

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
701 Lee Street  
Suite 950  
Des Plaines, IL 60016  
Phone: 847-803-4800 Fax: 847-390-8220



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## Citation and Notification of Penalty

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**To:**  
Arlington Plating Company  
600 S. Vermont St  
Palatine, IL 60078

**Inspection Number:** 1121917  
**Inspection Date(s):** 02/01/2016 - 03/04/2016  
**Issuance Date:** 07/27/2016

**Inspection Site:**  
600 S. Vermont St  
Palatine, IL 60078

*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.



## NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 07/27/2016. The conference will be held by telephone or at the OSHA office located at 701 Lee Street, Suite 950, Des Plaines, IL 60016 on \_\_\_\_\_ at \_\_\_\_\_.

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

**CERTIFICATION OF CORRECTIVE ACTION WORKSHEET**

**Inspection Number: 1121917**

Company Name: Arlington Plating Company  
Inspection Site: 600 S. Vermont St, Palatine, IL 60078  
Issuance Date: 07/27/2016

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, 701 Lee Street, Suite 950, Des Plaines, IL 60016**

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:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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#### **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 were free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to struck-by hazards:

- a) Strip Line - On or about February 1, 2016, the employer failed to ensure the hook on the east CM Lodestar Hoist, which was affixed to the Harrington 1C1-807-0604 Crane, was in a safe condition prior to being used by employees. The east hoist hook was not supplied with a functional safety latch, and due to the diameter of the spreader bar that was attached to the hook, the load restricted the closure of the safety latch.
- b) Strip Line- On or about February 1, 2016, the employer failed to ensure the hook on the west CM Lodestar Hoist, which was affixed to the Harrington 1C1-807-0604 Crane, was in a safe condition prior to being used by employees. The west hoist hook was not equipped, as originally supplied, with a safety latch.

**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 of abatement, or other written records.**

Among other methods, a feasible and acceptable abatement method to correct this hazard is to follow the guidelines in the American Society of Mechanical Engineers (ASME) B30.10-2014, Hooks - Safety Standard for Cableways, Cranes, Derricks, Hoists, Hooks, Jacks and Slings, Sections 10.1.10 Inspection, Removal, and Repair and 10.1.11 Operating Practices.

The employer must ensure that inspections are being conducted on hooks. Any conditions disclosed by the inspections performed in accordance with the requirements of para. 10-1.10.3 or 10-1.10.4 shall be corrected by repair or replacement before continuing to use the hook. All repairs and modifications shall be approved by the manufacturer or a qualified person. Additionally, when a hook is equipped with a latch, the load shall not restrict the closure of the latch.

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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Additional guidance can be found in CM Lodestar Operating, Maintenance & Parts Manual: Rated Loads 1/8 through 3 Tons.

Date By Which Violation Must be Abated:	08/22/2016
Proposed Penalty:	\$3960.00

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:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to struck-by hazards:

- a) Strip Line- On or about February 1, 2016, the employer failed to ensure the west CM Lodestar Hoist equipped with a 20 foot chain was in a safe condition prior to being used by employees. The west hoist was not equipped with a functional upper limit switch.
- b) Strip Line- On or about February 1, 2016, the employer failed to ensure the east CM Lodestar Hoist equipped with a 10 foot chain was in a safe condition prior to being used by employees. The east hoist was not equipped with a functional upper limit switch.

**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 of abatement, or other written records.**

Among other methods, a feasible and acceptable abatement method to correct this hazard is to follow the guidelines in the American Society of Mechanical Engineers (ASME) B30.16-2012, Overhead Hoists (Underhung) - Safety Standard for Cableways, Cranes, Derricks, Hoists, Hooks, Jacks and Slings, Sections 16-1.2.14 Overtravel Protection (Electric- or Air-Powered Hoists Only), 16-2.1 Inspection, and 16-4.3 Equipment Maintenance.

