

**Este documento es muy importante. Si ud. No habla inglés,  
busque un traductor o llame al (915) 534-6251.**

**U.S. Department of Labor** Occupational Safety and Health Administration  
4849 North Mesa Suite 200  
El Paso, TX 79912  
Phone: (915) 534-6251 Fax: (915) 534-6259



February 27, 2023

Dear Employer,

On 09 / 12 / 2022, an OSHA compliance officer met with you or your representative as part of an inspection at 1104 East San Antonio Avenue, El Paso, TX 79901. This letter includes the citations for the violations that were found (see summary below). Please choose one of the three options from the box to the right and complete the associated steps found on the following page **within 15 working days**. Please call us if you have any questions about the enclosed citation and/or penalties; we are here to help you choose the best option to resolve your citation as quickly as possible.  
Sincerely,

Diego Alvarado Jr., Area Director

**Your Citation Summary**  
Arizona Traders Co.  
Inspection Number: 1621387

**Total Amount Due: \$292693.00**  
**Payment Due Date: 15 working days  
after receipt of  
this letter**

*You must correct each violation by the date listed in the Citation and Notification of Penalty. Please see the violations and the correction deadline for each violation starting on page 6.*

**Total Number of Violations: 28**

**Your First Correction Deadline is:  
March 16, 2023**

### **Step 1 – Choose a Response Option and Act within 15 working days**

Respond now before you lose the ability to discuss potential adjustments to penalty amounts and/or due dates. Please choose one option below and complete the steps on the next page.

#### **Option #1 – Discuss with OSHA**

I would like to discuss the citation with an OSHA representative. This may lead to changes in the penalty amount, due date or correction deadlines (if appropriate).

#### **Option #2 – Correct and Pay**

I agree with the citation, penalties, and correction deadlines, and do not contest.

#### **Option #3 – Contest the Citation**

I do not agree with the citation, penalties, and/or correction deadlines, and would like to contest.

#### **Questions or Concerns?**

If you have any questions or concerns regarding the citation, penalties, and/or correction deadlines, please call us at (915) 534-6251.

## Step 2 – Complete One Option Checklist

Please post a copy of the citation at or near the place where each violation occurred, even if you plan to contest. You can use the checklist to the right to help plan your next steps. Please do not send in your checklist.

### Option #1 – Discuss with OSHA

I will complete by:



1. Call: Diego Alvarado Jr., Area Director, at (915) 534-6251 as soon as possible to schedule a meeting with an OSHA representative that must occur **within 15 working days** of receiving this citation. Bring supporting documentation of existing conditions and corrections done thus far. If necessary, you can still contest the citation after this meeting. **\*\*This meeting does NOT extend your 15 working day deadline to contest the citation.\*\***

\_\_\_ / \_\_\_



2. Fill in and post the attached "Notice to Employees OSHA Informal Conference" after scheduling meeting.

\_\_\_ / \_\_\_

### Option #2 – Correct Violations and Pay Penalty

I will complete by:



1. Correct violations, then complete and mail the attached "Certification of Corrective Action Worksheet" along with the appropriate evidence of repair (e.g. photos, purchase orders, etc.) to the OSHA office listed on the first page, **postmarked within 10 calendar days after each violation's correction deadline and include any required evidence. If these documents are transmitted by means other than mailing, the date the Agency received the documents is the date of submission.**

\_\_\_ / \_\_\_



2. Pay the **Total Penalty** by using one of the following methods:  
**\*\*Include your Inspection Number (see first page) on the payment.\*\***

\_\_\_ / \_\_\_

*Pay Online:* Search "OSHA" on [www.pay.gov](http://www.pay.gov) and complete the "OSHA Penalty Payment Form." Pay by debit, credit or Automated Clearing House (ACH) **within 15 working days.** Penalties over \$25,000 must be paid by ACH and require a Transaction ID (Call 202-693-2170 to obtain one).

