

U.S. Department of Labor
Occupational Safety and Health Administration
2296 Henderson Mill Road
Suite 200
Atlanta, GA 30345



Citation and Notification of Penalty

To:
Optima Stantron Corp. Div of Elma Electronic Inc.
and its successors
1775 McLeod Drive
Lawrenceville, GA 30043

Inspection Number: 1378704
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019

Inspection Site:
1775 Macleod Dr
Lawrenceville, GA 30043

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

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

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

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling 770-493-6644. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

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

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

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

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

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

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

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

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

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an

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

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

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

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

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 08/06/2019. The conference will be held by telephone or at the OSHA office located at 2296

Henderson Mill Road, Suite 200, Atlanta, GA 30345 on _____ at

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1378704

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043
Issuance Date: 08/06/2019

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, 2296 Henderson Mill Road, Suite 200, Atlanta, GA 30345**

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

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Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Maclcod Dr, Lawrenceville, GA 30043

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 1 a 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-1-2009 ("Acetylene"):

On or about 2/14/2019, workers walking in and around the storage area were exposed to smoke inhalation and thermal burn hazards where the unsecured acetylene cylinder was stored without a valve cap.

No abatement required

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$9472.00

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

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Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Maclod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.253(b)(4)(iii): Oxygen cylinders in storage were not separated from fuel-gas cylinders or combustible materials (especially oil or grease), a minimum distance of 20 feet:

On or about 2/14/2019, behind the paint booth, workers walking by or receiving materials from the area where unsecured oxygen and acetylene cylinder were stored within 1-foot of each other were exposed to smoke inhalation and thermal burn hazards.

No abatement required

Date By Which Violation Must be Abated:

Corrected During Inspection

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

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Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
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Citation 1 Item 2 Type of Violation: **Serious**

29 CFR 1910.146(c)(4): When the employer decided that its employees would enter permit spaces, the employer did not develop and implement a written permit space entry program that complied with 29 CFR 1910.146:

On or about 2/14/2019, the employer's written permit required confined space program did not identify the dust collector as a permit required confined space. Employees entering the dust collector during filter change operations were exposed to fall hazards of approximately 4-feet. Employees worked inside the dust collector from 2-inch metal beams with 12-inches between each beam.

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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	08/23/2019
Proposed Penalty:	\$9472.00

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Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
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Citation 1 Item 3 Type of Violation: **Serious**

29 CFR 1910.147(c)(1): The employer did not establish a program consisting of an energy control procedure, employee training and periodic inspections to ensure that before any employee performed any servicing or maintenance on a machine or equipment where the unexpected energizing, startup or release of stored energy could occur and cause injury, the machine or equipment shall be isolated from the energy source and rendered inoperative:

On or about 2/19/2019, an employee performed servicing and maintenance activities on machines and equipment such as, but not limited to the Cincinnati press brake, S/N 45136. The employee performing maintenance was not provided lockout or tagout devices to isolate energy sources, inspections on lockout procedures were not performed, nor was training provided to employees on the 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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

08/29/2019
\$13260.00

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
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Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Maclcod Dr, Lawrenceville, GA 30043

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

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

29 CFR 1910.157(e)(2): Portable fire extinguishers were not visually inspected at least monthly:

On or about 2/14/2019, monthly inspections of portable fire extinguishers were not performed since February 2018. Employees expected to fight incipient level fires were exposed to smoke inhalation and thermal burn hazards.

No abatement required

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$9472.00

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

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Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.157(g)(1): An educational program was not provided for all employees to familiarize them with the general principles of fire extinguisher use and the hazards involved with incipient stage fire fighting:

On or about 2/14/2019, throughout the facility, employees were exposed to fire and explosion hazards where combustible dust was present in that they were expected to fight incipient level fires where the employer failed to provide training on the use of portable fire extinguishers.

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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

08/29/2019

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

U.S. Department of Labor
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Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
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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 1910.178(l)(4)(iii): An evaluation of each powered industrial truck operator's performance was not being conducted at least once every three years:

On or about 2/14/2019, employees utilize PIT to transport product throughout the facility. Powered industrial truck operators were not evaluated since 2013 to ensure safe operation.

