

U.S. Department of Labor
Occupational Safety and Health Administration
200 N. High Street
Room 620
Columbus, OH 43215



Citation and Notification of Penalty

To:
Liberty Casting Company, LLC
and its successors
550 Liberty Road
Delaware, OH 43015

Inspection Number: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019

Inspection Site:
550 Liberty Road
Delaware, OH 43015

7019 0700 0000 9035 5967

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 614-469-5582. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

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

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

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

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

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

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

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

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

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

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

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

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 09/25/2019. The conference will be held by telephone or at the OSHA office located at 200 N.

High Street, Room 620, Columbus, OH 43215 on _____ at

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1390789

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015
Issuance Date: 09/25/2019

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

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

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

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

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

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

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

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

Signature

Date

Typed or Printed Name

Title

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

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

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

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Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.23(b): General requirements for all ladders. The employer must ensure:

29 CFR 1910.23(b)(1): Ladder rungs, steps, and cleats are parallel, level, and uniformly spaced when the ladder is in position for use;

a. On or about May 7, 2019, the fixed ladder used for access to the North Core Room mezzanine platform had ladder rungs that were not parallel, level and uniformly spaced due to damage. The ladder was bent and the lowest three rungs were not parallel, level or spaced uniformly due to the damage.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$5626.00

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: 1390789
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Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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 1910.25(b)(1): (1) Handrails, stair rail systems, and guardrail systems are provided in accordance with 29 CFR 1910.28;

- a. On or about May 30, 2019, the fixed stairway located north of the Mold Wash work station/position on the Main Line conveyor platform was not provided a stair rail system for the open side of the fixed stairway.
- b. On or about May 30, 2019, the fixed stairway located south of the Clean-out work station/position on the Main Line conveyor platform had a stairway rail system that was missing a midrail.

Due to these conditions, employees were subject to low level fall hazards during stairway use to access or egress from the Main Line conveyor platform.

Date By Which Violation Must be Abated: 10/07/2019
Proposed Penalty: \$5626.00

U.S. Department of Labor
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Inspection Number: 1390789
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Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.25(b) Stairways. General requirements. The employer must ensure:

29 CFR 1910.25(b)(3): (3) Stairs have uniform riser heights and tread depths between landings;

a. On or about May 30, 2019, the fixed stairway located south of the Clean-out work station/position on the Main Line conveyor platform had the first tread that was damaged, partially broken apart from the attachment point to the stairwall and was not of uniform riser height. Due to this condition, employees had exposure to a same level trip/fall hazard.

Date By Which Violation Must be Abated:

10/07/2019

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

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.28(b): Protection from fall hazards-

29 CFR 1910.28(b)(1): Unprotected sides and edges.

29 CFR 1910.28(b)(1)(i): Except as provided elsewhere in this section, the employer must ensure that each employee on a walking-working surface with an unprotected side or edge that is 4 feet (1.2 m) or more above a lower level is protected from falling by one or more of the following:

a. On or about May 7, 2019, the employer failed to provide fall protection for unprotected sides of the North Core Room Chemical Storage mezzanine at the center of the south facing side of mezzanine at the "bend" and beside the fixed ladder landing area. Due to these conditions, employees who accessed the platform were exposed to fall hazards of more than 6 feet to the concrete floor below.

Date By Which Violation Must be Abated:
Proposed Penalty:

10/07/2019
\$9377.00



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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 1910.132(c): Design. All personal protective equipment shall be of safe design and construction for the work to be performed.

a. On or about April 8, 2019, general utility gloves coated with latex material were used by employees to perform Flow Coat job duties in coremaking production that included exposure to ignited flammable materials. These duties included spray application of flammable liquids and ignition of the applied flammable liquid with a butane torch. Due to the combustible material composition of the general utility gloves, employees have increased risk for burns to the hand during the performance of required job duties.

b. On or about April 8, 2019, general utility gloves coated with latex material were used by employees to perform Mold Wash job duties in moldmaking production that included exposure to ignited flammable materials. These duties included spray application of flammable liquids and ignition of the applied flammable liquid with a butane torch. Due to the combustible material composition of the general utility gloves, employees have increased risk for burns to the hand during the performance of required job duties.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	10/30/2019
Proposed Penalty:	\$13127.00



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.138(a): General requirements. Employers shall select and require employees to use appropriate hand protection when employees' hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns; and harmful temperature extremes.

- a. On or about April 8, 2019, the employer failed to select and require the use of hand protection against thermal burns for employees in coremaking process areas. Employees were exposed to thermal hazards and had an increased risk for burns due to the lack of appropriate PPE when applying the flammable Flow Coat materials and then igniting the applied material with a butane torch.
- b. On or about April 8, 2019, the employer failed to select and require the use of hand protection against thermal burns for employees in moldmaking process areas. Employees were exposed to thermal hazards and had an increased risk for burns due to the lack of appropriate PPE when applying the flammable Mold Wash materials and then igniting the applied material with a butane torch.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

10/30/2019

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

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Company Name: Liberty Casting Company, LLC
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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 1910.147(d)(2): Machine or equipment shutdown. The machine or equipment shall be turned off or shut down using the procedures established for the machine or equipment. An orderly shutdown must be utilized to avoid any additional or increased hazard(s) to employees as a result of the equipment stoppage.

a. On or about April 30, 2019, the Loop Line Mill Mixer was not turned off, or shut down prior to and in preparation for employees performing work duties covered by this part that included cleaning material from the auger section to "unjam" the material. During these covered activities, the Loop Line Mill Operator and the Loop Line Mill Helper were exposed to caught-in hazards associated with the mechanical energy associated with the internal auger assembly.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$13127.00

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Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.147(f)(3)(ii)(D): Each authorized employee shall affix a personal lockout or tagout device to the group lockout device, group lockbox, or comparable mechanism when he or she begins work, and shall remove those devices when he or she stops working on the machine or equipment being serviced or maintained.

a. On or about April 30, 2019, employees involved with duties covered by this part failed to affix lockout devices or tagout devices prior to performing Loop Line Mill auger mechanism cleanout. During this covered activity, the Mill Operator and the Mill Helper were exposed to caught-in hazards posed by the internal auger mechanism component while the exterior housing (guarding) was removed. The equipment was not powered off, or shutdown during the performance of this activity.

Date By Which Violation Must be Abated:

Corrected During Inspection

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

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.219(f)(3): Sprockets and chains. All sprocket wheels and chains shall be enclosed unless they are more than seven (7) feet above the floor or platform. Where the drive extends over other machine or working areas, protection against falling shall be provided. This subparagraph does not apply to manually operated sprockets.

a. On or about May 30, 2019, there was a missing guard for protecting sprocket wheels and chains on the Main Line conveyor system adjacent to the fixed stairway for access to the Main Line Set-up work area. This unguarded sprocket wheel and chain was approximately three feet from the concrete floor and even with Main Line Set-up platform. Due to this condition, employees were exposed to caught-in and ingoing nip point hazards.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$13127.00

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

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.242(b): Compressed air used for cleaning. Compressed air shall not be used for cleaning purposes except where reduced to less than 30 p.s.i. and then only with effective chip guarding and personal protective equipment.

a. On or about April 30, 2019, compressed air was used for cleaning purposes that was not reduced to an effective pressure of less than 30 psi. A South Core Room employee performing coremaking job duties used a compressed air hand dispensing wand for cleaning that had dead end measured pressure of greater than 44 psi.

b. On or about April 30, 2019, compressed air was used for cleaning purposes that was not reduced to an effective pressure of less than 30 psi. A South Core Room employee used a compressed air hand dispensing wand for cleaning that had dead end measured pressure of greater than 60 psi.

Compressed air use that exceeded 30 psi posed an injection hazard to these employees.