The employer must ensure that inspections are being conducted on hoists. Any conditions disclosed by the inspections performed in accordance with the requirements of Section 16-2.1 that is determined by a qualified person to be a hazard to continued operation shall be corrected by adjustment, repair or replacement before continuing to use the hoist. All adjustments, repairs and replacements shall be performed by a designated person. A preventive maintenance program shall also be established and should be based on recommendations of the hoist manufacturer. If a qualified person determines it is appropriate, the program should also include that individual's additional recommendations based upon

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**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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review of the hoist application an operation.

Additionally, hoists shall be so designed and constructed that the load hook, either loaded or empty, shall not exceed the upper limit of travel.

Further guidance can be found in CM Lodestar Operating, Maintenance & Parts Manual: Rated Loads 1/8 through 3 Tons.

Date By Which Violation Must be Abated:	08/22/2016
Proposed Penalty:	\$3960.00

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:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

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

- a) Rear of the Jessup Line- On February 5, 2016, the employer failed to maintain all places of employment in a clean and orderly condition. The walking surfaces on the floor of the north and northeast side of the Jessup Line were severely corroded.
- b) Rear of the Strip Line- On or about February 12, 2016, the employer failed to maintain all places of employment in a clean and orderly condition. The walking surfaces on the floor north of the Strip Line were severely corroded.

**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 of abatement, or other written records.**

Date By Which Violation Must be Abated: 08/22/2016  
Proposed Penalty: \$5940.00

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:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

29 CFR 1910.133(a)(1): The employer did not ensure that each affected employee uses appropriate eye or face protection when exposed to eye or face hazards from liquid chemicals, acids or caustic liquids:

- a) Jessup Line- On February 1, 2016, the employer failed to require the use of appropriate eye protection, goggles, for employee use when exposed to acidic and caustic liquids while working on the Jessup Line.
- b) Jessup Line- On February 1, 2016, the employer failed to require the use of appropriate face protection, face shields, for employee use when exposed to acidic and caustic liquids while working on the Jessup Line.
- c) Jessup Line- On February 1, 2016, during tasks where the employees were required to wear face shields, the employer failed to ensure the use of appropriate eye protection, goggles, was worn under the face shields to protect the eyes of the employees.

**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 of abatement, or other written records.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/22/2016  
\$5940.00



**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

29 CFR 1910.134(c)(1): A written respiratory protection program that included the provisions in 29 CFR 1910.134(c)(1)(i) - (ix) with worksite specific procedures was not established and implemented for required respirator use:

a) Plating, Wastewater Treatment and Polishing Areas- On or about February 1, 2016, the employer did not establish a written respiratory protection program for employees required to use respiratory protection that included all provisions in 29 CFR 1910.134(c)(1)(i)-(ix), as applicable. The written respiratory protection program for the facility was established only for voluntary users. The employer required employees performing certain job tasks in the Plating, Stripping and Wastewater Treatment areas to wear North 7700 Series half-mask and North 7600 Series full-face respirators, each equipped with North 75SCP100 combination gas and vapor cartridges. The employer also required employees to wear 3M 8210 or 8210V N95 dust masks. The employer's requirement to use respiratory protection was outlined in their personal protective equipment hazard assessment as well as through posted signs, but was not outlined in the facility's written respiratory protection program.

**No abatement certification or documentation is required for this item.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$2970.00



**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

29 CFR 1910.134(c)(3): The employer did not designate a program administrator who was qualified by appropriate training or experience to administer or oversee the respiratory protection program and to conduct the required evaluations of program effectiveness:

a) Plating, Wastewater Treatment and Polishing Areas- On or about February 1, 2016, the employer did not ensure that the person designated to administer the respirator protection program was qualified by appropriate training or experience. The program in use was inaccurate and the application of training, medical evaluation, fit testing and the use of the respirators was not in compliance with the required standards.

**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 of abatement, or other written records.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/22/2016  
\$2970.00



**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

29 CFR 1910.134(e)(1): The employer did not provide a medical evaluation to determine the employee's ability to use a respirator, before the employee was fit tested or required to use the respirator in the workplace:

a) Plating and Wastewater Treatment- On or about February 1, 2016, the employer did not ensure that employees assigned to work where respirators were required were provided medical evaluations prior to wearing a respirator.

