

U.S. Department of Labor Occupational Safety and Health Administration
36 Triangle Park Drive
Cincinnati, OH 45246



09/01/2022

Woodbridge Englewood Inc. DBA Hematite Inc.
and its successors
300 Lau Parkway
Clayton, OH 45315

Dear Employer:

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following an OSHA Inspection", (OSHA 3000-04R) revised 2018, which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at (513) 841-4132.

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 cursive script that reads "Ken Montgomery".

Ken E. Montgomery
Area Director

Enclosures

U.S. Department of Labor
Occupational Safety and Health Administration
36 Triangle Park Drive
Cincinnati, OH 45246



Citation and Notification of Penalty

To:
Woodbridge Englewood Inc. DBA Hematite Inc.
and its successors
300 Lau Parkway
Clayton, OH 45315

Inspection Number: 1582147
Inspection Date(s): 03/09/2022 - 08/30/2022
Issuance Date: 09/01/2022

Inspection Site:
300 Lau Parkway
Clayton, OH 45315

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 (513) 841-4132. 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 09/01/2022. The conference will be held by telephone or at the OSHA office located at 36 Triangle Park Drive, Cincinnati, OH 45246 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1582147

Company Name: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315
Issuance Date: 09/01/2022

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, 36 Triangle Park Drive, Cincinnati, OH 45246.**

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: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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

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

a) On or about March 4, 2022, employees working on and around the MAAC VF1 Vacuum Forming Line were exposed to fire hazards, including burns and smoke inhalation, due to fires that occurred in the type A industrial oven when high molecular weight polyethylene (HMWPE) sheets and formed auto parts contacted heating elements and ignited due to conditions being present that allowed for the melting of the HMWPE and which did not prevent contact with the heating elements in the bottom of the oven.

b) On or about April 13, 2022, employees working on and around the MAAC VF1 Vacuum Forming Line were exposed to fire hazards, including burns and smoke inhalation, due to fires that occurred in the type A industrial oven when high molecular weight polyethylene (HMWPE) sheets and formed auto parts contacted heating elements and ignited due to conditions being present that allowed for the melting of the HMWPE and which did not prevent contact with the heating elements in the bottom of the oven.

c) On or about June 7, 2022, employees working on and around the MAAC VF1 Vacuum Forming Line were exposed to fire hazards, including burns and smoke inhalation, due to fires that occurred in the type A industrial oven when high molecular weight polyethylene (HMWPE) sheets and formed auto parts contacted heating elements and ignited due to conditions being present that allowed for the melting of the HMWPE and which did not prevent contact with the heating elements in the bottom of the oven.

Among other methods one feasible and acceptable method of abatement is to follow applicable sections of the NFPA 86 Standard for Ovens and Furnaces, Edition 2015:

8.18.2.1 Excess temperature limit interlocks shall be installed in accordance with one of the following:

(1) An excess temperature limit interlock shall be installed and interlocked into the burner management system.

8.2.5 Regularly scheduled inspection, testing, and maintenance of all safety devices shall be performed.

8.2.6 Safety devices shall be installed, used, and maintained in accordance with the manufacturer's instructions.

11.5.1 Upon activation of an oven's fire protection system, the following actions shall be initiated:

(1) Safety shutdown of the oven.

(2) Discontinue the introduction of flammable or combustible material.

Per the MAAC operator manual (manual 04834), turn on the sag eye laser sensor and enable the system to turn off the oven and will move the material out of the oven. Turn on the temperature IR sensors and input a high

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: 1582147
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Issuance Date: 09/01/2022



Citation and Notification of Penalty

Company Name: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

temperature which will move the material out of the oven.