Date By Which Violation Must be Abated:	10/30/2019
Proposed Penalty:	\$5626.00



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.303(b): Examination, installation, and use of equipment --

29 CFR 1910.303(b)(1): Examination. Electric equipment shall be free from recognized hazards that are likely to cause death or serious physical harm to employees. Safety of equipment shall be determined using the following considerations:

29 CFR 1910.303(b)(1)(iv): Electrical insulation;

a. On or about May 7, 2019, the electrical power supply flexible cable used to provide power for the Shaker Table had damaged insulation and was improperly repaired with standard electrical tape. The damaged flexible cable was subject to friction from concrete and metal surfaces and vibrational forces from the movement of the Shaker Table. Due to this condition, employees operating and/or working in close proximity to the Shaker Table controls were exposed to an electrical contact hazard.

b. On or about May 17, 2019, the electrical power supply flexible cable used to provide power for a limit switch on the Loop Line conveyor near the Clean-Out position had been damaged, was spliced and was improperly repaired with standard electrical tape. The damaged flexible cable was laying on the floor of the work area. Due to this condition, Loop Line employees were exposed to an electrical contact hazard.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$9377.00

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

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Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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 9 a Type of Violation: **Serious**

29 CFR 1910.305(a)(2)(x): Flexible cords and cables shall be protected from accidental damage, as might be caused, for example, by sharp corners, projections, and doorways or other pinch points.

a. On or about May 7, 2019, the flexible cord electrical power supply for the Shaker Table was laid on the floor and run across a short peaked concrete wall then into the Shaker Table. The flexible cord passed over metal projections atop the peaked concrete wall, passed over the housing wall of the exterior of the Shaker Table and was subject to pinch points associated with the Shaker Table vibrational mechanisms without protection from damage. Due to this condition, employees have exposure to potential electrical contact hazards.

Date By Which Violation Must be Abated:
Proposed Penalty:

10/30/2019
\$9377.00

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.305(a)(2)(xi): Cable assemblies and flexible cords and cables shall be supported in place at intervals that ensure that they will be protected from physical damage. Support shall be in the form of staples, cables ties, straps, or similar type fittings installed so as not to cause damage.

a. On or about May 7, 2019, the flexible cord electrical power supply for the Shaker Table was laid on the floor and run across a short peaked concrete wall then into the Shaker Table. The flexible cord was not supported to ensure protection from damage. Due to this condition, employees have exposure to potential electrical contact hazards.

Date By Which Violation Must be Abated:

10/30/2019

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

Company Name: Liberty Casting Company, LLC
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Citation 1 Item 10 Type of Violation: **Serious**

29 CFR 1910.305(b)(2)(i): All pull boxes, junction boxes, and fittings shall be provided with covers identified for the purpose. If metal covers are used, they shall be grounded. In completed installations, each outlet box shall have a cover, faceplate, or fixture canopy. Covers of outlet boxes having holes through which flexible cord pendants pass shall be provided with bushings designed for the purpose or shall have smooth, well-rounded surfaces on which the cords may bear.

a. On or about May 7, 2019, Shake-Out department employees were exposed to live electric parts due to the damaged electrical junction box for the Shake-Out Table electrical power supply located on a structural steel beam at the aisleway just east of the Shaker Table. The hinged cover for the enclosure was damaged and unable to close. Due to this condition, employees operating the Shaker Table controls which were located 3-4 inches below the open live parts were exposed to an electrical contact hazard.

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\$13127.00

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Company Name: Liberty Casting Company, LLC
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Citation 1 Item 11 Type of Violation: **Serious**

29 CFR 1910.305(g)(2): Identification, splices, and terminations.

29 CFR 1910.305(g)(2)(iii): Flexible cords and cables shall be connected to devices and fittings so that strain relief is provided that will prevent pull from being directly transmitted to joints or terminal screws.

a. On or about April 8, 2019, the strain relief device was damaged and pulled apart for the electrical power supply entering the motor housing junction box for the Rod Bending Machine in the Shake-out department. Due to this condition, the Rod Bending Machine Operator was exposed to an electrical contact hazard.

Date By Which Violation Must be Abated:
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10/07/2019
\$9377.00



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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 12 a Type of Violation: **Serious**

29 CFR 1910.1053(c): Permissible exposure limit (PEL). The employer shall ensure that no employee is exposed to an airborne concentration of respirable crystalline silica in excess of 50 micrograms per cubic meter, calculated as an 8-hour TWA.

a. On or about April 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Mill Operator duties. The employee was exposed to a concentration of 100.78 micrograms per cubic meter as an 8-hour time weighted average during the 474 minute sampling period which was approximately 2.01 times the PEL. Zero exposure was assumed for the six minutes not sampled.

b. On or about April 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Big Mill Operator duties. The employee was exposed to a concentration of 87.62 micrograms per cubic meter as an 8-hour time weighted average during the 478 minute sampling period which was approximately 1.75 times the PEL. Zero exposure was assumed for the two minutes not sampled.

c. On or about April 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Trim Core Mill Operator duties. The employee was exposed to a concentration of 89.03 micrograms per cubic meter as an 8-hour time weighted average during the 473 minute sampling period which was approximately 1.78 times the PEL. Zero exposure was assumed for the seven minutes not sampled.

d. On or about April 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Mill Operator Helper duties. The employee was exposed to a concentration of 122.22 micrograms per cubic meter as an 8-hour time weighted average during the 477 minute sampling period which was approximately 2.44 times the PEL. Zero exposure was assumed for the three minutes not sampled.

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e. On or about April 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Mill Operator Helper duties. The employee was exposed to a concentration of 113.18 micrograms per cubic meter as an 8-hour time weighted average during the 442 minute sampling period which was approximately 2.26 times the PEL. Zero exposure was assumed for the 38 minutes not sampled.

f. On or about April 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Flask Line Mill Operator duties. The employee was exposed to a concentration of 136.89 micrograms per cubic meter as an 8-hour time weighted average during the 471 minute sampling period which was approximately 2.74 times the PEL. Zero exposure was assumed for the nine minutes not sampled.

g. On or about April 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Flask Line Mill Helper duties. The employee was exposed to a concentration of 75.53 micrograms per cubic meter as an 8-hour time weighted average during the 380 minute sampling period which was approximately 1.51 times the PEL. Zero exposure was assumed for the 100 minutes not sampled.

h. On or about April 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Flask Line Mill Helper duties. The employee was exposed to a concentration of 95.93 micrograms per cubic meter as an 8-hour time weighted average during the 466 minute sampling period which was approximately 1.92 times the PEL. Zero exposure was assumed for the fourteen minutes not sampled.

i. On or about April 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Chromite Room Mill Operator duties. The employee was exposed to a concentration of 71.53 micrograms per cubic meter as an 8-hour time weighted average during the 469 minute sampling period which was approximately 1.43 times the PEL. Zero exposure was assumed for the eleven minutes not sampled.

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Company Name: Liberty Casting Company, LLC
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- j. On or about May 7, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Shake-out Bobcat Operator duties. The employee was exposed to a concentration of 200.4 micrograms per cubic meter as an 8-hour time weighted average during the 461 minute sampling period which was approximately 4.01 times the PEL. Zero exposure was assumed for the nineteen minutes not sampled.
- k. On or about May 7, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Shake-out Rod Bender Machine Operator duties. The employee was exposed to a concentration of 95.98 micrograms per cubic meter as an 8-hour time weighted average during the 461 minute sampling period which was approximately 1.92 times the PEL. Zero exposure was assumed for the nineteen minutes not sampled.
- l. On or about May 7, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Shake-out Float/Shaker Table Operator duties. The employee was exposed to a concentration of 112.93 micrograms per cubic meter as an 8-hour time weighted average during the 446 minute sampling period which was approximately 2.26 times the PEL. Zero exposure was assumed for the 34 minutes not sampled.
- m. On or about May 7, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Shake-out Forklift Operator duties. The employee was exposed to a concentration of 164.83 micrograms per cubic meter as an 8-hour time weighted average during the 468 minute sampling period which was approximately 3.29 times the PEL. Zero exposure was assumed for the twelve minutes not sampled.
- n. On or about May 17, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Mill Operator duties. The employee was exposed to a concentration of 132.53 micrograms per cubic meter as an 8-hour time weighted average during the 476 minute sampling period which was approximately 2.65 times the PEL. Zero exposure was assumed for the four minutes not sampled.

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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Company Name: Liberty Casting Company, LLC
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o. On or about May 17, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Closer duties. The employee was exposed to a concentration of 121.73 micrograms per cubic meter as an 8-hour time weighted average during the 470 minute sampling period which was approximately 2.43 times the PEL. Zero exposure was assumed for the ten minutes not sampled.

p. On or about May 17, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Clean-out duties. The employee was exposed to a concentration of 101.78 micrograms per cubic meter as an 8-hour time weighted average during the 457 minute sampling period which was approximately 2.04 times the PEL. Zero exposure was assumed for the 23 minutes not sampled.

q. On or about May 17, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Mold Wash duties. The employee was exposed to a concentration of 158.75 micrograms per cubic meter as an 8-hour time weighted average during the 450 minute sampling period which was approximately 3.18 times the PEL. Zero exposure was assumed for the 30 minutes not sampled.

r. On or about May 17, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Roll Over Operator duties. The employee was exposed to a concentration of 99.86 micrograms per cubic meter as an 8-hour time weighted average during the 471 minute sampling period which was approximately 1.99 times the PEL. Zero exposure was assumed for the nine minutes not sampled.

s. On or about May 17, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Mill Operator Helper duties. The employee was exposed to a concentration of 119.89 micrograms per cubic meter as an 8-hour time weighted average during the 474 minute sampling period which was approximately 2.39 times the PEL. Zero exposure was assumed for the six minutes not sampled.

