

U.S. Department of Labor Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131



09/27/2021

General Aluminum Mfg. Company
and its successors
5159 South Prospect Street
Ravenna, OH 44266

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", (OSHA3000-04R) 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 (216) 447-4194.

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,

A handwritten signature in blue ink, appearing to read "Howard B. Eberts", with a long horizontal flourish extending to the right.

Howard B Eberts
Area Director

Enclosures

U.S. Department of Labor

Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131



Citation and Notification of Penalty

To:

General Aluminum Mfg. Company
and its successors
5159 South Prospect Street
Ravenna, OH 44266

Inspection Number: 1522608**Inspection Date(s):** 03/31/2021 - 09/22/2021**Issuance Date:** 09/27/2021**Inspection Site:**

5159 South Prospect Street
Ravenna, OH 44266

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 (216) 447-4194. 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 09/27/2021. The conference will be held by telephone or at the OSHA office located at 6393 Oak Tree Blvd, Suite 203, Independence, OH 44131 on _____ at _____ . Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1522608

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266
Issuance Date: 09/27/2021

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, 6393 Oak Tree Blvd, Suite 203, Independence, OH 44131.**

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: 1522608
Inspection Date(s): 03/31/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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

29 CFR 1910.136(a): The employer did not ensure that each affected employee uses protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole:

- a) The employer is failing to provide personal protective equipment in the form of metatarsals to protect employees from crushing hazards in the workplace. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio. Employees are not required to wear metatarsal boots while performing tasks in the Turntable #2 Catcher Table area which require lifting product weighing approximately 75-85 pounds as often as 250 times per shift.
- b) The employer is failing to provide personal protective equipment in the form of metatarsals to protect employees from crushing hazards in the workplace. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio. Employees are not required to wear metatarsal boots while performing tasks in the Turntable #4 Casting Conveyor area which require lifting product weighing approximately 45 pounds as often as 250 times per shift.
- c) The employer is failing to provide personal protective equipment in the form of metatarsals to protect employees from crushing hazards in the workplace. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio. Employees are not required to wear metatarsal boots while performing tasks in the Turntable #5 Catcher Table area which require lifting product weighing approximately 50 pounds as often as 250 times per shift.
- d) The employer is failing to provide personal protective equipment in the form of metatarsals to protect employees from crushing hazards in the workplace. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio. Employees are not required to wear metatarsal boots while performing tasks in the T1XX area which require lifting product weighing approximately 50 pounds as often as 400 times per shift.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the

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: 1522608
Inspection Date(s): 03/31/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

November 01, 2021

Proposed Penalty:

\$12,873.00

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: 1522608
Inspection Date(s): 03/31/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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

29 CFR 1910.147(c)(7)(i)(A): Authorized employee(s) did not receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation:

a. The employer is exposing employees to crushing hazards in that employees whose duties require them to clean out the inside of the Herschal Knockout Machines designated as #2615 and #2616 are not trained as authorized. During cleaning, employees place parts of their body inside the machine to clean the area behind the front of the machine and are only trained as affected employees. This was most recently documented on March 30, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio. This lack of training exposes the employees to the unexpected energization of moving parts inside the machines.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	November 01, 2021
Proposed Penalty:	\$13,653.00

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: 1522608
Inspection Date(s): 03/31/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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: **Willful - 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. The employer is failing to protect employees from crushing hazards while working on the Knockout Machines designated as #2615 and #2616 located in the T1XX area in that machines are not properly guarded to prevent employees from being crushed in the machines by inadvertent activation, including that the two handed optic control designed for use by a single operator on each machine is being used by multiple operators working in tandem and the shot pin and lower safety limit switch are not functioning as intended. This was most recently documented on March 30, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio. Employees enter the machine to load and unload parts and as a result are exposed to crushing hazards. An employee loading machine #2616 was crushed to death when another employee activated the machine causing the door to close.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: November 01, 2021
Proposed Penalty: \$136,532.00

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: 1522608
Inspection Date(s): 03/31/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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

29 CFR 1910.212(a)(2): Machine guard(s) on machine(s) were so installed that they offered accident hazards in themselves:

a. The employer is failing to ensure employees are protected against crushing hazards in that employees place parts of their body inside the Herschal Knockout Machines designated #2615 and #2616 located in the T1XX area while loading and unloading parts. This was most recently documented on March 30, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio. An employee loading machine #2616 was crushed to death when another employee activated the machine causing the door to close.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: November 01, 2021
Proposed Penalty: \$0.00

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



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

Inspection Number: 1522608
Inspection Date(s): 03/31/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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

Citation 3 Item 1 a Type of Violation: **Repeat - Serious**

29 CFR 1910.147(c)(4)(i):Procedures were not utilized for the control of potentially hazardous energy when employees are engaged in activities covered by this section:

a, The employer is failing to protect employees from crushing hazards in that employees cleaning out the Herschal Knockout Machines designated #2615 and #2616 located in the T1XX area do not utilize lockout/tagout procedures. Employees place parts of their body inside the machine while cleaning the area behind the front of the machine with the use of an air wand and while conducting other servicing and maintenance activities. The employees are thereby exposed to the unexpected energization of moving parts inside the machines. This was occurring on or before March 30, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

General Aluminum Mfg. Company was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29CFR 1910.147(c)(4)(i), which was contained in OSHA inspection number 1134563, citation number 01, item number 001 and was affirmed as a final order on December 14, 2017, with respect to a workplace located at 1370 Chamberlain Blvd, Conneaut, OH 44030 .