**No abatement certification or documentation is required for this item.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$2970.00

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

**Inspection Number:** 1121917  
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**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

29 CFR 1910.134(f)(2): Employee(s) using tight-fitting facepiece respirators were not fit tested prior to initial use of the respirator:

a) Plating and Wastewater Treatment- On or about February 1, 2016, the employer did not ensure that employees required to wear respiratory protection were provided with fit tests to ensure proper fit of respirators. Affected employees were exposed to air contaminants from plating operations and subsequent plating waste byproducts.

**No abatement certification or documentation is required for this item.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$2970.00

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:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

29 CFR 1910.134(g)(1)(i)(A): Respirators with tight-fitting facepieces were worn by employees who had facial hair that came between the sealing surface of the facepiece and the face or that interfered with valve function:

a) Plating Areas- On or about February 1, 2016, the employer did not ensure that employees using North 7700 Series half-mask and North 7600 Series full-face respirators, each equipped with North 75SCP100 combination gas and vapor cartridges were free of facial hair that interfered with the face-to-facepiece seal and/or the valve function. A number of employees performing the addition of chrome flake to plating tanks, as well as performing work on the Strip Line, had full beards.

**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 of abatement, or other written records.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/22/2016  
\$2970.00



**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
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**Citation 1 Item 10** Type of Violation: **Serious**

29 CFR 1910.134(k)(1): The employer did not provide respirator training that would ensure each employee could demonstrate knowledge of items in section (i)-(vii):

a) Plating and Wastewater Treatment- On or about February 1, 2016, the employer did not ensure employees required to wear North 7600 and 7700 Series half-mask respirators, equipped with P100 Model #75SCP100L gas and vapor cartridges, during plating operations and while handling plating waste byproducts were provided effective training.

**No abatement certification or documentation is required for this item.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$2970.00



**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

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

a) Polishing Department- On or about June 8, 2016, the employer failed to develop, document and utilize machine specific procedures to control the potentially hazardous energy for the Rite Speed & Chas Polishing Machines #16 and #17. This failure prevented employees from knowing the proper information on how to secure all sources of energy, such as electrical and kinetic energy.

**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 of abatement, or other written records.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/22/2016  
\$3960.00



**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

29 CFR 1910.147(d): The established procedure for the application of energy control (the lockout or tagout procedure) was not done in sequence as required by 29 CFR 1910.147(d)(1) through (d)(6):

a) Plating Areas- On or about February 4 and 5, 2016, employees were exposed to machine hazards associated with hazardous potential energy, including the gravitational energy from hoists, during servicing and periodic inspections of the Coffing Degreaser Hoist, two Strip Line Crane CM Lodestar Hoists, EN Line Dryer CM Lodestar Hoist, and the two EN Line CM Lodestar Hoists. The employer failed to implement energy control application steps as lockout tagout devices were not applied to the remaining applicable energy control elements, involving dissipation of gravitation energy [(d)(5)(i)] and verification of isolation [(d)(6)], were not implemented to protect employees from machine servicing hazards.

b) Polishing Area- On or about June 8, 2016, employees were exposed to machine hazards associated with moving parts and in-going nip points during servicing of the Rite Speed & Chas Polishing Machines. The employer failed to implement energy control application steps as the machines were not shut down or turned off to perform the servicing work [per the 1910.(d)(2) requirements]. As a result, the remaining application energy control elements, involving machine isolation [(d)(3)], LOTO device application [(d)(4)], dissipation of residual energy [(d)(5)(i)], and verification of isolation [(d)(6)], were not implemented to protect employees from machine servicing hazards.

**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 of abatement, or other written records.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/22/2016  
\$5940.00



**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
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**Citation 1 Item 13** Type of Violation: **Serious**

29 CFR 1910.178(l)(4)(ii)(B): Refresher training in relevant topics was not provided to the operator when the operator was involved in an accident or near-miss incident:

a) Production Areas- On February 1, 2016, the employer failed to ensure that employees that had been in accidents involving powered industrial vehicles were retrained prior to operating a vehicle again.

