

## U.S. Department of Labor

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



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# Citation and Notification of Penalty

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**To:**  
Sunfield, Inc.  
and its successors  
116 Enterprise Drive  
Hebron, OH 43025

**Inspection Number:** 1128049  
**Inspection Date(s):** 02/23/2016 - 06/29/2016  
**Issuance Date:** 06/29/2016

**Inspection Site:**  
116 Enterprise Drive  
Hebron, OH 43025

7016 0910 0000 4171 7668

*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.*

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This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty **you either call to schedule an informal conference (see paragraph below) or you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.**

**Posting** - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

**Informal Conference** - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

**Right to Contest** – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

**Penalty Payment** – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically on [www.pay.gov](http://www.pay.gov). On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type “OSHA” and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>.

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

**Notification of Corrective Action** – For each violation which you do not contest, you must provide ***abatement certification*** to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that ***abatement documentation*** is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

**Employer Discrimination Unlawful** – The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

**Employer Rights and Responsibilities** – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

**Notice to Employees** – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

**Inspection Activity Data** – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at [www.osha.gov](http://www.osha.gov). If you have any dispute with the accuracy of the information displayed, please contact this office.

**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 06/29/2016. The conference will be held by telephone or at the OSHA office located at 200 N. High Street, Room 620, Columbus, OH 43215 on \_\_\_\_\_ at

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

**CERTIFICATION OF CORRECTIVE ACTION WORKSHEET**

**Inspection Number: 1128049**

Company Name: Sunfield, Inc.  
Inspection Site: 116 Enterprise Drive, Hebron, OH 43025  
Issuance Date: 06/29/2016

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

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

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

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

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

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

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

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Typed or Printed Name

\_\_\_\_\_  
Title

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

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

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

Inspection Number: 1128049  
Inspection Date(s): 02/23/2016 - 06/29/2016  
Issuance Date: 06/29/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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

*29 CFR 1910.137(c): In-service care and use of electrical protective equipment:*

*29 CFR 1910.137(c)(2): Specific requirements. The following specific requirements apply to rubber insulating blankets, rubber insulating covers, rubber insulating line hose, rubber insulating gloves, and rubber insulating sleeves:*

29 CFR 1910.137(c)(2)(viii): Electrical protective equipment shall be subjected to periodic electrical tests. Test voltages and the maximum intervals between tests shall be in accordance with Table I-4 and Table I-5:

a. On or about March 3, 2016, the employer failed to perform periodic electrical tests on rubber insulating gloves. Due this condition, maintenance employees required to use this equipment were exposed to electrical hazards and an increased risk for electrocution while trouble shooting energized 480 volt electrical equipment.

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/04/2016  
\$5500.00

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: 1128049  
Inspection Date(s): 02/23/2016 - 06/29/2016  
Issuance Date: 06/29/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
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**Citation 1 Item 2** Type of Violation: **Serious**

*29 CFR 1910.147(c)(6)(i): The employer shall conduct a periodic inspection of the energy control procedure at least annually to ensure that the procedure and the requirements of this standard are being followed:*

29 CFR 1910.147(c)(6)(i)(C): Where lockout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized employee, of that employee's responsibilities under the energy control procedure being inspected:

a. On or about February 23, 2016, in the production plant where lockout/tagout was to be used to de-energize equipment, the employer did not include a review of the energy control procedures with each authorized employee to identify deficiencies within the program, and review the knowledge of the authorized employee for the energy control procedure being inspected.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/04/2016  
\$7000.00

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

Inspection Number: 1128049  
Inspection Date(s): 02/23/2016 - 06/29/2016  
Issuance Date: 06/29/2016



### Citation and Notification of Penalty

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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

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

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

a. On or about February 18, 2016, on the RY-3 press line between press 3 and press 4, the employer did not provide a method of machine guarding to protect employees from entering the point of operation of the robotic arm that moves parts out of press 3, onto the idler station table and into press 4. The light curtains did not protect employees from the point of operation in that the light curtains were not installed correctly and could be reset automatically by initiating the presses while employees were in the danger zone.

