

**U.S. Department of Labor** Occupational Safety and Health Administration  
100 N. Summit Street  
Suite 100  
Toledo, OH 43604



10/27/2022

NOX US, LLC  
and its successors  
931 South Springville Avenue  
Fostoria, OH 44830

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 (419) 259-7542.

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](http://www.osha.gov). If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,



**Todd Jensen**  
Area Director

Enclosures

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
100 N. Summit Street  
Suite 100  
Toledo, OH 43604



## Citation and Notification of Penalty

**To:**  
NOX US, LLC  
and its successors  
931 South Springville Avenue  
Fostoria, OH 44830

**Inspection Number:** 1593763  
**Inspection Date(s):** 05/04/2022 - 10/19/2022  
**Issuance Date:** 10/27/2022

**Inspection Site:**  
931 S. Springville Avenue  
Fostoria, OH 44830

*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 (419) 259-7542. 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](http://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](http://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 10/27/2022. The conference will be held by telephone or at the OSHA office located at 100 N. Summit Street, Suite 100, Toledo, OH 43604 on \_\_\_\_\_ at \_\_\_\_\_.

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

## CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

**Inspection Number: 1593763**

Company Name: NOX US, LLC  
Inspection Site: 931 S. Springville Avenue, Fostoria, OH 44830  
Issuance Date: 10/27/2022

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, 100 N. Summit Street, Suite 100, Toledo, OH 43604.**

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:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

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

29 CFR 1910.22(a)(2): The employer did not ensure that the floor of each workroom is maintained in a clean and, to the extent feasible, in a dry condition. The employer did not ensure that when wet processes are used, drainage is maintained and, to the extent feasible, dry standing places, such as false floors, platforms, and mats are provided.

a. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, the employer did not ensure that the work floor, located in C-1 between Mix Mill 1 and the calender, was maintained in, so far as possible, a dry condition. Oil residue on the diamond-plated flooring exposed employees to slip and fall hazards.

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 22, 2022
Proposed Penalty:	\$10,256.00

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:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

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

29 CFR 1910.23(e)(2)(i): The employer did not ensure that steps are uniformly spaced and arranged, with a rise of not more than 10 inches (25 cm) and a depth of not less than 7 inches (18 cm).

a. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, employees who utilized the mobile ladder stand to access the elevated work platforms located at the C-1 calender were exposed to trip and fall hazards at a maximum height of 58 inches in that the rise of steps exceeded ten inches and were not uniform.

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, 2022
Proposed Penalty:	\$12,307.00



**Citation and Notification of Penalty**

**Company Name:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

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 3 a: Type of Violation: **Serious****

29 CFR 1910.28(b)(1)(i): Each employee on a walking/working surface having an unprotected side or edge which was four feet (1.2m) or more above a lower level was not protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.

a. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, employees were exposed to fall hazards of approximately 72 inches when accessing the elevated platforms located adjacent to the C-1 calender to clean the calender rolls.

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 03, 2022
Proposed Penalty:	\$14,357.00



**Citation and Notification of Penalty**

**Company Name:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

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

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

a. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, the employer did not ensure employees who accessed the elevated platforms located adjacent to the C-1 calender were protected from falling into dangerous equipment. Employees were exposed to falling into rotating parts of the equipment's rollers and power take-off shafts associated with the cooling rolls.

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 03, 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:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

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

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

- a. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, the employer did not ensure that pinch points, created when the chuck is operated to secure the spindle on the C-1 Line winder, were guarded to protect employees' fingers/hands from crushing and/or amputation injury.
- b. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, the employer did not ensure that employees were protected from crushing injuries to their hands/fingers when the spindle/bar holders operate to move a finished roll from the C-1 Line winder to the lift table. Employees were exposed to pinch points, created between the holders and spindle and between the finished roll and table.
- c. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, the employer did not ensure that Conveyor #2, located between Mix Mills 1 and 2 in C-1, was guarded. Employees were exposed to being caught in the conveyor's nip points created by the return idlers/rollers.
- d. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, the employer did not ensure that Conveyor #3, located between Mix Mills 1 and 2 in C-1, was guarded. Employees were exposed to being caught in the conveyor's nip points created by the return idlers/rollers.
- e. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, the employer did not ensure the three rotating mixing cones, installed on Mix Mill #1, were guarded to protect employees from pinch points and being caught-in the rotating parts.
- f. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, the employer did not ensure the two rotating mixing cones, installed on Mix Mill #2, were guarded to protect employees from pinch points and being caught-in the rotating parts.
- g. NOX US, LLC - Fostoria, Ohio: On or about May 17, 2022, the employer did not sure that the L-2 packing palletizer machine was guarded to protect employees from pinch points created between the raising/lowering palletizer roller table frame.