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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t. On or about May 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Mill Operator Helper duties. The employee was exposed to a concentration of 58.23 micrograms per cubic meter as an 8-hour time weighted average during the 476 minute sampling period which was approximately 1.16 times the PEL. Zero exposure was assumed for the four minutes not sampled.

u. On or about May 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Set-up duties. The employee was exposed to a concentration of 92.61 micrograms per cubic meter as an 8-hour time weighted average during the 467 minute sampling period which was approximately 1.85 times the PEL. Zero exposure was assumed for the thirteen minutes not sampled.

v. On or about May 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Clean-out duties. The employee was exposed to a concentration of 61.48 micrograms per cubic meter as an 8-hour time weighted average during the 475 minute sampling period which was approximately 1.23 times the PEL. Zero exposure was assumed for the five minutes not sampled.

w. On or about May 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Mold Wash duties. The employee was exposed to a concentration of 100.41 micrograms per cubic meter as an 8-hour time weighted average during the 469 minute sampling period which was approximately 2.01 times the PEL. Zero exposure was assumed for the eleven minutes not sampled.

x. On or about May 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Core Setter duties. The employee was exposed to a concentration of 132.13 micrograms per cubic meter as an 8-hour time weighted average during the 466 minute sampling period which was approximately 2.64 times the PEL. Zero exposure was assumed for the fourteen minutes not sampled.



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Company Name: Liberty Casting Company, LLC
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y. On or about May 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Core Setter duties. The employee was exposed to a concentration of 116.25 micrograms per cubic meter as an 8-hour time weighted average during the 462 minute sampling period which was approximately 2.32 times the PEL. Zero exposure was assumed for the eighteen minutes not sampled.

z. On or about June 6, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Mill Operator Helper duties. The employee was exposed to a concentration of 98.35 micrograms per cubic meter as an 8-hour time weighted average during the 456 minute sampling period which was approximately 1.97 times the PEL. Zero exposure was assumed for the 24 minutes not sampled.

aa. On or about June 6, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Trim Core Mill Table/Numbers duties. The employee was exposed to a concentration of 69.70 micrograms per cubic meter as an 8-hour time weighted average during the 451 minute sampling period which was approximately 1.39 times the PEL. Zero exposure was assumed for the 29 minutes not sampled.

bb. On or about June 6, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Trim Core Mill Operator duties. The employee was exposed to a concentration of 65.71 micrograms per cubic meter as an 8-hour time weighted average during the 466 minute sampling period which was approximately 1.31 times the PEL. Zero exposure was assumed for the fourteen minutes not sampled.

cc. On or about June 6, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Set-up duties. The employee was exposed to a concentration of 68.92 micrograms per cubic meter as an 8-hour time weighted average during the 476 minute sampling period which was approximately 1.38 times the PEL. Zero exposure was assumed for the four minutes not sampled.



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
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dd. On or about June 6, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Grey Flow Coat/Finisher duties. The employee was exposed to a concentration of 63.97 micrograms per cubic meter as an 8-hour time weighted average during the 473 minute sampling period which was approximately 1.28 times the PEL. Zero exposure was assumed for the seven minutes not sampled.

ee. On or about June 6, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Blue Flow Coat/Finisher duties. The employee was exposed to a concentration of 65.26 micrograms per cubic meter as an 8-hour time weighted average during the 468 minute sampling period which was approximately 1.31 times the PEL. Zero exposure was assumed for the twelve minutes not sampled.

ff. On or about June 6, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Crane Operator duties. The employee was exposed to a concentration of 61.05 micrograms per cubic meter as an 8-hour time weighted average during the 475 minute sampling period which was approximately 1.22 times the PEL. Zero exposure was assumed for the five minutes not sampled.

Silicosis and cancer are illnesses associated with exposure to airborne respirable crystalline silica.

PPE October 30, 2019
Plan December 30, 2019
Engineering Controls March 30, 2020

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/30/2020
Proposed Penalty:	\$13127.00



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.1053(f)(1): Methods of compliance-(1) Engineering and work practice controls. The employer shall use engineering and work practice controls to reduce and maintain employee exposure to respirable crystalline silica to or below the PEL, unless the employer can demonstrate that such controls are not feasible. Wherever such feasible engineering and work practice controls are not sufficient to reduce employee exposure to or below the PEL, the employer shall nonetheless use them to reduce employee exposure to the lowest feasible level and shall supplement them with the use of respiratory protection that complies with the requirements of paragraph (g) of this section.

The employer failed to implement engineering and work practice controls to assure employee exposure to respirable crystalline silica was below the permissible exposure limit. Employees with exposure in excess of the PEL included, but is not limited to, the following documented employee exposures:

- a. On or about April 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Mill Operator duties. The employee was exposed to a concentration of 100.78 micrograms per cubic meter as an 8-hour time weighted average during the 474 minute sampling period which was approximately 2.01 times the PEL. Zero exposure was assumed for the six minutes not sampled.
- b. On or about April 30, 2019, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Big Mill Operator duties. The employee was exposed to a concentration of 87.62 micrograms per cubic meter as an 8-hour time weighted average during the 478 minute sampling period which was approximately 1.75 times the PEL. Zero exposure was assumed for the two minutes not sampled.
- c. On or about April 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Trim Core Mill Operator duties. The employee was exposed to a concentration of 89.03 micrograms per cubic meter as an 8-hour time weighted average during the 473 minute sampling period which was approximately 1.78 times the PEL. Zero exposure was assumed for the seven minutes not sampled.

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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d. On or about April 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Mill Operator Helper duties. The employee was exposed to a concentration of 122.22 micrograms per cubic meter as an 8-hour time weighted average during the 477 minute sampling period which was approximately 2.44 times the PEL. Zero exposure was assumed for the three minutes not sampled.

e. On or about April 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Mill Operator Helper duties. The employee was exposed to a concentration of 113.18 micrograms per cubic meter as an 8-hour time weighted average during the 442 minute sampling period which was approximately 2.26 times the PEL. Zero exposure was assumed for the 38 minutes not sampled.

f. On or about April 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Flask Line Mill Operator duties. The employee was exposed to a concentration of 136.89 micrograms per cubic meter as an 8-hour time weighted average during the 471 minute sampling period which was approximately 2.74 times the PEL. Zero exposure was assumed for the nine minutes not sampled.

g. On or about April 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Flask Line Mill Helper duties. The employee was exposed to a concentration of 75.53 micrograms per cubic meter as an 8-hour time weighted average during the 380 minute sampling period which was approximately 1.51 times the PEL. Zero exposure was assumed for the 100 minutes not sampled.

h. On or about April 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Flask Line Mill Helper duties. The employee was exposed to a concentration of 95.93 micrograms per cubic meter as an 8-hour time weighted average during the 466 minute sampling period which was approximately 1.92 times the PEL. Zero exposure was assumed for the fourteen minutes not sampled.



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- i. On or about April 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Chromite Room Mill Operator duties. The employee was exposed to a concentration of 71.53 micrograms per cubic meter as an 8-hour time weighted average during the 469 minute sampling period which was approximately 1.43 times the PEL. Zero exposure was assumed for the eleven minutes not sampled.
- j. On or about May 7, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Shake-out Bobcat Operator duties. The employee was exposed to a concentration of 200.4 micrograms per cubic meter as an 8-hour time weighted average during the 461 minute sampling period which was approximately 4.01 times the PEL. Zero exposure was assumed for the nineteen minutes not sampled.
- k. On or about May 7, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Shake-out Rod Bender Machine Operator duties. The employee was exposed to a concentration of 95.98 micrograms per cubic meter as an 8-hour time weighted average during the 461 minute sampling period which was approximately 1.92 times the PEL. Zero exposure was assumed for the nineteen minutes not sampled.
- l. On or about May 7, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Shake-out Float/Shaker Table Operator duties. The employee was exposed to a concentration of 112.93 micrograms per cubic meter as an 8-hour time weighted average during the 446 minute sampling period which was approximately 2.26 times the PEL. Zero exposure was assumed for the 34 minutes not sampled.
- m. On or about May 7, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Shake-out Forklift Operator duties. The employee was exposed to a concentration of 164.83 micrograms per cubic meter as an 8-hour time weighted average during the 468 minute sampling period which was approximately 3.29 times the PEL. Zero exposure was assumed for the twelve minutes not sampled.