#### **ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/04/2016  
\$7000.00

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:** 1128049  
**Inspection Date(s):** 02/23/2016 - 06/29/2016  
**Issuance Date:** 06/29/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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

29 CFR 1910.217(c)(3)(iii)(f): Guards shall be used to protect all areas of entry to the point of operation not protected by the presence sensing device:

a. On or about February 18, 2016, on the RY-3 press line, the employer did not ensure that light curtain presence sensing devices, of the adjacent idler station, were adjusted so that entry from the side of press 3 into the point of operation would be detected at all times and the press could not cycle. The light curtains did not protect employees from the point of operation in that the light curtains were not installed correctly and could be reset automatically by initiating the presses while employees were in the danger zone.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

08/04/2016

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

**Inspection Number:** 1128049  
**Inspection Date(s):** 02/23/2016 - 06/29/2016  
**Issuance Date:** 06/29/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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

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

29 CFR 1910.303(b)(7)(iv): There shall be no damaged parts that may adversely affect safe operation or mechanical strength of the equipment, such as parts that are broken, bent, cut, or deteriorated by corrosion, chemical action, or overheating:

a. On or about April 6, 2016, the 480 volt energized electrical box located behind K-5 was damaged and had openings to energized parts, thereby exposing employees to an electrical hazard.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/04/2016  
\$7000.00

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

**Inspection Number:** 1128049  
**Inspection Date(s):** 02/23/2016 - 06/29/2016  
**Issuance Date:** 06/29/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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

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

a. On or about March 24, 2016, in the plant on the main walkway used by employees to enter the office area, the 480 volt cabinet had two fuses open to the main buss, thereby exposing employees to a fire/explosion hazard.

b. On or about April 7, 2016, in the plant behind press A-2 and A-3, there were two missing circuit breakers in the 480 volt energized electrical panel where employees entered to turn equipment on and off, thereby exposing employees to an electrical hazard.

Date By Which Violation Must be Abated:

Corrected During Inspection

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

Inspection Number: 1128049  
Inspection Date(s): 02/23/2016 - 06/29/2016  
Issuance Date: 06/29/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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

29 CFR 1910.333(a)(1): "Deenergized parts." Live parts to which an employee may be exposed shall be deenergized before the employee works on or near them, unless the employer can demonstrate that deenergizing introduces additional or increased hazards or is infeasible due to equipment design or operational limitations. Live parts that operate at less than 50 volts to ground need not be deenergized if there will be no increased exposure to electrical burns or to explosion due to electric arcs. Note 1: Examples of increased or additional hazards include interruption of life support equipment, deactivation of emergency alarm systems, shutdown of hazardous location ventilation equipment, or removal of illumination for an area. Note 2: Examples of work that may be performed on or near energized circuit parts because of infeasibility due to equipment design or operational limitations include testing of electric circuits that can only be performed with the circuit energized and work on circuits that form an integral part of a continuous industrial process in a chemical plant that would otherwise need to be completely shut down in order to permit work on one circuit or piece of equipment. Note 3: Work on or near deenergized parts is covered by paragraph (b) of this section:

a. On or about April 6, 2016, two Sunfield employees were observed performing work inside a 480 volt electrical panel (the control box for the weld side K-5 press) without deenergizing the equipment. Due to this condition, employees were exposed to live electrical parts and associated hazards.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

07/12/2016  
\$7000.00

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:** 1128049  
**Inspection Date(s):** 02/23/2016 - 06/29/2016  
**Issuance Date:** 06/29/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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

29 CFR 1910.335(a)(1)(i): Employees working in areas where there are potential electrical hazards shall be provided with, and shall use, electrical protective equipment that is appropriate for the specific parts of the body to be protected and for the work to be performed. Note: Personal protective equipment requirements are contained in Subpart I of this part:

a. On or about April 6, 2016, two employees, who were inspecting a 480 volt electrical panel box to the K-5 press, were not provided hand, neck, ear and face protection when working in the energized panel. Due to this condition, employees were exposed to electrical hazards, potential arc flash hazards and increased risk for electrocution.

Date By Which Violation Must be Abated:  
Proposed Penalty:

07/06/2016  
\$5500.00

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

**Inspection Number:** 1128049  
**Inspection Date(s):** 02/23/2016 - 06/29/2016  
**Issuance Date:** 06/29/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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

29 CFR 1910.1030(f)(1)(i): The employer shall make available the hepatitis B vaccine and vaccination series to all employees who have occupational exposure, and post-exposure evaluation and follow-up to all employees who have had an exposure incident:

a. On or about February 18, 2016, four Sunfield employees were required to clean blood, bodily fluids and other potentially infectious materials from equipment involved in a mechanical power press accident. The employees had not received and had not been offered the hepatitis B vaccination series, thus exposing the employees an increased risk of illness.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/04/2016  
\$5500.00



### Citation and Notification of Penalty

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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

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

29 CFR 1910.147(d): The established procedure for the application of energy control (the lockout or tagout procedures) did not cover the actions listed in and was not done in sequence as required by 29 CFR 1910.147(d)(1)-(6):

The employer does not protect employees from the hazardous energy of machinery or equipment by turning off or shutting down machinery or equipment as required by energy control procedures, ensuring energy isolation devices are operated to isolate machinery or equipment from their energy source(s), and affixing lockout devices to energy isolation devices by authorized employees:

a. On or about February 18, 2016, the employer did not ensure that employees implemented energy control procedures on mechanical power presses prior to allowing them to enter the point of operation to remove scrap. Press 3 of the RY-3 robotic press line was not isolated from energy sources prior to engaging in this servicing and maintenance activity. A mechanical power press operator was in the point of operation, removing scrap when the press cycled, crushing the employee's right arm. The employee's arm was later surgically amputated.