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: November 01, 2021
Proposed Penalty: \$136,532.00

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: 1522608
Inspection Date(s): 03/31/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

Citation 3 Item 1 b Type of Violation: **Repeat - 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):

a. The employer is failing to protect employees from crushing hazards while cleaning and conducting other servicing or maintenance activities on the Hershel Knockout Machines designated #2615 and #2616 located in the T1XX area. The employer is failing to ensure the energy control application steps are followed as the machine is not shut down or turned off to perform the cleaning and servicing or maintenance work [per the 1910.147(d)(2) requirements], including cleaning the machine with an air wand and entering into the machine to remove debris. As a result, the remaining applicable energy 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)], are not implemented to protect employees from unexpected energization. This was occurring on or before March 30, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

General Aluminum Mfg. Company was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.147(d)(4)(i) which was contained in OSHA inspection number 1050654, citation number 01 item number 002 and was affirmed as a final order on March 3, 2017, with respect to a workplace located at 5159 South Prospect Street, Ravenna, Ohio 44266.

General Aluminum Mfg. Company was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.147(d)(3), which was contained in OSHA inspection number 1060722, citation number 01, item number 001 and was affirmed as a final order on February 27, 2017, with respect to a workplace located at 13663 Short Road, Wapakoneta, Ohio 45895.

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

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: 1522608
Inspection Date(s): 03/31/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	November 01, 2021
Proposed Penalty:	\$0.00

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



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

Inspection Number: 1522608
Inspection Date(s): 03/31/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during the operating cycle(s):

a. The employer is failing to protect employees from amputation hazards in that the unused portion of the band saw blade in the T1XX area is not guarded. Employees trim the flanges off different size parts with no adjustable blade guard. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

General Aluminum Mfg., Company was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29CFR 1910.212(a)(3)(ii), which was contained in OSHA inspection number 1060722, citation number 01, item number 001C and was affirmed as a final order on February 25, 2017, with respect to a workplace located at 13663 Short Road, Wapakoneta, OH 45895.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: November 01, 2021
Proposed Penalty: \$75,092.00

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



Howard B Eberts
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131



**INVOICE /
DEBT COLLECTION NOTICE**

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266
Issuance Date: 09/27/2021

Summary of Penalties for Inspection Number: 1522608

Citation 1 Item 1, Serious	\$12,873.00
Citation 1 Item 2, Serious	\$13,653.00
Citation 2 Item 1a, Willful - Serious	\$136,532.00
Citation 2 Item 1b, Willful - Serious	\$0.00
Citation 3 Item 1a, Repeat - Serious	\$136,532.00
Citation 3 Item 1b, Repeat - Serious	\$0.00
Citation 3 Item 2, Repeat - Serious	\$75,092.00

TOTAL PROPOSED PENALTIES: \$374,682.00

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 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

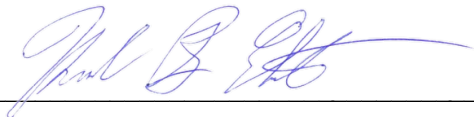
your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to two times.

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.



Howard B Eberts
Area Director

September 27, 2021

Date

U.S. Department of Labor Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131



09/27/2021

General Aluminum Mfg. Company
and its successors
5159 South Prospect Street
Ravenna, OH 44266

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", (OSHA3000-04R) 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 (216) 447-4194.

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,

A handwritten signature in blue ink, appearing to read "Howard B. Eberts", with a long horizontal flourish extending to the right.

Howard B Eberts
Area Director

Enclosures

U.S. Department of Labor
Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131



Citation and Notification of Penalty

To:
General Aluminum Mfg. Company
and its successors
5159 South Prospect Street
Ravenna, OH 44266

Inspection Number: 1533816
Inspection Date(s): 05/28/2021 - 09/22/2021
Issuance Date: 09/27/2021

Inspection Site:
5159 South Prospect Street
Ravenna, OH 44266

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 (216) 447-4194. 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 09/27/2021. The conference will be held by telephone or at the OSHA office located at 6393 Oak Tree Blvd, Suite 203, Independence, OH 44131 on _____ at _____ . Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1533816

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266
Issuance Date: 09/27/2021

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, 6393 Oak Tree Blvd, Suite 203, Independence, OH 44131.**

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: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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

29 CFR 1910.119(d):The employer did not complete a compilation of written process safety information pertaining to the equipment in the process.