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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Company Name: Liberty Casting Company, LLC
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n. On or about May 17, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Mill Operator duties. The employee was exposed to a concentration of 132.53 micrograms per cubic meter as an 8-hour time weighted average during the 476 minute sampling period which was approximately 2.65 times the PEL. Zero exposure was assumed for the four minutes not sampled.

o. On or about May 17, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Closer duties. The employee was exposed to a concentration of 121.73 micrograms per cubic meter as an 8-hour time weighted average during the 470 minute sampling period which was approximately 2.43 times the PEL. Zero exposure was assumed for the ten minutes not sampled.

p. On or about May 17, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Clean-out duties. The employee was exposed to a concentration of 101.78 micrograms per cubic meter as an 8-hour time weighted average during the 457 minute sampling period which was approximately 2.04 times the PEL. Zero exposure was assumed for the 23 minutes not sampled.

q. On or about May 17, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Mold Wash duties. The employee was exposed to a concentration of 158.75 micrograms per cubic meter as an 8-hour time weighted average during the 450 minute sampling period which was approximately 3.18 times the PEL. Zero exposure was assumed for the 30 minutes not sampled.

r. On or about May 17, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Roll Over Operator duties. The employee was exposed to a concentration of 99.86 micrograms per cubic meter as an 8-hour time weighted average during the 471 minute sampling period which was approximately 1.99 times the PEL. Zero exposure was assumed for the nine minutes not sampled.

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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s. On or about May 17, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Mill Operator Helper duties. The employee was exposed to a concentration of 119.89 micrograms per cubic meter as an 8-hour time weighted average during the 474 minute sampling period which was approximately 2.39 times the PEL. Zero exposure was assumed for the six minutes not sampled.

t. On or about May 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Mill Operator Helper duties. The employee was exposed to a concentration of 58.23 micrograms per cubic meter as an 8-hour time weighted average during the 476 minute sampling period which was approximately 1.16 times the PEL. Zero exposure was assumed for the four minutes not sampled.

u. On or about May 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Set-up duties. The employee was exposed to a concentration of 92.61 micrograms per cubic meter as an 8-hour time weighted average during the 467 minute sampling period which was approximately 1.85 times the PEL. Zero exposure was assumed for the thirteen minutes not sampled.

v. On or about May 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Clean-out duties. The employee was exposed to a concentration of 61.48 micrograms per cubic meter as an 8-hour time weighted average during the 475 minute sampling period which was approximately 1.23 times the PEL. Zero exposure was assumed for the five minutes not sampled.

w. On or about May 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Mold Wash duties. The employee was exposed to a concentration of 100.41 micrograms per cubic meter as an 8-hour time weighted average during the 469 minute sampling period which was approximately 2.01 times the PEL. Zero exposure was assumed for the eleven minutes not sampled.



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Company Name: Liberty Casting Company, LLC
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x. On or about May 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Core Setter duties. The employee was exposed to a concentration of 132.13 micrograms per cubic meter as an 8-hour time weighted average during the 466 minute sampling period which was approximately 2.64 times the PEL. Zero exposure was assumed for the fourteen minutes not sampled.

y. On or about May 30, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Main Line Core Setter duties. The employee was exposed to a concentration of 116.25 micrograms per cubic meter as an 8-hour time weighted average during the 462 minute sampling period which was approximately 2.32 times the PEL. Zero exposure was assumed for the eighteen minutes not sampled.

z. On or about June 6, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing Loop Line Mill Operator Helper duties. The employee was exposed to a concentration of 98.35 micrograms per cubic meter as an 8-hour time weighted average during the 456 minute sampling period which was approximately 1.97 times the PEL. Zero exposure was assumed for the 24 minutes not sampled.

aa. On or about June 6, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Trim Core Mill Table/Numbers duties. The employee was exposed to a concentration of 69.70 micrograms per cubic meter as an 8-hour time weighted average during the 451 minute sampling period which was approximately 1.39 times the PEL. Zero exposure was assumed for the 29 minutes not sampled.

bb. On or about June 6, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Trim Core Mill Operator duties. The employee was exposed to a concentration of 65.71 micrograms per cubic meter as an 8-hour time weighted average during the 466 minute sampling period which was approximately 1.31 times the PEL. Zero exposure was assumed for the fourteen minutes not sampled.

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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cc. On or about June 6, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Set-up duties. The employee was exposed to a concentration of 68.92 micrograms per cubic meter as an 8-hour time weighted average during the 476 minute sampling period which was approximately 1.38 times the PEL. Zero exposure was assumed for the four minutes not sampled.

dd. On or about June 6, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Grey Flow Coat/Finisher duties. The employee was exposed to a concentration of 63.97 micrograms per cubic meter as an 8-hour time weighted average during the 473 minute sampling period which was approximately 1.28 times the PEL. Zero exposure was assumed for the seven minutes not sampled.

ee. On or about June 6, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Blue Flow Coat/Finisher duties. The employee was exposed to a concentration of 65.26 micrograms per cubic meter as an 8-hour time weighted average during the 468 minute sampling period which was approximately 1.31 times the PEL. Zero exposure was assumed for the twelve minutes not sampled.

ff. On or about June 6, an employee was exposed to airborne respirable crystalline silica that exceeded the PEL while performing South Core Room Crane Operator duties. The employee was exposed to a concentration of 61.05 micrograms per cubic meter as an 8-hour time weighted average during the 475 minute sampling period which was approximately 1.22 times the PEL. Zero exposure was assumed for the five minutes not sampled.

Silicosis and cancer are illnesses associated with exposure to airborne respirable crystalline silica.



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

ABATEMENT NOTE

Step 1

Abatement due October 30, 2019

Immediately develop and implement an effective respiratory protection program that complies with the OSHA respiratory protection standard, 29 CFR 1910.134.

Step 2

Abatement due December 30, 2019

Submit to the Area Director a written, detailed plan of abatement outlining a schedule for the implementation of engineering and/or administrative measures to control employee exposure to hazardous substances as referenced in this citation. This plan shall include, at a minimum, target dates for following actions, which must be consistent with the abatement dates required by this citation:

1. Evaluation and listing of engineering control options;
2. Selection and criteria for selection of optimum control methods and subsequent completion of selected control design;
3. Procurement of equipment and materials associated with installation, installation and operation of selected control measures;
4. Testing, and acceptance, or modification/supplementation/redesign of controls;
5. All proposed control measures shall be approved by a competent industrial hygienist, competent industrial ventilation specialist experienced in complex processes or other technically qualified person.

Step 3

Abatement due March 30, 2020

Abatement shall have been completed by the implementation of feasible engineering and/or administrative controls upon verification of their effectiveness in achieving compliance.



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Company Name: Liberty Casting Company, LLC
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Feasible administrative and/or engineering controls could include but the employer is not bound by or limited to, the following:

1. Equip processes with local exhaust capture ventilation such as, but not limited to, downdraft collection tables or collection points, hooded ventilation at designated worker positions and slotted capture ventilation at emission points;
2. Improve existing local exhaust ventilation systems in the Shake-Out department by increasing efficiency of collection with increased air movement by installation of targeted make-up air systems, by modifying existing ductwork and duct systems, by increasing fan motor/collector capacities and/or by modifying or upgrading existing equipment;
3. Develop an inspection and maintenance program to assure continual control of airborne material available for inhalation from delivery, storage and collection systems focused on elimination of unintentional releases into the work space related to material transportation streams;
4. Implement vacuum systems use (portable and/or house systems) for cleaning work surfaces and employee clothing. Eliminate the use of compressed air for cleaning purposes of work areas and personnel
5. Develop work practices incorporated as standard operating procedures to reduce emissions of airborne material available for inhalation focused on reduction of compressed air use in production quality assurance programs, i.e. the removal of sand for surface finish castings quality issues.
6. Provide enclosed and ventilated cabs for the Bobcat and Forklift Operator equipment utilized in the Shake-Out department. Equip the ventilation systems for the operator cabs with high-efficiency particulate air mechanical filtration.

