

**Este documento es muy importante. Si ud. No habla inglés,
busque un traductor o llame al (618) 632-8612.**

U.S. Department of Labor Occupational Safety and Health Administration
11 Executive Drive Suite 11
Fairview Heights, IL 62208
Phone: (618) 632-8612 Fax: (618) 632-5712



December 6, 2019

Dear Craig Rathgeb,

On 06/07/2019, an OSHA compliance officer met with you or your representative as part of an inspection at 1200 16TH STREET Granite City, IL 62040. This letter includes the citations for the violations that were found (see summary below). Please choose one of the three options from the box to the right and complete the associated steps found on the following page **within 15 working days**. Please call us if you have any questions about the enclosed citation and/or penalties; we are here to help you choose the best option to resolve your citation as quickly as possible.

Sincerely,


Aaron Priddy, Area Director

Your Citation Summary

**Mayco Manufacturing, LLC DBA Mayco
Industries, Inc.**

Inspection Number: 1407365

Total Amount Due: \$223148.00

**Payment Due Date: 15 working days
after receipt of
this letter**

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

Total Number of Violations : 31

**Your First Correction Deadline is:
1/3/2020**

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

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

Option #1 – Discuss with OSHA

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

Option #2 – Correct and Pay

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

Option #3 – Contest the Citation

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

Questions or Concerns?

If you have any questions or concerns regarding the citation, penalties, and/or correction deadlines, please call us at (618) 632-8612.

Step 2 – Complete One Option Checklist

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

Option #1 – Discuss with OSHA

I will complete by:



1. Call: Aaron Priddy, Area Director, at (618) 632-8612 as soon as possible to schedule a meeting with an OSHA representative that must occur **within 15 working days** of receiving this citation. Bring supporting documentation of existing conditions and corrections done thus far. If necessary, you can still contest the citation after this meeting. ****This meeting does NOT extend your 15 working day deadline to contest the citation.****

☐ ____ / ____



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

☐ ____ / ____

Option #2 – Correct Violations and Pay Penalty

I will complete by:



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

☐ ____ / ____



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

☐ ____ / ____

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

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

Option #3 – Contest the Citation

I will complete by:



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

☐ ____ / ____

U.S. Department of Labor

Occupational Safety and Health Administration
11 Executive Drive
Suite 11
Fairview Heights, IL 62208



Citation and Notification of Penalty

To:

Mayco Manufacturing, LLC DBA Mayco Industries,
Inc.
and its successors
1200 16TH STREET
Granite City, IL 62040

Inspection Number: 1407365**Inspection Date(s):** 06/07/2019 - 06/07/2019**Issuance Date:** 12/06/2019**Inspection Site:**

1200 16TH STREET
Granite City, IL 62040

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 618-632-8612. 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

12/06/2019. The conference will be held by telephone or at the OSHA office located at 11

Executive Drive, Suite 11, Fairview Heights, IL 62208 on _____ at

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1407365

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040
Issuance Date: 12/06/2019

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 11 Executive Drive, Suite 11, Fairview Heights, IL 62208**

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

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

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

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

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

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

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

Signature

Date

Typed or Printed Name

Title

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

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

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

Inspection Number: 1407365
Inspection Date(s): 06/07/2019 - 06/07/2019
Issuance Date: 12/06/2019



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.22(a)(3): Walking-working surfaces are not maintained free of hazards such as sharp or protruding objects, loose boards, corrosion, leaks, spills, snow, and ice:

On or about August 8th, 2019, in the shot-bagging area of the Shot Department, the employer did not ensure that the floors of the area were free of slip hazards created by the presence of lead shot BBs on the floors.