On or about May 28, 2021, where sulfur dioxide (liquid) was present in quantities greater than 1000 pounds, the employer did not complete a compilation of written process safety information pertaining to the hazards of the highly hazardous chemicals used or produced by the process, the technology of the process, and the equipment in the process exposing employees to hazards associated with sulfur dioxide.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	October 15, 2021
Proposed Penalty:	\$10,728.00

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

Inspection Number: 1533816
Inspection Date(s): 05/28/2021 - 09/22/2021
Issuance Date: 09/27/2021



Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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

29 CFR 1910.119(e)(1):The employer did not perform an initial process hazard analysis (hazard evaluation) on processes covered by 29 CFR 1910.119:

On or about May 28, 2021, where sulfur dioxide (liquid) was present in quantities greater than 1000 pounds, the employer did not perform an initial process hazard analysis (PHA). Lack of a PHA results in an employer not adequately identifying, evaluating, and controlling the hazards of the process, exposing employees to hazards associated with sulfur dioxide.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	October 15, 2021
Proposed Penalty:	\$10,728.00

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: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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

29 CFR 1910.119(f)(1): The employer did not develop and implement written operating procedures that provided clear instructions for safely conducting activities involved in each covered process consistent with the process safety information addressing at least the elements listed in 1910.119(f)(1)(i)(A)-1910.119(f)(1)(iv):

On or about May 28, 2021, where sulfur dioxide (liquid) was present in quantities greater than 1000 pounds, the employer did not develop and implement written operating procedures which outline items (i) through (iv) of 1910.119(f)(1). Lack of operating procedures consistent with the requirements of the PSM standard can result in equipment malfunction, failure, or chemical release exposing employees to hazards associated with sulfur dioxide.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	October 22, 2021
Proposed Penalty:	\$10,728.00

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: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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

29 CFR 1910.119(g)(3): The employer did not ascertain that each employee involved in operating a process has received and understood the training required by this paragraph and did not prepare a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.

On or about May 28, 2021, where sulfur dioxide (liquid) was present in quantities greater than 1000 pounds, the employer did not ensure that training on an overview of the process and in operating procedures outlined in 1910.119(f) was conducted and documented. Lack of training and subsequent verification and documentation exposes employees to hazards associated with sulfur dioxide in the event of equipment failure or leaks in the system.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	October 15, 2021
Proposed Penalty:	\$10,728.00

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: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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

29 CFR 1910.119(j)(2):The employer did not establish written procedures to maintain the on-going integrity of process equipment:

On or about May 28, 2021, where sulfur dioxide (liquid) was present in quantities greater than 1000 pounds, the employer had not developed and implemented written procedures to maintain the ongoing integrity of process equipment, such as for equipment including, but not limited to the Silvan Industries Liquid Surge Tank (sn: 485411) and the Kunkle Safety Relief Valve 910. Lack of mechanical integrity procedures/inspections can result in equipment failures and loss of containment, exposing employees to hazards associated with sulfur dioxide.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	October 15, 2021
Proposed Penalty:	\$10,728.00



Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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

29 CFR 1910.119(l)(1):The employer did not establish written procedures to manage changes to process chemicals, technology, equipment, and procedures, and changes to facilities that affect a covered process:

On or about May 28, 2021, where sulfur dioxide (liquid) was present in quantities greater than 1000 pounds, the employer had not developed and implemented written procedures to manage changes to process chemicals, technology, equipment, and procedures; and changes to facility that affect a covered process. Lack of management of change procedures could result in equipment failures and loss of containment due to failure to: assess the impact of changes, update operating procedures with any changes, to update changes to process safety information, and to train employees on the proposed changes, exposing employees to hazards associated with sulfur dioxide.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

October 15, 2021
\$10,728.00

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: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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 1910.119(n):The employer did not establish an emergency action plan for the entire plant in accordance with the provisions of 29 CFR 1910.38:

On or about May 28, 2021, where sulfur dioxide (liquid) was present in quantities greater than 1000 pounds, the employer had not developed and implemented written emergency action plan in accordance with 1910.38 in that their existing plan lacked procedures for reporting a fire or other emergency, procedures to be followed by employees who remain to operate critical plant operations before they evacuate, procedures to be followed by employees performing rescue or medical duties, the name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan, as well as procedures for handling small releases.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **October 15, 2021**
Proposed Penalty: **\$10,728.00**

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

Inspection Number: 1533816
Inspection Date(s): 05/28/2021 - 09/22/2021
Issuance Date: 09/27/2021



Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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

29 CFR 1910.120(q)(1):The employer did not develop and implement an emergency response plan to handle anticipated emergencies prior to commencement of emergency response operations:

On or about May 28, 2021, where employees are expected to respond to emergencies involving the plant's sulfur dioxide blending system, the employer had not developed and implemented a written emergency response plan.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	October 15, 2021
Proposed Penalty:	\$0.00