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: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

PPE October 30, 2019
Plan December 30, 2019
Engineering Controls March 30, 2020

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

03/30/2020

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.1053(g)(1): Respiratory protection-(1) General. Where respiratory protection is required by this section, the employer must provide each employee an appropriate respirator that complies with the requirements of this paragraph and 29 CFR 1910.134. The employer failed to require respiratory protection and implement a respiratory protection program that complied with 29 CFR 1910.134 for employees with exposures that exceeded the permissible exposure limit (PEL) for respirable silica. Documented exposures included:

- a. On April 30, 2019, an employee in the Loop Line area performing Mill Operator job duties (see Citation 1 item 12 instance a. for exposure information,)
- b. On April 30, 2019, an employee in the South Core Room performing Big Mill Operator job duties (see Citation 1 item 12 instance b. for exposure information,)
- c. On April 30, 2019, an employee in the South Core Room performing Trim Core Mill Operator job duties (see Citation 1 item 12 instance c. for exposure information,)
- d. On April 30, 2019, an employee in the Main Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance d. for exposure information,)
- e. On April 30, 2019, an employee in the Loop Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance e. for exposure information,)
- f. On April 30, 2019, an employee in the Flask Line area performing Mill Operator job duties (see Citation 1 item 12 instance f. for exposure information,)
- g. On April 30, 2019, an employee in the Flask Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance g. for exposure information,)
- h. On April 30, 2019, an employee in the Flask Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance h. for exposure information,)

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

- i. On April 30, 2019, an employee in the Chromite area performing Mill Operator job duties (see Citation 1 item 12 instance i. for exposure information,)
- j. On May 7, 2019, an employee in the Shake-out area performing Bobcat Operator job duties (see Citation 1 item 12 instance j. for exposure information,)
- k. On May 7, 2019, an employee in the Shake-out area performing Rob Bender Machine Operator job duties (see Citation 1 item 12 instance k. for exposure information,)
- l. On May 7, 2019, an employee in the Shake-out area performing Float/Shaker Table job duties (see Citation 1 item 12 instance l. for exposure information,)
- m. On May 7, 2019, an employee in the Shake-out area performing Forklift Operator job duties (see Citation 1 item 12 instance m. for exposure information,)
- n. On May 17, 2019, an employee in the Loop Line area performing Mill Operator job duties (see Citation 1 item 12 instance n. for exposure information,)
- o. On May 17, 2019, an employee in the Loop Line area performing Closer job duties (see Citation 1 item 12 instance o. for exposure information,)
- p. On May 17, 2019, an employee in the Loop Line area performing Clean-out job duties (see Citation 1 item 12 instance p. for exposure information,)
- q. On May 17, 2019, an employee in the Loop Line area performing Mold Wash job duties (see Citation 1 item 12 instance q. for exposure information,)
- r. On May 17, 2019, an employee in the Loop Line area performing Roll Over Operator job duties (see Citation 1 item 12 instance r. for exposure information,)
- s. On May 17, 2019, an employee in the Loop Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance s. for exposure information,)

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: Liberty Casting Company, LLC
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- t. On May 30, 2019, an employee in the Main Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance t. for exposure information,)
- u. On May 30, 2019, an employee in the Main Line area performing Set-up job duties (see Citation 1 item 12 instance u. for exposure information,)
- v. On May 30, 2019, an employee in the Main Line area performing Clean-out job duties (see Citation 1 item 12 instance v. for exposure information,)
- w. On May 30, 2019, an employee in the Main Line area performing Mold Wash job duties (see Citation 1 item 12 instance w. for exposure information,)
- x. On May 30, 2019, an employee in the Main Line area performing Core Setter job duties (see Citation 1 item 12 instance x. for exposure information,)
- y. On May 30, 2019, an employee in the Main Line area performing Core Setter job duties (see Citation 1 item 12 instance y. for exposure information,)
- z. On June 6, 2019, an employee in the Loop Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance z. for exposure information,)
- aa. On June 6, 2019, an employee in the South Core Room performing Trim Core Mill Table/Number job duties (see Citation 1 item 12 instance aa. for exposure information,)
- bb. On June 6, 2019, an employee in the South Core Room performing Trim Core Mill Operator job duties (see Citation 1 item 12 instance bb. for exposure information,)
- cc. On June 6, 2019, an employee in the South Core Room performing Set-up job duties (see Citation 1 item 12 instance cc. for exposure information,)
- dd. On June 6, 2019, an employee in the South Core Room performing Grey Flow Coat/Finisher job duties (see Citation 1 item 12 instance dd. for exposure information,)

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: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

ee. On June 6, 2019, an employee in the South Core Room performing Blue Flow Coat/Finisher job duties (see Citation 1 item 12 instance ee. for exposure information,)

ff. On June 6, 2019, an employee in the South Core Room performing Crane Operator job duties (see Citation 1 item 12 instance ff. for exposure information.)

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

10/30/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.1053(g)(1): Respiratory protection. General. Where respiratory protection is required by this section, the employer must provide each employee an appropriate respirator that complies with the requirements of this paragraph and 29 CFR 1910.134. Respiratory protection is required:

29 CFR 1910.1053(g)(1)(iv): During periods when the employee is in a regulated area.

On or about April 30, 2019, the employer failed to require respiratory protection use for employees who worked in regulated areas with silica exposure that exceeded the permissible exposure limit. Regulated areas and respiratory protection use was required due to the following documented employee exposures:

- a. On April 30, 2019, an employee in the Loop Line area performing Mill Operator job duties (see Citation 1 item 12 instance a. for exposure information,)
- b. On April 30, 2019, an employee in the South Core Room performing Big Mill Operator job duties (see Citation 1 item 12 instance b. for exposure information,)
- c. On April 30, 2019, an employee in the South Core Room performing Trim Core Mill Operator job duties (see Citation 1 item 12 instance c. for exposure information,)
- d. On April 30, 2019, an employee in the Main Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance d. for exposure information,)
- e. On April 30, 2019, an employee in the Loop Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance e. for exposure information,)
- f. On April 30, 2019, an employee in the Flask Line area performing Mill Operator job duties (see Citation 1 item 12 instance f. for exposure information,)
- g. On April 30, 2019, an employee in the Flask Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance g. for exposure information,)

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

- h. On April 30, 2019, an employee in the Flask Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance h. for exposure information,)
- i. On April 30, 2019, an employee in the Chromite area performing Mill Operator job duties (see Citation 1 item 12 instance i. for exposure information,)
- j. On May 7, 2019, an employee in the Shake-out area performing Bobcat Operator job duties (see Citation 1 item 12 instance j. for exposure information,)
- k. On May 7, 2019, an employee in the Shake-out area performing Rob Bender Machine Operator job duties (see Citation 1 item 12 instance k. for exposure information,)
- l. On May 7, 2019, an employee in the Shake-out area performing Float/Shaker Table job duties (see Citation 1 item 12 instance l. for exposure information,)
- m. On May 7, 2019, an employee in the Shake-out area performing Forklift Operator job duties (see Citation 1 item 12 instance m. for exposure information,)
- n. On May 17, 2019, an employee in the Loop Line area performing Mill Operator job duties (see Citation 1 item 12 instance n. for exposure information,)
- o. On May 17, 2019, an employee in the Loop Line area performing Closer job duties (see Citation 1 item 12 instance o. for exposure information,)
- p. On May 17, 2019, an employee in the Loop Line area performing Clean-out job duties (see Citation 1 item 12 instance p. for exposure information,)
- q. On May 17, 2019, an employee in the Loop Line area performing Mold Wash job duties (see Citation 1 item 12 instance q. for exposure information,)
- r. On May 17, 2019, an employee in the Loop Line area performing Roll Over Operator job duties (see Citation 1 item 12 instance r. for exposure information,)

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

- s. On May 17, 2019, an employee in the Loop Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance s. for exposure information,)
- t. On May 30, 2019, an employee in the Main Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance t. for exposure information,)
- u. On May 30, 2019, an employee in the Main Line area performing Set-up job duties (see Citation 1 item 12 instance u. for exposure information,)
- v. On May 30, 2019, an employee in the Main Line area performing Clean-out job duties (see Citation 1 item 12 instance v. for exposure information,)
- w. On May 30, 2019, an employee in the Main Line area performing Mold Wash job duties (see Citation 1 item 12 instance w. for exposure information,)
- x. On May 30, 2019, an employee in the Main Line area performing Core Setter job duties (see Citation 1 item 12 instance x. for exposure information,)
- y. On May 30, 2019, an employee in the Main Line area performing Core Setter job duties (see Citation 1 item 12 instance y. for exposure information,)
- z. On June 6, 2019, an employee in the Loop Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance z. for exposure information,)
- aa. On June 6, 2019, an employee in the South Core Room performing Trim Core Mill Table/Number job duties (see Citation 1 item 12 instance aa. for exposure information,)
- bb. On June 6, 2019, an employee in the South Core Room performing Trim Core Mill Operator job duties (see Citation 1 item 12 instance bb. for exposure information,)
- cc. On June 6, 2019, an employee in the South Core Room performing Set-up job duties (see Citation 1 item 12 instance cc. for exposure information,)

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

dd. On June 6, 2019, an employee in the South Core Room performing Grey Flow Coat/Finisher job duties (see Citation 1 item 12 instance dd. for exposure information,)

ee. On June 6, 2019, an employee in the South Core Room performing Blue Flow Coat/Finisher job duties (see Citation 1 item 12 instance ee. for exposure information,)

ff. On June 6, 2019, an employee in the South Core Room performing Crane Operator job duties (see Citation 1 item 12 instance ff. for exposure information.)