Date By Which Violation Must be Abated:
Proposed Penalty:

01/03/2020
\$10419.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.28(b)(3)(ii): Each employee is not protected from tripping into or stepping into or through any hole that is less than 4 feet (1.2 m) above a lower level by covers or guardrail systems:

On or about August 8th, 2019, in the Cast Department, employees were not protected from tripping or stepping into the burner pit located between Kettles 3 and 4 through the use of covers or guardrail systems.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/03/2020
Proposed Penalty:	\$13260.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.28(b)(6)(i): Each employee less than 4 feet (1.2 m) above dangerous equipment was not protected from falling into or onto the dangerous equipment by a guardrail system or a travel restraint system, unless the equipment is covered or guarded to eliminate the hazard:

On or about August 8th, 2019, in the Hydron Department, employees were not protected from falling into a kettle that was filled with a molten lead alloy while a mixing shaft was operating within the kettle. The kettle opening was not guarded through the use of a cover, guardrail system, or travel restraint system, thereby exposing employees to thermal and rotating machinery hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/03/2020
Proposed Penalty:	\$13260.00



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.

Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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 1910.134(d)(1)(iii): The employer did not identify and evaluate the respiratory hazard(s) in the workplace; including a reasonable estimate of employee exposures to respiratory hazards and identification of the contaminant's chemical state and physical form:

On or about August 8th, 2019, the employer did not identify and evaluate the respiratory hazards in the Bullet Shred area, Cast Department, or Hydron Department, to include a reasonable estimate of employee exposures to respiratory hazards and the identification of the contaminant's chemical state and physical form. Such hazards include, but are not limited to, tin, antimony, copper, and other such metals present in the materials used in the melting and bullet-shredding process.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$13260.00



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.1018(e)(2): Initial monitoring was not performed for each workplace, or work operation covered by 29 CFR 1910.1018 to accurately determine the airborne concentration of inorganic arsenic to which employees may be exposed:

On or about August 6th, 2019, in the Bullet Shred Department, the employer did not ensure that initial monitoring for arsenic had been performed to accurately determine the airborne concentration of inorganic arsenic to which employees may be exposed.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

01/27/2020

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.1018(e)(4): Additional monitoring was not conducted when there was a production, process, control or personnel change, or other reason to suspect a change which may result in new or additional exposure(s) to inorganic arsenic:

On or about August 6th, 2019, in the Cast Department, the employer did not ensure that additional monitoring for arsenic had been performed when changes to kettle ventilation, equipment placement, building pressure, and material processing for the Bullet Shred Department had been made that may result in new or additional exposures to inorganic arsenic.

Date By Which Violation Must be Abated:

Corrected During Inspection



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

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

On or about August 6th, 2019, the press labeled "Press 5" in the Extrusion Department was not locked out during the adjustment of the extruded lead wire on the guide wheel. The employer failed to implement energy control application steps as the machine was not shut down or turned off to perform the servicing work [per the 1910.147(d)(2) requirements]. As a result, the remaining applicable control elements, involving machine isolation [(d)(3)], LOTO device application [(d)(4)], dissipation of residual energy [(d)(5)(i)], and verification of isolation [(d)(6)], were not implemented to protect employees from machine servicing hazards.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/03/2020
Proposed Penalty:	\$13260.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

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

On or about June 6th, 2019, employees were exposed to injurious corrosive materials, which include but are not limited to sodium hydroxide, calcium hydroxide, and potassium hydroxide, in the Dry Chemical Storage Room and within the Cast Department. Suitable facilities for quick drenching or flushing of the eyes and body were not available within the work area for immediate emergency use.

Date By Which Violation Must be Abated:
Proposed Penalty:

01/27/2020
\$10419.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.212(a)(1): One or more methods of machine guarding was not provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks:

The employer did not ensure that one or more methods of machine guarding were provided on work equipment to protect the operator and other employees in the machine area from hazards such as those created by the point of operation, in-going nip points, and rotating parts:

