

U.S. Department of Labor Occupational Safety and Health Administration
1141 Montlimar Drive
Suite 1006
Mobile, AL 36609



07/19/2021

SPI / MOBILE PULLEY WORKS, INC
and its successors
P.O. BOX 50010
Mobile, AL 36609

Dear Employer:

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following an OSHA Inspection", (OSHA 3000-04R) revised 2018, which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at (251) 441-6131.

You will note on page 6 of the booklet that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dates together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

As indicated on page 3 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

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 the citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing conditions as well as of 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.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of 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.

Sincerely,



Jose A. Gonzalez
Area Director

Enclosures

U.S. Department of Labor
Occupational Safety and Health Administration
1141 Montlimar Drive
Suite 1006
Mobile, AL 36609



Citation and Notification of Penalty

To:
SPI / MOBILE PULLEY WORKS, INC
and its successors
P.O. BOX 50010
Mobile, AL 36609

Inspection Number: 1512081
Inspection Date(s): 01/28/2021 - 01/28/2021
Issuance Date: 07/19/2021

Inspection Site:
905 SOUTH ANN STREET
Mobile, AL 36605

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 (251) 441-6131. During such an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

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

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

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

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the [pay.gov](http://www.pay.gov) homepage, type “OSHA” in the Search field and select Search. From **OSHA Penalty Payment Form** search result, select Continue. The direct link is:

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

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

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

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

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

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

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

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

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 07/19/2021. The conference will be held by telephone or at the OSHA office located at 1141

Montlimar Drive, Suite 1006, Mobile, AL 36609 on _____ at

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1512081

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605
Issuance Date: 07/19/2021

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, 1141 Montlimar Drive, Suite 1006, Mobile, AL 36609.**

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

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

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

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

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

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

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

Signature

Date

Typed or Printed Name

Title

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

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



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

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

a) P&H Overhead crane #2 at Foundry area: On or about January 27, 2021, the employer exposed an employee to caught-in and crush-by hazards in that an employee was allowed to stand on the crane trolley while it was energized when installing a new wire rope.

Among other methods, feasible and effective means to correct this hazard would be to:

1. Establish a work rule to ensure employees are not permitted to be on the crane while it is in operation; and
2. Ensure employees are trained on the work rule and any other changes caused by the work rule.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

July 29, 2021

Proposed Penalty:

\$13,653.00



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.30(a)(3)(iv): The employer did not train each employee in the correct use of personal fall protection systems and equipment specified in paragraph (a)(1) of this section, including, but not limited to, proper hook-up, anchoring, and tie-off techniques, and methods of equipment inspection and storage, as specified by the manufacturer:

a) Foundry area: On or about January 27, 2021 ; the employer exposed employees to fall hazards of up to 31.4 feet to the ground level. The employer did not train each employee in the correct use of personal fall protection systems and equipment specified in paragraph (a)(1) of this section, including, but not limited to, proper hook-up, anchoring, and tie-off techniques, and methods of equipment inspection and storage, as specified by the manufacturer.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 29, 2021
\$7,022.00

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: 1512081
Inspection Date(s): 01/28/2021 - 01/28/2021
Issuance Date: 07/19/2021



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.178(l)(4)(iii): An evaluation of each powered industrial truck operator's performance was not being conducted at least once every three years:

a) Foundry area: On or about February 17, 2021 and at times prior thereto the employer exposed employees to struck-by hazards in that powered industrial truck operators were allowed to operate all terrain forklift without having been evaluated at least once every three years as required by the standard.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 29, 2021
\$7,022.00

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: 1512081
Inspection Date(s): 01/28/2021 - 01/28/2021
Issuance Date: 07/19/2021



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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 1910.179(b)(5): The rated load of crane(s) was not plainly marked on each side of the crane:

(a) Foundry area: P&H Crane#2: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to struck-by hazards by failing to plainly mark on each side of the crane the rated load of the crane.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 27, 2021
\$7,022.00

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: 1512081
Inspection Date(s): 01/28/2021 - 01/28/2021
Issuance Date: 07/19/2021



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.179(j)(3): A complete periodic inspection of crane(s) had not been conducted in the past 12 months:

(a) Foundry area: Overhead Crane #1: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to struck-by and/or caught-in hazards by failing to conduct a complete periodic inspection of crane #1 in the past 12 months.

(b) Foundry area: P& H Overhead Crane #2: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to struck-by and/or caught-in hazards by failing to conduct a complete periodic inspection of crane #2 in the past 12 months.