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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

08/29/2019
\$9472.00

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

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Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Maclcod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.178(n)(6): Industrial truck drivers were not required to look in the direction of, and keep a clear view of the path of travel:

a. On or about 2/14/2019, two employees were observed not looking in the direction of travel while operating a forklift to transport materials in the facility. Employees were exposed to struck-by 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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

08/23/2019

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: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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

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:

- a. On or about 2/14/2019 in the cabinet assembly area, tip tables 1 through 5 were not guarded to prevent caught-in and crushing hazards during operations.
- b. Workers were exposed to amputation hazards where there was no guarding installed at the unused portions of the Amada horizontal band saw.
- c. at the Amada press brake, S/N HD 1003 NT, two workers were observed performing braking operations where only one operator utilized the foot pedal to actuate the brake. The second foot pedal was not in use as the machine was set up for operation by one person. Employees were exposed to amputation 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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 08/29/2019
Proposed Penalty: \$13260.00

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

Inspection Number: 1378704
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Maclcod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.242(b): Compressed air used for cleaning purposes was not reduced to less than 30 P.S.I.:

On or about 2/14/2019 throughout the facility, workers observed performing daily cleaning tasks of materials including but not limited to powder coating dust and metal chips and shavings from work areas and their person with compressed air. Employees were exposed to embolism and struck by hazards where the compressed air was measured at above 100 P.S.I.

No abatement required

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$11366.00

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: 1378704
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macloed Dr, Lawrenceville, GA 30043

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

29 CFR 1910.303(b)(1)(iv): Electric equipment was not free from recognized hazards that were likely to cause serious physical harm to employees, such as damaged electrical insulation:

a. On or about 2/14/2019 at the Cincinnati press break S/N 45136 workers plugging and unplugging a 110V fluorescent light were exposed to electrical shock and burn hazards where the plug was repaired with electricians tape to create the housing for the plug.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation. (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

08/23/2019
\$7577.00

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: 1378704
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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 2/14/2019, employees throughout the facility were exposed to electric shock hazards at locations including but not limited to:

- a) the weld shop, equipment such as but not limited to the lift tables and hand tools were receiving power from flexible cords plugged into metal electrical junction boxes with prepunched knockouts used as extension cords and not mounted to a rigid surface.
- b) hydraulic press areas, equipment such as but not limited to the radio and hand tools was receiving power from flexible cords plugged into metal electrical junction boxes with prepunched knockouts used as extension cords and not mounted to a rigid surface.
- c) Buffalo pedestal drill press, was receiving power from flexible cords plugged into metal electrical junction boxes with prepunched knockouts used as extension cords and not mounted to a rigid surface.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation. (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

08/23/2019
\$7577.00

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: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Maclcod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.305(b)(1)(ii): Unused openings in boxes, cabinets, or fittings were not effectively closed:

On or about 2/14/2019:

- a. in the cabinet assembly area, table 1, workers were exposed to electrical shock and burn hazards where the tipper table, 480V, Square D, electrical knife switch was missing a 1-inch knock out.
- b. in the cabinet assembly area, table 2, workers were exposed to electrical shock and burn hazards where the tipper table, 480V, Square D, electrical knife switch was missing a 1-inch knock out.
- c. in the cabinet assembly area, table 4, workers were exposed to electrical shock and burn hazards where the tipper table, 480V, Push On, electrical knife switch was missing a 1 1/2-inch knock out.
- d. in the cabinet assembly area, table 5, workers were exposed to electrical shock and burn hazards where the tipper table, 480V, GE, electrical knife switch was missing a 1-inch knock out.
- e. in the milling machine area, workers walking by or working in the vicinity of the exhaust fan No. 3, 480V, Square D, electrical knife switch was missing a 3/4-inch knock out were exposed to electrical shock and burn hazards if contact were made.
- f. at the Amada Horizontal band saw, workers were exposed to electrical shock and burn hazards where the 220V, knife switch was missing a 3/4-inch knock out.
- g. at the 10-foot Accushear, workers were exposed to electrical shock and burn hazards where the LOTO handle was missing, creating an unused opening that had exposed 460V electrical components.
- h. On or about 2/14/2019 at the 10-foot Accushear, workers were exposed to electrical shock and burn hazards where there was an unused opening exposing the 460V electrical components.

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

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

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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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	08/29/2019
Proposed Penalty:	\$11366.00

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Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
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Citation 1 Item 11 Type of Violation: **Serious**

29 CFR 1910.305(g)(2)(iii): Flexible cords were not connected to devices and fittings so that tension would not be transmitted to joints or terminal screws:

On or about 2/14/2019 throughout the facility, workers plugging and unplugging electrical equipment were exposed to electrical shock and burn hazards where there strain relief was not provided on equipment including but not limited to:

- a. Baldor bench grinder S/N W883
- b. Cincinnati press break S/N 45136, industrial power strip powering fluorescent light

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation. (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated: 08/29/2019
Proposed Penalty: \$5683.00

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: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Maclcod Dr, Lawrenceville, GA 30043

Citation 2 Item 1 Type of Violation: **Other-than-Serious**

29 CFR 1910.178(q)(7): Industrial trucks were not examined before being placed in service:

On or about 2/14/2019, throughout the facility powered industrial trucks were not inspected at the beginning of shift or before use.