- a) On or about August 6th, 2019, in the Extrusion Department, the employer did not ensure that employees were protected from the point of operation on the press labeled "Press #5." Employees were observed removing lead from the cam shaft while it was in operation, and were thereby exposed to in-going nip points between the cam shaft and the base of the press. No guarding was present on the machine that would limit or prevent employee exposure to the hazard.
- b) On or about August 6th, 2019, in the Extrusion Department, the employer did not ensure that employees were protected from the point of operation on Press #9. Employees were observed facilitating the transfer of lead billets into the press, while it was in operation, and where thereby exposed to in-going nip points between the loading tray and the carriage return loading the billet, as well as crush and struck-by hazards associated with the metal arm that loads the billet into the press. No guarding was present on the machine that would limit or prevent employee exposure to the hazard.
- c) On or about August 8th, 2019, in the Bullet Shred Department, the employer did not ensure that employees were protected from crush hazards presented by the raising and lowering of the bullet shred hopper. Employees were observed adjacent to the open space created by the elevated hopper, and no guarding was present to prevent employee access to the space.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

01/27/2020

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: 1407365
Inspection Date(s): 06/07/2019 - 06/07/2019
Issuance Date: 12/06/2019



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

Proposed Penalty:

\$13260.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

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

29 CFR 1910.219(b)(1): Flywheel(s) with parts seven feet or less above floor(s) or platform(s) were not guarded in accordance with the requirements specified in 29 CFR 1910.219(b)(1)(i) through (b)(1)(iv):

On or about August 8th, 2019, the following machine flywheels, located 7 feet or less above the floor level or working platforms, were not guarded:

- a) In the Shot Department, the rotary drum flywheel, located next to the top of the employee ladder access to the shot-sorting machine located on the first floor of the department, was not guarded. Employees working off of a ladder were exposed to the rotating flywheel of the power transmission assembly.
- b) In the Extrusion Department, the flywheels of Press #9 were not guarded. Employees attending the machine and guiding extruded wire into boxes were exposed to the rotating flywheels of the power transmission assembly.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/27/2020
Proposed Penalty:	\$13260.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.219(d)(1): Pulley(s) with part(s) seven feet or less from the floor or work platform were not guarded in accordance with the requirements specified in 29 CFR 1910.219(m) and (o):

On or about August 8th, 2019, in the Shot Department, the rotary drum pulley, located next to the top of the employee ladder access to the shot-sorting machine located on the first floor of the department, was not guarded. Employees working off of a ladder were exposed to the moving pulley of the power transmission assembly.

Date By Which Violation Must be Abated:

Corrected During Inspection



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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:

On or about July 19th, 2019, in the Bullet Shred Department, the employer did not ensure that a flexible cord providing power to a scale underneath the bullet shred machine was protected from accidental damage incurred by being placed in a main path of travel.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/03/2020
Proposed Penalty:	\$13260.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.305(g)(1)(iv)(A): Flexible cords and/or cables were used as a substitute for the fixed wiring of a structure:

On or about July 19th, 2019, in the Bullet Shred Department, a flexible extension cord was used to provide power to an electronic scale positioned underneath the Bullet Shred Machine in lieu of a fixed wiring system.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

01/27/2020

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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 10 a Type of Violation: **Serious**

29 CFR 1910.1018(k)(1): All surfaces were not maintained as free as practicable of accumulations of inorganic arsenic:

The employer did not ensure that workplace surfaces were maintained as free as practicable of accumulations of inorganic arsenic in areas that include, but are not limited to, the employee lunch room, "Clean Side" locker room, hydration shacks, and the Bullet Shred Department. The methods and frequency of cleaning were ineffective in controlling accumulations of arsenic in the following locations:

1. On or about June 27th, 2019, arsenic was found to be present on the buttons of a soda machine in the employee lunch room.
2. On or about June 27th, 2019, arsenic was found to be present on the keypad of a microwave in the employee lunch room.
3. On or about June 27th, 2019, arsenic was found to be present on a bench in the "Clean Side" locker room.
4. On or about June 27th, 2019, arsenic was found to be present on the fins of an air dryer in the "Clean Side" locker room.
5. On or about June 27th, 2019, arsenic was found to be present on the dispense nozzle of a water cooler in the Cast Department hydration shack.
6. On or about June 27th, 2019, arsenic was found to be present on the dispense nozzle of a water cooler in the Shot Department hydration shack.
7. On or about August 8th, 2019, arsenic was found to be present on the exterior of the Density

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

Separator at the end of the bullet shred machine in the Bullet Shred Department.