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

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

Inspection Number: 1533816
Inspection Date(s): 05/28/2021 - 09/22/2021
Issuance Date: 09/27/2021



Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266

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


29 CFR 1910.120(q)(8)(ii): A statement of the training or competency of each employee was not made:

On or about May 28, 2021, the employer did not ensure that statements were made of annual training or competency for each employee involved in emergency response for the sulfur dioxide system.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

October 15, 2021
\$0.00



Howard B Eberts
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
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131



**INVOICE /
DEBT COLLECTION NOTICE**

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 South Prospect Street, Ravenna, OH 44266
Issuance Date: 09/27/2021

Summary of Penalties for Inspection Number: 1533816

Citation 1 Item 1, Serious	\$10,728.00
Citation 1 Item 2, Serious	\$10,728.00
Citation 1 Item 3, Serious	\$10,728.00
Citation 1 Item 4, Serious	\$10,728.00
Citation 1 Item 5, Serious	\$10,728.00
Citation 1 Item 6, Serious	\$10,728.00
Citation 1 Item 7a, Serious	\$10,728.00
Citation 1 Item 7b, Serious	\$0.00
Citation 1 Item 7c, Serious	\$0.00

TOTAL PROPOSED PENALTIES: \$75,096.00

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 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

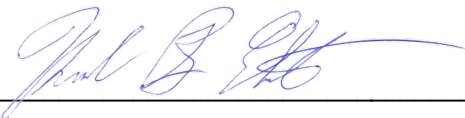
bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The 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.



Howard B Eberts

Area Director

September 27, 2021

Date

U.S. Department of Labor Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131



09/27/2021

General Aluminum Mfg. Company
and its successors
6065 Parkland Blvd
Cleveland, OH 44124

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", (OSHA3000-04R) 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 (216) 447-4194.

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,

A handwritten signature in blue ink, appearing to read "Howard B. Eberts", with a long horizontal flourish extending to the right.

Howard B Eberts
Area Director

Enclosures

U.S. Department of Labor
Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131



Citation and Notification of Penalty

To:
General Aluminum Mfg. Company
and its successors
5159 S. Prospect St.
Ravenna, OH 44266

Inspection Number: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Inspection Site:
5159 S. Prospect St.
Ravenna, OH 44266

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 (216) 447-4194. 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 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 09/27/2021. The conference will be held by telephone or at the OSHA office located at 6393 Oak Tree Blvd, Suite 203, Independence, OH 44131 on _____ at _____ . Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1529075

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266
Issuance Date: 09/27/2021

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, 6393 Oak Tree Blvd, Suite 203, Independence, OH 44131.**

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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

29 CFR OSH ACT of 1970 Section (5)(a)(1):Section 5(a)(1) of the Occupational Safety and Health Act: 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 burn hazards from fire and explosions due to the presence of water in locations where molten aluminum was being poured.

- a. The employer is failing to protect employees from burn and explosion hazards due to the potential for molten aluminum contacting standing water underneath the tilt pour devices on turn table #2. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio. The water lines cooling the molds on the tilt pour devices are leaking, and water is being allowed to pool on the floor under the tilt pour devices.
- b. The employer is failing to protect employees from burn and explosion hazards due to the potential for molten aluminum contacting standing water underneath the tilt pour devices on turn table #1B. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio. The water lines cooling the molds on the tilt pour devices are leaking, and water is being allowed to pool on the floor under the tilt pour devices.

Among other methods, feasible and acceptable means of abatement would be to implement a program to regularly repair and/or replace all sources of water leaks including, but not limited to, leaking water lines as needed and prior to aluminum pours.

Abatement Schedule:

STEP 1- A combination of administrative controls shall be implemented as an interim protective measure until feasible engineering and administrative controls can be permanently implemented.

STEP 2- A written detailed plan of abatement shall be submitted to the Area Director outlining a schedule for the implementation of engineering and/or administrative measures to control employee exposures to the hazardous condition as referenced in this citation. This plan shall include, at a minimum, target dates for the following actions which must be consistent with the abatement dates required by this citation: (1) Evaluation of

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

engineering/administrative control options; (2) Selection of optimum control methods and completion of design; (3) Procurement, installation and operation of selected control measures; and (4) Testing and acceptance or modification/redesign of controls;
STEP 3- Abatement shall have been completed by the implementation of feasible engineering and administrative controls upon verification of their effectiveness in achieving compliance.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	October 22, 2021
Proposed Penalty:	\$13,653.00

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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

29 CFR 1910.132(a): Protective equipment was not used when necessary whenever hazards capable of causing injury and impairment were encountered.

a. The employer is failing to protect quality control technicians from molten aluminum burn hazards to the torso, arms, and legs when the employee is taking quality control samples and adding alloys to the molten aluminum bath. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio. Quality Control technicians are not being required to wear adequate PPE when near molten aluminum.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	October 22, 2021
Proposed Penalty:	\$13,653.00

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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

29 CFR 1910.147(c)(7)(i)(A): Authorized employee(s) did not receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation.