Due to the failure to require respiratory protection use as part of a respiratory protection program that complied with this part, employees were at increased risk for silicosis and lung cancer associated with the inhalation hazards associated with respirable quartz silica.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 10/30/2019

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

Inspection Number: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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 13 a Type of Violation: **Serious**

29 CFR 1910.1053(d)(1): Exposure assessment-(1) General. The employer shall assess the exposure of each employee who is or may reasonably be expected to be exposed to respirable crystalline silica at or above the action level in accordance with either the performance option in paragraph (d)(2) or the scheduled monitoring option in paragraph (d)(3) of this section.

a. On or about April 8, 2019, the employer failed to perform an exposure assessment for all employees who performed the job tasks in work areas where exposure to respirable crystalline silica at or above the action level was reasonably expected. Employees performed the following job tasks/classifications without an exposure assessment required by this part that included, but were not limited to: Main Mill Line Helper, Main Mill Line Clean-out, Main Mill Line Flow Coat, Main Mill Line Set-up, Main Mill Line Core Setters, Loop Line Helper, Loop Line Set-up, Loop Line Roll Over Operator, Loop Line Clean Out, Loop Line Flow Coat, Loop Line Closer, Loop Line Set-up, South Core Room Set-up, South Core Room Crane, South Core Room Trim Core Numbers/Table, South Core Room Blue Flow Coat/Finisher, North Core Room Helper, North Core Room Lead, Shake-out Rod Machine Operator, Shake-out Bobcat Operator, Shake-out Forklift Operator, Shake-out Float/Shaker Table Operator, Chromite Room Helper, Chromite Room Finisher and Maintenance.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/29/2019
Proposed Penalty:	\$13127.00

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

Citation 1 Item 13 b Type of Violation: **Serious**

29 CFR 1910.1053(d)(6)(i): Employee notification of assessment results. (i) Within 15 working days after completing an exposure assessment in accordance with paragraph (d) of this section, the employer shall individually notify each affected employee in writing of the results of that assessment or post the results in an appropriate location accessible to all affected employees.

On or about and after May 7, 2019, the employer had failed to notify employees of exposure assessment results. On the following 4 occasions the employer performed air monitoring for determination of employee exposure assessment of airborne respirable crystalline silica and failed to provide any employee notifications of the results:

- a. May 7, 2019,
- b. May 17, 2019,
- c. May 30, 2019, and
- d. June 6, 2019.

Due to the failure to notify employees monitored on these dates of the respective exposure assessment results; employees were not aware that individual exposures exceeded the permissible exposure limit for respirable silica. Inhalation hazards associated with respirable silica included increased risk for silicosis and cancer.

Date By Which Violation Must be Abated:

10/07/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.1053(e)(1): Regulated areas-(1) Establishment. The employer shall establish a regulated area wherever an employee's exposure to airborne concentrations of respirable crystalline silica is, or can reasonably be expected to be, in excess of the PEL.

The employer failed to establish and implement regulated areas for employees with exposure that exceeded the respirable crystalline silica PEL for the following documented employee exposures:

- a. On April 30, 2019, an employee in the Loop Line area performing Mill Operator job duties (see Citation 1 item 12 instance a. for exposure information,)
- b. On April 30, 2019, an employee in the South Core Room performing Big Mill Operator job duties (see Citation 1 item 12 instance b. for exposure information,)
- c. On April 30, 2019, an employee in the South Core Room performing Trim Core Mill Operator job duties (see Citation 1 item 12 instance c. for exposure information,)
- d. On April 30, 2019, an employee in the Main Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance d. for exposure information,)
- e. On April 30, 2019, an employee in the Loop Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance e. for exposure information,)
- f. On April 30, 2019, an employee in the Flask Line area performing Mill Operator job duties (see Citation 1 item 12 instance f. for exposure information,)
- g. On April 30, 2019, an employee in the Flask Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance g. for exposure information,)
- h. On April 30, 2019, an employee in the Flask Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance h. for exposure information,)

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

- i. On April 30, 2019, an employee in the Chromite area performing Mill Operator job duties (see Citation 1 item 12 instance i. for exposure information,)
- j. On May 7, 2019, an employee in the Shake-out area performing Bobcat Operator job duties (see Citation 1 item 12 instance j. for exposure information,)
- k. On May 7, 2019, an employee in the Shake-out area performing Rob Bender Machine Operator job duties (see Citation 1 item 12 instance k. for exposure information,)
- l. On May 7, 2019, an employee in the Shake-out area performing Float/Shaker Table job duties (see Citation 1 item 12 instance l. for exposure information,)
- m. On May 7, 2019, an employee in the Shake-out area performing Forklift Operator job duties (see Citation 1 item 12 instance m. for exposure information,)
- n. On May 17, 2019, an employee in the Loop Line area performing Mill Operator job duties (see Citation 1 item 12 instance n. for exposure information,)
- o. On May 17, 2019, an employee in the Loop Line area performing Closer job duties (see Citation 1 item 12 instance o. for exposure information,)
- p. On May 17, 2019, an employee in the Loop Line area performing Clean-out job duties (see Citation 1 item 12 instance p. for exposure information,)
- q. On May 17, 2019, an employee in the Loop Line area performing Mold Wash job duties (see Citation 1 item 12 instance q. for exposure information,)
- r. On May 17, 2019, an employee in the Loop Line area performing Roll Over Operator job duties (see Citation 1 item 12 instance r. for exposure information,)
- s. On May 17, 2019, an employee in the Loop Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance s. for exposure information,)

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

t. On May 30, 2019, an employee in the Main Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance t. for exposure information,)

u. On May 30, 2019, an employee in the Main Line area performing Set-up job duties (see Citation 1 item 12 instance u. for exposure information,)

v. On May 30, 2019, an employee in the Main Line area performing Clean-out job duties (see Citation 1 item 12 instance v. for exposure information,)

w. On May 30, 2019, an employee in the Main Line area performing Mold Wash job duties (see Citation 1 item 12 instance w. for exposure information,)

x. On May 30, 2019, an employee in the Main Line area performing Core Setter job duties (see Citation 1 item 12 instance x. for exposure information,)

y. On May 30, 2019, an employee in the Main Line area performing Core Setter job duties (see Citation 1 item 12 instance y. for exposure information,)

z. On June 6, 2019, an employee in the Loop Line area performing Mill Operator Helper job duties (see Citation 1 item 12 instance z. for exposure information,)

aa. On June 6, 2019, an employee in the South Core Room performing Trim Core Mill Table/Number job duties (see Citation 1 item 12 instance aa. for exposure information,)

bb. On June 6, 2019, an employee in the South Core Room performing Trim Core Mill Operator job duties (see Citation 1 item 12 instance bb. for exposure information,)

cc. On June 6, 2019, an employee in the South Core Room performing Set-up job duties (see Citation 1 item 12 instance cc. for exposure information,)

dd. On June 6, 2019, an employee in the South Core Room performing Grey Flow Coat/Finisher job duties (see Citation 1 item 12 instance dd. for exposure information,)

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: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

ee. On June 6, 2019, an employee in the South Core Room performing Blue Flow Coat/Finisher job duties (see Citation 1 item 12 instance ee. for exposure information,)

ff. On June 6, 2019, an employee in the South Core Room performing Crane Operator job duties (see Citation 1 item 12 instance ff. for exposure information.)

Due to the failure to establish any regulated areas in the workplace, employees were at increased risk for silicosis and lung cancer created by the inhalation hazards associated with respirable quartz silica.

Due to the failure to establish any regulated areas in the workplace, employees were at increased risk for silicosis and lung cancer created by the inhalation hazards associated with respirable quartz silica.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/29/2019
Proposed Penalty:	\$13127.00

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: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.1053(f): Methods of compliance. -

29 CFR 1910.1053(f)(2)(i): Written exposure control plan. (i) The employer shall establish and implement a written exposure control plan that contains the elements found in 29 CFR 1910.1053(f)(2)(i)(A)-(C).