As a result, the remaining applicable energy control elements, involving machine isolation [1910.147(d)(3)], lock-out/tag-out device application [1910.147(d)(4)], dissipation of residual energy [1910.147(d)(5)(i)], and verification of isolation [1910.147(d)(6)], were not implemented to protect employees from machine servicing hazards, such as removing scrap from the point of operation.

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

**Inspection Number:** 1128049  
**Inspection Date(s):** 02/23/2016 - 06/29/2016  
**Issuance Date:** 06/29/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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To abate this violation, the employer must ensure that machinery or equipment are turned off or shut down, energy isolation devices are operated in a manner to isolate the machinery or equipment from the energy source(s), and lockout devices are affixed to energy isolation devices as part of the hazardous energy control process for servicing and maintenance activities including, but not limited to: die installation, die removal, die repair, setting-up, adjusting, inspecting, cleaning, unjamming, scrap removal, making adjustments and tool changes.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	08/04/2016
Proposed Penalty:	\$70000.00

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:** Sunfield, Inc.

**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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

*29 CFR 1910.147(c)(7)(i): General. Training and Communication: The employer shall 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. The training shall include the following:*

29 CFR 1910.147(c)(7)(i)(A): Each authorized employee shall receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control:

a. The employer does not protect employees from the hazardous energy of machinery or equipment by providing lockout/tagout (hazardous energy control) training that includes facility/process specific information, such as (but not limited to) the recognition of hazardous energy sources, the type and magnitude of energy available and the methods necessary to isolate and control such energy:

On or about February 18, 2016, the employer failed to provide authorized employee training for the employee, a mechanical power press operator on RY-3 line, prior to the employee engaging in servicing and maintenance activities, such as, but not limited to, scrap removal, die cleaning, die repair, and die changing. The employee performed servicing and maintenance activities without isolating and controlling hazardous energy sources, exposing the employee to struck-by, crushing and amputation hazards. The employee is a full time associate.

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

**Inspection Number:** 1128049  
**Inspection Date(s):** 02/23/2016 - 06/29/2016  
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**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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To abate this violation, the employer must ensure that lockout/tagout (control of hazardous energy) training is performed for all press operators, to include temporary associates, ensure that the training is provided prior to employees performing service and maintenance activities and must ensure that training includes machine specific hazardous energy source recognition, evaluation, the means and methods to control such energy including, but not limited to these servicing and maintenance activities: die installation, die removal, die repair, setting-up, adjusting, inspecting, cleaning, unjamming, scrap removal, making adjustments and tool changes.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

08/04/2016

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  
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Inspection Number: 1128049  
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**Citation and Notification of Penalty**

Company Name: Sunfield, Inc.  
Inspection Site: 116 Enterprise Drive, Hebron, OH 43025

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

29 CFR 1910.217(f): *Operation of power presses:*

29 CFR 1910.217(f)(2): Instruction to operators. The employer shall train and instruct the operator in the safe method of work before starting work on any operation covered by this section. The employer shall insure by adequate supervision that correct operating procedures are being followed:

a. The employer does not protect employees from the hazards associated with mechanical power press operation by providing safe method of operation training that includes equipment specific information, such as, but not limited to, machine specific hazards, hazards of interconnected equipment, the operational controls, basic major component knowledge regarding dies, flywheels and air valves, safe die changing procedures and machine safeguarding methods:

On or about February 18, 2016, the employer failed to provide training on the safe operation (method of work) of mechanical power presses prior to assigning an employee to perform work as an operator on RY-3 line mechanical power presses. The employee was a full time associate.