- a. The employer is failing to protect operators from pinch point hazards by ensuring employees are trained as authorized employees under the company's lockout program when performing work such as, but not limited to, core box prep and core box maintenance activities on the #2 core machine located in the Core Department. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- b. The employer is failing to protect operators from pinch point hazards by ensuring employees are trained as authorized employees under the company's lockout program when performing work such as, but not limited, to core box prep and core box maintenance activities on the #3143 core machine located in the Core Department. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- c. The employer is failing to protect operators from pinch point hazards by ensuring employees are trained as authorized employees under the company's lockout program when performing work such as, but not limited to, mold prep activities, performing maintenance on the equipment, and when unjamming stuck parts from the upper die at the robot catching station on Tilt Pour Turntable #2 located in the foundry area. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- d. The employer is failing to protect operators from pinch point hazards by ensuring employees are trained as authorized employees under the company's lockout program when performing work such as, but not limited to, mold prep activities, performing maintenance on the equipment, and when unjamming stuck parts from the upper die at the robot catching station on Tilt Pour Turntable #1B located in the foundry area. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

e. The employer is failing to protect operators from pinch point hazards by ensuring employees are trained as authorized employees under the company's lockout program when performing work such as, but not limited to, mold prep activities, performing maintenance on the equipment, and when unjamming stuck parts from the upper die at the robot catching station on Tilt Pour Turntable #4a located in the foundry area. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

f. The employer is failing to protect operators from pinch point hazards by ensuring employees are trained as authorized employees under the company's lockout program when performing work such as, but not limited to, mold prep activities, performing maintenance on the equipment, and when unjamming stuck parts from the upper die at the robot catching station on Tilt Pour Turntable #5 located in the foundry area. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

g. The employer is failing to protect operators from pinch point hazards by ensuring employees are trained as authorized employees under the company's lockout program when performing work such as, but not limited to, mold prep activities, performing maintenance on the equipment, and when unjamming stuck parts from the upper die at the robot catching station on Tilt Pour Turntable #6 located in the foundry area. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: October 22, 2021
Proposed Penalty: \$13,653.00

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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 1910.178(a)(4): Modifications or additions which affect capacity and safe operation of powered industrial truck were performed by the employer without the manufacturer's prior written approval.

- a. The employer is failing to ensure the manufacturer's approval is obtained prior to using an aftermarket boom attachment with a Caterpillar R9141 forklift. Employees are exposed to crushing hazards while using the aftermarket boom attachment to remove fixtures from the knockout machine #2616. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- b. The employer is failing to ensure the manufacturer's approval is obtained prior to using an aftermarket boom attachment with a Caterpillar GC55K forklift. Employees are exposed to crushing hazards while using the aftermarket boom attachment to load scrap aluminum into furnaces #5 and #6. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- c. The employer is failing to ensure the manufacturer's approval is obtained prior to using an aftermarket boom attachment with a Mitsubishi FGC60K forklift. Employees are exposed to crushing hazards while using the aftermarket boom attachment to drop off furnaces #5 and #6. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

Date By Which Violation Must be Abated:
Proposed Penalty:

October 22, 2021
\$13,653.00

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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

29 CFR 1910.178(a)(5): The powered industrial truck was equipped with front-end attachments other than factory installed attachments, however the employer did not request that the truck be marked to identify the attachments and show the approximate weight of the truck and attachment combination at maximum elevation with load laterally centered.

- a. The employer is failing to ensure the forklift data plate for the Caterpillar R9141 forklift is updated to show the identity and approximate weight of the truck and attachment combination prior to using the boom attachment. Employees are exposed to crushing hazards while using the aftermarket boom attachment to remove fixtures from the knockout machine #2616. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- b. The employer is failing to ensure the forklift data plate for the Caterpillar GC55K forklift is updated to show the identity and approximate weight of the truck and attachment combination prior to using the boom attachment. Employees are exposed to crushing hazards while using the aftermarket boom attachment to load scrap aluminum into furnaces #5 and #6. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- c. The employer is failing to ensure the forklift data plate for the Mitsubishi FGC60K forklift is updated to show the identity and approximate weight of the truck and attachment combination prior to using the boom attachment. Employees are exposed to crushing hazards while using the aftermarket boom attachment to dross off furnaces #5 and #6. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	October 22, 2021
Proposed Penalty:	\$0.00

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



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

Inspection Number: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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: **Willful - Serious**

29 CFR 1910.147(c)(4)(i): Procedures were not developed, documented and utilized for the control of potentially hazardous energy when employees were engaged in activities covered by this section:

- a. The employer is failing to protect operators from pinch point hazards by ensuring employees utilized lockout procedures when performing work such as but not limited to core box prep and core box maintenance activities on the #2 core machine located in the Core Department. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- b. The employer is failing to protect operators from pinch point hazards by ensuring employees utilized lockout procedures when performing work such as but not limited to core box prep and core box maintenance activities on the #3143 core machine located in the Core Department. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- c. The employer is failing to protect operators from pinch point hazards by ensuring operators utilized lockout procedures when working on the Tilt Pour Turntable #2 located in the foundry area. Employees perform mold prep activities, maintenance on the equipment, and unjam stuck parts from the upper die at the robot catching station. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- d. The employer is failing to protect operators from pinch point hazards by ensuring operators utilized lockout procedures when working on the Tilt Pour Turntable #1B located in the foundry area. Employees perform mold prep activities, maintenance on the equipment, and unjam stuck parts from the upper die at the robot catching station. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- e. The employer is failing to protect operators from pinch point hazards by ensuring operators utilized lockout procedures when working on the Tilt Pour Turntable #4A located in the foundry area. Employees perform mold prep activities, maintenance on the equipment, and unjam stuck parts from the upper die at the robot catching

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

station. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

f. The employer is failing to protect operators from pinch point hazards by ensuring operators utilized lockout procedures when working on the Tilt Pour Turntable #5 located in the foundry area. Employees perform mold prep activities, maintenance on the equipment, and unjam stuck parts from the upper die at the robot catching station. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

g. The employer is failing to protect operators from pinch point hazards by ensuring operators utilized lockout procedures when working on the Tilt Pour Turntable #6 located in the foundry area. Employees perform mold prep activities, maintenance on the equipment, and unjam stuck parts from the upper die at the robot catching station. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	November 15, 2021
Proposed Penalty:	\$136,532.00

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

Citation 2 Item 1 b Type of Violation: **Willful - 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).

- a. The employer is failing to protect operators from pinch point hazards by ensuring employees were provided procedures adequately listing the actions necessary to de-energize equipment prior to performing work such as but not limited to core box prep and core box maintenance activities on the #2 core machine located in the Core Department. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- b. The employer is failing to protect operators from pinch point hazards by ensuring employees were provided procedures adequately listing the actions necessary to de-energize equipment prior to performing work such as but not limited to core box prep and core box maintenance activities on the #3143 core machine located in the Core Department. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- c. The employer is failing to protect operators from pinch point hazards by ensuring operators were provided procedures adequately listing the actions necessary to de-energize equipment prior to working on the Tilt Pour Turntable #2 located in the foundry area. Employees perform mold prep activities, maintenance on the equipment, and unjam stuck parts from the upper die at the robot catching station. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- d. The employer is failing to protect operators from pinch point hazards by ensuring operators were provided procedures adequately listing the actions necessary to de-energize equipment prior to working on the Tilt Pour Turntable #1B located in the foundry area. Employees perform mold prep activities, maintenance on the equipment, and unjam stuck parts from the upper die at the robot catching station. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

e. The employer is failing to protect operators from pinch point hazards by ensuring operators were provided procedures adequately listing the actions necessary to de-energize equipment prior to working on the Tilt Pour Turntable #4A located in the foundry area. Employees perform mold prep activities, maintenance on the equipment, and unjam stuck parts from the upper die at the robot catching station. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

f. The employer is failing to protect operators from pinch point hazards by ensuring operators were provided procedures adequately listing the actions necessary to de-energize equipment prior to working on the Tilt Pour Turntable #5 located in the foundry area. Employees perform mold prep activities, maintenance on the equipment, and unjam stuck parts from the upper die at the robot catching station. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

g. The employer is failing to protect operators from pinch point hazards by ensuring operators were provided procedures adequately listing the actions necessary to de-energize equipment prior to working on the Tilt Pour Turntable #6 located in the foundry area. Employees perform mold prep activities, maintenance on the equipment, and unjam stuck parts from the upper die at the robot catching station. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

As a result, the remaining applicable energy control elements, involving machine isolation [1910.147(d)(3)], lock-out/tag-out device application [1910.147(d)(4)], dissipation of residual energy [1910.147(d)(5)], and verification of isolation [1910.147(d)(6)] are not implemented to protect employees from struck-by and caught-in-between hazards while employees are conducting activities such as, but not limited to, performing servicing and maintenance work on the tilt pour devices, unjamming castings from the top molds of the tilt pour devices using a hammer, removing aluminum flashing from the mold halves on the tilt pour devices, performing servicing on the sand blow head and vents of the core boxes, and applying clay to the interior surfaces of the core boxes.

