

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



03/25/2024

HBD Thermoid, Inc.
and its successors
5200 Upper Metro Place, Suite 110
Dublin, OH 43017

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. 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:

HBD Thermoid, Inc.
and its successors
5200 Upper Metro Place, Suite 110
Dublin, OH 43017

Inspection Number: 1706288

Inspection Date(s): 10/24/2023 - 10/24/2023

Issuance Date: 03/25/2024

Inspection Site:

1301 W. Sandusky St
Bellefontaine, OH 43311

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. At the top of the pay.gov homepage, type "OSHA" in the Search field and select Search. From **OSHA Penalty Payment Form** search result, select Continue. The direct link is:

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

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

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

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

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that

he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

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

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

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 03/25/2024. 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: 1706288

Company Name: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311
Issuance Date: 03/25/2024

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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

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

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

a.) HBD/Thermoid, INC - Bellefontaine, Ohio: On or about November 7, 2023, employees were exposed to machine hazards associated with moving parts during setup activities such as, but not limited to, when changing yarn, threading and changing rings, on Lapper #2. The employer did not implement energy control application steps as the machine was not shutdown 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)(6)], dissipation of residual energy [(d)(5)(i)], and verification of isolation [(d)(6)], were not implemented to protect employees from machine servicing 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: April 10, 2024
Proposed Penalty: \$12,676.00

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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

Citation 1 Item 2: 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) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, located in the finishing department employees were required to retrieve hose by hand from the end of the conveyor belt in cell 7. The employer did not ensure the conveyor belt was guarded to prevent contact with the ingoing nip point between the conveyors belt and its end roller thereby exposing the employees to caught in hazards.
- b) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, located in the finishing department employees were required to retrieve hose by hand from the end of the conveyor belt in cell 8. The employer did not ensure the conveyor belt was guarded to prevent contact with the ingoing nip point between the conveyors belt and its end roller thereby exposing the employees to caught in hazards.
- c) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, located in the finishing department employees were required to retrieve hose by hand from the end of the conveyor belt in cell 9. The employer did not ensure the conveyor belt was guarded to prevent contact with the ingoing nip point between the conveyors belt and its end roller thereby exposing the employees to caught in hazards.
- d) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about November 7, 2023, located in the extrusion department, employees were required to guide hose by hand along Line 8-layer (microwave) conveyor belt. The employer did not ensure the conveyor belt was guarded to prevent contact with the ingoing nip point between the conveyors belt and its end roller thereby exposing the employees to caught-in hazards.
- e) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about November 7, 2023, located in the extrusion department, employees were required to guide hose by hand along Line 7-layer (microwave) conveyor belt. The employer did not ensure the conveyor belt was guarded to prevent contact with the ingoing nip point between the conveyors belt and its end roller thereby exposing the employees to caught-in 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: 1706288
Inspection Date(s): 10/24/2023 - 10/24/2023
Issuance Date: 03/25/2024



Citation and Notification of Penalty

Company Name: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

April 10, 2024
\$16,131.00

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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

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

29 CFR 1910.212(a)(4): Revolving drum(s), barrel(s), or container(s) were not guarded by enclosure(s) which were interlocked with the drive mechanism so that the barrel(s), drum(s), or container(s) could not revolve unless the enclosure(s) were in place:

- a) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about November 07, 2023, the employer did not ensure the line #5 reeler station cooling drums were enclosed by interlocking guards. In this condition employees were exposed to ingoing nip points created by the two vertically aligned horizontal rotating drums and wound hose being cooled.
- b) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure the line #1 reeler station cooling drums were enclosed by interlocking guards. In this condition employees were exposed to ingoing nip points created by the two vertically aligned horizontal rotating drums and wound hose being cooled.
- c) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure the line #2 reeler station cooling drums were enclosed by interlocking guards. In this condition employees were exposed to ingoing nip points created by the two vertically aligned horizontal rotating drums and wound hose being cooled.
- d) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure the line #7 reeler station cooling drums were enclosed by interlocking guards. In this condition employees were exposed to ingoing nip points created by the two vertically aligned horizontal rotating drums and wound hose being cooled.
- e) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure the line #8 reeler station cooling drums were enclosed by interlocking guards. In this condition employees were exposed to ingoing nip points created by the two vertically aligned horizontal rotating drums and wound hose being cooled.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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

Date By Which Violation Must be Abated:
Proposed Penalty:

April 10, 2024
\$12,676.00



Citation and Notification of Penalty

Company Name: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

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

29 CFR 1910.219(c)(2)(i): All exposed part(s) of horizontal shafting seven (7) feet or less from floor or working platform were not protected by stationary casing(s) enclosing shafting completely or by trough(s) enclosing sides and top or sides and bottom of shafting:

a) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about November 7, 2023, located in the Extrusion Department, employees were required to place and remove absorbent pads on the floor at the Line 2 extruder's six and one-half inch long unguarded rotating horizontal shaft that was approximately 43 inches above the floor exposing employees to caught-in 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: **April 10, 2024**
Proposed Penalty: **\$12,676.00**

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

Inspection Number: 1706288
Inspection Date(s): 10/24/2023 - 10/24/2023
Issuance Date: 03/25/2024



Citation and Notification of Penalty

Company Name: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

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

29 CFR 1910.305(b)(1)(ii): Unused openings in boxes, cabinets, or fittings were not effectively closed:

a) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the two unused one-inch openings of the control panel for the Line #2 SE and North floor cat-pullers were effectively closed. In this condition, employees tasked with operating the Cat-Pullers from the control panel were exposed to 120 VAC.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

April 10, 2024
\$12,676.00

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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

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

29 CFR 1910.305(b)(2)(i): Pull boxes, junction boxes, and fittings were not provided with covers approved for the purpose:

a) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about November 1, 2023, the employer did not ensure that an electrical junction box containing 480v conductors found on Line #2 cooling drum was effectively closed with an approved cover. Employees working from the machine's platform in proximity to the exposed wires were exposed to electrical shock.

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: **April 17, 2024**
Proposed Penalty: **\$12,676.00**



Citation and Notification of Penalty

Company Name: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

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

29 CFR 1910.305(g)(2)(iii): Flexible cords were not connected to devices and fittings so that tension would not be transmitted to joints or terminal screws:

- a) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the flexible cord connected to foot operated controls of the line #1 spooler was secured in a way to ensure strain relief. Employees operating on or around the equipment in this condition were exposed to shock hazards.
- b) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the flexible cord connected to the line #2 spooler was secured in a way ensure strain relief. Employees operating on or around the equipment in this condition were exposed to shock hazards.
- c) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the flexible cord connected to foot operated controls of the line #3 spooler was secured in a way to ensure strain relief. Employees operating on or around the equipment in this condition were exposed to shock hazards.
- d) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the flexible cord connected to the line #3 spooler was secured in a way to ensure strain relief. Employees operating on or around the equipment in this condition were exposed to shock hazards.
- e) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the flexible cord connected to the line #5 counter was secured in a way to ensure strain relief. Employees operating on or around the equipment in this condition were exposed to shock hazards.
- f) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the flexible cord connected to electrical box of the line #8 spooler was secured in a way to ensure strain relief. Employees operating on or around the equipment in this condition were exposed to shock hazards.
- g) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the flexible cord connected to foot operated controls of the line #8 spooler was secured in a way to ensure strain relief. Employees operating on or around the equipment in this condition were exposed to shock hazards.
- h) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the flexible cord connected to foot operated controls of the cell #10 baler was secured in a way to ensure strain relief.

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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

Employees operating on or around the equipment in this condition were exposed to shock hazards.

i) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the flexible cord connected to electrical box of the line #10 baler was secured in a way to ensure strain relief. Employees operating on or around the equipment in this condition were exposed to shock hazards.

j) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the flexible cord connected to electrical box of the line #8 overhead cat-puller motor was secured in a way to ensure strain relief. Employees operating on or around the equipment in this condition were exposed to shock hazards.

k) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the flexible cord connected to electrical box of the line #2 Festoon was attached to ensure strain relief. Employees operating on or around the equipment in this condition were exposed to shock 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:	April 10, 2024
Proposed Penalty:	\$16,131.00

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: 1706288
Inspection Date(s): 10/24/2023 - 10/24/2023
Issuance Date: 03/25/2024



Citation and Notification of Penalty

Company Name: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

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

29 CFR 1910.305(g)(2)(ii): Flexible cords were not used only in continuous lengths without splice or tap:

a) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure that the flexible cord connected to the foot operated pedal on the Line #1 spooler was free of splices. Employees performing work tasks near the exposed conductors were exposed to shock hazards up to 120 VAC.