Address failure modes identified in the Woodbridge document MS VF1 FMEA prior to operation of the equipment which include but are not limited to parts being stuck in the frame, improper loading of material due to air leaks at robots and clamps, damaged clamps, improperly adjusted clamps, incorrect sheet sizes, loading cardboard, failure of carousel to rotate, fire blanket not deploying, sag eyes dirty, not functioning, and not adjusted correctly.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	September 28, 2022
Proposed Penalty:	\$14,502.00

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: 1582147
Inspection Date(s): 03/09/2022 - 08/30/2022
Issuance Date: 09/01/2022



Citation and Notification of Penalty

Company Name: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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

29 CFR 1910.37(a): Exit routes must be free and unobstructed. No materials or equipment may be placed, either permanently or temporarily, within the exit route. The exit access must not go through a room that can be locked, such as a bathroom, to reach an exit or exit discharge, nor may it lead into a dead-end corridor. Stairs or a ramp must be provided where the exit route is not substantially level.

a) From prior to March 4, 2022 through June 21, 2022 and at times thereafter, the path of exit went through locked doors through the office spaces.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

September 28, 2022
\$14,502.00

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: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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

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

- (i) Select, and have each affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment;
- (ii) Communicate selection decisions to each affected employee; and,
- (iii) Select PPE that properly fits each affected employee.

a) On or about March 4, 2022, the employer had not assessed the hazards present and the personal protective equipment required when they fought a molten HMWPE fire in a type A industrial oven on the MAAC VF1 vacuum forming line and removed HMWPE sheets from the oven. Operators and team leads are required to manually remove the HMWPE during the fires and during fault conditions and put a wooden board in the oven. Team leads and maintenance are required to put out the fire.

b) On or about April 13, 2022, the employer had not assessed the hazards present and the personal protective equipment required when they fought a molten HMWPE fire in a type A industrial oven on the MAAC VF1 vacuum forming line and removed HMWPE sheets from the oven. Operators and team leads are required to manually remove the HMWPE during the fires and during fault conditions and put a wooden board in the oven. Team leads and maintenance are required to put out the fire.

c) On or about June 7, 2022, the employer had not assessed the hazards present and the personal protective equipment required when they fought a molten HMWPE fire in a type A industrial oven on the MAAC VF1 vacuum forming line and removed HMWPE sheets from the oven. Operators and team leads are required to manually remove the HMWPE during the fires and during fault conditions and put a wooden board in the oven. Team leads and maintenance are required to put out the fire.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

September 28, 2022

Proposed Penalty:

\$14,502.00

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: 1582147
Inspection Date(s): 03/09/2022 - 08/30/2022
Issuance Date: 09/01/2022



Citation and Notification of Penalty

Company Name: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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**

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

a) From prior to March 4, 2022 through June 21, 2022 and at times thereafter, the team leads had not utilized lockout procedures for the MAAC VF1 vacuum forming line and AVT VF2 vacuum forming line when performing change overs. Employees were exposed to moving parts carousel, frames, and clamps.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

September 28, 2022
\$14,502.00

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: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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

29 CFR 1910.147(d): Application of control. The established procedures for the application of energy control (the lockout or tagout procedures) shall cover the following elements and actions and shall be done in the following sequence:

- (1) Preparation for shutdown. Before an authorized or affected employee turns off a machine or equipment, the authorized employee shall have knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the method or means to control the energy.
- (2) Machine or equipment shutdown. The machine or equipment shall be turned off or shut down using the procedures established for the machine or equipment. An orderly shutdown must be utilized to avoid any additional or increased hazard(s) to employees as a result of the equipment stoppage.
- (3) Machine or equipment isolation. All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s).
- (4)(i) Lockout or tagout devices shall be affixed to each energy isolating device by authorized employees.
- (5)(i) Following the application of lockout or tagout devices to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained, and otherwise rendered safe.
- (6) Verification of isolation. Prior to starting work on machines or equipment that have been locked out or tagged out, the authorized employee shall verify that isolation and deenergization of the machine or equipment have been accomplished.

a) From prior to March 4, 2022 through June 21, 2022 and at times thereafter, team leads were not locking out the MAAC VF1 and AVT VF2 vacuum forming lines when performing changeovers.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: September 28, 2022
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.



Citation and Notification of Penalty

Company Name: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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

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

(B) Specific procedural steps for shutting down, isolating, blocking and securing machines or equipment to control hazardous energy;

(D) Specific requirements for testing a machine or equipment to determine and verify the effectiveness of lockout devices, tagout devices, and other energy control measures.

a) From prior to March 4, 2022 through June 21, 2022, the employer did not provide specific procedural steps for locking out equipment such as but not limited to the MAAC VF1 vacuum forming line in that the procedure only contained a list of energy sources with a labeled map.

b) From prior to March 4, 2022 through June 21, 2022, the employer did not provide verification procedures for testing lockout on equipment such as but not limited to the MAAC VF1 vacuum forming line.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

September 28, 2022

Proposed Penalty:

\$14,502.00

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: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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

29 CFR 1910.147(c)(6)(i): The employer shall conduct a periodic inspection of the energy control procedure at least annually to ensure that the procedure and the requirements of this standard are being followed.