To abate this violation, the employer must develop and implement safe method of mechanical power press operation training that is performed prior to assigning press operators including those who are temporary associates, to operate, to assist in operating or receiving on-the-job training in operating mechanical power presses, or mechanical power press lines.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

08/04/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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

*29 CFR 1910.217(c)(3): Safeguarding the point of operation - Point of operation devices:*

*29 CFR 1910.217(c)(3)(iii): A presence sensing point of operation device shall protect the operator as provided in paragraph (c)(3)(i)(a) of this section, and shall be interlocked into the control circuit to prevent or stop slide motion if the operator's hand or other part of his body is within the sensing field of the device during the downstroke of the press slide:*

29 CFR 1910.217(c)(3)(iii)(f): Guards shall be used to protect all areas of entry to the point of operation not protected by the presence sensing device:

The employer does not use guards to protect all areas of entry to the point of operation or any other entry points not protected by presence sensing devices.

a. On or about March 17, 2016, on the RY-4 press line, press 1, approximately six to seven inches of duct tape was used to blank out the bottom right side of the light curtain. This prohibited the presence sensing device from properly guarding the point of operation for the press, and the blanked area was not protected with additional guarding. Due to this condition, employees were exposed to struck-by, crushing and amputation hazards.

To abate this violation the employer must ensure that guards are used to protect all areas of entry into the point of operation not protected by presence sensing devices.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

07/20/2016  
\$70000.00



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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

*29 CFR 1910.217(c)(3): Safeguarding the point of operation - Point of operation devices:*

*29 CFR 1910.217(c)(3)(iii): A presence sensing point of operation device shall protect the operator as provided in paragraph (c)(3)(i)(a) of this section, and shall be interlocked into the control circuit to prevent or stop slide motion if the operator's hand or other part of his body is within the sensing field of the device during the downstroke of the press slide:*

29 CFR 1910.217(c)(3)(iii)(f): Guards shall be used to protect all areas of entry to the point of operation not protected by the presence sensing device:

The employer does not use guards to protect all areas of entry to the point of operation or any other entry points not protected by presence sensing devices.

a. On or about March 17, 2016, on the RY-4 press line, press 2, approximately six to seven inches of electrical tape was used to blank out the bottom, right side of the light curtain. This prohibited the presence sensing device from properly guarding the point of operation for the press, and the blanked area was not protected with additional guarding. Due to this condition, employees were exposed to struck-by, crushing and amputation hazards.

To abate this violation the employer must ensure that guards are used to protect all areas of entry into the point of operation not protected by presence sensing devices.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/04/2016  
\$70000.00

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

Inspection Number: 1128049  
Inspection Date(s): 02/23/2016 - 06/29/2016  
Issuance Date: 06/29/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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Citation 2 Item 4 Type of Violation: **Willful**

*29 CFR 1910.217(c)(3): Safeguarding the point of operation - Point of operation devices:*

*29 CFR 1910.217(c)(3)(iii): A presence sensing point of operation device shall protect the operator as provided in paragraph (c)(3)(i)(a) of this section, and shall be interlocked into the control circuit to prevent or stop slide motion if the operator's hand or other part of his body is within the sensing field of the device during the downstroke of the press slide:*

29 CFR 1910.217(c)(3)(iii)(f): Guards shall be used to protect all areas of entry to the point of operation not protected by the presence sensing device:

The employer does not use guards to protect all areas of entry to the point of operation or any other entry points not protected by presence sensing devices.

a. On or about March 17, 2016, on the RY-4 press line, press 6, approximately six to seven inches of electrical tape was used to blank out the bottom, right side of the light curtain. This prohibited the presence sensing device from properly guarding the point of operation for the press, and the blanked area was not protected with additional guarding. Due to this condition, employees were exposed to struck-by, crushing, and amputation hazards.

To abate this violation the employer must ensure that guards are used to protect all areas of entry into the point of operation not protected by presence sensing devices.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/04/2016  
\$70000.00

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

Inspection Number: 1128049  
Inspection Date(s): 02/23/2016 - 06/29/2016  
Issuance Date: 06/29/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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Citation 2 Item 5 Type of Violation: **Willful**

*29 CFR 1910.217(c)(3): Safeguarding the point of operation - Point of operation devices:*

*29 CFR 1910.217(c)(3)(iii): A presence sensing point of operation device shall protect the operator as provided in paragraph (c)(3)(i)(a) of this section, and shall be interlocked into the control circuit to prevent or stop slide motion if the operator's hand or other part of his body is within the sensing field of the device during the downstroke of the press slide:*

29 CFR 1910.217(c)(3)(iii)(f): Guards shall be used to protect all areas of entry to the point of operation not protected by the presence sensing device:

The employer does not use guards to protect all areas of entry to the point of operation or any other entry points not protected by presence sensing devices.

a. On or about March 17, 2016, on the RY-4 press line, press 7, approximately seven and one half inches of electrical tape was used to blank out the bottom, right side of the light curtain. This prohibited the presence sensing device from properly guarding the point of operation for the press, and the blanked area was not protected with additional guarding. Due to this condition, employees were exposed to struck-by, crushing and amputation hazards.