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: April 10, 2024
Proposed Penalty: \$16,131.00

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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

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

29 CFR 1910.332(b)(1): Employees were not trained in and familiar with the safety-related work practices required by 1910.331 through 1910.335 that pertained to their respective job assignments:(a)

a) HBD Thermoid, Inc. located in Bellefontaine, Ohio: On or about October 18, 2023, the employer failed to ensure maintenance employees responsible for working on electrical equipment such as replacing an electrical 480 volt motor on CV tank Zone 14 and troubleshooting 700 volt 400 amp fuses inside the CVR #13 electrical panel, were not familiar with the following safety-related work practices:

1. Employees were not familiar with the required electrical protective equipment to wear to protect their upper torsos, legs, face, head and hands from hazards created by electrical shock, arc flash, and arc blast;
2. Employees were not familiar with how to properly and safely use electrical testing equipment;
3. Employees were not familiar with how to safely use and inspect insulated tools;
4. Employees were not familiar with how to inspect electrical protective equipment;
5. Employees were not familiar with how to properly deenergize and lockout electrical equipment.

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

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

May 08, 2024
\$16,131.00

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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

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

29 CFR 1910.333(a): Safety-related work practices were not employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts, when work was performed near or on equipment or circuits which were or could be energized:

a) HBD Thermoid, Inc. located in Bellefontaine, Ohio: On or about October 31, 2023, the employer failed to ensure a maintenance employee working on the CVR Line 3 electrical panel locked out the electrical disconnect upstream prior to troubleshooting fuses inside of the 480 volt electrical panel.

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:	May 08, 2024
Proposed Penalty:	\$16,131.00

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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

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

29 CFR 1910.335(a)(1)(i): Employees working in areas where there were potential electrical hazards were not provided with and required to use electrical protective equipment that was appropriate for the specific parts of the body that needed to be protected and for the work being performed.

a) HBD Thermoid, Inc. located in Bellefontaine, Ohio: On or about October 18, 2023, the employer failed to ensure a maintenance employee working on the Line 7 CV Tank Zone 14 blower motor was wearing arc rated clothing, insulated gloves, arc rated face shield, arc rated hard hat and an arc rated balaclava when exposed to 480 volt electrical hazards while performing voltage testing inside of the Line 7 contactor box.

b) HBD Thermoid, Inc. located in Bellefontaine, Ohio: On or about October 31, 2023, the employer failed to ensure a maintenance employee working on the CVR Line 3 electrical panel was wearing arc rated clothing, insulated gloves, arc rated face shield, arc rated hard hat and an arc rated balaclava when exposed to 480 volt electrical hazards while performing voltage testing.

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:	May 08, 2024
Proposed Penalty:	\$16,131.00

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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

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

29 CFR 1910.212(a)(1): One or more methods of machine guarding is 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) HBD Thermoid, Inc. Bellefontaine, Ohio: Located in the Finishing Department on Cell #7, employees manually feed rubber hose onto a rotating baler. The employer does not ensure the employees are protected from caught-in hazards created by the rotating baler with its protruding components and struck-by hazards from its rotating paddles and hose fitting ends. This was identified on October 24, 2023.

b) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, the employer does not ensure the cell #8 baler is guarded in such a manner as to prevent employees' hands from reaching the ingoing nip point created by the hose being wound and the high-speed rotating flanges (paddles). Employees performing operational tasks in proximity of the rotating equipment are exposed to caught in hazards.

c) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, the employer does not ensure the cell #9 baler is guarded in such a manner as to prevent employees' hands from reaching the ingoing nip point created by the hose being wound and the high-speed rotating flanges (paddles). Employees performing operational tasks in proximity of the rotating equipment are exposed to caught in hazards.

d) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, the employer does not ensure the cell #10 baler is guarded in such a manner as to prevent employees' hands from reaching the ingoing nip point created by the hose being wound and the high-speed rotating flanges (paddles). Employees performing operational tasks in proximity of the rotating equipment are exposed to caught in hazards.

e) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, the employer failed to ensure the line #1 spooler is guarded in such a manner as to prevent employees' hands from reaching the ingoing nip point created by the winding of the hose on the spinning reels. Employees tasked with spooling hose in this condition were exposed to caught in hazards.

f) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, the employer failed to ensure the line #2 spooler is guarded in such a manner as to prevent employees' hands from reaching the ingoing nip point created by the winding of the hose on the spinning reels. Employees tasked with spooling hose in this condition were exposed to caught in hazards.