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:** NOX US, LLC

**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

h. NOX US, LLC - Fostoria, Ohio: On or about May 3, 2022, employees working at the boxing machine, located after the C-cutter in the Off-line room, were exposed to pinch points created by the machine's pneumatic paddle.

i. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, the employer did not ensure that the C-1 cooling rolls were guarded. The ingoing nip points created by the rotating rolls exposed employees to caught-in and crushing injuries.

j. NOX US, LLC - Fostoria, Ohio: On or about August 2, 2022, employees working at the Silla Machine (#2015-6-171) B-Cutter, located at the L-1 packing line, were exposed to the ingoing nip point created between the machine's exit conveyor and roller.

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 03, 2022

Proposed Penalty:

\$14,357.00

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:** NOX US, LLC

**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

### **Citation 1 Item 5: Type of Violation: **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. NOX US, LLC - Fostoria, Ohio: On or about May 17, 2022, the employer did not ensure the infeed side of the Silla Machine (#2015-6-172) A-Cutter, used to cut vinyl floor slabs, was adequately guarded to protect employees from point of operation hazards created by the machine's cutter die.
- b. NOX US, LLC - Fostoria, Ohio: On or about May 17, 2022, the employer did not ensure the infeed side of the Silla Machine (#2015-6-171) B-Cutter, used to cut vinyl floor slabs, was adequately guarded to protect employees from point of operation hazards created by the machine's cutter die.
- c. NOX US, LLC - Fostoria, Ohio: On or about August 1, 2022, the employer did not ensure the infeed and outfeed sides of the Silla Machine (#2015-6-170) C-Cutter, used to cut vinyl floor slabs, was adequately guarded to protect employees from point of operation hazards created by the machine's cutter die.
- d. NOX US, LLC - Fostoria, Ohio: On or about May 17, 2022, the employer did not ensure the infeed and outfeed sides of the Silla Machine (#2018-8-254) D-Cutter, used to cut vinyl floor slabs, was adequately guarded to protect employees from point of operation hazards created by the machine's cutter die.
- e. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, the employer did not ensure that the cutter wheels, used to cut plastic on Mix Mill #1 in C-1, were guarded. The nip point created between the cutter wheels and the mill exposed employees to point of operation hazards.
- f. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, the employer did not ensure that the cutter wheels, used to cut plastic on Mix Mill #2 in C-1, were guarded. The nip point created between the cutter wheels and the mill exposed employees to point of operation hazards.

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:** 1593763  
**Inspection Date(s):** 05/04/2022 - 10/19/2022  
**Issuance Date:** 10/27/2022



**Citation and Notification of Penalty**

**Company Name:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	November 03, 2022
Proposed Penalty:	\$14,357.00

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:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

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

29 CFR 1910.219(i)(2): Bolt(s), nuts, or setscrews used in shaft coupling(s) extended beyond the flange of the coupling and were not covered with safety sleeve(s):

a. NOX US, LLC - Fostoria, Ohio: On or about May 4, 2022, the employer did not ensure that the couplings, located at the rotary joints on the end of the rolls on Mix Mill #2, were guarded to protect employees from being caught in the protruding bolts/rotating parts.

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 07, 2022
Proposed Penalty:	\$10,256.00





**Citation and Notification of Penalty**

**Company Name:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

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

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

a. NOX US, LLC - Fostoria, Ohio: The employer does not ensure employees are provided with and wear personal protective equipment to protect against burn injuries to the arms. This violation was most recently observed on or about May 4, 2022, employees in the C-1 area who handle scrap plastic; and operate and clean the mix mills, calender, and take-off rolls, were exposed to severe thermal burns.