*Pay by Check:* Mail check or money order payable to "DOL-OSHA" for the Total Penalty to the OSHA office listed on the first page **within 15 working days.**

### Option #3 – Contest the Citation

I will complete by:



Mail a letter of intent to legally contest to the OSHA office listed on the first page, postmarked within **15 working days.**

\_\_\_ / \_\_\_

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
4849 North Mesa  
Suite 200  
El Paso, TX 79912



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## Citation and Notification of Penalty

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**To:**  
Arizona Traders Co., dba Siltec, Inc.  
and its successors  
1104 East San Antonio Avenue  
El Paso, TX 79901

**Inspection Number:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023

**Inspection Site:**  
1104 East San Antonio Avenue  
El Paso, TX 79901

*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 by calling (915) 534-6251. 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 at [www.pay.gov](http://www.pay.gov). At the top of the [pay.gov](http://www.pay.gov) homepage, type “OSHA” in the Search field and select Search. From **OSHA Penalty Payment Form** search result, select Continue. 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 02/27/2023. The conference will be held by telephone or at the OSHA office located at 4849 North Mesa, Suite 200, El Paso, TX 79912 on \_\_\_\_\_ at \_\_\_\_\_.

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

**CERTIFICATION OF CORRECTIVE ACTION WORKSHEET**

**Inspection Number: 1621387**

Company Name: Arizona Traders Co., dba Siltec, Inc.  
Inspection Site: 1104 East San Antonio Avenue, El Paso, TX 79901  
Issuance Date: 02/27/2023

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, 4849 North Mesa, Suite 200, El Paso, TX 79912.**

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

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

On or about September 12, 2022, employees were exposed to fire/inhalation hazards in that the establishment's main entrance/exit route was obstructed by two refrigerators and a metal storage cabinet.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

March 23, 2023  
\$13,394.00

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

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

29 CFR 1910.101(b): The in plant handling, storage, and unitization of all compressed gases in cylinders, portable tanks, rail tank cars, or motor vehicle cargo tanks were not in accordance with Compressed Gas Association Pamphlet P-1-1963-1965.

On or about September 12, 2022, Oxygen tanks were not properly stored. The condition exposed employees to struck-by and explosion/fire hazards in the following instances:

- 1) On the south wall of the Main Work Area, three Oxygen tanks were approximately 1 ft. away from spark producing equipment (Rectifier and DC Power Supply used in the electroplating process).
- 2) In the east corner of the Main Work Area, two Oxygen tank were observed on the floor next to three fire extinguishers and approximately 3 ft. from an Acetylene tank (flammable gas).
- 3) In the Plating Room there were two Carbon Dioxide Tanks next to a blue container with the label that read oxidizer (severe fire hazard).

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: **March 23, 2023**  
Proposed Penalty: **\$13,394.00**

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.102(a): In-plant transfer, handling, storage, and/or use of acetylene in cylinders did not comply with the provisions of CGA Pamphlet G-1-2008 ("Acetylene"):

On or about September 12, 2022, in the Main Work Area, Acetylene and Oxygen cylinders were stored next to each other, without barrier. This condition exposed employees to struck-by and fire hazards.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$0.00

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

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

On or about September 12, 2022, the employer did not assess the workplace to determine if hazards were present, or were likely to be present, which necessitated the use of eye and face protection. This condition exposed employees to workplace hazards such as but not limited to serve eye damage and loss of vision.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 16, 2023
Proposed Penalty:	\$15,625.00

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.133(a)(1): Eye and face protection. General requirements. The employer did not ensure that each affected employee uses appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation.

In the Main Work Areas, employees were exposed to flying metal particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors and were not wearing any form of eye protection in the following areas:

- 1) September 12, 2022, in the Main Work Room four (4) employees performing jewelry setting operations using Fiberglass Resin were observed not wearing eye protection.
- 2) September 16, 2022, in the Main Work Room one (1) employee performing jewelry setting operations using Fiberglass Resin was observed wearing prescription eyewear that was not American National Standards Institute (ANSI-87) rated safety eyewear.
- 3) September 16, 2022, in the Polishing Area one (1) employee performing polishing / grinding operations was observed wearing prescription eyewear that was not American National Standards Institute (ANSI-87) rated safety eyewear.
- 4) September 16, 2022, in the Main Work Room two (2) employees performing jewelry setting operations using Fiberglass Resin were observed wearing prescription eyewear that was not American National Standards Institute (ANSI-87) rated safety eyewear.
- 5) On September 16, 2022, in the exterior rear fenced area of the facility one (1) employee performing cleaning operations was observed not wearing eye protection.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

March 23, 2023

Proposed Penalty:

\$15,625.00

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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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 5 a** Type of Violation: **Serious**

29 CFR 1910.134(c)(1): The employer did not establish and implement a written respiratory protection program with worksite-specific procedures in any workplace where respirators were necessary to protect the health of the employee or whenever respirators were required by the employer:

On or about September 12, 2022, the employer did not ensure that a written respiratory protection program was established and implemented for those employees involved in the following operations such as but not limited to:

- a) Plating and dipping process.
- b) Mixing chemicals.
- c) Jewelry making.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$15,625.00

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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**Citation 1 Item 5 b** 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:

On or about September 12, 2022, the employer did not ensure that employees wearing respirators were provided a medical evaluation to determine the employee's ability to use a respirator while working with and around hazardous chemicals, including but not limited to nitric acid, muriatic acid 22deg., hydrochloric acid, copper sulfate, phosphoric acid, 85% ACS, surf-n ammonium sulfate standard grade. This condition exposed employees to nerve and muscle disorders including amyotrophic lateral sclerosis, Guillain-Barre syndrome, and myasthenia gravis, lung and airway diseases such as asthma, cystic fibrosis, COPD, and interstitial lung diseases, fluid buildup in the lungs or pulmonary embolism (a blood clot in your lungs), infections of the brain or spinal cord such as meningitis.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$0.00

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.134(f)(1): The employer did not ensure that employees using a tight-fitting facepiece respirator pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT) as stated in this paragraph:

On or about September 12, 2022, the employer did not ensure fit testing was conducted for employees using a tight-fitting facepiece respirators in the workplace. This condition exposed employees to nerve and muscle disorders including amyotrophic lateral sclerosis, Guillain-Barre syndrome, and myasthenia gravis, lung and airway diseases such as asthma, cystic fibrosis, COPD, and interstitial lung diseases, fluid buildup in the lungs or pulmonary embolism (a blood clot in your lungs), infections of the brain or spinal cord such as meningitis while working with chemicals including but not limited to nitric acid, muriatic acid 22deg., hydrochloric acid, copper sulfate, phosphoric acid, 85% ACS, surf-n ammonium sulfate standard grade.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$0.00

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.134(h)(2)(i): Respirators were not stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals or were not packed or stored to prevent deformation of the facepiece and exhalation valve:

On or about September 12, 2022, the employer did not ensure respirators not in use were stored properly. Respirators were stored in the work area and were subject to chemical contamination, respirator malfunction or failure. This condition exposed employees to nerve and muscle disorders including amyotrophic lateral sclerosis, Guillain-Barre syndrome, and myasthenia gravis, lung and airway diseases such as asthma, cystic fibrosis, COPD, and interstitial lung diseases, fluid buildup in the lungs or pulmonary embolism (a blood clot in your lungs), and infections of the brain or spinal cord such as meningitis.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$0.00

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.141(a)(3)(i): Places of employment were not kept clean to the extent that the nature of the work allowed:

On or about September 12, 2022, the employer did not ensure that work areas were maintained in sanitary condition, such as but not limited to:

- a) Work table where employees used to eat food and drinks.
- b) Work area cluttered with boxes, chemicals, equipment on floor.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$13,394.00

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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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 7 a** Type of Violation: **Serious**

29 CFR 1910.141(c)(1)(iii): The sewage disposal method endangered the health of the employee(s):

On or about September 12, 2022, the employer did not provide employees with a proper sewage disposal method. This condition endangered the health of employees and exposed them to possible health hazards such as but not limited to:

- a) Hepatitis B and C
- b) Salmonella
- c) E. coli
- d) Meningitis
- e) Parasites
- f) Skin irritation

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$15,625.00



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.141(d)(2)(ii): Lavatories were not provided with hot and cold, or tepid running water:

On or about September 12, 2022, the employer did not provide lavatories with hot and cold, or tepid running water. This condition endangered the health of employees and exposed them to possible health hazards such as but not limited to:

- a) Hepatitis B and C
- b) Salmonella
- c) E. coli
- d) Meningitis
- e) Parasites
- f) Skin irritation

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$0.00

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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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 8 a** Type of Violation: **Serious**

29 CFR 1910.141(g)(2): Employees were permitted to consume food or beverage in area(s) exposed to toxic materials:

On or about September 12, 2022, the employer permitted employees to consume food or beverage in area(s) exposed to toxic materials / chemicals including but not limited to:

- a) Ferric Chloride Hexahydrate
- b) Ammonium Sulfate
- c) Sodium Bisulfate Anhydrous
- d) Silver Nitrate
- e) Sulfuric Acid

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$13,394.00

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.141(g)(4): Food or beverages were stored in area(s) exposed to toxic material(s):

On or about September 12, 2022, the employer permitted employees to store food or beverage in area(s) exposed to toxic materials / chemicals including but not limited to:

- a) Ferric Chloride Hexahydrate
- b) Ammonium Sulfate
- c) Sodium Bisulfate Anhydrous
- d) Silver Nitrate
- e) Sulfuric Acid

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: **March 23, 2023**  
Proposed Penalty: **\$0.00**

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

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

On or about September 12, 2022, listed or labeled equipment was not installed and/or used in accordance with manufacturer's instruction and UL White Book listing. Employees were exposed to electrical shock and fire hazards.

- 1) In the Plating / Casting Room: Three (3) outlet splitter adapters and three extension cords were plugged into one another.
- 2) In the Main Work Area: One (1) three outlet splitter adapters and an extension cord were plugged into one another.
- 3) In the Main Work Area between two bench buffers: One (1) three outlet splitter and an extension cord were plugged into one another.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$11,162.00

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.303(b)(7)(iv): There were 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.

On or about September 12, 2022, employees were exposed to electrical shock hazards in the following instances:

- a) In the Outdoor Shed Area, three 110V outlets receptacles were deteriorated by corrosion.
- b) In the Polishing Area next to four water softer tanks, a four-outlet receptacle against the wall was damaged.
- c) In the Polishing Area behind stacked Gamma Seal lids, a four-outlet receptacle located against the wall was broken.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$6,696.00

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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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 11 a Type of Violation: **Serious****

29 CFR 1910.305(b)(1)(i): Openings through which conductors entered cutout boxes, cabinets, or fittings were not effectively closed:

On or about September 12, 2022, in the plating room, the electrical panel covers were not securely fastened in place. This condition exposed employees to electrical shock hazards.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$6,696.00

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.305(b)(3)(iii): Covers for boxes were not permanently marked "HIGH VOLTAGE." The marking was not on the outside of the box cover and shall be readily visible and legible.

On or about September 12, 2022, in the plating room, an electrical panel was not permanently marked "HIGH VOLTAGE". This condition exposed employees to electrical shock hazards.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$0.00

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.1200(h)(1): Employees were not provided effective information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard that the employees had not been previously trained about was introduced into their work area:

On or about September 12, 2022, employees in the Sprung Room, Casting Room, Plating Room, Polishing Room, and Main Work Room were not provided effective information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard that the employees had not been previously trained about was introduced into their work area.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$0.00

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.1200(f)(6): The employer did not ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with the product identifier and word, pictures and/or symbols which provide the general information regarding the hazards of the chemical:

On or about September 12, 2022, the employer did not ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with the product identifier and word, pictures and/or symbols. Employees were exposed to nerve and muscle disorders including amyotrophic lateral sclerosis, Guillain-Barre syndrome, and myasthenia gravis, lung and airway diseases such as asthma, cystic fibrosis, COPD, and interstitial lung diseases, fluid buildup in the lungs or pulmonary embolism (a blood clot in your lungs) and infections of the brain or spinal cord such as meningitis in the following instances:

- a) In the Sprung Room (Wax Oil Casting Room) there were two (2) unlabeled plastic bottles in front of a bottle of Ferric Acid containing ACS (Aluminum Sulfate).
- b) In the Sprung Room (Wax Oil Casting Room) on metal shelf#1 there were three (3) unlabeled plastic bottles containing Copper Nitrate, Ferric Amm. Oxylate, and Acid EDTA.
- c) In the Sprung Room (Wax Oil Casting Room) on metal shelf #2 there were 16 plastic bottles without symbols which provided the general information regarding the hazards of the chemical.
- d) In the Plating/Casting Room, on top the sink by the eye and skin flush station there were eight (8) plastic bottles without symbols which provided the general information regarding the hazards of the chemical.
- e) In the Plating Room, there was four (4) Plastic bottle on top of and underneath a wooden table with an unknown chemical without symbols which provided the general information regarding the hazards of the chemical.
- f) In the Main Work Room, there were two (2) containers (blue rubber barrels labeled with black marker "Sulfuric" and white bucket labeled with black marker " Potassium Carbonate") underneath a table with an unknown chemical without symbols which provided the general information regarding the hazards of the chemical.
- g) In Office #2, there were three (3) plastic containers on the floor in a box containing tortilla chips that were open, with unknown chemicals without symbols which provided the general information regarding the hazards of the chemical.