On or about April 8, 2019, the employer failed to establish and implement a written exposure control plan for the workplace. The employer did not have a written description of the tasks that involved exposure to respirable crystalline silica, a written description of the engineering controls, work practices, and respiratory protection used to limit exposure or a written description of housekeeping measures. Employees in coremaking, moldmaking and Shake-Out department activities were exposed on a daily basis to inhalation hazards associated with silica that included silicosis and lung cancer.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/29/2019
Proposed Penalty:	\$13127.00

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: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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 16 a Type of Violation: **Serious**

29 CFR 1910.1053(h)(1): Housekeeping. (1) The employer shall not allow dry sweeping or dry brushing where such activity could contribute to employee exposure to respirable crystalline silica unless wet sweeping, HEPA-filtered vacuuming or other methods that minimize the likelihood of exposure are not feasible.

a. On or about May 30, 2019, the employer allowed dry sweeping in the South Core Finishing area. A South Core Grey Flow Coat/Finisher was observed dry sweeping with an industrial push broom and generating visible dust from the sweeping. During this daily activity of dry sweeping sand, the employee had exposure to inhalation hazards associated with the respirable crystalline silica.

Date By Which Violation Must be Abated:	10/30/2019
Proposed Penalty:	\$9377.00

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

Citation 1 Item 16 b Type of Violation: **Serious**

29 CFR 1910.1053(h)(2)(i): The employer shall not allow compressed air to be used to clean clothing or surfaces where such activity could contribute to employee exposure to respirable crystalline silica unless compressed air is used in conjunction with a ventilation system that effectively captures the dust cloud created by the compressed air.

a. On or about April 30, 2019, a South Core Room employee was witnessed using compressed air to clean clothing. During this activity, no ventilation system was used. Due to this activity, the employee was exposed to inhalation hazards associated with airborne silica generated through use of compressed air.

b. On or about April 30, 2019, a South Core Room employee was witnessed using compressed air to clean a work table surface where "numbers" were made as part of Trim Core duties. During this activity, no ventilation system was used. Due to this activity, the employee was exposed to inhalation hazards associated with airborne silica generated through use of compressed air.

c. On or about April 30, 2019, a Loop Line employee was witnessed using compressed air to clean clothing. During this activity, no ventilation system was used. Due to this activity, the employee was exposed to inhalation hazards associated with airborne silica generated through use of compressed air.

Date By Which Violation Must be Abated:

10/07/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

Citation 1 Item 16 c Type of Violation: **Serious**

29 CFR 1910.1053(h)(2)(ii): The employer shall not allow compressed air to be used to clean clothing or surfaces where such activity could contribute to employee exposure to respirable crystalline silica unless no alternative method is feasible.

a. On or about April 30, 2019, a South Core Room employee was witnessed using compressed air to clean clothing. During this activity, no ventilation system was used. Due to this activity, the employee was exposed to inhalation hazards associated with airborne silica generated through use of compressed air.

b. On or about April 30, 2019, a South Core Room employee was witnessed using compressed air to clean a work table surface where "numbers" were made as part of Trim Core duties. Due to this activity, the employee was exposed to inhalation hazards associated with airborne silica generated through use of compressed air.

c. On or about April 30, 2019, a Loop Line employee was witnessed using compressed air to clean clothing. During this activity, no ventilation system was used. Due to this activity, the employee was exposed to inhalation hazards associated with airborne silica generated through use of compressed air.

Date By Which Violation Must be Abated:

10/07/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

Citation 1 Item 17 Type of Violation: **Serious**

29 CFR 1910.1053(i)(1)(i): Medical surveillance-(1) General. (i) The employer shall make medical surveillance available at no cost to the employee, and at a reasonable time and place, for each employee who will be occupationally exposed to respirable crystalline silica at or above the action level for 30 or more days per year.

The employer failed to implement a medical surveillance program for employees with the following documented exposures:

- a. On April 30, 2019, an employee in the Loop Line area performing Mill Operator job duties (see Citation 1 item 1 instance a. for exposure information,)
- b. On April 30, 2019, an employee in the South Core Room performing Big Mill Operator job duties (see Citation 1 item 1 instance b. for exposure information,)
- c. On April 30, 2019, an employee in the South Core Room performing Trim Core Mill Operator job duties (see Citation 1 item 1 instance c. for exposure information,)
- d. On April 30, 2019, an employee in the Main Line area performing Mill Operator Helper job duties (see Citation 1 item 1 instance d. for exposure information,)
- e. On April 30, 2019, an employee in the Loop Line area performing Mill Operator Helper job duties (see Citation 1 item 1 instance e. for exposure information,)
- f. On April 30, 2019, an employee in the Flask Line area performing Mill Operator job duties (see Citation 1 item 1 instance f. for exposure information,)
- g. On April 30, 2019, an employee in the Flask Line area performing Mill Operator Helper job duties (see Citation 1 item 1 instance g. for exposure information,)
- h. On April 30, 2019, an employee in the Flask Line area performing Mill Operator Helper job duties (see Citation 1 item 1 instance h. for exposure information,)

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

- i. On April 30, 2019, an employee in the Chromite area performing Mill Operator job duties (see Citation 1 item 1 instance i. for exposure information,)
- j. On May 7, 2019, an employee in the Shake-out area performing Bobcat Operator job duties (see Citation 1 item 1 instance j. for exposure information,)
- k. On May 7, 2019, an employee in the Shake-out area performing Rob Bender Machine Operator job duties (see Citation 1 item 1 instance k. for exposure information,)
- l. On May 7, 2019, an employee in the Shake-out area performing Float/Shaker Table job duties (see Citation 1 item 1 instance l. for exposure information,)
- m. On May 7, 2019, an employee in the Shake-out area performing Forklift Operator job duties (see Citation 1 item 1 instance m. for exposure information,)
- n. On May 17, 2019, an employee in the Loop Line area performing Mill Operator job duties (see Citation 1 item 1 instance n. for exposure information,)
- o. On May 17, 2019, an employee in the Loop Line area performing Closer job duties (see Citation 1 item 1 instance o. for exposure information,)
- p. On May 17, 2019, an employee in the Loop Line area performing Clean-out job duties (see Citation 1 item 1 instance p. for exposure information,)
- q. On May 17, 2019, an employee in the Loop Line area performing Mold Wash job duties (see Citation 1 item 1 instance q. for exposure information,)
- r. On May 17, 2019, an employee in the Loop Line area performing Roll Over Operator job duties (see Citation 1 item 1 instance r. for exposure information,)
- s. On May 17, 2019, an employee in the Loop Line area performing Mill Operator Helper job duties (see Citation 1 item 1 instance s. for exposure information,)

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

t. On May 30, 2019, an employee in the Main Line area performing Mill Operator Helper job duties (see Citation 1 item 1 instance t. for exposure information,)

u. On May 30, 2019, an employee in the Main Line area performing Set-up job duties (see Citation 1 item 1 instance u. for exposure information,)

v. On May 30, 2019, an employee in the Main Line area performing Clean-out job duties (see Citation 1 item 1 instance v. for exposure information,)

w. On May 30, 2019, an employee in the Main Line area performing Mold Wash job duties (see Citation 1 item 1 instance w. for exposure information,)

x. On May 30, 2019, an employee in the Main Line area performing Core Setter job duties (see Citation 1 item 1 instance x. for exposure information,)

y. On May 30, 2019, an employee in the Main Line area performing Core Setter job duties (see Citation 1 item 1 instance y. for exposure information,)

z. On June 6, 2019, an employee in the Loop Line area performing Mill Operator Helper job duties (see Citation 1 item 1 instance z. for exposure information,)

aa. On June 6, 2019, an employee in the South Core Room performing Trim Core Mill Table/Number job duties (see Citation 1 item 1 instance aa. for exposure information,)

bb. On June 6, 2019, an employee in the South Core Room performing Trim Core Mill Operator job duties (see Citation 1 item 1 instance bb. for exposure information,)

cc. On June 6, 2019, an employee in the South Core Room performing Set-up job duties (see Citation 1 item 1 instance cc. for exposure information,)

dd. On June 6, 2019, an employee in the South Core Room performing Grey Flow Coat/Finisher job duties (see Citation 1 item 1 instance dd. for exposure information,)

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: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

ee. On June 6, 2019, an employee in the South Core Room performing Blue Flow Coat/Finisher job duties (see Citation 1 item 1 instance ee. for exposure information,)

ff. On June 6, 2019, an employee in the South Core Room performing Crane Operator job duties (see Citation 1 item 1 instance ff. for exposure information,)

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/29/2019
Proposed Penalty:	\$13127.00

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: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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 18 a Type of Violation: **Serious**

29 CFR 1910.1053(j)(1): Communication of respirable crystalline silica hazards to employees-(1) Hazard communication. The employer shall include respirable crystalline silica in the program established to comply with the hazard communication standard (HCS) (29 CFR 1910.1200). The employer shall ensure that each employee has access to labels on containers of crystalline silica and safety data sheets, and is trained in accordance with the provisions of HCS and paragraph (j)(3) of this section. The employer shall ensure that at least the following hazards are addressed: Cancer, lung effects, immune system effects, and kidney effects.

a. On or about April 8, 2019, throughout the facility, containers of crystalline silica (sand hoppers, silos and other storage containers) were not labeled according to the hazard communication standard. The employer failed to inform employees with appropriate labeling regarding cancer, lung effects, immune system effects and kidney effects associated with occupational exposure to airborne silica.