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

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: October 22, 2021
Proposed Penalty: \$0.00

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



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

Inspection Number: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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

Citation 2 Item 2 a Type of Violation: **Willful - 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. The employer is failing to protect operators from pinch point hazards created by the movement of the Hall Permanent Mold Tilt Pour Devices for turntable #2, located in the foundry area, while performing various tasks such as, but not limited to, attaching hoses to the equipment, placing floor dry around the bottom of the tilt pours, blowing water off the rotating pouring deck, shoveling up floor dry from around the base of the tilt pours, and checking water flow gages to the molds. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

October 22, 2021
\$136,532.00

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s).

a. The employer is failing to protect operators from crushing hazards on the Hall Permanent Mold Tilt Pour Devices for turntable #2, located in the foundry area. Employees are exposed to crushing hazards created by the upper and lower molds as the mold halves close. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **October 22, 2021**
Proposed Penalty: **\$0.00**

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



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

Inspection Number: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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 3 a Type of Violation: **Willful - 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. The employer is failing to protect operators from pinch point hazards created by the movement of the Hall Permanent Mold Tilt Pour Devices for turntable #1B, located in the foundry area, while performing various tasks such as, but not limited to, attaching hoses to the equipment, placing floor dry around the bottom of the tilt pours, blowing water off the rotating pouring deck, shoveling up floor dry from around the base of the tilt pours, and checking water flow gages to the molds. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **October 22, 2021**
Proposed Penalty: **\$136,532.00**

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

Citation 2 Item 3 b Type of Violation: **Willful - Serious**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s).

a. The employer is failing to protect operators from crushing hazards on the Hall Permanent Mold Tilt Pour Devices for turntable #1B, located in the foundry area. Employees are exposed to crushing hazards created by the upper and lower molds as the mold halves close. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **October 22, 2021**
Proposed Penalty: **\$0.00**

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



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

Inspection Number: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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 4 a Type of Violation: **Willful - 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. The employer is failing to protect operators from pinch point hazards created by the movement of the Hall Permanent Mold Tilt Pour Devices for turntable #5, located in the foundry area, while performing various tasks such as, but not limited to, attaching hoses to the equipment, placing floor dry around the bottom of the tilt pours, blowing water off the rotating pouring deck, shoveling up floor dry from around the base of the tilt pours, and checking water flow gages to the molds. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- b. The employer is failing to protect operators from pinch point hazards created by the movement of the catcher cell robot for turntable #5, located in the foundry area, employees are exposed to pinch point hazards between the robot catcher table and the employee's work station. The work station is equipped with light curtains but there is a 33 inch gap between the work station light curtain and the robot cell metal enclosure which allows employees to reach around the guarding and enter the robot's operational envelope. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

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.

Date By Which Violation Must be Abated:
Proposed Penalty:

October 22, 2021
\$136,532.00



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

Inspection Number: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

Citation 2 Item 4 b Type of Violation: **Willful - Serious**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

a. The employer is failing to protect operators from crushing hazards on the Hall Permanent Mold Tilt Pour Devices for turntable #5, located in the foundry area. Employees are exposed to crushing hazards created by the upper and lower molds as the mold halves close. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **October 22, 2021**
Proposed Penalty: **\$0.00**

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



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

Inspection Number: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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 5 a Type of Violation: **Willful - 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. The employer is failing to protect operators from pinch point hazards created by the movement of the Hall Permanent Mold Tilt Pour Devices for turntable #6, located in the foundry area, while performing various tasks such as, but not limited to, attaching hoses to the equipment, placing floor dry around the bottom of the tilt pours, blowing water off the rotating pouring deck, shoveling up floor dry from around the base of the tilt pours, and checking water flow gages to the molds. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- b. The employer is failing to protect operators from pinch point hazards created by the movement of the catcher cell robot for turntable #6, located in the foundry area, employees are exposed to pinch point hazards between the robot catcher table and the employee's work station. The work station is equipped with light curtains but there is a 36 inch gap between the work station light curtain and the robot cell metal enclosure which allows employees to reach around the guarding and enter the robot's operational envelope. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

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.

Date By Which Violation Must be Abated:
Proposed Penalty:

October 22, 2021
\$136,532.00



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

Inspection Number: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

Citation 2 Item 5 b Type of Violation: **Willful - Serious**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s).

a. The employer is failing to protect operators from crushing hazards on the Hall Permanent Mold Tilt Pour Devices for turntable #6, located in the foundry area. Employees are exposed to crushing hazards created by the upper and lower molds as the mold halves close. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **October 22, 2021**
Proposed Penalty: **\$0.00**

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



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

Inspection Number: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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 6 a Type of Violation: **Willful - 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. The employer is failing to protect operators from pinch point hazards created by the movement of the Hall Permanent Mold Tilt Pour Devices for turntable #4a, located in the foundry area, while performing various tasks such as, but not limited to, attaching hoses to the equipment, placing floor dry around the bottom of the tilt pours, blowing water off the rotating pouring deck, shoveling up floor dry from around the base of the tilt pours, and checking water flow gages to the molds. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **October 22, 2021**
Proposed Penalty: **\$136,532.00**

