

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:
BCS MANUFACTURING LLC
and its successors
4215 Tholozan Ave.
Saint Louis, MO 63116

Inspection Number: 1111245
Inspection Date(s): 12/09/2015 - 12/10/2015
Issuance Date: 03/10/2016
Reply to the Attention: Strategic Team Leader

Inspection Site:
4215 Tholozan Ave.
Saint Louis, MO 63116

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 03/10/2016. 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: 1111245

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116
Issuance Date: 03/10/2016

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: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

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 elevated falls and/or caught in-between hazards:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 - On or about 12/09/2015, employees were exposed to elevated fall hazards and/or the hazard of being caught in-between concrete floor and lifting equipment while riding an "Autoquip" Series 35 Scissor Lift, at heights of approximately 5 to 6 feet above concrete surface, to dump trash barrels into a larger dumpster.

Among other methods, feasible and acceptable means of hazard abatement include:

The employer could follow the manufacturer's warning within the operator's manual, which states "NEVER stand, sit or ride on the lift!".

IN THE ALTERNATIVE:

29 CFR 1910.23(c)(1): Every open-sided floor or platform 4 feet or more above adjacent floor or ground level was not 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 4215 Tholozan Ave in St. Louis, MO 63116 - On or about 12/09/2015, employees were exposed to elevated fall hazards and/or the hazard of being caught in-between concrete floor and lifting equipment while riding an "Autoquip" Series 35 Scissor Lift, at heights of approximately 5 to 6 feet above concrete surface, to dump trash barrels into a larger dumpster.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19

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

Inspection Number: 1111245
Inspection Date(s): 12/09/2015 - 12/10/2015
Issuance Date: 03/10/2016



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 03/16/2016
Proposed Penalty: \$2800.00

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: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.22(a)(1): All places of employment, passageways, storerooms or service rooms were not kept clean and orderly or in a sanitary condition:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 - On or about 12/09/2015, where employees were exposed to explosion or other fire hazards due to accumulated wood dust, the employer failed to ensure all places of employment, passageways, storerooms or other service rooms were kept clean and orderly or in a sanitary condition.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/05/2016
Proposed Penalty:	\$2800.00

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

Inspection Number: 1111245
Inspection Date(s): 12/09/2015 - 12/10/2015
Issuance Date: 03/10/2016



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

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

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Building Front) - On or about 12/09/2015, the employer failed to keep exit routes free and unobstructed.

Abatement certification is required for this item.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

04/05/2016
\$1200.00

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: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.37(b)(5): Each doorway or passage along an exit access that could be mistaken for an exit was not marked "Not an Exit" or similar designation, or be identified by a sign indicating its actual use (e.g. closet):

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Milling Area) - On or about 12/09/2015, the employer failed to mark each doorway or passage along an exit access that could be mistaken for an exit "Not an Exit" or similar designation, or identify by a sign indicating its actual use.

Abatement certification is required for this item.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

04/05/2016
\$1200.00



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

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

29 CFR 1910.106(d)(4)(iii): Wiring. Electrical wiring and equipment located in inside storage rooms used for Category 1 or 2 flammable liquids, or Category 3 flammable liquids with a flashpoint below 100 °F (37.8 °C), was not approved under subpart S of this part for Class I, Division 2 Hazardous Locations; for Category 3 flammable liquids with a flashpoint at or above 100 °F (37.8 °C) and Category 4 flammable liquids, was not approved for general use:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Flammable Storage) - On or about 12/09/2015, employees were exposed to explosion or other fire hazards where a "DeLonghi" (TYP 3107, W 1500, V 120) non-intrinsically safe air heater was located inside storage rooms used for Category 1 or 2 flammable liquids, or Category 3 flammable liquids with a flashpoint below 100 °F (37.8 °C), was not approved under subpart S of this part for Class I, Division 2 Hazardous Locations; for Category 3 flammable liquids with a flashpoint at or above 100 °F (37.8 °C) and Category 4 flammable liquids, and was not approved for general use.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/05/2016
Proposed Penalty: \$2800.00