(c) Foundry area: Overhead Crane #3: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to struck-by and/or caught-in hazards by failing to conduct a complete periodic inspection of crane #3 in the past 12 months.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 27, 2021
\$0.00

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



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

Citation 1 Item 5 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:

- a) Machine Shop: Rafamet: Vertical turning lathe machine: On or about February 23, 2021 and at times prior thereto; the employer exposed employees to struck-by and caught-in hazards in that employees were allowed to work within four feet of exposed rotating machine table.
- b) Machine Shop: Cincinnati Hypro - Vertical turning lathe machine: On or about, February 23, 2021, and at times prior thereto; the employer exposed employees to struck-by and caught-in hazards in that employees were allowed to work within three feet of exposed rotating machine table.
- c) Machine Shop: MP - Vertical turning lathe machine: On or about, February 23, 2021, and at times prior thereto; the employer exposed employees to struck-by and caught-in hazards in that employees were allowed to work within three feet of exposed rotating machine table.
- d) Machine Shop: Farrel Betts and Nile Tool Works - Vertical turning lathe machines: On or about, February 23, 2021, and at times prior thereto; the employer exposed employees to struck-by and caught-in hazards in that employees were allowed to work within four feet of exposed rotating machine table.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 29, 2021
\$8,778.00

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: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

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

29 CFR 1910.1053(c): The employer did not ensure that no employee was exposed to an airborne concentration of respirable crystalline silica in excess of 50 ug/m³, calculated as an 8-hour TWA:

- (a) Reclaim area: On or about February 11, 2021, and at times prior thereto; the employer exposed an employee to respiratory hazards from respirable crystalline silica of 97 micrograms per cubic meter of air while working at the sand reclaim area.
- (b) Reclaim area: On or about February 11, 2021, and at times prior thereto; the employer exposed an employee to respiratory hazards from respirable crystalline silica of 110 micrograms per cubic meter of air while working at the sand reclaim area.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 29, 2021
\$8,778.00

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: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.1053(f)(1):The employer did not 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:

(a) Reclaim area: On or about February 11, 2021, and at times prior thereto; the employer exposed an employee to respiratory hazards from respirable crystalline silica of 97 micrograms per cubic meter of air while working at the sand reclaim area. The employer did not use engineering and work practice controls to reduce and maintain employee exposure to respirable crystalline silica to or below the PEL.

(b) Reclaim area: On or about February 11, 2021, and at times prior thereto; the employer exposed an employee to respiratory hazards from respirable crystalline silica of 110 micrograms per cubic meter of air while working at the sand reclaim area. The employer did not use engineering and work practice controls to reduce and maintain employee exposure to respirable crystalline silica to or below the PEL.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 29, 2021
\$0.00



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.1053(g)(1)(iv): Respiratory protection was not provided during periods when the employee was in a regulated area:

(a) Reclaim area: On or about February 11, 2021, and at times prior thereto, the employer exposed an employee to respiratory hazards from respirable crystalline silica, in that the employee was required to wear a half-mask negative pressure respirator with chemical cartridges. The employee was exposed to respirable crystalline silica at 97 micrograms per cubic meter of air while working at the sand reclaim area.

(b) Reclaim area: On or about February 11, 2021, and at times prior thereto, the employer exposed an employee to respiratory hazards from respirable crystalline silica, in that the employee was required to wear a half-mask negative pressure respirator with chemical cartridges. The employee was exposed to respirable crystalline silica at 110 micrograms per cubic meter of air while working at the sand reclaim area.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$0.00

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

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

Inspection Number: 1512081
Inspection Date(s): 01/28/2021 - 01/28/2021
Issuance Date: 07/19/2021



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.134(d)(3)(iv)(B): The employer did not provide an air-purifying respirator equipped with a filter certified by NIOSH under 30 CFR par 11 as a high efficiency particulate air (HEPA) filter, or an air-purifying respirator equipped with a filter certified for particulates by NIOSH under 42 CFR part 84 for protection against particulates:

(a) Reclaim area: On or about February 11, 2021, and at times prior thereto; the employer exposed employees to respiratory hazards from respirable crystalline silica by requiring employees to wear half-mask negative pressure respirators with chemical cartridges for protection against respirable crystalline silica particulates. Two employees were exposed to respirable crystalline silica above the OSHA established Permissible Exposure Limit of 50 micrograms per cubic meter of air while working at sand reclaim area a regulated area.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$0.00