To abate this violation the employer must ensure that guards are used to protect all areas of entry into the point of operation not protected by presence sensing devices.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	08/04/2016
Proposed Penalty:	\$70000.00

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:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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**Citation 2 Item 6** Type of Violation: **Willful**

*29 CFR 1910.217(c)(3): Safeguarding the point of operation - Point of operation devices:*

*29 CFR 1910.217(c)(3)(iii): A presence sensing point of operation device shall protect the operator as provided in paragraph (c)(3)(i)(a) of this section, and shall be interlocked into the control circuit to prevent or stop slide motion if the operator's hand or other part of his body is within the sensing field of the device during the downstroke of the press slide:*

29 CFR 1910.217(c)(3)(iii)(f): Guards shall be used to protect all areas of entry to the point of operation not protected by the presence sensing device:

The employer does not use guards to protect all areas of entry to the point of operation or any other entry points not protected by presence sensing devices.

a. On or about March 24, 2016 on the RY-6 press line, press 1, approximately six inches of electrical tape was used to blank out the bottom, right side of the light curtain. This prohibited the presence sensing device from properly guarding the point of operation for the press, and the blanked area was not protected with additional guarding. Due to this condition, employees were exposed to struck-by, crushing, and amputation hazards.

To abate this violation the employer must ensure that guards are used to protect all areas of entry into the point of operation not protected by presence sensing devices.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: 08/04/2016  
Proposed Penalty: \$70000.00



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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Citation 2 Item 7 Type of Violation: **Willful**

*29 CFR 1910.217(c)(3): Safeguarding the point of operation - Point of operation devices:*

*29 CFR 1910.217(c)(3)(iii): A presence sensing point of operation device shall protect the operator as provided in paragraph (c)(3)(i)(a) of this section, and shall be interlocked into the control circuit to prevent or stop slide motion if the operator's hand or other part of his body is within the sensing field of the device during the downstroke of the press slide:*

29 CFR 1910.217(c)(3)(iii)(f): Guards shall be used to protect all areas of entry to the point of operation not protected by the presence sensing device:

The employer does not use guards to protect all areas of entry to the point of operation or any other entry points not protected by presence sensing devices.

a. On or about March 24, 2016, on the RY-6 press line, press 5, approximately eight inches of electrical tape was used to blank out the bottom, left side of the light curtain. This prohibited the presence sensing device from properly guarding the point of operation for the press, and the blanked area was not protected with additional guarding. Due to this condition, employees were exposed to struck-by, crushing, and amputation hazards.

To abate this violation the employer must ensure that guards are used to protect all areas of entry into the point of operation not protected by presence sensing devices.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/04/2016  
\$70000.00

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

**Inspection Number:** 1128049  
**Inspection Date(s):** 02/23/2016 - 06/29/2016  
**Issuance Date:** 06/29/2016



**Citation and Notification of Penalty**

**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025

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**Citation 3 Item 1** Type of Violation: **Other-than-Serious**

29 CFR 1910.147(f)(2)(i): Whenever outside servicing personnel are to be engaged in activities covered by the scope and application of this standard, the on-site employer and the outside employer shall inform each other of their respective lockout or tagout procedures:

- a. On or about March 17, 2016, in the RY press area where Aida press contractors were installing a part revolution mechanical power press, Sunfield failed to share their hazardous energy control program and did not inform the contractor before starting the shutdown and lockout of the electrical power, thereby exposing employees to an electrical hazard.

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$0.00

A handwritten signature in cursive script that reads 'Vanessa Martin'.

Vanessa Martin  
Area Director

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



## INVOICE / DEBT COLLECTION NOTICE

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**Company Name:** Sunfield, Inc.  
**Inspection Site:** 116 Enterprise Drive, Hebron, OH 43025  
**Issuance Date:** 06/29/2016

<b>Summary of Penalties for Inspection Number</b>	<b>1128049</b>
<b>Citation 1, Serious</b>	<b>\$44500.00</b>
<b>Citation 2, Willful</b>	<b>\$490000.00</b>
<b>Citation 3, Other-than-Serious</b>	<b>\$0.00</b>
<b>TOTAL PROPOSED PENALTIES</b>	<b>\$534500.00</b>

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

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

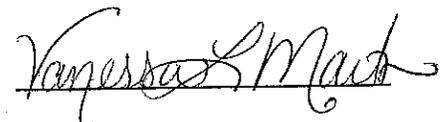
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.

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

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

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

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



Vanessa Martin  
Area Director