8. On or about August 8th, 2019, arsenic was found to be present on the tare system control panel near the infeed hopper of the Bullet Shred Department.
9. On or about August 8th, 2019, arsenic was found to be present on the control pendant for the infeed hopper of the Bullet Shred Department.
10. On or about August 8th, 2019, arsenic was found to be present on the plastic covering the exit of the Density Separator at the end of the bullet shred machine in the Bullet Shred Department.
11. On or about August 8th, 2019, arsenic was found to be present on the touch control panel for the material separation system in the Bullet Shred Department.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/27/2020
Proposed Penalty:	\$13260.00



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.1025(h)(1): All surfaces were not maintained as free as practicable of accumulations of lead:

The employer did not ensure that workplace surfaces were maintained as free as practicable of accumulations of lead in areas that include, but are not limited to, the employee lunch room, "Clean Side" locker room, hydration shacks, and the Bullet Shred Department. The methods and frequency of cleaning were ineffective in controlling accumulations of lead in the following locations:

1. On or about June 27th, 2019, lead was found to be present on the buttons of a soda machine in the employee lunch room.
2. On or about June 27th, 2019, lead was found to be present on the keypad of a microwave in the employee lunch room.
3. On or about June 27th, 2019, lead was found to be present on a bench in the "Clean Side" locker room.
4. On or about June 27th, 2019, lead was found to be present on the fins of an air dryer in the "Clean Side" locker room.
5. On or about June 27th, 2019, lead was found to be present on the dispense nozzle of a water cooler in the Cast Department hydration shack.
6. On or about June 27th, 2019, lead was found to be present on the dispense nozzle of a water cooler in the Shot Department hydration shack.
7. On or about August 8th, 2019, lead was found to be present on the tare system control panel near the infeed hopper of the bullet shred machine in the Bullet Shred Department.
8. On or about August 8th, 2019, lead was found to be present on the control pendant for the infeed hopper in the Bullet Shred Department.

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: 1407365
Inspection Date(s): 06/07/2019 - 06/07/2019
Issuance Date: 12/06/2019



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

9. On or about August 8th, 2019, lead was found to be present on the plastic covering the exit of the Density Separator at the end of the bullet shred machine in the Bullet Shred Department.

10. On or about August 8th, 2019, lead was found to be present on the touch control panel for the material separation system in the Bullet Shred Department.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

01/27/2020

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.1018(k)(4): A written housekeeping and maintenance plan for inorganic arsenic which lists the appropriate frequencies for carrying out housekeeping operations and for cleaning and maintaining dust collection equipment was not kept and available for inspection by the Assistant Secretary:

On or about August 8th, 2019, the employer did not ensure that a written housekeeping and maintenance plan for inorganic arsenic, which lists the appropriate frequencies for carrying out housekeeping operations and for cleaning & maintaining dust collection equipment, was not kept for areas where employees may be exposed to inorganic arsenic. Such areas include, but are not limited to, the Shot Department, the Cast Department, the Bullet Shred Department, and the employee lunch & change rooms.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/27/2020
Proposed Penalty:	\$13260.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.

Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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 1910.1018(k)(5): Periodic cleaning of inorganic arsenic dust collection and ventilation equipment and checks of their effectiveness were not carried out to maintain the effectiveness of the system:

On or about August 8th, 2019, in areas that include but are not limited to, the Bullet Shred, Shot, and Cast Department, the employer did not ensure that periodic checks of the effectiveness of the ventilation systems were performed.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

01/27/2020

Proposed Penalty:

\$13260.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.1025(e)(4)(i): When ventilation was used to control exposure to lead, measurements which demonstrate the effectiveness of the system in controlling lead exposure were not made at least every three months:

On or about August 8th, 2019, in areas that include but are not limited to, the Bullet Shred, Hydron, Shot, and Cast Department, the employer did not ensure that measurements that demonstrated the effectiveness of the ventilation systems in controlling airborne lead exposures were made at least every three months.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 01/27/2020