**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 of abatement, or other written records.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/22/2016  
\$4950.00



**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

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

a) Northeast Corner of the Facility- On February 5, 2016, the employer failed to ensure that the space around electrical equipment, such as the space in front of the electrical switchgear that controlled the Jessup Line Condensate Pump Return, 50 KVA Transformer, EN Line Hydroclo Acid Scrubber, and the Hoist Line Exhaust Fan, was not used for storage of materials.

**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 of abatement, or other written records.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/22/2016  
\$2970.00

**U.S. Department of Labor**  
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**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

29 CFR 1910.303(g)(1)(iii): The employer did not ensure that at least one entrance of sufficient area was provided to give access to the working space about electric equipment 600 Volts, nominal, or less:

a) Northeast Corner of the Facility- On February 1, 2016, the employer failed to ensure that at least one entrance of sufficient area was provided to allow for access to the working space at multiple panels of electrical switchgear that were located in the northeast corner of the facility.

**No abatement certification or documentation is required for this item.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

Quick Fix Applied  
\$2525.00

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:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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**Citation 1 Item 16** 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:

a) Hand Line 2- On or about February 1, 2016, the employer failed to ensure that the flexible cord for the Temp Controller above Tank 612 of Acid Copper was provided with strain relief to prevent pull from being transferred to joints and terminal screws.

**No abatement certification or documentation is required for this item.**

Date By Which Violation Must be Abated:  
Proposed Penalty:

Quick Fix Applied  
\$2525.00



### **Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

29 CFR 1910.147(c)(4)(ii): Procedures did not clearly and specifically outline the scope, purpose, authorization, rules, and techniques to be utilized for the control of hazardous energy, and the means to enforce compliance including, but not limited to, 29 CFR 1910.147(c)(4)(ii)(B), (c)(4)(ii)(C) and (c)(4)(ii)(D):

- a) Facility Wide- On or about February 4 and 5, 2016, the established procedures for the application of energy control did not specify the steps for an orderly shutdown, isolation, blocking and securing of the EN Line Lodestar Hoists, Dryer Area Lodestar Hoist, Strip Line Crane, and the Degreaser Area Coffing Hoist, for servicing and maintenance to avoid any additional or increased hazards to employees as a result of equipment stoppage, to control hazardous energy.
- b) Facility Wide- On or about February 4 and 5, 2016, the established procedures for the application of energy control did not specify the specific procedural steps for the placement, removal and transfer of lockout devices and the responsibility for them when working on the EN Line Lodestar Hoists, Dryer Area Lodestar Hoist, Strip Line Crane, and the Degreaser Area Coffing Hoist.
- c) Facility Wide- On or about February 4 and 5, 2016, the established procedures for the application of energy control did not specify how to test the EN Line Lodestar Hoists, Dryer Area Lodestar Hoist, Strip Line Crane, and the Degreaser Area Coffing Hoist, to determine and verify the effectiveness of the lockout devices, tagout devices, and other energy control measures.

**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 of abatement, or other written records.**

Arlington Plating Company was previously cited for a violation of an equivalent Occupational Safety and Health Standard 1910.147(c)(4)(ii)(B)-(D), which was contained in OSHA inspection number 929496, citation number 1, item number 4(a) and was affirmed as a final order on July 16, 2015, with respect to a workplace located at 600 S. Vermont Street in Palatine, Illinois.

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:** 1121917  
**Inspection Date(s):** 02/01/2016 - 03/04/2016  
**Issuance Date:** 07/27/2016



**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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**Date By Which Violation Must be Abated:**  
**Proposed Penalty:**

**08/22/2016**  
**\$9900.00**

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:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

29 CFR 1910.147(c)(7)(i): The employer did not provide adequate training to ensure that employees acquired the knowledge and skills required for the safe application, usage and removal of energy control devices:

a) Polishing Department- On or about June 8, 2016, the employer did not ensure that all Polishing Department employees that performed belt changes were adequately trained as Authorized employees. These employees performed daily servicing of the Rite Speed & Chas Polishing Machines without the knowledge and skills needed for the safe application, usage, and removal of energy control. These machines had both electrical and kinetic energy.