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 07, 2022
Proposed Penalty:	\$123,062.00



## **Citation and Notification of Penalty**

**Company Name: NOX US, LLC**

**Inspection Site: 931 S. Springville Avenue, Fostoria, OH 44830**

---

### **Citation 2 Item 2: Type of Violation: **Willful - 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. NOX US, LLC - Fostoria, Ohio: The employer does not ensure that employees who service and maintain the Laminator Line C-1 winder machine are trained in the skills required for the safe application, usage, and removal of energy controls. This violation was identified on April 28, 2022, after a serious injury incident from an employee being caught-in the rotating spindle of the winder machine and most recently on or about May 4, 2022, when employees performed setup on the winder machine and were not trained to isolate and render energy controls safe prior to performing the setup task.

b. NOX US, LLC - Fostoria, Ohio: The employer does not ensure that employees who service and maintain equipment located in C-1 such as, but not limited to, the take-off rolls, emboss rolls, cooling rolls, cutter, and winder, are trained in the skills required for the safe application, usage, and removal of energy controls. This violation was most recently identified on or about May 4, 2022, when employees fed material through the equipment to setup the line and were not trained to isolate and/ or render energy sources safe prior to performing servicing tasks.

c. NOX US, LLC - Fostoria, Ohio: The employer does not ensure that employees who service and maintain the C-1 cooling rolls are trained in the skills required for the safe application, usage, and removal of energy controls. This violation was most recently identified on or about May 9, 2022, when employees setup the cooling rolls by wrapping/unwrapping them with paper towels and were not trained to isolate and/or render energy sources safe prior to performing servicing tasks.

d. NOX US, LLC - Fostoria, Ohio: The employer does not ensure that employees who maintain the C-1 mix mills are trained in the skills required for the safe application, usage, and removal of energy controls. This violation was most recently identified on May 4, 2022, when employees cleaned the mills and were not trained to isolate and/or render energy sources safe prior to performing the maintenance task.

e. NOX US, LLC - Fostoria, Ohio: The employer does not ensure that employees who service and maintain the Silla cutter presses such as, but not limited to, the Silla Machine A-Cutter (#2015-6-172), are trained in the skills required for the safe application, usage, and removal of energy controls. This violation was most recently identified on or about May 9, 2022, when employees conducted a die change on the press and were not trained to isolate

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:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

and/or render energy sources safe prior to the setup tasks.

f. NOX US, LLC - Fostoria, Ohio: The employer does not ensure that employees who service and maintain the tape dispenser, located in L-2 Packing department, are trained in the skills required for the safe application, usage, and removal of energy controls. This violation was most recently identified on or about May 17, 2022, when employees replaced the tape and were not trained to isolate and/or render energy sources safe prior to the setup tasks.

NOX US, LLC was previously cited for a Repeat violation of this Occupational Safety and Health Standard 29 CFR 1910.147(c)(7)(i), which was contained in OSHA inspection number 1419279, citation number 3, item number 1 and was affirmed as a final order on January 17, 2022, with respect to a workplace located at 931 South Springville Avenue, Fostoria, Ohio 44830.

NOX US, LLC was previously cited for a Willful violation of this Occupational Safety and Health Standard 29 CFR 1910.147(c)(7)(i), which was contained in OSHA inspection number 1248648, citation number 1, item number 2c and was affirmed as a final order on January 22, 2019, with respect to a workplace located at 931 South Springville Avenue, Fostoria, Ohio 44830.

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 03, 2022
Proposed Penalty:	\$143,577.00



## **Citation and Notification of Penalty**

**Company Name: NOX US, LLC**

**Inspection Site: 931 S. Springville Avenue, Fostoria, OH 44830**

---

### **Citation 2 Item 3: 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. NOX US, LLC - Fostoria, Ohio: The employer does not ensure employees are protected from nip point and caught-in hazards when they apply tape to a cardboard core on a rotating spindle at the C-1 winder machine. On or about April 28, 2022, an employee was caught in a rotating spindle resulting in serious injuries. In addition, this was most recently observed on or about May 4, 2022, when employer did not implement energy control application steps as the machine was not shut down or turned off to perform the servicing work [per the 1910.147(d)(2) requirements]. As a result, the remaining applicable 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), were not implemented to protect employees from machine servicing hazards.