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.1018(n)(2): Affected employee(s) were not provided an opportunity for a medical examination at the time of initial assignment to an area where they are likely to be exposed to inorganic arsenic over the action level at least 30 days per year that included at least the elements specified in 29 CFR 1910.1018(n)(2)(i) - (ii):

On or about August 6th, 2019, the employer did not ensure that employees were provided an opportunity for a medical examination that included a nasal and skin examination at the time of the initial assignment to areas where they are likely to be exposed to inorganic arsenic over the action level at least 30 days per year. Such areas include, but are not limited to, the Cast Department.

Date By Which Violation Must be Abated:
Proposed Penalty:

01/27/2020
\$6251.00



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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 14 a Type of Violation: **Serious**

29 CFR 1910.1018(o)(1)(ii): Training was not provided for employee(s) at the time of initial assignment to an area where employees are subject to inorganic arsenic exposure above the action level, or for whom there is a possibility of skin or eye irritation from inorganic arsenic:

On or about August 8th, 2019, the employer had not ensured that training had been provided to employees in the Cast Department at the time of their initial assignment, where employees are subject to inorganic arsenic exposures above the action level and where there is a possibility of skin irritation from exposure to inorganic arsenic.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/27/2020
Proposed Penalty:	\$13260.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.1200(h)(3)(ii): Employee training did not include the physical and health hazards of the chemicals in the work area:

On or about June 7th, 2019, the employer did not ensure that employee training for employees in and around the Cast Department included the physical and health hazards of the chemicals in the work area. Such chemicals include, but are not limited to, sodium hydroxide, sulfur, and potassium hydroxide.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 01/27/2020



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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 15 a Type of Violation: **Serious**

29 CFR 1910.1025(c)(1): Employee(s) were exposed to lead at concentrations greater than fifty micrograms per cubic meter of air (ug/cm³) averaged over an eight-hour period:

On or about August 6th and August 8th, 2019, the employer did not ensure that employees were not exposed to lead at concentrations greater than 50 ug/cm³ averaged over an eight-hour period:

1. On or about August 6th, 2019, an employee from the Maintenance Department, working in the Cast Department, was exposed to an 8-hour TWA of 507 ug/m³ over the 476 minute sampling period, which is approximately 10.1 times the permissible exposure limit (PEL) of 50 ug/m³. The employee was performing grinding and cutting operations at the automatic dressing machine.
2. On or about August 6th, 2019, an employee from the Maintenance Department, working in the baghouses and Bullet Shred Department, was exposed to an 8-hour TWA of 617 ug/m³ over the 458 minute sampling period, which is approximately 12.3 times the PEL of 50 ug/m³. The employee was changing waste barrels at the Process and Hygiene baghouses, and performing maintenance on the Density Separator located at the end of the bullet shred machine in the Bullet Shred Department.
3. On or about August 8th, 2019, an employee in the Bullet Shred Department was exposed to an 8-hour TWA of 821 ug/m³ over the 477 minute sampling period, which is approximately 16.4 times the PEL of 50 ug/m³. The employee was attending the bullet shred machine, which includes (but is not limited to) loading the infeed hopper, operating a forklift within the department, exchanging waste barrels, and other tasks to ensure the continuous operation of the machine.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

01/27/2020

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: 1407365
Inspection Date(s): 06/07/2019 - 06/07/2019
Issuance Date: 12/06/2019



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

Proposed Penalty:

\$13260.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.1025(c)(2): Employee(s) were exposed to lead for more than eight -8 hours during the work day in excess of the reduced permissible exposure limit:

On or about August 8th, 2019, the employer did not ensure that employees working an extended workshift were not exposed to lead at concentrations greater than the reduced permissible exposure limit (PEL) of 40 micrograms per cubic meter of air (ug/cm3) averaged over a ten-hour period:

An employee in the Hydron Department was exposed to a 10-hour time-weighted average of 275 ug/m3 over the 508 minute sampling period, which is approximately 6.9 times the reduced PEL of 40 ug/m3. The employee was charging a kettle in the Hydron Department, and casting lead billets at the Hydron machine.