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.307(c): Equipment, wiring methods, and installations of equipment in hazardous (classified) locations were not intrinsically safe, approved for the hazardous (classified) location, or safe for the hazardous (classified) location:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Flammable Storage) - On or about 12/09/2015, employees were exposed to explosion or other fire hazards where a "DeLonghi" (TYP 3107, W 1500, V 120) non-intrinsically safe air heater was located inside flammable storage room, and not approved for the hazard (classified) location, or safe for the hazardous (classified) location.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/05/2016



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.107(b)(5)(ii): Discarded filter pads and filter rolls were not immediately removed to a safe, well-detached location or placed in a water-filled metal container and disposed of at the close of the day's operation unless maintained completely in water:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 - On or about 12/09/2015, employees were exposed to fire hazards where discarded filter pads and filter rolls were not immediately removed to a safe, well-detached location or placed in a water-filled metal container and disposed of at the close of the day's operation unless maintained completely in water.

Abatement certification is required for this item.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/05/2016
Proposed Penalty:	\$1600.00



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.107(c)(6): Electrical wiring and equipment not subject to deposits of combustible residues but located in a spraying area as herein defined were not explosion-proof type approved for Class I, group D locations and did not otherwise conform to the provisions of subpart S of this part, for Class I, Division 1, Hazardous Locations:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Finishing Area) - On or about 12/09/2015, employees were exposed to fire hazards where electrical wiring and equipment located in a spraying area as herein defined were not explosion-proof type approved for Class I, group D locations and did not otherwise conform to the provisions of subpart S of this part, for Class I, Division 1, Hazardous Locations.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/05/2016
Proposed Penalty:	\$2800.00



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.107(g)(3): Residue scrapings and debris contaminated with residue were not immediately removed from the premises and properly disposed. Approved metal waste cans were not provided wherever rags or waste were impregnated with finishing material; and all such rags or waste were not deposited therein immediately after use. The contents of waste cans were not properly disposed of at least once daily or at the end of each shift:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Finishing Area) - On or about 12/09/2015, employees were exposed to fire hazards where residue scrapings and debris contaminated with residue were not immediately removed from the premises and properly disposed, and approved metal waste cans were not provided wherever rags or waste were impregnated with finishing material.

Abatement certification is required for this item.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/05/2016
Proposed Penalty:	\$2400.00



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.132(d)(1): The employer did not assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE):

a) At 4215 Tholozan Ave in St. Louis, MO 63116 - On or about 12/09/2015, the employer failed to assess the workplace where employees were exposed to struck-by hazards and hazards of contacting sharp edges were present, or were likely to be present, which necessitate the use of personal protective equipment (PPE).

Abatement certification is required for this item.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/05/2016
Proposed Penalty:	\$2400.00



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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 10 a Type of Violation: **Serious**

29 CFR 1910.147(c)(1): The employer did not establish a program consisting of an energy control procedure, employee training and periodic inspections to ensure that before any employee performed any servicing or maintenance on a machine or equipment where the unexpected energizing, startup or release of stored energy could occur and cause injury, the machine or equipment shall be isolated from the energy source and rendered inoperative:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Woodshop) - On or about 12/09/2015, the employer failed to establish a program consisting of an energy control procedure, employee training and periodic inspections to ensure that before any employee performed any servicing or maintenance on a machine or equipment, such as, but not limited to, an "Autoquip" Series 35 Scissor Lift where the unexpected energizing, startup or release of stored energy could occur and cause injury, the machine or equipment shall be isolated from the energy source and rendered inoperative.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/05/2016
Proposed Penalty: \$2800.00



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.147(c)(4)(i): Procedures were not developed, documented and utilized for the control of potentially hazardous energy when employees were engaged in activities covered by this section:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Woodshop) - On or about 12/09/2015, where employees were exposed to the hazard of being contacted by the unexpected release of hazardous energy during maintenance or repair of equipment, such as, but not limited to, an "Autoquip" Series 35 Scissor Lift, procedures were not developed, documented and utilized for the control of potentially hazardous energy when employees were engaged in activities covered by this section.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/05/2016