b. NOX US, LLC - Fostoria, Ohio: The employer does not ensure employees are protected from rotating parts and pinch points created by moving components of the take-off rolls, emboss rolls, cooling rolls, cutter, and winder, at the C-1 line, in that the equipment is not locked out prior to cleaning the take-off rolls and threading the line for production. This violation was most recently observed on or about May 4, 2022, when the employer did not implement energy control application steps as the machine was not shut down or turned off to perform the servicing work [per the 1910.147(d)(2) requirements]. As a result, the remaining applicable 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), were not implemented to protect employees from machine servicing hazards.

c. NOX US, LLC - Fostoria, Ohio: The employer does not ensure employees are protected from ingoing nip points created by the C-1 cooling rolls in that the equipment was not locked out prior to the setup activity of applying and removing paper towels on the rolls. This violation was most recently observed on or about May 9, 2022, when the employer did not implement energy control application steps as the machine was not shut down or turned off to perform the servicing work [per the 1910.147(d)(2) requirements]. As a result, the remaining applicable 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), were not implemented to protect employees from machine servicing hazards.

d. NOX US, LLC - Fostoria, Ohio: The employer does not ensure employees are protected from crushing injuries in that the mix mills, located in C-1, were not locked out prior to cleaning the equipment's rolls. This violation was

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:** NOX US, LLC

**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

most recently observed on or about May 4, 2022, when the employer did not implement energy control application steps as the machine was not shut down or turned off to perform the servicing work [per the 1910.147(d)(2) requirements]. As a result, the remaining applicable 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)], were not implemented to protect employees from machine servicing hazards.

e. NOX US, LLC - Fostoria, Ohio: The employer does not ensure employees are protected from crushing injuries from guide posts/cylinders on the side of the Silla Machine A-Cutter (#2015-6-172) while performing maintenance tasks such as, but not limited to, die changes. This violation was most recently observed on or about May 9, 2022, when the employer did not implement energy control application steps as the machine was not shut down or turned off to perform the servicing work [per the 1910.147(d)(2) requirements]. As a result, the remaining applicable 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)], were not implemented to protect employees from machine servicing hazards.

f. NOX US, LLC - Fostoria, Ohio: The employer does not protect employees from amputation injury in that the tape dispenser, located in the L-2 Packing Department, is not locked out prior to performing a changeover of the tape roll. This violation was most recently observed on or about May 17, 2022, when the employer did not implement energy control application steps as the machine was not shut down or turned off to perform the servicing work [per the 1910.147(d)(2) requirements]. As a result, the remaining applicable 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)], were not implemented to protect employees from machine servicing hazards.

NOX US, LLC was previously cited for a Repeat violation of this Occupational Safety and Health Standard 29 CFR 1910.147(d), which was contained in OSHA inspection number 1419279, citation number 2, item number 1b and was affirmed as a final order on January 17, 2022, with respect to a workplace located at 931 South Springville Avenue, Fostoria, Ohio 44830.

NOX US, LLC was previously cited for a Willful violation of this Occupational Safety and Health Standard 29 CFR 1910.147(c)(4)(i), which was contained in OSHA inspection number 1419279, citation number 1, item number 2a and was affirmed as a final order on January 22, 2019, with respect to a workplace located at 931 South Springville Avenue, Fostoria, Ohio 44830.

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:** 1593763  
**Inspection Date(s):** 05/04/2022 - 10/19/2022  
**Issuance Date:** 10/27/2022



**Citation and Notification of Penalty**

**Company Name:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: November 03, 2022  
Proposed Penalty: \$143,577.00

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: NOX US, LLC**  
**Inspection Site: 931 S. Springville Avenue, Fostoria, OH 44830**

---

**Citation 2 Item 4: 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. NOX US, LLC - Fostoria, Ohio: The employer does not ensure that the ingoing nip point on Waste Trim Conveyor #1, located in the C-1 area, is guarded to protect employees from being caught in the rotating conveyor rollers. This violation was most recently observed on May 4, 2022, while employees were hand-feeding plastic material into the powered rollers.

b. NOX US, LLC - Fostoria, Ohio: The employer does not ensure that the ingoing nip point on Waste Trim Conveyor #2, located in the C-1 area, is guarded to protect employees from being caught in the rotating conveyor rollers. This violation was most recently observed on May 4, 2022, while employees were hand-feeding plastic material into the powered rollers.