**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 of abatement, or other written records.**

Arlington Plating Company was previously cited for a violation of this Occupational Safety and Health Standard 1910.147(c)(7)(i), which was contained in OSHA inspection number 929496, citation number 1, item number 5(a) and was affirmed as a final order on July 16, 2015, with respect to a workplace located at 600 S. Vermont Street in Palatine, Illinois.

Date By Which Violation Must be Abated:  
Proposed Penalty:

08/22/2016  
\$13860.00



### Citation and Notification of Penalty

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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#### Citation 2 Item 3 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:

- a) Flight Bar Maintenance Area- On February 1, 2016, the employer failed to ensure that the unused portion of the cutting blade on the DoAll Vertical Bandsaw, which was used to cut materials other than wood, was fully guarded and enclosed to protect employees during the operation of the machine.
- b) Maintenance Shop- On or about February 1, 2016, the employer failed to ensure that the unused portions of the cutting blade on the Dayton Horizontal Bandsaw, which was used to cut materials other than wood, was fully guarded and enclosed to protect employees during the operation of the machine.
- c) Tube Buffing Room- On February 1, 2016, the employer failed to ensure that the spindle end on Buffing Machine #1 and Buffing Machine #2 was fully guarded and enclosed to protect employees during the operation of the machine.
- d) Polishing Department- On March 4, 2016, the employer failed to ensure that the spindle end on the Rite Speed & Chas Polishing Machine #6R was fully guarded and enclosed to protect employees during the operation of the machine.

**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 of abatement, or other written records.**

Arlington Plating Company was previously cited for a violation of this Occupational Safety and Health Standard 1910.212(a)(1), which was contained in OSHA inspection number 929496, citation number 2, item number 2, and was affirmed as a final order on July 16, 2015, with respect to a workplace located at 600 S. Vermont Street in Palatine, Illinois.

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:** 1121917  
**Inspection Date(s):** 02/01/2016 - 03/04/2016  
**Issuance Date:** 07/27/2016



**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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**Date By Which Violation Must be Abated:**  
**Proposed Penalty:**

**08/22/2016**  
**\$13860.00**

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



### Citation and Notification of Penalty

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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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 4 a Type of Violation: **Repeat**

29 CFR 1910.303(b)(6): Conductors and equipment located in wet or damp locations were not identified for that environment:

- a) Northeast Corner of the Facility- On February 1, 2016, the employer failed to ensure all enclosures and fittings, in environments where they were exposed to liquids, vapors and/or a corrosive atmosphere, were identified for use in that type of operating environment. The conduit and switchgear in the northeast corner of the facility were not identified for the wet and damp location.
- b) Jessup Line- On February 1, 2016, the employer failed to ensure all enclosures, boxes, and fittings, in environments where they were exposed to liquids, vapors and/or a corrosive atmosphere, were identified for use in that type of operating environment. The outlet and conduit near the Scrubber Discharge Tank and Rectifier T-698 were not identified for the wet and damp location.
- c) Hand Line 2- On February 1, 2016, the employer failed to ensure all enclosures, boxes, and fittings, in environments where they were exposed to liquids, vapors and/or a corrosive atmosphere, were identified for use in that type of operating environment. The outlet and conduit above Tank 612 of Acid Copper were not identified for the wet and damp location.
- d) Strip Line- On or about Feb. 12, 2016, the employer failed to ensure all enclosures, boxes, and fittings, in environments where they were exposed to liquids, vapors and/or a corrosive atmosphere, were identified for use in that type of operating environment. The conduit running along the north side of the Strip Line enclosure was not identified for the wet and damp location.

