

U.S. Department of Labor Occupational Safety and Health Administration
6393 Oak Tree Blvd,
Suite 203
Independence, OH 44131
Phone: 216-447-4194 Fax: 216-520-1624



June 20, 2016

Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
8120 TYLER BLVD.
Mentor, OH 44060

Dear Employer,

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following an OSHA Inspection", (OSHA 3000) revised 2015, which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone.

You will note on page 6 of the booklet that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dates together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

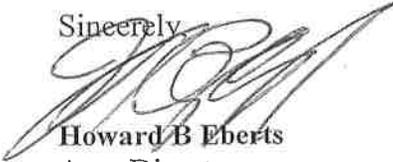
As indicated on page 6 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

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 the citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing conditions as well as of 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.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of 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.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Eberts", written over the word "Sincerely,".

Howard B Eberts
Area Director

Enclosures

U.S. Department of Labor

Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131
Phone: 216-447-4194 Fax: 216-520-1624



Citation and Notification of Penalty

To:
Trailer Component Mfg., Inc. (Tracom) , dba Buyers
Products Co.
and its successors
8120 TYLER BLVD.
Mentor, OH 44060

Inspection Site:
8120 TYLER BLVD.
Mentor, OH 44060

Inspection Number: 1123226
Inspection Date(s): 01/29/2016 - 03/22/2016
Issuance Date: 06/20/2016

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 06/20/2016. The conference will be held by telephone or at the OSHA office located at 6393 Oak Tree Blvd, Suite 203, Independence, OH 44131 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1123226

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060
Issuance Date: 06/20/2016

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, 6393 Oak Tree Blvd, Suite 203, Independence, OH 44131**

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

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

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

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

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

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

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

Signature

Date

Typed or Printed Name

Title

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

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

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

Inspection Number: 1123226
Inspection Date(s): 01/29/2016 - 03/22/2016
Issuance Date: 06/20/2016



Citation and Notification of Penalty

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060

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

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which was free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that the oblong master link used to attach an under the hook attachment (Vacuum suction lifting device) to the hoisting mechanism on the jib crane did not have affixed and legible identification markings thus creating the potential to overload the crane exposing the operator and others working in the immediate area to struck by and/or crushing hazards:

On or about 03/21/2016, the oblong master link used to attach the vacuum suction lifting device to the hoisting mechanism of the jib crane did not have affixed and legible identification markings. The operator and others working in the immediate area were exposed to struck-by and/or crushing hazards from falling objects if the crane were to exceed the rated capacity.

Among other methods, one feasible and acceptable abatement method to correct the hazard is to follow the American Society of Mechanical Engineers - ASME B20-1 safety standard for Below-the-Hook Lifting Devices: Chapter 20.1.2.: MARKING, CONSTRUCTION, AND INSTALLATION Sub-section 20-1.2.1 which states; (a) Rated Loads. The rated load of the lifting device shall be legibly marked on the main structure or on a tag attached to it where it is visible. If the lifting device is made up of several lifters each detachable from the group, these lifters shall also be marked with their individual rated loads.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

07/15/2016
\$4400.00

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

Inspection Number: 1123226
Inspection Date(s): 01/29/2016 - 03/22/2016
Issuance Date: 06/20/2016



Citation and Notification of Penalty

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060

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 1910.132(d)(2): The employer did not verify, through a written certification, that the required workplace hazard assessment had been performed:

A written certification verifying that the required site assessment had been performed was not completed by the employer.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

08/05/2016
\$4400.00

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

Inspection Number: 1123226
Inspection Date(s): 01/29/2016 - 03/22/2016
Issuance Date: 06/20/2016



Citation and Notification of Penalty

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060

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

29 CFR 1910.133(a)(3): The employer did not ensure that employees wearing prescription lenses while engaged in operations that involve eye hazards wore eye protection that incorporates the prescription in its design or wore eye protection that can be worn over the prescription lenses.

On or about 3/21/2016, the employer failed to ensure and/or enforce the use of adequate eye protection for employees wearing prescription lenses. Employees using the company's vertical band saw, drill press machinery or CNC machinery were not protected from exposure to flying chips, sparks or objects.

Date By Which Violation Must be Abated:

Corrected During Inspection

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

Inspection Number: 1123226
Inspection Date(s): 01/29/2016 - 03/22/2016
Issuance Date: 06/20/2016



Citation and Notification of Penalty

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060

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

29 CFR 1910.179(l)(3)(iii)(d): Pendant control stations were not kept clean, and/or their function labels were not kept legible:

The six (6) push button pendant control remote used by employees to operate the 3 ton overhead bridge crane located in the receiving and raw material warehouse area of the facility was not clearly marked to identify the directional and/or functionality (e.g.: North, South, Up and Down) of each button(s).