NOX US, LLC was previously cited for a Serious violation of this Occupational Safety and Health Standard 29 CFR 1910.212(a)(1), which was contained in OSHA inspection number 1419279, citation number 1, item number 2 and was affirmed as a final order on January 17, 2022, with respect to a workplace located at 931 South Springville Avenue, Fostoria, Ohio 44830.

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 03, 2022**  
Proposed Penalty: **\$143,577.00**

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:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

Citation 2 Item 5: 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. NOX US, LLC - Fostoria, Ohio: The employer does not ensure the powered rollers, located in the L-1 Packing Department that feeds both the A and B Cutters, are guarded to protect employees from being caught in the rotating rollers. This was most recently identified on May 16, 2022, when packing employees were working at this roller conveyor.

NOX US, LLC was previously cited for a Serious violation of this Occupational Safety and Health Standard 29 CFR 1910.212(a)(1), which was contained in OSHA inspection number 1419279, citation number 1, item number 2 and was affirmed as a final order on January 17, 2022, with respect to a workplace located at 931 South Springville Avenue, Fostoria, Ohio 44830.

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 03, 2022  
Proposed Penalty: \$143,577.00





**Citation and Notification of Penalty**

**Company Name:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

Citation 2 Item 6: 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. NOX US, LLC - Fostoria, Ohio: The employer does not ensure the powered rollers on the Box Machine roller conveyor, located at L-1 Packing A-Cutter Line, are guarded to protect employees from being caught in the rotating rollers. This was most recently observed on May 17, 2022, when employees were working at the Box Machine rollers.

NOX US, LLC was previously cited for a Serious violation of this Occupational Safety and Health Standard 29 CFR 1910.212(a)(1), which was contained in OSHA inspection number 1419279, citation number 1, item number 2 and was affirmed as a final order on January 17, 2022, with respect to a workplace located at 931 South Springville Avenue, Fostoria, Ohio 44830.

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 03, 2022  
Proposed Penalty: \$143,577.00

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:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

Citation 2 Item 7: 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. NOX US, LLC - Fostoria, Ohio: The employer does not ensure the powered rollers on the Box Machine roller conveyor, located at L-1 Packing B-Cutter Line, are guarded to protect employees from being caught in the rotating rollers. This was most recently observed on May 17, 2022, when employees were working at the Box Machine rollers.

NOX US, LLC was previously cited for a Serious violation of this Occupational Safety and Health Standard 29 CFR 1910.212(a)(1), which was contained in OSHA inspection number 1419279, citation number 1, item number 2 and was affirmed as a final order on January 17, 2022, with respect to a workplace located at 931 South Springville Avenue, Fostoria, Ohio 44830.

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 03, 2022  
Proposed Penalty: \$143,577.00

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:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

**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. NOX US, LLC - Fostoria, Ohio: The employer does not ensure the powered rollers on the Box Machine roller conveyor, located at L-2 Packing D-Cutter Line, are guarded to protect employees from being caught in the rotating rollers. This was most recently observed on May 17, 2022, when employees were working at the Box Machine roller.

NOX US, LLC was previously cited for a Serious violation of this Occupational Safety and Health Standard 29 CFR 1910.212(a)(1), which was contained in OSHA inspection number 1419279, citation number 1, item number 2 and was affirmed as a final order on January 17, 2022, with respect to a workplace located at 931 South Springville Avenue, Fostoria, Ohio 44830.

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 03, 2022  
Proposed Penalty: \$143,577.00

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:** NOX US, LLC

**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

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

29 CFR 1910.216(b)(1)(iii): Safety tripwire cable or wire center cord was not located within 2 inches of a vertical plane tangent to the front and rear rolls. The cables were more than 72 inches above the level on which the operator stands.

a. NOX US, LLC - Fostoria, Ohio: The employer does not ensure that the tripwire cable, located on the inbound side of Mix Mill #1 in area C-1, is no more than 72 inches above the level where the operator stands located within 2 inches of a vertical plane tangent to the roll. This violation was most recently observed on May 4, 2022, when the tripwire cable was located behind the front of the roll and at a height of up to approximately 79 inches on one end of the mill roll, and approximately 75.5 inches above the level where the operator stands, exposing the operator to caught-in hazards.