Date By Which Violation Must be Abated:
Proposed Penalty:

10/30/2019
\$9377.00

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: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

Citation 1 Item 18 b Type of Violation: **Serious**

29 CFR 1910.1053(j): Communication of respirable crystalline silica hazards to employees-

29 CFR 1910.1053(j)(3): Employee information and training.

29 CFR 1910.1053(j)(3)(i): The employer shall ensure that each employee covered by this section can demonstrate knowledge and understanding of at least the following:

29 CFR 1910.1053(j)(3)(i)(D): The contents of this section;

a. On or about April 8, 2019, the employer failed to ensure that employees received training and information on the contents of the OSHA respirable crystalline silica standard, 29 CFR 1910.1053.

Date By Which Violation Must be Abated:

10/07/2019

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

Inspection Number: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

Citation 1 Item 18 c Type of Violation: **Serious**

29 CFR 1910.1200(f)(10): The employer shall ensure that workplace labels or other forms of warning are legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. Employers having employees who speak other languages may add the information in their language to the material presented, as long as the information is presented in English as well.

a. On or about April 8, 2019, throughout the facility, containers of crystalline silica (sand hoppers, silos and other storage containers) were not labeled according to the hazard communication standard. The employer failed to inform employees with appropriate labeling regarding cancer, lung effects, immune system effects and kidney effects associated with occupational exposure to airborne silica.

Date By Which Violation Must be Abated:

10/30/2019

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

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

29 CFR 1910.132(a): Application. Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, shall be provided, used, and maintained in a sanitary and reliable condition wherever it is necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.

a. On or about April 8, 2019, the employer failed to assure that employees involved with Flow Coat processes in the coremaking production areas were provided and required to use personal protective equipment and/or protective clothing to protect against thermal burns to the upper extremities. Employees were exposed to thermal hazards and had an increased risk for burns due to the lack of PPE or protective clothing when applying the flammable material and then igniting the applied material with a butane torch.

b. On or about April 8, 2019, the employer failed to assure that employees involved with Mold Wash processes in the moldmaking production areas were provided with and required to use personal protective equipment and/or protective clothing to protect against thermal burns to the upper extremities. Employees were exposed to thermal hazards and had an increased risk for burns due to the lack of PPE or protective clothing when applying the flammable material and then igniting the applied material with a butane torch.

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

Inspection Number: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

Liberty Casting Company, LLC was previously cited for a violation of this Occupational Safety and Health Standard, which was contained in OSHA inspection number 1340635, citation number 1, item number 2a and was affirmed as a final order on December 4, 2018 with respect to a workplace located at 550 Liberty Road, Delaware, Ohio 43015.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	10/30/2019
Proposed Penalty:	\$26255.00

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: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.132(d): Hazard assessment and equipment selection.

29 CFR 1910.132(d)(1): The employer shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If such hazards are present, or likely to be present, the employer shall:

29 CFR 1910.132(d)(1)(i): Select, and have each affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment;

a. On or about April 8, 2019, the employer failed to select and require the use of PPE for protection against burns associated with "Flow Coat" operations that involved the ignition of flammable liquids with butane torches as part of coremaking production processes. Due to this condition, employees have increased risk for burns during these activities.

b. On or about April 8, 2019, the employer failed to select and require the use of PPE for protection against burns associated with Mold Wash operations that involved the ignition of flammable liquids with butane torches as part of moldmaking production processes. Due to this condition, employees have increased risk for burns during these activities.

Liberty Casting Company, LLC was previously cited for a violation of this Occupational Safety and Health Standard, which was contained in OSHA inspection number 1340635, citation number 1, item number 2b and was affirmed as a final order on December 4, 2018 with respect to a workplace located at 550 Liberty Road, Delaware, Ohio 43015.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

10/30/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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: **Repeat**

29 CFR 1910.147(c)(4)(i): Procedures shall be developed, documented and utilized for the control of potentially hazardous energy when employees are engaged in the activities covered by this section.

a. On or about May 17, 2019, the employer failed to develop, implement and maintain documented machine specific lockout/tagout (control of hazardous energy) procedures for the Loop Line department that included the Roll-Over machine and the conveyor system. Employees performed activities covered by this part that included, but were not limited to, conveyor mechanical repairs. During covered activities, maintenance employees were exposed to caught-in hazards associated with the mechanical energy associated with the conveyor mechanism

Liberty Casting Company, LLC was previously cited for a violation of this Occupational Safety and Health Standard, which was contained in OSHA inspection number 1045810, citation number 1, item number 1 and was affirmed as a final order on May 20, 2015, with respect to a workplace located at 550 Liberty Road, Delaware, Ohio 43015.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	10/30/2019
Proposed Penalty:	\$26255.00



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

29 CFR 1910.147(c)(4): Energy control procedure.

29 CFR 1910.147(c)(4)(ii): The procedures shall clearly and specifically outline the scope, purpose, authorization, rules, and techniques to be utilized for the control of hazardous energy, and the means to enforce compliance including, but not limited to, the following:

29 CFR 1910.147(c)(4)(ii)(B): Specific procedural steps for shutting down, isolating, blocking and securing machines or equipment to control hazardous energy;

a. On or about April 30, 2019, the employer failed to document the specific procedural steps for the control of potentially hazardous energy for the Loop Line Mill internal auger assembly. Employees performed required activities covered by this part that included cleaning material from the auger section to "unjam" material buildup. During these covered activities, the Loop Line Mill Operator and the Loop Line Mill Helper were exposed to caught-in hazards associated with the mechanical energy associated with the internal auger assembly.

Liberty Casting Company, LLC was previously cited for a violation of an equivalent Occupational Safety and Health Standard (1910.147(c)(4)(i)) which was contained in OSHA inspection number 1045810, citation number 1, item number 1 and was affirmed as a final order on May 20, 2015, with respect to a workplace located at 550 Liberty Road, Delaware, Ohio 43015.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

10/30/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

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

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

- a. On or about April 30, an employee working as the Loop Line Helper performed duties covered by this part and had not received training in the hazardous energy sources related to the Loop Line Mill, the methods and means for hazardous energy isolation and the methods and means of hazardous energy control for the Loop Line Mill. The employee worked on the interior auger section of the Loop Line Mill with exposure to potential caught-in hazards associated with this equipment.
- b. On or about May 17, 2019, a maintenance technician performed duties covered by this part and had not received training in the hazardous energy sources related to the Loop Line conveyor system, the methods and means for hazardous energy isolation and the methods and means of hazardous energy control for the Loop Line conveyor system. The employee worked on the conveyor system, removed machine guards to perform the required work and had exposure to caught-in hazards associated with the power transmission equipment associated with the conveyor.

Liberty Casting Company, LLC was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1045810, citation number 1, item number 2 and was affirmed as a final order on May 20, 2015, with respect to a workplace located at 550 Liberty Road, Delaware, Ohio 43015.

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

Inspection Number: 1390789
Inspection Date(s): 04/08/2019 - 07/12/2019
Issuance Date: 09/25/2019



Citation and Notification of Penalty

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 10/30/2019
Proposed Penalty: \$26255.00

A handwritten signature in blue ink, appearing to read "Larry M. Johnson", written over a horizontal line.

Larry M. Johnson
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
200 N. High Street
Room 620
Columbus, OH 43215



INVOICE / DEBT COLLECTION NOTICE

Company Name: Liberty Casting Company, LLC
Inspection Site: 550 Liberty Road, Delaware, OH 43015
Issuance Date: 09/25/2019

Summary of Penalties for Inspection Number	1390789
Citation 1, Serious	\$191283.00
Citation 2, Repeat	\$78765.00
TOTAL PROPOSED PENALTIES	\$270048.00

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.



Larry M. Johnson
Area Director



Date