The reduced PEL was calculated in accordance with 29 CFR 1910.1025(c)(2), in which the maximum PEL, in ug/m3, is equal to 400 divided by the number of hours worked in the day.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

01/27/2020



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.1025(e)(1)(i): For any employees exposed to lead above the permissible exposure limit for more than 30 days per year the employer did not implement engineering and work practice controls (including administrative controls) were not implemented to reduce and maintain employee exposure to lead:

On or about August 8th, 2019, the employer did not implement effective engineering and work practice controls (including administrative controls) to reduce and maintain employee exposure to lead in the (a) Bullet Shred Department, (b) Hydron Department, and (c) for Maintenance employees, where employees are exposed to lead above the permissible exposure limit for more than 30 days per year.

Abatement Schedule:

Step 1: Effective respiratory protection shall be provided and used by exposed employees as an interim protective measure until feasible engineering controls can be implemented, or whenever such controls fail to reduce employee exposure to within permissible exposure limits.

Abatement date: January 10th, 2020

Step 2: A written, detailed plan of abatement shall be submitted to the Area Director, outlining a schedule for the implementation of engineering measures to control employee exposures to hazardous substances as referenced in this citation. This plan shall include, at a minimum, target dates for the following actions, which must be consistent with abatement dates required by this citation:

1. Evaluation of engineering control options;
2. Selection of optimum control methods and completion of designs;
3. Procurement, installation, and operation of selected control measures;
4. Testing and acceptance or modification/redesign of controls.

Note: All proposed control measures shall be approved for each particular use by a competent industrial hygienist or other technically qualified person.



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

Abatement date: February 10th, 2020

Step 3: Abatement shall have been completed by the implementation of feasible engineering controls upon verification of their effectiveness in achieving compliance.

Abatement date: March 10th, 2020

- a) General methods of control applicable to the Bullet Shred Department include, but are not limited to:
- 1) Increase air flow at the ventilation capture points at the dump hopper, screener, and along the bullet shred machine conveyors, and any other such location where local exhaust ventilation is provided;
 - 2) Fully or partially enclose the ends of conveyors along the bullet shred machine to reduce the release of fugitive dusts;
 - 3) Test and balance the ventilation system to ensure optimal exhaust performance;
 - 4) Include a maintenance and inspection program for the ventilation system to ensure the ductwork is properly sealed, secured to the equipment as it is designed to exhaust, and holes are detected corrected prior to operating the unit;
 - 5) Determine the applicability and feasibility of fresh air islands to provide tempered, clean air to employees;
 - 6) Implement a schedule of employee rotation to limit employee exposures.
- b) General methods of control applicable to the Hydron Department include, but are not limited to:
- 1) Redesign and/or replace the local exhaust hood positioned over the hot lead reservoir on the Hydron machine to increase the effectiveness of the exhaust;
 - 2) Increase air flow at the local exhaust hood positioned over the hot lead reservoir on the Hydron machine;
 - 3) Enforce the practice of closing the thermal collars over the Hydron kettles to reduce the release of leaded alloy fume and increase the effectiveness of the kettle ventilation;
 - 4) Test and balance the ventilation system to ensure optimal exhaust performance;
 - 5) Include a maintenance and inspection program for the ventilation system to ensure the ductwork is properly sealed, secured to the equipment as it is designed to exhaust, and holes are detected corrected prior to operating the unit;
 - 6) Determine the applicability and feasibility of fresh air islands to provide tempered, clean air to employees;

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

- 7) Implement a schedule of employee rotation to limit employee exposures.
- c) General methods of control applicable to Maintenance employees include, but are not limited to:
- 1) Provide and enforce the use of local exhaust ventilation with high efficiency capture rates for employees performing maintenance tasks that may create or dislodge leaded dusts from surfaces (such as, but not limited to, grinding, welding and cutting operations, and changing waste barrels connected to the baghouses);
 - 2) Develop and implement an effective cleaning program that reduces the amount of lead dust on work surfaces, and maintains surfaces as free as practicable from lead dust;
 - 3) Ensure that administrative controls within the departments that Maintenance employees are working in are being followed and enforced (such as, but not limited to, the effective use of thermal collars on the kettles within the Cast and Hydron Departments).