**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 of abatement, or other written records.**

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:** 1121917  
**Inspection Date(s):** 02/01/2016 - 03/04/2016  
**Issuance Date:** 07/27/2016



**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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Arlington Plating Company was previously cited for a violation of this Occupational Safety and Health Standard 1910.303(b)(6), which was contained in OSHA inspection number 929496, citation number 1, item number 12(a) and was affirmed as a final order on July 16, 2015, with respect to a workplace located at 600 S. Vermont Street in Palatine, Illinois.

**Date By Which Violation Must be Abated:** 08/22/2016  
**Proposed Penalty:** \$9900.00

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:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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#### Citation 2 Item 4 b Type of Violation: **Repeat**

29 CFR 1910.303(b)(7)(iv): Equipment with damaged parts that may adversely affect its safe operation or its mechanical strength, such as broken, bent, cut, or deteriorated by corrosion, chemical action, or overheating parts was used:

- a) Northeast Corner of the Facility- On February 1, 2016, the employer failed to ensure all electrical equipment was in good repair. The conduit and switchgear in the northeast corner of the facility showed outward signs of damage, including corrosion.
- b) Jessup Line- On February 1, 2016, the employer failed to ensure all electrical equipment was in good repair. The outlet and conduit near the Scrubber Discharge Tank and Rectifier T-698, showed outward signs of damage, including corrosion.
- c) Hand Line 2- On February 1, 2016, the employer failed to ensure all electrical equipment was in good repair. The outlet and conduit above Tank 612 of Acid Copper showed outward signs of damage, including corrosion.
- d) Strip Line- On or about Feb. 12, 2016, the employer failed to ensure all electrical equipment was in good repair. The conduit running along the north side of the Strip Line enclosure showed outward signs of damage, including corrosion.

**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 of abatement, or other written records.**

Date By Which Violation Must be Abated:

08/22/2016

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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

**Inspection Number:** 1121917  
**Inspection Date(s):** 02/01/2016 - 03/04/2016  
**Issuance Date:** 07/27/2016



**Citation and Notification of Penalty**

**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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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:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078

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

29 CFR 1910.305(e)(1): Cabinets, cutout boxes, fittings, boxes, and panelboard enclosures in damp or wet locations were not installed to prevent moisture or water from entering and accumulating within the enclosures. The enclosures were not weatherproof in wet locations:

a) Jessup Line- On February 1, 2016, the employer failed to ensure the electrical box mounted to the column near Tank 429 in the middle of the work platform on the Jessup Line was installed to prevent moisture and water from entering and used weatherproof electrical components. The outlet was being used without the weatherproof cover that was part of the manufacturer's design and showed signs of residue from the wet process on the face of the outlet.

**No abatement certification or documentation is required for this item.**

Arlington Plating Company was previously cited for a violation of this Occupational Safety and Health Standard 1910.305(e)(1), which was contained in OSHA inspection number 929496, citation number 1, item number 12(b) and was affirmed as a final order on July 16, 2015, with respect to a workplace located at 600 S. Vermont Street in Palatine, Illinois.

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$7920.00

A handwritten signature in cursive script, appearing to read "Angeline Loftus", written over a horizontal line.

**Angeline Loftus**  
Area Director

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
701 Lee Street  
Suite 950  
Des Plaines, IL 60016  
Phone: 847-803-4800 Fax: 847-390-8220



## INVOICE / DEBT COLLECTION NOTICE

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**Company Name:** Arlington Plating Company  
**Inspection Site:** 600 S. Vermont St, Palatine, IL 60078  
**Issuance Date:** 07/27/2016

<b>Summary of Penalties for Inspection Number</b>	<b>1121917</b>
<b>Citation 1, Serious</b>	<b>\$60490.00</b>
<b>Citation 2, Repeat</b>	<b>\$55440.00</b>
<b>TOTAL PROPOSED PENALTIES</b>	<b>\$115930.00</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.

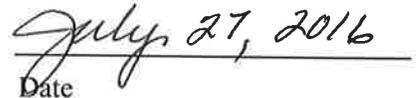
**Delinquent Charges:** A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%)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

  
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Angeline Loftus

Area Director

  
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Date