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$4400.00

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: 1123226
Inspection Date(s): 01/29/2016 - 03/22/2016
Issuance Date: 06/20/2016



Citation and Notification of Penalty

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060

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

29 CFR 1910.215(a)(4): Work rest(s) on grinding machinery were not adjusted closely to the wheel with a maximum opening of one eighth inch:

On or about 03/21/2015, the employer failed to ensure that the work rest on the right side of the (Dewalt: model #: DW756) pedestal grinder located next to the Haas CNC machinery was properly adjusted. The opening measured approximately 3/8 inches.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$4400.00

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

Inspection Number: 1123226
Inspection Date(s): 01/29/2016 - 03/22/2016
Issuance Date: 06/20/2016



Citation and Notification of Penalty

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060

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

29 CFR 1910.303(b)(7)(i): Unused openings in boxes, raceways, auxiliary gutters, cabinets, equipment cases, or housings were not effectively closed to afford protection substantially equivalent to the wall of the equipment:

On or about 03/21/2016 the employer failed to ensure that a 220 volt junction box used by employees who operated the spot/stud welder and portable welder at robot 11 was free from damage. The face plate was pulled away from the junction box exposing the operator(s) to electrical hazards from the wiring contained within the unit.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$3300.00

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

Inspection Number: 1123226
Inspection Date(s): 01/29/2016 - 03/22/2016
Issuance Date: 06/20/2016



Citation and Notification of Penalty

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060

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

29 CFR 1910.304(b)(3)(ii)(C)(3): Each cord set, attachment cap, plug, and receptacle of cord sets, and any equipment connected by cord and plug, was not visually inspected before each day use for external defects, such as deformed or missing pins or insulation damage, and for indications of possible internal damage:

On or before 03/21/2016, the employer failed to ensure that employees conducted visual inspections of equipment and/or machinery that was connected by cord and plug. The equipment includes but is not limited to the following:

- a. The cord and plug of the crane used at robot 9 had insulation damaged which exposed the internal wires exposing employees to an electrical hazard.
- b. The spot/stud welder located at robot 11 had insulation damaged which exposed the internal wires exposing employees to an electrical hazard.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$4400.00

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

Inspection Number: 1123226
Inspection Date(s): 01/29/2016 - 03/22/2016
Issuance Date: 06/20/2016



Citation and Notification of Penalty

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060

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

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:

On or about 03/21/2016, adequate strain relief was not provided for the stud/spot welder located at Robot 11.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$4400.00

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: 1123226
Inspection Date(s): 01/29/2016 - 03/22/2016
Issuance Date: 06/20/2016



Citation and Notification of Penalty

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060

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

29 CFR 1910.1200(f)(5)(i): The employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged or marked with the identity of the hazardous chemical(s) therein:

On or about 3/21/2016 the employer failed to ensure that hazardous chemicals that were transferred from the original container and placed into portable spray bottles that were distributed throughout the facility, were properly labeled to identify the chemical contained within. Chemicals used at the facility include, but are not limited to, lubing oils or coolants.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

08/05/2016
\$3300.00

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

Inspection Number: 1123226
Inspection Date(s): 01/29/2016 - 03/22/2016
Issuance Date: 06/20/2016



Citation and Notification of Penalty

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060

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

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

A periodic inspection of the company's energy control procedures was not completed as required.

Trailer Component Manufacturing Inc. dba Buyers Products Company was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.147(c)(6)(i), which was contained in OSHA inspection number 107523, citation number 01, item number 01 and was affirmed as a final order on March 19, 2012, with respect to a workplace located at 8120 Tyler Blvd., Mentor OH 44060.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	08/05/2016
Proposed Penalty:	\$22000.00

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: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060

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

29 CFR 1910.212(a)(1): One or more methods of machine guarding was 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:

The employer failed to ensure that various equipment or machinery used at the site was effectively guarded. The unguarded and/or inadequately guarded equipment includes, but is not limited to, the following:

- a. The drill press, which was kept in continuous mode, was unguarded exposing employees to flying chips and sparks.
- b. The Do All vertical band-saw had unused portions of the blade not guarded. The opening measured approximately 5.5 - 6 inches exposing employees to possible amputation hazards.
- c. Guarding to prevent entry into the rear of the (Accurpress) 120 ton and 240 ton press brake(s) was not installed.

Trailer Component Manufacturing Inc. dba Buyers Products Company was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910. 212 (a) (1), which was contained in OSHA inspection number 666238, citation number 01, item number 01 and was affirmed as a final order on December 06,2012, with respect to a workplace located at 8120 Tyler Blvd., Mentor OH 44060.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

07/15/2016
\$27500.00

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

Inspection Number: 1123226
Inspection Date(s): 01/29/2016 - 03/22/2016
Issuance Date: 06/20/2016



Citation and Notification of Penalty

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060

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

29 CFR 1910.303(b)(2): Listed or labeled electrical equipment was not used or installed in accordance with instructions included in the listing or labeling:

On or about 3/21/2016, a metal junction box located at robot 9 that was designed for permanent installation was suspended from a flexible cord.

Trailer Component Manufacturing Inc. dba Buyers Products Company was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.303(b)(2), which was contained in OSHA inspection number 107523, citation number 01, item number 01 and was affirmed as a final order on March 19, 2012, with respect to a workplace located at 8120 Tyler Blvd., Mentor OH 44060.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$16500.00

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

Howard B Eberts
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131
Phone: 216-447-4194 Fax: 216-520-1624



INVOICE / DEBT COLLECTION NOTICE

Company Name: Trailer Component Mfg., Inc. (Tracom) , dba Buyers Products Co.
Inspection Site: 8120 TYLER BLVD., Mentor, OH 44060
Issuance Date: 06/20/2016

Summary of Penalties for Inspection Number	1123226
Citation 1, Serious	\$33000.00
Citation 2, Repeat	\$66000.00
TOTAL PROPOSED PENALTIES	\$99000.00

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

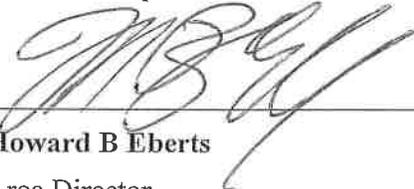
account, the bank will attempt to make the transfer up to 2 times.

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.



Howard B Eberts
Area Director



Date