U.S. Department of Labor
Occupational Safety and Health Administration
420 Madison Ave
Suite 600
Toledo, OH 43604
Phone: 419-259-7542 Fax: 419-259-6355

Citation and Notification of Penalty

To:
SANOH AMERICA, Inc.
and its successors
1849 INDUSTRIAL DRIVE
Findlay, OH 45840

Inspection Site:
1849 INDUSTRIAL DRIVE
Findlay, OH 45840

Inspection Number: 1106514
Inspection Date(s): 11/18/2015 - 04/04/2016
Issuance Date: 04/18/2016

AMENDED CITATION

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.

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

NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 04/18/2016. The conference will be held by telephone or at the OSHA office located at 420 Madison Ave, Suite 600, Toledo, OH 43604 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1106514

Company Name: SANOH AMERICA, Inc.
Inspection Site: 1849 INDUSTRIAL DRIVE, Findlay, OH 45840
Issuance Date: 04/18/2016

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, 420 Madison Ave, Suite 600, Toledo, OH 43604**

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: SANOH AMERICA, Inc.
Inspection Site: 1849 INDUSTRIAL DRIVE, Findlay, OH 45840

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

29 CFR 1910.23(c)(1): Every open-sided floor or platform 4 feet or more above adjacent floor or ground level 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. Sanoh America, Inc. located in Findlay, Ohio: On or about November 18, 2015, employees were exposed to fall hazards of 57 inches to concrete while standing on top of the speed roller station on the PVDF line to perform speed roll change-outs.

b. Sanoh America, Inc. located in Findlay, Ohio: On or about November 18, 2015, employees were exposed to fall hazards of 50 inches to concrete while standing on top of the tension roller station on the PVDF line to perform tension roll change-outs.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date By Which Violation Must be Abated:	04/27/2016
Proposed Penalty:	$5,500.00

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: SANOH AMERICA, Inc.
Inspection Site: 1849 INDUSTRIAL DRIVE, Findlay, OH 45840

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 1910.212(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. Examples of guarding methods are-barrier guards, two-hand tripping devices,electronic safety devices, etc.:

a. Sanoh America, Inc. located in Findlay, Ohio: On or about November 18, 2015, the employer did not ensure the Eaton Leonard tube bending machine was properly guarded to protect employees from crushing hazards created by the swing arm while manually supporting the tube.

b. Sanoh America, Inc. located in Findlay, Ohio: On or about November 18, 2015, the employer did not ensure tube bending machine #3 was properly guarded to protect employees from crushing hazards created by the swing arm while manually supporting the tube.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/18/2016
Proposed Penalty:	$7,000.00

Citation and Notification of Penalty

Company Name: SANOH AMERICA, Inc.
Inspection Site: 1849 INDUSTRIAL DRIVE, Findlay, OH 45840

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

29 CFR 1910.212(a)(3)(ii): The point of operation of machines whose operation exposes an employee to injury, was not guarded. The guarding device was not in conformity with any appropriate standards therefor, or, in the absence of applicable specific standards, was not so designed and constructed as to prevent the operator from having any part of his body in the danger zone during the operating cycle:

a. Sanoh America, Inc. located in Findlay, Ohio: On or about November 18, 2015, the employer did not ensure employees making adjustments to the straighteners in the straightener department were protected from point of operation hazards created by the rotating straightener wheels.

b. Sanoh America, Inc. located in Findlay, Ohio: On or about November 18, 2015, the employer did not ensure tube bending machine #3 was properly guarded to protect employees from pinch points created by the pressure die and the clamp while manually supporting the tube.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 05/18/2016

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: SANOH AMERICA, Inc.
Inspection Site: 1849 INDUSTRIAL DRIVE, Findlay, OH 45840

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

Citation 2 Item 1 a Type of Violation: **Repeat**
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 the activities covered by this section:

a. Sanoh America, Inc. located in Findlay, Ohio: On or about November 18, 2015, the employer did not ensure machine specific lockout procedures were utilized for the PVDF line speed drive rollers. Employees removing worn drive rollers were exposed to mechanical and pneumatic energy during the operation.

b. Sanoh America, Inc. located in Findlay, Ohio: On or about November 18, 2015, the employer did not ensure machine specific lockout procedures were utilized for the PVDF line tension drive rollers. Employees removing worn drive rollers were exposed to mechanical and pneumatic energy during the operation.

c. Sanoh America, Inc. located in Findlay, Ohio: On or about November 18, 2015, the employer did not ensure machine specific lockout procedures were utilized for the PA line tension rollers. Employees removing worn tension rollers were exposed to mechanical and pneumatic energy during the operation.

Sanoh America, Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.147(c)(4)(I), which was contained in OSHA inspection number 313148595, citation number 1, item number 1 and was affirmed as a final order on June 16, 2009, with respect to a workplace located at 115 Mount Vernon Ave., Mount Vernon, Ohio. Sanoh America, Inc. was previously cited a second time of this occupational safety and health standard or its equivalent standard 29 CFR 1910.147(c)(4)(I), which was contained in OSHA inspection number 107311, citation number 2, item number 1 and was affirmed as a final order on April 18, 2012, with respect to a workplace located at 1849 Industrial Drive, Findlay, Ohio.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation

Citation and Notification of Penalty

Company Name: SANOH AMERICA, Inc.
Inspection Site: 1849 INDUSTRIAL DRIVE, Findlay, OH 45840

(using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/04/2016
Proposed Penalty:	$70,000.00

Citation and Notification of Penalty

Company Name: SANOH AMERICA, Inc.
Inspection Site: 1849 INDUSTRIAL DRIVE, Findlay, OH 45840

Citation 2 Item 2 b Type of Violation: **Repeat**
29 CFR 1910.147(d)(3): All energy isolating devices that were needed to control the energy to the machine or equipment were not physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s).

a. Sanoh America, Inc. located in Findlay, Ohio: On or about November 18, 2015, the employer did not ensure employees isolated the electrical energy prior to working on the speed drive rollers for the PVDF line.

b. Sanoh America, Inc. located in Findlay, Ohio: On or about November 18, 2015, the employer did not ensure employees isolated the electrical energy prior to working on the tension drive rollers for the PVDF line.

c. Sanoh America, Inc. located in Findlay, Ohio: On or about November 18, 2015, the employer did not ensure employees isolated the electrical energy prior to working on the tension rollers for the PA line.

Sanoh America, Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.147(d)(3), which was contained in OSHA inspection number 107311, citation number 1, item number 5a and was affirmed as a final order on April 18, 2012, with respect to a workplace located at 1849 Industrial Drive, Findlay, Ohio.

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: SANOH AMERICA, Inc.
Inspection Site: 1849 INDUSTRIAL DRIVE, Findlay, OH 45840

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 05/04/2016

Kimberly Nelson
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
420 Madison Ave
Suite 600
Toledo, OH 43604
Phone: 419-259-7542 Fax: 419-259-6355

INVOICE / DEBT COLLECTION NOTICE AMENDED CITATION

Company Name: **SANOH AMERICA, Inc.**
Inspection Site: **1849 INDUSTRIAL DRIVE, Findlay, OH 45840**
Issuance Date: **04/18/2016**

Summary of Penalties for Inspection Number	**1106514**
Citation 1, Serious	**$12,500.00**
Citation 2, Repeat	**$70,000.00**
TOTAL PROPOSED PENALTIES	**$82,500.00**

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.

Kimberly Nelson
Area Director

April 19, 2016
Date