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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

08/29/2019
\$0.00

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

William C. Fulcher
Area Director

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
2296 Henderson Mill Road
Suite 200
Atlanta, GA 30345



INVOICE / DEBT COLLECTION NOTICE

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043
Issuance Date: 08/06/2019

Summary of Penalties for Inspection Number	1378704
Citation 1, Serious	\$107977.00
Citation 2, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES	\$107977.00

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

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

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

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

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

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

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

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



William C. Fulcher
Area Director

08/06/2019
Date

U.S. Department of Labor
Occupational Safety and Health Administration
2296 Henderson Mill Road
Suite 200
Atlanta, GA 30345



Citation and Notification of Penalty

To:
Optima Stantron Corp. Div of Elma Electronic Inc.
and its successors
1775 McLeod Drive
Lawrenceville, GA 30043

Inspection Number: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019

Inspection Site:
1775 Macleod Dr
Lawrenceville, GA 30043

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

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

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

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling 770-493-6644. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

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

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

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

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

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

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

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

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

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an

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

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

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

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

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 08/06/2019. The conference will be held by telephone or at the OSHA office located at 2296 Henderson Mill Road, Suite 200, Atlanta, GA 30345 on _____ at

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1379024

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043
Issuance Date: 08/06/2019

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, 2296 Henderson Mill Road, Suite 200, Atlanta, GA 30345**

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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.107(b)(5)(iv): Space within the spray booth on the downstream and upstream sides of filters were not protected with approved automatic sprinklers:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were performing painting operations in the powder coating booths. The paint booths were not protected with approved automatic sprinklers:

- a. Powder coating line
- b. Walking (offset) booth

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

08/30/2019
\$9472.00

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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.107(i)(8): Electrical equipment for electrostatic hand spraying was not so interlocked with the ventilation of the spraying area(s) that the equipment cannot be operated unless the ventilation fan(s) are in operation:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were performing painting operations in the walking (offset) powder coating booth. The equipment for electrostatic hand spraying was not interlocked with the ventilation of the spraying area.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

08/30/2019
\$9472.00

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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.107(l)(4)(i): Operation and maintenance. All areas shall be kept free of the accumulation of powder coating dusts, particularly such horizontal surfaces as ledges, beams, pipes, hoods, booths, and floors.

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, the areas where the painting was performed, had explosive dust in the paint area, floors, inside the powder coating booth, on top of booth and on masonry walls, exposing employees to fire hazards.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

08/30/2019
\$9472.00

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: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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

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

29 CFR 1910.133(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 flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employer did not provide employees with the appropriate eye and face protection for use while working with:

- a) corrosives chemicals, such as but not limited to Envirokote 3385 NP, Industrial Purple Cleaner and Degreaser, containing nitric acid and sodium hydroxide, respectively - employees only used safety glasses and latex gloves;
- b) propane when changing the propane tanks of the forklifts- employees did not wear proper eye and face protection;
- c) the saws - employees with prescribed lenses did not wear safety glasses or prescribed safety glasses.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

08/30/2019
\$9472.00

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

Inspection Number: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were exposed to corrosive chemical products such as but not limited to the Envirokote 3385 NP, Industrial Purple Cleaner and Degreaser, containing nitric acid and sodium hydroxide, respectively, when the employer did not have a suitable facility for quick drenching or flushing eyes and body for immediate use in the paint area and in the cleaning area next to the rolling door.

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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

08/30/2019

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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.138(a): The employer did not select and require employee(s) to use appropriate hand protection when employees' hands were exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasion; punctures; chemical burns; thermal burns; and harmful temperature extremes:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were changing the propane tanks for the forklifts. The employer did not provide employees with the appropriate hand protection for use while changing the propane tanks.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

08/30/2019
\$5683.00

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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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 6 a Type of Violation: **Serious**

29 CFR 1910.1200(e)(1): The employer did not develop, implement, and/or maintain at the workplace a written hazard communication program which describes how the criteria specified in 29 CFR 1910.1200(f), (g), and (h) will be met:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were exposed to hazardous chemical products such as but not limited to the Envirokote 3385 NP (containing nitric acid), Industrial Purple Cleaner and Degreaser (containing sodium hydroxide), Cyclo-147F Cyclomethicone Navy Solvent and Cleaner, Denatured Alcohol, AL104U Interpon 100 Gray and 6100 Series Fast Dry Enamel Screen Ink. The Company's written hazard communication program was not maintained and updated since 1996.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

08/30/2019
\$9472.00

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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.1200(f)(6): The employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged or marked with the information specified under paragraphs (f)(6)(i) through (ii) of this section:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were exposed to hazardous chemical products such as but not limited to the Envirokote 3385 NP, Industrial Purple Cleaner and Degreaser, Cyclo-147F Cyclomethicone Navy Solvent and Cleaner, Denatured Alcohol, AL104U Interpon 100 Gray and 6100 Series Fast Dry Enamel Screen Ink. The secondary containers such as but not limited to the ones located in the compressor room, the maintenance area and the assembly area were not properly labeled.