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

Citation 2 Item 6 b Type of Violation: **Willful - Serious**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

a. The employer is failing to protect operators from crushing hazards on the Hall Permanent Mold Tilt Pour Devices for turntable #4A, located in the foundry area. Employees are exposed to crushing hazards created by the upper and lower molds as the mold halves close. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **October 22, 2021**
Proposed Penalty: **\$0.00**

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



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

Inspection Number: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

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 7 a Type of Violation: **Willful - 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. The employer is failing to protect operators from pinch point hazards on the #2 core machine located in the Core Department while performing various tasks including, but not limited to, monitoring the operation of core machine #2. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **October 22, 2021**
Proposed Penalty: **\$136,532.00**

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

Citation 2 Item 7 b Type of Violation: **Willful - Serious**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s).

a. The employer is failing to protect operators from crushing hazards on Core Machine #2, located in the core room. Employees are exposed to crushing hazards created by the closing of the lower mold and the top plate as while performing various tasks, including but not limited to, set up, removing finished cores from the equipment, and cleaning between cycles. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	October 22, 2021
Proposed Penalty:	\$0.00

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



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

Inspection Number: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

Citation 2 Item 8 Type of Violation: **Willful - 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. The employer is failing to protect operators from pinch point hazards on the #3143 core machine and associated picker table located in the Core Department while performing various tasks including, but not limited to, monitoring the operation of core machine 3143, cleaning between cycles, and removing cores from the picker table. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	October 22, 2021
Proposed Penalty:	\$136,532.00

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

Citation 3 Item 1 Type of Violation: **Repeat - 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. The employer is failing to protect operators from pinch point hazards created by the movement of the chuck and tooling of the Bridgeport mill, located in the quality control department. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- b. The employer is failing to protect operators from struck-by hazards created by the movement of the skip hoist used to load aluminum scrap into furnace #2. The barrier guarding around the base of the skip hoist is not equipped with a functioning interlock. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.
- c. The employer is failing to protect operators from pinch point hazards created by the movement of the chuck and tooling of the Cubic Lathe 5-712, located adjacent to the heat treat department. The barrier guard is not equipped with a functioning interlock. This was most recently documented on May 6, 2021 at the General Aluminum Mfg. Company facility located in Rootstown Township, Ohio.

General Aluminum Mfg. Company was previously cited for a violation of this occupational safety and health standard or its equivalent standard 1910.212.a.1, which was contained in OSHA inspection number 1060722, citation number 1, item number 1b and was affirmed as a final order on February 27, 2017, with respect to a workplace located at 13663 Short Rd., Wapakoneta, OH 45895.

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

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: 1529075
Inspection Date(s): 05/06/2021 - 09/22/2021
Issuance Date: 09/27/2021

Citation and Notification of Penalty

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

October 22, 2021

Proposed Penalty:

\$75,092.00

A handwritten signature in blue ink, appearing to read "Howard B Eberts", is written over a horizontal line.

Howard B Eberts
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
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131



**INVOICE /
DEBT COLLECTION NOTICE**

Company Name: General Aluminum Mfg. Company
Inspection Site: 5159 S. Prospect St., Ravenna, OH 44266
Issuance Date: 09/27/2021

Summary of Penalties for Inspection Number: 1529075

Citation 1 Item 1, Serious	\$13,653.00
Citation 1 Item 2, Serious	\$13,653.00
Citation 1 Item 3, Serious	\$13,653.00
Citation 1 Item 4a, Serious	\$13,653.00
Citation 1 Item 4b, Serious	\$0.00
Citation 2 Item 1a, Willful - Serious	\$136,532.00
Citation 2 Item 1b, Willful - Serious	\$0.00
Citation 2 Item 2a, Willful - Serious	\$136,532.00
Citation 2 Item 2b, Willful - Serious	\$0.00
Citation 2 Item 3a, Willful - Serious	\$136,532.00
Citation 2 Item 3b, Willful - Serious	\$0.00
Citation 2 Item 4a, Willful - Serious	\$136,532.00
Citation 2 Item 4b, Willful - Serious	\$0.00
Citation 2 Item 5a, Willful - Serious	\$136,532.00
Citation 2 Item 5b, Willful - Serious	\$0.00
Citation 2 Item 6a, Willful - Serious	\$136,532.00
Citation 2 Item 6b, Willful - Serious	\$0.00
Citation 2 Item 7a, Willful - Serious	\$136,532.00
Citation 2 Item 7b, Willful - Serious	\$0.00
Citation 2 Item 8, Willful - Serious	\$136,532.00
Citation 3 Item 1, Repeat - Serious	\$75,092.00

TOTAL PROPOSED PENALTIES: \$1,221,960.00

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.

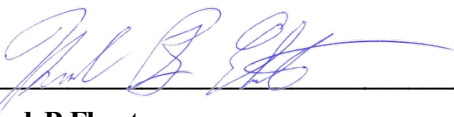
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 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.



Howard B Eberts

Area Director

September 27, 2021

Date