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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- h) In Office #2, a white container stacked on top of a blue barrel that read CU Chloride new ACS the original product label was scratched off.
- i) In Office #2, there were seven (7) rubber containers stacked on top of each other with unknown chemicals without symbols which provided the general information regarding the hazard of the chemical.
- j) In Office #1, there were seven (7) plastic bottles on the floor with unknown chemicals without symbols which provided the general information regarding the hazard of the chemical.
- k) In the Plating Room, there was a rubber container containing blue colored liquid with unknown chemicals inside. (Waste container).

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$0.00

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.1200(g)(8): The employer did not maintain in the workplace copies of the required safety data sheets for each hazardous chemical, and did not ensure that they were readily accessible during each work shift to employees when they were in their work area(s):

On or about September 12, 2022, the employer did not maintain in the workplace copies of the required safety data sheets for each hazardous chemical and did not ensure they were readily accessible during each work shift to employees. Employees engaged in electroplating, casting, wax working, enameling, sealing, pickling, anodizing, etching, and finishing jewelry were exposed to health hazards such as but not limited to, nerve and muscle disorders including amyotrophic lateral sclerosis, Guillain-Barre syndrome, and myasthenia gravis, lung and airway diseases such as asthma, cystic fibrosis, COPD, and interstitial lung diseases, fluid buildup in the lungs or pulmonary embolism (a blood clot in your lungs) and infections of the brain or spinal cord such as meningitis.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$0.00

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.1200(j)(1): The employer did not train employees regarding the new label elements and safety data sheets format by December 1, 2013.

On or about September 12, 2022, the employer did not train employees regarding the new label elements and safety data sheets format by December 1, 2013. This condition exposed employees to safety and health hazards.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$0.00

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:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.1200(f)(9): The employer removed or defaced existing labels on incoming containers of hazardous chemicals and did not immediately mark the containers with the required information:

On or about September 12, 2022, the employer removed or defaced existing labels on incoming containers of hazardous chemicals and did not immediately mark with the identity of the product and its hazard warnings in the following instances:

- a) In the Sprung Room (Wax Oil Casting Room) there were two (2) unlabeled plastic bottles in front of a bottle of Ferric Acid containing ACS (Aluminum Sulfate).
- b) In the Sprung Room (Wax Oil Casting Room) on metal shelf#1 there were three (3) unlabeled plastic bottles containing Copper Nitrate, Ferric Amm. Oxylate, and Acid EDTA.
- c) In the Sprung Room (Wax Oil Casting Room) on metal shelf #2 there were 16 plastic bottles without symbols which provided the general information regarding the hazards of the chemical.
- d) In the Plating/Casting Room, on top the sink by the eye and skin flush station there were eight (8) plastic bottles without symbols which provided the general information regarding the hazards of the chemical.
- e) In the Plating Room, there was four (4) Plastic bottle on top of and underneath a wooden table with unknown chemicals without symbols which provided the general information regarding the hazards of the chemical.
- f) In the Main Work Room, there were two (2) containers (blue rubber barrels labeled with black marker "Sulfuric" and white bucket labeled with black marker "Potassium Carbonate") underneath a table with an unknown chemical without symbols which provided the general information regarding the hazards of the chemical.
- g) In Office #2, there were three (3) plastic containers on the bottom of a box containing tortilla chips that were open, with unknown chemicals without symbols which provided the general information regarding the hazards of the chemical.
- h) In Office #2, a white container stacked on top of a blue barrel that read "CU Chloride new ACS" the original product label was scratched off.

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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- i) In Office #2, there were seven (7) rubber containers stacked on top of each other with unknown chemicals without symbols which provided the general information regarding the hazard of the chemical.
  - j) In Office #1, there were seven (7) plastic bottles on the floor with unknown chemicals without symbols which provided the general information regarding the hazard of the chemical.
  - k) In the Room, there was a rubber container containing bluish liquid unknown chemicals inside. (Waste container).