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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

08/30/2019

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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

Citation 1 Item 6 c 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):

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were exposed to hazardous chemical products such as but not limited to the Envirokote 3385 NP, Industrial Purple Cleaner and Degreaser, Cyclo-147F Cyclomethicone Navy Solvent and Cleaner, Denatured Alcohol, AL104U Interpon 100 Gray and 6100 Series Fast Dry Enamel Screen Ink. Safety data sheets were not maintained and readily accessible to employees, as required by the hazard communication standard.

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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

08/30/2019

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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

Citation 1 Item 6 d 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:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were exposed to hazardous chemical products such as but not limited to the Envirokote 3385 NP, Industrial Purple Cleaner and Degreaser, Cyclo-147F Cyclomethicone Navy Solvent and Cleaner, Denatured Alcohol, AL104U Interpon 100 Gray and 6100 Series Fast Dry Enamel Screen Ink. Effective information and training as required by the hazard communication standard was not provided.

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.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

08/30/2019

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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macloed Dr, Lawrenceville, GA 30043

Citation 2 Item 1 Type of Violation: **Other-than-Serious**

29 CFR 1910.107(l)(4)(iii): "No Smoking" signs in large letters on contrasting color background were not conspicuously posted at all powder coating areas and powder storage rooms:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were performing painting operations in the paint area using the powder coating booths. The paint area and the powder storage room did not have "No Smoking" signs.

No abatement certification or documentation required for this violation.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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 2 a Type of Violation: **Other-than-Serious**

29 CFR 1910.134(c)(1): The respiratory protection program was not updated as necessary to reflect those changes in workplace conditions that affected respirator use:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were required the use of respirators (N95) while painting in the powder coating booths. The employer failed to update the program, which reflects information such as but not limited to the use of N95 as a required respirator in the powder coating booths and the areas where the respirators are required.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated: 08/30/2019
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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

Citation 2 Item 2 b Type of Violation: **Other-than-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:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were required to use respirators (N95) while painting in the powder coating booths. The employer did not provide the medical evaluation to employees as required by the Respiratory Protection Standard.

No abatement certification or documentation required for this violation.

Date By Which Violation Must be Abated:

Corrected During Inspection

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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.134(g)(1)(i): 29 CFR 1910.134(g)(1)(i): The employer permitted respirators with tight-fitting facepieces to be worn by employees who have facial hair that came between the sealing surface of the facepiece and the face or interfered with valve function:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were required to use respirators (N95) while painting in the powder coating booths. The employer failed to enforce the proper use of the respirator as required by the Respiratory Protection Standard when allowing employees to use respirators with facial hair that came between the sealing surface of the facepiece and the face.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:

08/30/2019

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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.134(k)(1): The employer did not provide respirator training that ensured that each employee could demonstrate knowledge of at least the following elements: Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator; What the limitations and capabilities of the respirator are; How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions; How to inspect, put on and remove, use, and check the seals of the respirator; What the procedures are for maintenance and storage of the respirator, and How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were required to use respirators (N95) while painting in the powder coating booths. The employer did not provide all employees of training on respirators to ensure the proper use of them, the procedures of maintenance and the limitations of the respirators.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:

08/30/2019

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: 1379024
Inspection Date(s): 02/14/2019 - 03/27/2019
Issuance Date: 08/06/2019



Citation and Notification of Penalty

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Maclcod Dr, Lawrenceville, GA 30043

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

29 CFR 1910.134(c)(2)(i): Respirator users were not provided with the information contained in Appendix D to 29 CFR 1910.134 when the employer determined that any voluntary respirator use was permissible:

Optima Stantron Corp. Div of Elma Electronic Inc., Lawrenceville, GA - On or about 02/14/2019, employees were working in areas such as but no limited to the assembly department, sanding department and welding department were provided with respirators (N95) for voluntary use. The employer did not provide the information contained in the Appendix D of the Respiratory Protection Standard.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:

08/30/2019


William C. Fulcher
Area Director

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
2296 Henderson Mill Road
Suite 200
Atlanta, GA 30345



INVOICE / DEBT COLLECTION NOTICE

Company Name: Optima Stantron Corp. Div of Elma Electronic Inc.
Inspection Site: 1775 Macleod Dr, Lawrenceville, GA 30043
Issuance Date: 08/06/2019

Summary of Penalties for Inspection Number	1379024
Citation 1, Serious	\$53043.00
Citation 2, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES	\$53043.00

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

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

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

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

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

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

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

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



William C. Fulcher

Area Director

08/06/2019

Date