(A) The periodic inspection shall be performed by an authorized employee other than the ones(s) utilizing the energy control procedure being inspected.

(B) The periodic inspection shall be conducted to correct any deviations or inadequacies identified.

(C) Where lockout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized employee, of that employee's responsibilities under the energy control procedure being inspected.

a) On or about March 9, 2022, the employer did not conduct a periodic inspection of the lockout procedure for equipment such as but not limited to the MAAC VF1 vacuum forming line. The procedure was inadequate.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

September 28, 2022

Proposed Penalty:

\$14,502.00

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: 1582147
Inspection Date(s): 03/09/2022 - 08/30/2022
Issuance Date: 09/01/2022



Citation and Notification of Penalty

Company Name: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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

29 CFR 1910.147(c)(7)(i): The employer shall provide training to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees. The training shall include the following:
(A) Each authorized employee shall receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control.

a) From prior to November of 2021 to April 11, 2022, the employer did not provide training to new maintenance employees on how to perform lockout on machines such as but not limited to MAAC VF1 Vacuum forming lines, AVT VF2 Vacuum forming lines, and CP3 Plastic Forming Line.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: September 28, 2022
Proposed Penalty: \$14,502.00

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: 1582147
Inspection Date(s): 03/09/2022 - 08/30/2022
Issuance Date: 09/01/2022



Citation and Notification of Penalty

Company Name: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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

29 CFR 1910.212(a)(1): Types of guarding. One or more methods of machine guarding shall be 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. Examples of guarding methods are-barrier guards, two-hand tripping devices, electronic safety devices, etc.

a) From prior to March 4, 2022 through June 21, 2022 and at times thereafter, the operators on the VF1 Vacuum Forming Line were not provided guarding at the elevator when loading the elevator.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	September 28, 2022
Proposed Penalty:	\$10,360.00

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: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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

29 CFR 1910.1200(h)(3): Training. Employee training shall include at least:

- (i) Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.);
- (ii) The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area;
- (iii) The measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.

a) From prior to March 4, 2022 through June 21, 2022 and at times thereafter, the employer had not provided hazard communications training on high molecular weight polyethylene (HMWPE) for employees who were required to handle, process into auto parts, or put out fires near or involving HMWPE. The employees were not trained on electrostatic hazards, combustible dust hazards, respiratory hazards (irritant) when on fire or heated, and that the material is easily ignitable and creates a molten plastic that can cause thermal burns.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	September 28, 2022
Proposed Penalty:	\$14,502.00

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: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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 1910.157(g)(1): Where the employer has provided portable fire extinguishers for employee use in the workplace, the employer shall also provide an educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage firefighting.

- a) On or about March 4, 2022, a fire occurred on second shift on the VF1 Vacuum Forming Line. Employees designated to use portable fire extinguishers such as but not limited to second shift team lead and second shift maintenance employees were not trained to utilize fire extinguishers to fight a fire that was larger than an incipient level fire in that 12 fire extinguishers were used until the sprinkler system was activated, the fire was over the employees' heads, and there was no clear path of escape as employees were on a guardrail enclosed ramp next to the oven.
- b) On or about April 13, 2022, a fire occurred on third shift on the VF1 Vacuum Forming Line that reignited three times. Employees designated to use portable fire extinguisher such as but not limited to the third shift team lead and third shift maintenance employees were not adequately trained to utilize fire extinguishers to fight a fire that reignited four times, the fire was over the employees' heads, and there was no clear path of escape as employees were on a guardrail enclosed ramp next to the oven.
- c) On or about June 7, 2022, a fire occurred on third shift on the VF1 Vacuum Forming Line that reignited three times. Employees designated to use portable fire extinguisher such as but not limited to the third shift team lead and third shift maintenance employees were not adequately trained to utilize fire extinguishers to fight a fire that reignited three times, the fire was over the employees' heads, and there was no clear path of escape as employees were on a guardrail enclosed ramp next to the oven.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: September 28, 2022
Proposed Penalty: \$145,027.00

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: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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

29 CFR 1910.157(g)(2): The employer shall provide the education required in paragraph (g)(1) of this section upon initial employment and at least annually thereafter.