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

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

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Woodshop) - On or about 12/09/2015, the employer failed to provide training to ensure that the purpose and function of the energy control program are understood by employees involved in maintenance and repair activities on equipment, such as, but not limited to, an "Autoquip" Series 35 Scissor Lift, and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/05/2016



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.213(c)(1): Each circular hand-fed rip saw was not guarded by a hood which completely enclose that portion of the saw above the table and that portion of the saw above the material being cut:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Milling Area) - On or about 12/09/2015, employees were exposed to the hazard of being caught in the point of operation where a "Delta" 10-inch tilting arbor saw was not guarded by a hood which completely enclose that portion of the saw above the table and that portion of the saw above the material being cut.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/05/2016
Proposed Penalty: \$2800.00

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

Inspection Number: 1111245
Inspection Date(s): 12/09/2015 - 12/10/2015
Issuance Date: 03/10/2016



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.213(c)(2): Each hand-fed circular rip saw was not furnished with a spreader to prevent material from squeezing the saw or being thrown back on the operator:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Milling Area) - On or about 12/09/2015, employees were exposed to struck-by hazards where a "Delta" 10-inch tilting arbor saw was not furnished with a spreader to prevent material from squeezing the saw or being thrown back on the operator.

Abatement certification is required for this item.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/05/2016
Proposed Penalty:	\$2400.00

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: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.213(c)(3): Each hand-fed circular rip saw was not provided with nonkickback fingers or dogs so located as to oppose the thrust or tendency of the saw to pick up the material or to throw it back toward the operator:

- a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Milling Area) - On or about 12/09/2015, employees were exposed to struck-by hazards where a "Delta" 10-inch tilting arbor saw was not provided with nonkickback fingers or dogs so located as to oppose the thrust or tendency of the saw to pick up the material or to throw it back toward the operator.
- b) At 4215 Tholozan Ave in St. Louis, MO 63116 (Milling Area) - On or about 12/09/2015, employees were exposed to struck-by hazards where a "Rockwell" (Model: 12/14) 10-inch tilting arbor saw was not provided with nonkickback fingers or dogs so located as to oppose the thrust or tendency of the saw to pick up the material or to throw it back toward the operator.

Abatement certification is required for these items.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 04/05/2016
Proposed Penalty: \$2400.00

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

Inspection Number: 1111245
Inspection Date(s): 12/09/2015 - 12/10/2015
Issuance Date: 03/10/2016



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

Citation 1 Item 14 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) At 4215 Tholozan Ave in St. Louis, MO 63116 - On or about 12/09/2015, where employees were using compressed air for cleaning, the employer failed to ensure compressed air was reduced to less than 30psi.

Abatement certification is required for this item.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/05/2016
Proposed Penalty:	\$2400.00

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: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.303(b)(8)(i): Electrical equipment was not firmly secured to the surface on which it was mounted:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Near Table Saws) - On or about 12/09/2015, the employer failed to ensure electrical equipment was firmly secured to the surface on which it was mounted.

b) At 4215 Tholozan Ave in St. Louis, MO 63116 (Near Scissor Lift) - On or about 12/09/2015, the employer failed to ensure electrical equipment was firmly secured to the surface on which it was mounted.

Abatement certification is required for these items.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

04/05/2016
\$1600.00



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.303(g)(2)(i): Except as elsewhere required or permitted by Subpart S of Part 1910, live parts of electric equipment operating at 50 volts or more were not guarded against accidental contact by use of approved cabinets or other forms of approved enclosures or by any of the means identified in paragraphs (A), (B), (C), and (D) of 29 CFR 1910.303(g)(2)(i):

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Finishing Area) - On or about 12/09/2015, employees were exposed to electrical hazards where an outlet box, approximately 240 volts - 3 phase, was not guarded against accidental contact by use of approved enclosures or by any of the means identified in paragraphs (A), (B), (C), and (D) of 29 CFR 1910.303(g)(2)(I).