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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

- g) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, the employer failed to ensure the line #4 spooler is guarded in such a manner as to prevent employees' hands from reaching the ingoing nip point created by the winding of the hose on the spinning reels. Employees tasked with spooling hose in this condition were exposed to caught in hazards.
- h) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about October 24, 2023, the employer failed to ensure the line #5 spooler is guarded in such a manner as to prevent employees' hands from reaching the ingoing nip point created by the winding of the hose on the spinning reels. Employees tasked with spooling hose in this condition were exposed to caught in hazards.
- i) HBD Thermoid, Inc. Bellefontaine, Ohio: On or about September 27, 2023, the employer failed to ensure the line 7 spooler is guarded in such a manner as to prevent employees' hands from reaching the ingoing nip point created by the hose being wound on the spinning reels. Employees tasked with spooling hose were exposed to caught in 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:	April 10, 2024
Proposed Penalty:	\$161,323.00

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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

Citation 3 Item 1: Type of Violation: **Other-than-Serious**

29 CFR 1910.303(b)(2): Listed or labeled electrical equipment was not used or installed in accordance with instructions included in the listing or labeling:

a) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not follow UL listing instructions for relocatable power taps in Cell #9.

- Relocatable power taps are intended to be directly connected to a permanently installed branch-circuit receptacle outlet.
- Relocatable power taps are not intended to be series connected (daisy chained) to other relocatable power taps or to extension cords.
- Relocatable power taps are not intended to be permanently secured to building structures, tables, work benches or similar structures, nor are they intended to be used as a substitute for fixed wiring.

b) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not follow UL listing instructions for relocatable power taps in Cell #8.

- Relocatable power taps are intended to be directly connected to a permanently installed branch-circuit receptacle outlet.
- Relocatable power taps are not intended to be series connected (daisy chained) to other relocatable power taps or to extension cords.
- Relocatable power taps are not intended to be permanently secured to building structures, tables, work benches or similar structures, nor are they intended to be used as a substitute for fixed wiring.

c) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not follow UL listing instructions for relocatable power taps in Cell #7.

- Relocatable power taps are intended to be directly connected to a permanently installed branch-circuit receptacle outlet.
- Relocatable power taps are not intended to be series connected (daisy chained) to other relocatable power taps or to extension cords.
- Relocatable power taps are not intended to be permanently secured to building structures, tables, work benches or similar structures, nor are they intended to be used as a substitute for fixed wiring.

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

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: 1706288
Inspection Date(s): 10/24/2023 - 10/24/2023
Issuance Date: 03/25/2024



Citation and Notification of Penalty

Company Name: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

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: April 10, 2024
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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311

Citation 3 Item 2: Type of Violation: **Other-than-Serious**

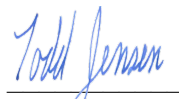
29 CFR 1910.303(b)(7)(iv): Electrical equipment was not free of damaged parts that may adversely affect safe operation or mechanical strength of the equipment, such as parts that are broken, bent, cut, or deteriorated by corrosion, chemical action, or overheating:

a) HBD Thermoid, Inc. - Bellefontaine, Ohio: On or about October 24, 2023, the employer did not ensure Line #8 spooler flexible conduit was kept in a safe condition. Line #8 spooler's flexible conduit was broken at its fitting revealing its insulated conductors.

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: April 10, 2024
Proposed Penalty: \$0.00



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: HBD Thermoid, Inc.
Inspection Site: 1301 W. Sandusky St, Bellefontaine, OH 43311
Issuance Date: 03/25/2024

Summary of Penalties for Inspection Number: 1706288

Citation 1 Item 1, Serious	\$12,676.00
Citation 1 Item 2, Serious	\$16,131.00
Citation 1 Item 3, Serious	\$12,676.00
Citation 1 Item 4, Serious	\$12,676.00
Citation 1 Item 5, Serious	\$12,676.00
Citation 1 Item 6, Serious	\$12,676.00
Citation 1 Item 7, Serious	\$16,131.00
Citation 1 Item 8, Serious	\$16,131.00
Citation 1 Item 9, Serious	\$16,131.00
Citation 1 Item 10, Serious	\$16,131.00
Citation 1 Item 11, Serious	\$16,131.00
Citation 2 Item 1, Willful - Serious	\$161,323.00
Citation 3 Item 1, Other-than-Serious	\$0.00
Citation 3 Item 2, Other-than-Serious	\$0.00

TOTAL PROPOSED PENALTIES: \$321,489.00

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.



Todd Jensen

Area Director

March 25, 2024

Date