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: March 23, 2023  
Proposed Penalty: \$0.00

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:** 1621387  
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**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.151(c): Where employees were exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body were not provided within the work area for immediate emergency use:

On or about September 12, 2022, the employer did not provide suitable facilities for quick drenching or flushing of the eyes and body within the facility for immediate emergency use. Employees are exposed to corrosive chemicals such as but not limited to, hydrochloric acid, nitric acid and ferric chloride.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 16, 2023
Proposed Penalty:	\$133,932.00

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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

29 CFR 1910.124(f): Employees were not knowledgeable of the proper first-aid procedures appropriate to the dipping or coating hazards to which they were exposed:

On or about September 12, 2022, the employer did not ensure that employees were knowledgeable of the proper first aid procedures. This condition exposed employees to possible chemical burns, eye irritation or irritation of the upper respiratory tract, etc.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	March 23, 2023
Proposed Penalty:	\$1,253.00

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:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



**Citation and Notification of Penalty**

**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901

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Citation 3 Item 2 Type of Violation: **Other-than-Serious**

29 CFR 1910.124(g)(1): Employees who worked with liquids that could burn, irritate, or otherwise harm their skin were not provided with locker space or other storage space to prevent contamination of their street clothes:

On or about September 12, 2022 the employer did not provide locker space or other storage space to prevent the contamination of employee's street clothes when employees were working with liquids that may burn, irritate or otherwise harm their skin.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: March 23, 2023  
Proposed Penalty: \$1,253.00

  
**Diego Alvarado Jr.**  
Area Director

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



## INVOICE / DEBT COLLECTION NOTICE

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**Company Name:** Arizona Traders Co., dba Siltec, Inc.  
**Inspection Site:** 1104 East San Antonio Avenue, El Paso, TX 79901  
**Issuance Date:** 02/27/2023

Summary of Penalties for Inspection Number: 1621387

Citation 1 Item 1, Serious	\$13,394.00
Citation 1 Item 2a, Serious	\$13,394.00
Citation 1 Item 2b, Serious	\$0.00
Citation 1 Item 3, Serious	\$15,625.00
Citation 1 Item 4, Serious	\$15,625.00
Citation 1 Item 5a, Serious	\$15,625.00
Citation 1 Item 5b, Serious	\$0.00
Citation 1 Item 5c, Serious	\$0.00
Citation 1 Item 5d, Serious	\$0.00
Citation 1 Item 6, Serious	\$13,394.00
Citation 1 Item 7a, Serious	\$15,625.00
Citation 1 Item 7b, Serious	\$0.00
Citation 1 Item 8a, Serious	\$13,394.00
Citation 1 Item 8b, Serious	\$0.00
Citation 1 Item 9, Serious	\$11,162.00
Citation 1 Item 10, Serious	\$6,696.00
Citation 1 Item 11a, Serious	\$6,696.00
Citation 1 Item 11b, Serious	\$0.00
Citation 1 Item 12a, Serious	\$15,625.00
Citation 1 Item 12b, Serious	\$0.00
Citation 1 Item 12c, Serious	\$0.00
Citation 1 Item 12d, Serious	\$0.00
Citation 1 Item 12e, Serious	\$0.00
Citation 1 Item 12f, Serious	\$0.00
Citation 1 Item 12g, Serious	\$0.00
Citation 2 Item 1, Willful - Serious	\$133,932.00
Citation 3 Item 1, Other-than-Serious	\$1,253.00
Citation 3 Item 2, Other-than-Serious	\$1,253.00

**TOTAL PROPOSED PENALTIES:** \$292,693.00



To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically at [www.pay.gov](http://www.pay.gov). At the top of the [pay.gov](http://www.pay.gov) homepage, type "OSHA" in the Search field and select Search. From the **OSHA Penalty Payment Form** search result, select Continue. 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 two 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

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

**Inspection Number:** 1621387  
**Inspection Date(s):** 09/12/2022 - 09/12/2022  
**Issuance Date:** 02/27/2023



collect the unpaid debt.

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

**Diego Alvarado Jr.**  
Area Director

2/27/23  
Date