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the "Certification of Corrective Action Worksheet"), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase of repair of equipment, photographic or video evidence of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

04/21/2020



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.

Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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 1910.1025(e)(3)(iv): Written compliance programs for lead were not revised and updated annually to reflect the current status of the program:

On or about June 7th, 2019, the employer did not ensure that the written Lead Compliance Program had been reviewed or revised to reflect the current status of the program on at least an annual basis. Deficiencies in the program include, but are not limited to the following:

- (a) A description of each operation in which lead is emitted, to include but not limited to, the machinery used, the material processed, the controls in place, employee job responsibilities, the operating procedures, and the maintenance practices;
- (b) A description of the specific means that will be employed to achieve compliance, including engineering plans and studies used to determine methods selected for controlling exposures to lead;
- (c) A report of the technology considered in meeting the permissible exposure limit;
- (d) Air monitoring data that documents the source of the lead emissions;
- (e) A detailed schedule for the implementation of the program;
- (f) A work practice program;
- (g) An administrative control schedule, and;
- (h) Other relevant 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: 1407365
Inspection Date(s): 06/07/2019 - 06/07/2019
Issuance Date: 12/06/2019



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

Date By Which Violation Must be Abated:
Proposed Penalty:

01/27/2020
\$10419.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.1025(n)(1)(ii): The record of exposure monitoring for lead did not include the required items:

On or about June 7th, 2019, the employer did not ensure that monitoring records of exposure to lead included all of the information required by the standard, in that they did not include the type of respiratory devices worn, if any, the job classification of all other employees whose exposure the measurement is intended to represent, nor the environmental variables that could affect the measurement of the employee's exposure.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

01/27/2020



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.1025(i)(4)(iv): Employees entering lunchroom facilities with protective work clothing or equipment were not required to remove surface lead dust by vacuuming, downdraft booth, or other cleaning method(s):

On or about August 8th, 2019, the employer did not ensure that employees entering the lunchroom facility with protective coveralls were required to remove surface lead dust by vacuuming, downdraft booths, or other cleaning methods.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/27/2020
Proposed Penalty:	\$13260.00



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.1200(f)(6)(ii): Except as provided in 29 CFR 1910.1200(f)(7) and 29 CFR 1910.1200(f)(8), the employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged or marked with the product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals and which, in conjunction with the other information immediately available to employees under the hazard communication program, would provide employees with the specific information regarding the physical and health hazards of the hazardous chemical:

- a) On or about June 7th, 2019, the employer did not ensure that each pallet of caustic material stored in the Dry Chemical Room adjacent to the Cast Department was clearly labeled, tagged or marked with the product identifier and words, pictures, symbols or combination thereof, nor were the pallets marked such that general information regarding the hazards of the chemicals would be conveyed to employees. Such materials include, but are not limited to, sulfur, sodium hydroxide, potassium hydroxide, and other such chemicals used in the kettle cleaning and charging process.
- b) On or about July 19th, 2019, in the Bullet Shred and Cast Departments, the employer did not ensure that each drum of dross material was labeled, tagged or marked with the product identifier and words, pictures, symbols, or a combination thereof to provide general information regarding the hazards of the materials. Hazardous materials include, but is not limited to, lead dust, arsenic dusts, and other metal dusts associated with the drossing process and material.
- c) On or about July 19th, in the Bullet Shred Department, the employer did not ensure that each collection drum stationed around the bullet shred machine was labeled, tagged, or marked with the product identifier and words, pictures, symbols, or a combination thereof to provide general information regarding the hazards of the materials. Hazardous material includes, but is not limited to: copper, lead, arsenic, ferrous metals, and dusts associated with these metals.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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: 1407365
Inspection Date(s): 06/07/2019 - 06/07/2019
Issuance Date: 12/06/2019



