137.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$13860.00



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

**Citation 3 Item 2 a** Type of Violation: **Repeat**

29 CFR 1910.219(d)(1): Pulley(s) with part(s) seven feet or less from the floor or work platform were not guarded in accordance with the requirements specified at 29 CFR 1910.219(m) and (o):

- a/ Inside of the Main Building, specifically at the Kieserling Line, two pulleys were unguarded. The pulleys were approximately four feet above the floor.
- b/ Inside of the Main Building, specifically at the Schumag Line, a pulley was partially unguarded. The pulley was approximately five feet above the floor.
- c/ Inside of the Main Building, specifically near the operator's station on the Danieli Line, a pulley was unguarded. The pulley was approximately four feet above and adjacent to the designated walkway.

St. Louis Cold Drawn Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard, 29 CFR 1910.219(d)(1), which was contained in OSHA inspection number 908320, citation 1, item 8a, and was affirmed as a final order on 09/10/14, with respect to a workplace located at 1060 Pershall Road, St. Louis, Missouri 63137.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: 02/12/2016  
Proposed Penalty: \$13860.00

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:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

**Citation 3 Item 2 b** Type of Violation: **Repeat**

29 CFR 1910.219(e)(3)(i): Vertical and inclined belts were not enclosed by a guard conforming to standards in paragraphs (m) and (o) of this section:

a/ At the Kieserling Line, two inclined belts were unguarded. The maximum height of the pulleys was approximately 62 inches.

b/ At the Danieli Line, specifically adjacent to the operator's station, one inclined belt was unguarded. The maximum height of the pulley was approximately 36 inches.

St. Louis Cold Drawn Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard, 29 CFR 1910.219(e)(3)(i), which was contained in OSHA inspection number 908320, citation 1, item 8b, and was affirmed as a final order on 09/10/14, with respect to a workplace located at 1060 Pershall Road, St. Louis, Missouri 63137.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: 02/12/2016



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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**Citation 3 Item 3** Type of Violation: **Repeat**

29 CFR 1910.303(b)(7)(iv): There were damaged parts that may adversely affect safe operation or mechanical strength of the equipment, such as parts that are broken, bent, cut, or deteriorated by corrosion, chemical action, or overheating:

a/ At the Schumag Line, specifically the rear aisleway, a live, quad-receptacle box possessed a damaged outlet. A flexible cord was plugged into this box.

b/ At the Schumag Line, specifically the main aisleway, a live, quad-receptacle box possessed a knockout that was partially pushed in.

St. Louis Cold Drawn Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard, 29 CFR 1910.303(b)(7)(iv), which was contained in OSHA inspection number 908320, citation 1, item 10, and was affirmed as a final order on 09/10/14, with respect to a workplace located at 1060 Pershall Road, St. Louis, Missouri 63137.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$13860.00

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

Inspection Number: 1077467  
Inspection Date(s): 07/15/2015 - 12/24/2015  
Issuance Date: 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

**Citation 3 Item 4** Type of Violation: **Repeat**

29 CFR 1910.304(g)(5): The path to ground from circuits, equipment, and enclosures was not permanent, continuous, and effective:

a/ Inside of Building #2, specifically at the Work Station, the flexible cord supplying 120 volt electrical power to the Milwaukee Portable Band Saw, m/n 6226, s/n 457HD14230136, was missing its grounding pin.

St. Louis Cold Drawn Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard, 29 CFR 1910.304(g)(5), which was contained in OSHA inspection number 908320, citation 1, item 12, and was affirmed as a final order on 09/10/14, with respect to a workplace located at 1060 Pershall Road, St. Louis, Missouri 63137.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

02/12/2016  
\$13860.00

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:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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

**Citation 3 Item 5 a** Type of Violation: **Repeat**

29 CFR 1910.305(b)(1)(ii): Unused openings in cabinets, boxes, and fittings were not effectively closed:

- a/ Inside of Building #2, an unused opening approximately two inches wide existed on the front panel of a 480 volt, fuse distribution panel box.
- b/ Inside of Building #2, specifically in the Hot Water Heating Room, six circuit breakers were missing from a live, circuit breaker panel box. The unused opening was covered in duct tape.
- c/ Inside of the Main Building, specifically at the bottom of the main stairwell, a live, dual receptacle box was missing a knockout.

St. Louis Cold Drawn Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard, 29 CFR 1910.305(b)(1)(ii), which was contained in OSHA inspection number 908320, citation 1, item 13a, and was affirmed as a final order on 09/10/14, with respect to a workplace located at 1060 Pershall Road, St. Louis, Missouri 63137.

**ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.**

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: 02/12/2016  
Proposed Penalty: \$13860.00



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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**Citation 3 Item 5 b** Type of Violation: **Repeat**

29 CFR 1910.305(b)(2)(i): All pull boxes, junction boxes, and fittings were not provided with covers identified for the purpose:

a/ At the Kieserling Line, the cover belonging to a live, junction box was held in place by one out of four screws. The internal wiring was fully exposed to dust and liquids.

b/ Inside of Building #2, the cover belonging to a live, junction box was missing. This junction box was located just above the floor of the rear aisleway of the Draw Bench Line.

c/ Inside of Building #2, the latches belonging to a cover to a live, 480 volt fuse distribution panel box were ineffective in keeping it closed. The upper latch was severely damaged leaving an opening approximately four inches wide. The lower latch was held in place by a piece of wire.

d/ Inside of Building #2, the cover belonging to a live, junction box attached to the Draw Bench Line was missing.

St. Louis Cold Drawn Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard, 29 CFR 1910.305(b)(2)(i), which was contained in OSHA inspection number 908320, citation 1, item 13b, and was affirmed as a final order on 09/10/14, with respect to a workplace located at 1060 Pershall Road, St. Louis, Missouri 63137.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

02/12/2016



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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**Citation 3 Item 6** Type of Violation: **Repeat**

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

a/ At the Secondary Processing Area, the outer insulation belonging to a flexible cord attached to a pendant control for an unmarked, overhead crane was severely damaged. One of two strain relief cables stemming from the pendant control to the flexible cord was snapped. Strain relief was broken.

St. Louis Cold Drawn Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard, 29 CFR 1910.219(e)(3)(i), which was contained in OSHA inspection number 908320, citation 1, item 14, and was affirmed as a final order on 09/10/14, with respect to a workplace located at 1060 Pershall Road, St. Louis, Missouri 63137.

ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	02/12/2016
Proposed Penalty:	\$13860.00



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.

**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

**Citation 3 Item 7** Type of Violation: **Repeat**

29 CFR 1910.334(a)(2)(ii): When there was a defect or evidence of damage that might expose an employee to injury, the defective or damaged item shall be removed from service, and no employee may use it until repairs and tests necessary to render the equipment safe had been made:

a/ At the Kieserling Line, a section of flexible cord stemming from a motor was missing approximately three inches of its outer insulation.

b/ At the Kieserling Line, a section of flexible cord stemming from a second motor was missing a portion of its outer insulation.

c/ In between the Kieserling and Schumag Lines, the outer insulation belonging to a yellow, flexible cord that powered an industrial shop vac, unknown make, model, or serial number, was nearly severed in half.

d/ At the Schumag Line, the outer insulation belonging to the flexible cord supplying 120 volt electrical power to an Industrial Shop Vac, unknown m/n or s/n, was missing.

e/ Inside of Building #2, specifically at the Work Station, the outer insulation belonging to the flexible cord supplying 120 volt electrical power to the Milwaukee Portable Band Saw, m/n 6226, s/n 457HD14230136, was missing.

f/ Inside of the Maintenance Department, the outer insulation belonging to a flexible cord powering a 220 volt Miller Plasma Cutter #74 was severely damaged. The conductors were exposed.

St. Louis Cold Drawn Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard, 29 CFR 1910.219(e)(3)(i), which was contained in OSHA inspection number 908320, citation 1, item 15, and was affirmed as a final order on 09/10/14, with respect to a workplace located at 1060 Pershall Road, St. Louis, Missouri 63137.

**ABATEMENT CERTIFICATION AND ABATEMENT VERIFICATION ARE REQUIRED FOR THIS VIOLATION.**

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:** 1077467  
**Inspection Date(s):** 07/15/2015 - 12/24/2015  
**Issuance Date:** 12/24/2015



**Citation and Notification of Penalty**

**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137

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**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

02/12/2016  
\$13860.00

A handwritten signature in black ink, appearing to read "W. McDonald", written over a horizontal line.

 **William McDonald**  
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  
1222 Spruce Street  
Room 9.104  
Saint Louis, MO 63103  
Phone: 314-425-4249 Fax: 314-425-4289



## INVOICE / DEBT COLLECTION NOTICE

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**Company Name:** ST. LOUIS COLD DRAWN INC.  
**Inspection Site:** 1060 Pershall Road, Saint Louis, MO 63137  
**Issuance Date:** 12/24/2015

<b>Summary of Penalties for Inspection Number</b>	<b>1077467</b>
<b>Citation 1, Serious</b>	<b>\$108900.00</b>
<b>Citation 2, Willful</b>	<b>\$138600.00</b>
<b>Citation 3, Repeat</b>	<b>\$97020.00</b>
<b>TOTAL PROPOSED PENALTIES</b>	<b>\$344520.00</b>

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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](http://www.pay.gov). On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your

original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

**Interest:** Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

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

**Administrative Costs:** Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



**William McDonald**  
Area Director

12/24/2015

Date