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



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

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

29 CFR 1910.1053(g)(2): Where respirator use was required by this section, the employer did not institute a respiratory protection program in accordance with 29 CFR 1910.134:

a) Reclaim area: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to respiratory hazards from respirable crystalline silica by providing and requiring employees to wear half-mask negative pressure respirators without providing the employees with medical evaluation to determine their medical ability to use the respirator and fit testing for proper fit of the respirator. Two employees were exposed to respirable crystalline silica above the OSHA established Permissible Exposure Limit of 50 micrograms per cubic meter of air while working at the sand reclaim area.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$7,022.00



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

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

(a) Reclaim area: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to respiratory hazards from respirable crystalline silica by providing and requiring employees to wear half-mask negative pressure respirators without providing the employees with medical evaluation to determine their ability to use the respirator. Two employees were exposed to respirable crystalline silica above the OSHA established Permissible Exposure Limit of 50 micrograms per cubic meter of air while working at the sand reclaim area.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$0.00

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

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

Inspection Number: 1512081
Inspection Date(s): 01/28/2021 - 01/28/2021
Issuance Date: 07/19/2021



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

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

(a) Reclaim area: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to respiratory hazards from respirable crystalline silica by providing and requiring employees to wear half-mask negative pressure respirators without fit testing employees prior to initial use of the respirators. Two employees were exposed to respirable crystalline silica above the OSHA established Permissible Exposure Limit of 50 micrograms per cubic meter of air while working at the sand reclaim area.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$0.00

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



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.1053(d)(3)(iv): Where the most recent exposure monitoring indicated that employee exposures were above the PEL, the employer did not repeat such monitoring within three months of the most recent monitoring:

(a) Reclaiming area: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to respirable crystalline silica hazards without conducting repeat exposure monitoring within three months of the most recent monitoring as required by the standard. The employer conducted employees monitoring for respirable crystalline silica hazards on April 10, 2017. Monitoring results indicated that some employees were exposed to respirable crystalline silica above the PEL.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 29, 2021
\$7,022.00



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.1053(i)(1)(i): The employer did not make medical surveillance available at no cost to each employee, and at a reasonable time and place, for each employee who has been occupationally exposed to respirable crystalline silica at or above the action level for 30 or more days per year:

a) Reclaiming area: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to respirable crystalline silica hazards at or above the action level for 30 or more days per year without providing employees with medical surveillance. Two employees were exposed to respirable crystalline silica above the OSHA established Permissible Exposure Limit of 50 micrograms per cubic meter of air while working at sand reclaim area.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 29, 2021
\$8,778.00



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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 1910.1053(j)(1): The employer did not include respirable crystalline silica in the program established to comply with the hazard communication standard (HCS) (29 CFR 1910.1200):

(a) Reclaiming area: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to respirable crystalline silica hazards without including respirable crystalline silica in the program established to comply with the hazard communication standard.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 27, 2021
\$7,022.00



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.1053(j)(3)(i): The employer did not ensure that each employee covered by this section could demonstrate knowledge and understanding of the following: (A) the health hazards associated with exposure to respirable crystalline silica; (B) specific tasks in the workplace that could result in exposure to respirable crystalline silica; (C) specific measures the employer has implemented to protect employees from exposure to respirable crystalline silica, including engineering controls, work practices, and respirators to be used; (D) the contents of this section; and, (E) the purpose and a description of the medical surveillance program required by paragraph (i) of this section:

(a) Reclaiming area: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to respirable crystalline silica hazards by failing to provide employees with specific information and training relating to respirable crystalline silica as required by the standard.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 27, 2021
\$0.00

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

Inspection Number: 1512081
Inspection Date(s): 01/28/2021 - 01/28/2021
Issuance Date: 07/19/2021



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.1053(j)(3)(ii): The employer did not make a copy of this section readily available without cost to each employee covered by this section:

(a) Reclaiming area: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to respirable crystalline silica hazards without making a copy of the standard readily available without cost to each employee covered by this section.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 27, 2021
\$0.00

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



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

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

29 CFR 1910.1053(e)(2)(i): The employer did not demarcate regulated areas from the rest of the workplace in a manner that minimized the number of employees exposed to respirable crystalline silica within the regulated area:

(a) Reclaiming area: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to respirable crystalline silica hazards without demarcating regulated areas from the rest of the workplace in a manner that minimized the number of employees exposed to respirable crystalline silica within the regulated area.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 27, 2021
\$7,022.00