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

Date By Which Violation Must be Abated:
Proposed Penalty:

01/03/2020
\$13260.00

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: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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: **Other-than-Serious**

29 CFR 1910.134(d)(3)(iii)(B)(2): The employer did not implement a change schedule for respirators not equipped with an End of Service Life Indicator (ESLI) that would ensure cartridges were changed before the end of their service life:

On or about August 6th, 2019, the employer had not implemented an effective change schedule for respirator cartridge filters without an ESLI that ensured that cartridges were changed before the end of their service life. Cartridge filters in use include, but are not limited to, 3M 7093c Hydrogen Fluoride/P100 filters and 3M 7093 P100 filters.

Date By Which Violation Must be Abated:
Proposed Penalty:

01/27/2020
\$0.00



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

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

29 CFR 1910.134(h)(1): Respirators were not cleaned and disinfected using the procedures in Appendix B-2 of 29 CFR 1910.134 or equivalent procedures recommended by the respirator manufacturer:

On or about August 6th, 2019, half-face respirators were cleaned and disinfected in a manner outside of the procedures specified in Appendix B-2 of the standard, and outside of the procedures recommended by the respirator manufacturer. Respirators were tumble-dried in a commercial dryer or placed in a heated cabinet for drying.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

01/03/2020



Citation and Notification of Penalty

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040

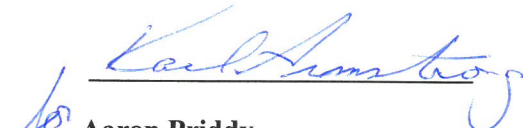
Citation 2 Item 1 c Type of Violation: **Other-than-Serious**

29 CFR 1910.134(l)(1): Evaluations of the workplace were not conducted to ensure the written respiratory protection program was being effectively implemented:

On or about June 7th, 2019, the employer had not ensured that evaluations of the workplace had been performed to ensure that the written respiratory protection program was being effectively implemented, and had not assessed the respiratory program elements that include, but are not limited to, proper respirator and filter use in the workplace conditions encountered by employees, proper respirator cleaning and maintenance, and change schedules for respirator filters and cartridges.

Date By Which Violation Must be Abated:

01/27/2020



Aaron Priddy
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
11 Executive Drive
Suite 11
Fairview Heights, IL 62208



INVOICE / DEBT COLLECTION NOTICE

Company Name: Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Inspection Site: 1200 16TH STREET, Granite City, IL 62040
Issuance Date: 12/06/2019

Summary of Penalties for Inspection Number	1407365
Citation 1, Serious	\$223148.00
Citation 2, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES	\$223148.00

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

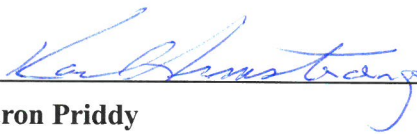
account, the bank will attempt to make the transfer up to 2 times.

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.

for 

Aaron Priddy
Area Director

12/6/2019

Date

SENDER: COMPLETE THIS SECTION

- ☐ Complete items 1, 2, and 3.
- ☐ Print your name and address on the reverse so that we can return the card to you.
- ☐ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mayco Manufacturing, LLC DBA Mayco Industries, Inc.
Attn: Craig Rathgeb, EHS Manager
1200 16TH STREET
Granite City, IL 62040
1407365

9590 9402 4834 9032 0381 09



2. Article Number (Transfer from service label)

7019 0160 0000 4572 8172

COMPLETE THIS SECTION ON DELIVERY

A. Signature 		<input type="checkbox"/> Agent
B. Received by (Printed Name) Ronde Brodstreet	C. Date of Delivery 12.9.19	<input type="checkbox"/> Addressee
D. Is delivery address different from item 1? If different, delivery address below:		<input type="checkbox"/> Yes <input type="checkbox"/> No

3. Service Type	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Insured Mail	
Restricted Delivery	

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Domestic Return Receipt