Abatement certification is required for this item.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/05/2016
Proposed Penalty:	\$2000.00

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

Inspection Number: 1111245
Inspection Date(s): 12/09/2015 - 12/10/2015
Issuance Date: 03/10/2016



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.305(b)(1)(i): Conductors entering cutout boxes, cabinets, or fittings were not protected from abrasions:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Dust Collection System near Milling Machine) - On or about 12/09/2015, employees were exposed to fire hazards where conductors entering fittings on a dust collection system motor were not protected from abrasions.

Abatement certification is required for this item.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/05/2016
Proposed Penalty:	\$1600.00

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: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

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

- a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Behind Beam Saw) - On or about 12/09/2015, employees were exposed to fire hazards where unused openings in a junction box were not effectively closed.
- b) At 4215 Tholozan Ave in St. Louis, MO 63116 (Near Table Saws) - On or about 12/09/2015, employees were exposed to fire hazards where unused openings in a junction box were not effectively closed.
- c) At 4215 Tholozan Ave in St. Louis, MO 63116 (Near Scissor Lift) - On or about 12/09/2015, employees were exposed to fire hazards where unused openings in a junction box were not effectively closed.
- d) At 4215 Tholozan Ave in St. Louis, MO 63116 (Near Milling Machine) - On or about 12/09/2015, employees were exposed to fire hazards where unused openings in a junction box were not effectively closed.
- e) At 4215 Tholozan Ave in St. Louis, MO 63116 (Finishing Booth) - On or about 12/09/2015, employees were exposed to fire hazards where unused openings in a junction box were not effectively closed.
- f) At 4215 Tholozan Ave in St. Louis, MO 63116 (Main Incoming Electric Panel) - On or about 12/09/2015, employees were exposed to fire hazards where unused openings in a junction box were not effectively closed.

Abatement certification is required for these items.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/05/2016

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: 1111245
Inspection Date(s): 12/09/2015 - 12/10/2015
Issuance Date: 03/10/2016



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

Proposed Penalty:

\$1600.00

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: 1111245
Inspection Date(s): 12/09/2015 - 12/10/2015
Issuance Date: 03/10/2016



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

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

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Assembly, Milling, Finishing, and Restroom Areas) - On or about 12/09/2015, flexible cords were used as a substitute for fixed wiring of overhead florescent light fixtures.

Abatement certification is required for this item.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/05/2016
Proposed Penalty:	\$1600.00

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: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.305(g)(1)(iv)(B): Flexible cords and cables were run through holes in walls, ceilings, or floors:

a) At 4215 Tholozan Ave in St. Louis, MO 63116 (Flammable Storage) - On or about 12/09/2015, employees were exposed to explosion or other fire hazards where the flexible cord of a "DeLonghi" (TYP 3107, W 1500, V 120) non-intrinsically air heater was ran through a hole in the wall.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	04/05/2016
Proposed Penalty:	\$2800.00



Citation and Notification of Penalty

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116

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

29 CFR 1910.178(l)(1)(i): The employer did not ensure that each powered industrial truck operator is competent to operate a powered industrial truck safely, as demonstrated by the successful completion of the training and evaluation specified in this paragraph (l):

a) At 4215 Tholozan Ave in St. Louis, MO 63116 - On or about 12/09/2015, the employer failed to ensure that each powered industrial truck operator is competent to operate a "Yale" (Model: GLP060TFNUAE087; S/N: E117B11155T) powered industrial truck safely, as demonstrated by the successful completion of the training and evaluation specified in this paragraph (l).

Abatement certification is required for this item.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

04/05/2016
\$400.00

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

f William McDonald
Area Director

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

Company Name: BCS MANUFACTURING LLC
Inspection Site: 4215 Tholozan Ave., Saint Louis, MO 63116
Issuance Date: 03/10/2016

Summary of Penalties for Inspection Number	1111245
Citation 1, Serious	\$44000.00
Citation 2, Other-than-Serious	\$400.00
TOTAL PROPOSED PENALTIES	\$44400.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

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

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

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

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

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

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



William McDonald

Date

f Area Director