b. NOX US, LLC - Fostoria, Ohio: The employer does not ensure that the tripwire cable, located on the inbound/front side of Mix Mill #2 in area C-1, is no more than 72 inches above the level where the operator stands and located within 2 inches of a vertical plane tangent to the roll. This violation was most recently observed on May 4, 2022, when the tripwire cable was located past the front of the roll and at a height approximately 84 inches on one end of the mill roll and up to approximately 88.5 inches where the operator stands, exposing the operator to caught-in hazards.

c. NOX US, LLC - Fostoria, Ohio: The employer does not ensure that the tripwire cable, located on the outbound/back side of Mix Mill #2 in area C-1, is no more than 72 inches above the level where the operator stands and located within 2 inches of a vertical plane tangent to the roll. This violation was most recently observed on May 4, 2022, when tripwire cable was located past the front of the roll and at a height of approximately 73.5 inches on one end of the mill roll and up to approximately 78.5 inches on the other end, exposing the operator to caught-in hazards.

NOX US, LLC was previously cited for a Serious violation of this Occupational Safety and Health Standard 29 CFR 1910.216(b)(1)(iii), which was contained in OSHA inspection number 1244737, citation number 1, item number 2 and was affirmed as a final order on January 22, 2019, with respect to a workplace located at 931 South Springville Avenue, Fostoria, Ohio 44830.

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:** 1593763  
**Inspection Date(s):** 05/04/2022 - 10/19/2022  
**Issuance Date:** 10/27/2022



**Citation and Notification of Penalty**

**Company Name:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

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 03, 2022  
Proposed Penalty: \$28,714.00

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:** NOX US, LLC  
**Inspection Site:** 931 S. Springville Avenue, Fostoria, OH 44830

---

Citation 4 Item 1: Type of Violation: **Other-than-Serious**

29 CFR 1910.147(c)(6)(i): The employer did not conduct a periodic inspection of the energy control procedures at least annually to ensure that the procedure and the requirement of this standard were being followed:

a. NOX US, LLC - Fostoria, Ohio: On or about May 4 2022, a periodic inspection of the energy control procedures was not performed to ensure that lockout/tagout procedures and requirements of 29 CFR 1910.147 were being followed. The employer did not ensure that energy control procedures for equipment associated with the C-1 line and L1 Packing Lines were inspected annually.

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 07, 2022  
Proposed Penalty: \$0.00

A handwritten signature in blue ink that reads "Todd Jensen".

---

**Todd Jensen**  
Area Director

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
100 N. Summit Street  
Suite 100  
Toledo, OH 43604



---

**INVOICE /  
DEBT COLLECTION NOTICE**

---

**Company Name: NOX US, LLC**  
**Inspection Site: 931 S. Springville Avenue, Fostoria, OH 44830**  
**Issuance Date: 10/27/2022**

Summary of Penalties for Inspection Number: 1593763

Citation 1 Item 1, Serious	\$10,256.00
Citation 1 Item 2, Serious	\$12,307.00
Citation 1 Item 3a, Serious	\$14,357.00
Citation 1 Item 3b, Serious	\$0.00
Citation 1 Item 4, Serious	\$14,357.00
Citation 1 Item 5, Serious	\$14,357.00
Citation 1 Item 6, Serious	\$10,256.00
Citation 2 Item 1, Willful - Serious	\$123,062.00
Citation 2 Item 2, Willful - Serious	\$143,577.00
Citation 2 Item 3, Willful - Serious	\$143,577.00
Citation 2 Item 4, Willful - Serious	\$143,577.00
Citation 2 Item 5, Willful - Serious	\$143,577.00
Citation 2 Item 6, Willful - Serious	\$143,577.00
Citation 2 Item 7, Willful - Serious	\$143,577.00
Citation 2 Item 8, Willful - Serious	\$143,577.00
Citation 3 Item 1, Repeat - Serious	\$28,714.00
Citation 4 Item 1, Other-than-Serious	\$0.00

**TOTAL PROPOSED PENALTIES: \$1,232,705.00**

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](http://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.



---

**Todd Jensen**

Area Director

October 27, 2022

---

Date