- a) On or about March 4, 2022, a fire occurred on second shift on the VF1 Vacuum Forming Line. Employees designated to use portable fire extinguishers such as but not limited to second shift team lead and second shift maintenance employees were not educated initially and annually thereafter on the principles of fighting an incipient stage fire and fire extinguisher use.
- b) On or about April 13, 2022, a fire occurred on third shift on the VF1 Vacuum Forming Line that reignited three times. Employees designated to use portable fire extinguisher such as but not limited to the third shift team lead and third shift maintenance employees were not educated initially and annually thereafter on the principles of fighting an incipient stage fire and fire extinguisher use.
- c) On or about June 7, 2022, a fire occurred on third shift on the VF1 Vacuum Forming Line that reignited three times. Employees designated to use portable fire extinguisher such as but not limited to the third shift team lead and third shift maintenance employees were not educated initially and annually thereafter on the principles of fighting an incipient stage fire and fire extinguisher use.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: September 28, 2022
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.



Citation and Notification of Penalty

Company Name: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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

1910.157(g)(3) The employer shall provide employees who have been designated to use fire fighting equipment as part of an emergency action plan with training in the use of the appropriate equipment.

a) On or about March 4, 2022 during the fire in the oven on the MAAC VF1 Forming Line, the employer had not provided training to the second shift maintenance personnel, who were designated in the emergency action plan to put out the fire, in the use of appropriate fire fighting equipment.

b) On or about April 13, 2022 during the fire in the oven on the MAAC VF1 Forming Line, the employer had not provided training to the third shift VF1 team lead, who was designated in the emergency action plan to put out the fire, in the use of appropriate fire fighting equipment.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	September 28, 2022
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.



Citation and Notification of Penalty

Company Name: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315

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

29 CFR 1910.157(g)(4) The employer shall provide the training required in paragraph (g)(3) of this section upon initial assignment to the designated group of employees and at least annually thereafter.

- a) On or about March 4, 2022 during the fire in the oven on the MAAC VF1 Forming Line, the employer had not provided initial fire extinguisher training to the second shift maintenance personnel, who were designated in the emergency action plan to use portable fire extinguishers.
- b) On or about April 13, 2022 during the fire in the oven on the MAAC VF1 Forming Line, the employer had not provided initial fire extinguisher training to the third shift VF1 team lead, who was designated in the emergency action plan to use portable fire extinguishers.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: September 28, 2022
Proposed Penalty: \$0.00

Ken Montgomery

Ken E. Montgomery
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
36 Triangle Park Drive
Cincinnati, OH 45246



**INVOICE /
DEBT COLLECTION NOTICE**

Company Name: Woodbridge Englewood Inc. DBA Hematite Inc.
Inspection Site: 300 Lau Parkway, Clayton, OH 45315
Issuance Date: 09/01/2022

Summary of Penalties for Inspection Number: 1582147

Citation 1 Item 1, Serious	\$14,502.00
Citation 1 Item 2, Serious	\$14,502.00
Citation 1 Item 3, Serious	\$14,502.00
Citation 1 Item 4a, Serious	\$14,502.00
Citation 1 Item 4b, Serious	\$0.00
Citation 1 Item 5, Serious	\$14,502.00
Citation 1 Item 6, Serious	\$14,502.00
Citation 1 Item 7, Serious	\$14,502.00
Citation 1 Item 8, Serious	\$10,360.00
Citation 1 Item 9, Serious	\$14,502.00
Citation 2 Item 1a, Willful - Serious	\$145,027.00
Citation 2 Item 1b, Willful - Serious	\$0.00
Citation 2 Item 1c, Willful - Serious	\$0.00
Citation 2 Item 1d, Willful - Serious	\$0.00

TOTAL PROPOSED PENALTIES:**\$271,403.00**

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.

Ken Montgomery

Ken E. Montgomery

Area Director

9-1-2022

Date