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

Inspection Number: 1512081
Inspection Date(s): 01/28/2021 - 01/28/2021
Issuance Date: 07/19/2021



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.1053(e)(2)(ii): The employer failed to post signs at all entrances to regulated areas:

(a) Reclaim area: On or about February 11, 2021, and at times prior thereto, the employer failed to post signs at all entrances to regulated areas that warn employees of the danger of respirable crystalline silica.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 27, 2021
\$0.00

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

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

Inspection Number: 1512081
Inspection Date(s): 01/28/2021 - 01/28/2021
Issuance Date: 07/19/2021



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.1053(j)(2):The employer did not post signs at all entrances to regulated areas that bear the following legend:

DANGER RESPIRABLE CRYSTALLINE SILICA
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
WEAR RESPIRATORY PROTECTION IN THIS AREA
AUTHORIZED PERSONNEL ONLY

(a) Reclaiming area: On or about February 11, 2021, and at times prior thereto, the employer exposed employees to respirable crystalline silica hazards by failing to post signs at all entrances to regulated areas that warn employees of the danger of respirable crystalline silica.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 27, 2021
\$0.00

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

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

Inspection Number: 1512081
Inspection Date(s): 01/28/2021 - 01/28/2021
Issuance Date: 07/19/2021



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.134(k)(6): The employer did not provide the basic advisory information on respirators, as presented in Appendix D of 29 CFR 1910.134, in written or oral format to employees who wear respirators when such use was not required by the employer:

a) Foundry area: On or about February 17, 2021 and at times prior thereto the employer did not provide the basic advisory information on respirators as presented in Appendix D of 29CFR 1910.134 to employees wearing respirators voluntarily at the foundry.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 27, 2021
\$0.00

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

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

Inspection Number: 1512081
Inspection Date(s): 01/28/2021 - 01/28/2021
Issuance Date: 07/19/2021



Citation and Notification of Penalty

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605

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

29 CFR 1910.184(e)(3)(i): Thorough periodic inspections of alloy steel chain slings in use were not made on a regular basis:

a) Foundry area: On or about February 17, 2021, and times prior thereto, the employer did not ensure alloy steel chains slings used daily for rigging loads were thoroughly inspected annually.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 29, 2021
\$0.00


Jose A. Gonzalez
Area Director

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

U.S. Department of Labor
Occupational Safety and Health Administration
1141 Montlimar Drive
Suite 1006
Mobile, AL 36609



INVOICE / DEBT COLLECTION NOTICE

Company Name: SPI / MOBILE PULLEY WORKS, INC
Inspection Site: 905 SOUTH ANN STREET, Mobile, AL 36605
Issuance Date: 07/19/2021

Summary of Penalties for Inspection Number: 1512081

Citation 1 Item 1, Serious	\$13,653.00
Citation 1 Item 2, Serious	\$7,022.00
Citation 1 Item 3, Serious	\$7,022.00
Citation 1 Item 4a, Serious	\$7,022.00
Citation 1 Item 4b, Serious	\$0.00
Citation 1 Item 5, Serious	\$8,778.00
Citation 1 Item 6a, Serious	\$8,778.00
Citation 1 Item 6b, Serious	\$0.00
Citation 1 Item 6c, Serious	\$0.00
Citation 1 Item 6d, Serious	\$0.00
Citation 1 Item 7a, Serious	\$7,022.00
Citation 1 Item 7b, Serious	\$0.00
Citation 1 Item 7c, Serious	\$0.00
Citation 1 Item 8, Serious	\$7,022.00
Citation 1 Item 9, Serious	\$8,778.00
Citation 1 Item 10a, Serious	\$7,022.00
Citation 1 Item 10b, Serious	\$0.00
Citation 1 Item 10c, Serious	\$0.00
Citation 1 Item 11a, Serious	\$7,022.00
Citation 1 Item 11b, Serious	\$0.00
Citation 1 Item 11c, Serious	\$0.00
Citation 2 Item 1, Other-than-Serious	\$0.00
Citation 2 Item 2, Other-than-Serious	\$0.00

TOTAL PROPOSED PENALTIES:

\$89,141.00

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

Search. From the **OSHA Penalty Payment Form** search result, select Continue. The direct link is: <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

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

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

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

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

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


Jose A. Gonzalez
Area Director

07/19/2021
Date