

U.S. Department of Labor Occupational Safety and Health Administration
4050 Crums Mill Road
Suite 102
Harrisburg, PA 17112



12/31/2024

Zep, Inc., dba AFCO
and its successors
600 Galleria Parkway SE, Suite 1500
Atlanta, GA 30329

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), 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 (717) 782-3902.

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,

Kevin T. Chambers
Area Director

Enclosures

U.S. Department of Labor

Occupational Safety and Health Administration
4050 Crums Mill Road
Suite 102
Harrisburg, PA 17112



Citation and Notification of Penalty

To:

Zep, Inc., dba AFCO
and its successors
600 Galleria Parkway SE, Suite 1500
Atlanta, GA 30329

Inspection Number: 1761311**Inspection Date(s):** 07/11/2024 - 12/13/2024**Issuance Date:** 12/31/2024**Inspection Site:**

800 Development Avenue
Chambersburg, PA 17201

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 (717) 782-3902. 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 12/31/2024. The conference will be held by telephone or at the OSHA office located at 4050 Crums Mill Road, Suite 102, Harrisburg, PA 17112 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1761311

Company Name: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201
Issuance Date: 12/31/2024

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, 4050 Crums Mill Road, Suite 102, Harrisburg, PA 17112.**

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: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

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

29 CFR 1910.28(b)(1)(i): Except as provided elsewhere in this section 29 CFR 1910.28, the employer did not ensure that each employee on a walking-working surface with an unprotected side or edge that is 4 feet (1.2 m) or more above a lower level is protected from falling by one or more of the systems described in 29 CFR 1910.28(b)(1)(i):

a.) 800 Development Avenue, Chambersburg, PA - Batch Platform - On or about July 11, 2024, the batch mixing mezzanine/platform was not completely guarded, nor were other acceptable means or methods of fall protection used, exposing employees to a fall hazard of at least 5-feet.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photographic or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	January 28, 2025
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: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

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 2 a Type of Violation: **Serious**

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

a.) 800 Development Avenue, Chambersburg, PA - Chemical Processing Facility - On or about July 11, 2024, the employer did not develop or implement an emergency response plan for employees who were engaged in emergency response operations associated with a chemical release/spill.

ABATEMENT NOTES: Among other methods, feasible and acceptable means of abatement would be to develop an emergency response plan for emergencies which shall address, as a minimum, the following to the extent that they are not addressed elsewhere:

- Pre-emergency planning and coordination with outside parties;
- Personnel roles, lines of authority, training, and communication;
- Emergency recognition and prevention;
- Safe distances and places of refuge;
- Site security and control;
- Evacuation routes and procedures;
- Decontamination;
- Emergency medical treatment and first aid;
- Emergency alerting and response procedures;
- Critique of response and follow-up; and
- PPE and emergency equipment.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photographic or video evidence of abatement or other 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: 1761311
Inspection Date(s): 07/11/2024 - 12/13/2024
Issuance Date: 12/31/2024



Citation and Notification of Penalty

Company Name: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

February 05, 2025
\$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: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

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

29 CFR 1910.120(q)(6)(ii): First responders at the operational level did not receive at least eight hours of training or did not have sufficient experience to objectively demonstrate competency in the areas required by 29 CFR 1910.120(q)(6)(ii)(A) through (q)(6)(ii)(F) and/or the employer did not so certify:

a.) 800 Development Avenue, Chambersburg, PA - Chemical Processing Facility - On or about July 11, 2024, the employer did not train employees for emergency response operations associated with chemical releases/spills, which resulted in employee chemical exposures.

ABATEMENT NOTES: Among other methods, feasible and acceptable means of abatement would be to train first responders at the operational level to objectively demonstrate competency in the following areas:

- An understanding of what hazardous substances are, and the risks associated with them in an incident.
- An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
- The ability to recognize the presence of hazardous substances in an emergency.
- The ability to identify the hazardous substances, if possible.
- An understanding of the role of the first responder awareness individual in the employer's emergency response plan including site security and control and the U.S. Department of Transportation's Emergency Response Guidebook.
- The ability to realize the need for additional resources, and to make appropriate notifications to the communication center.
- Knowledge of the basic hazard and risk assessment techniques.
- Know how to select and use proper personal protective equipment provided to the first responder operational level.
- An understanding of basic hazardous materials terms.
- Know how to perform basic control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available with their unit.
- Know how to implement basic decontamination procedures.
- An understanding of the relevant standard operating procedures and termination procedures.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents

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: 1761311
Inspection Date(s): 07/11/2024 - 12/13/2024
Issuance Date: 12/31/2024



Citation and Notification of Penalty

Company Name: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photographic or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: February 05, 2025
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: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

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 1910.134(c)(1): A written respiratory protection program that included the provisions in 29 CFR 1910.134(c)(1)(i) - (ix) with worksite specific procedures was not established and implemented for required respirator use:

- a.) 800 Development Avenue, Chambersburg, PA - Chemical Processing Facility - On or about July 11, 2024, the employer established and implemented a written respiratory protection program for employees who were engaged in chemical manufacturing and spill clean-up, however program lacked elements including, but not limited to:
- Work-site specific procedures
 - Procedures for selecting respirators for use in the workplace
 - Procedures for proper use of respirators in routine and reasonably foreseeable emergency situations;
 - Procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding (cartridge change out schedule), and otherwise maintaining respirators; and
 - Procedures for regularly evaluating the effectiveness of the program.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photographic or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: February 05, 2025
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: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

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

29 CFR 1910.134(d)(1)(iii): The employer did not identify and evaluate respiratory hazards in the workplace to include a reasonable estimate of employee exposure to respiratory hazards and an identification of the contaminant's chemical state and physical form

a.) 800 Development Ave, Chambersburg PA - Chemical Processing Facility - On or about July 11, 2024, the employer did not conduct an evaluation/assessment of the workplace for applicable respiratory hazards.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photographic or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	February 05, 2025
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: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

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

29 CFR 1910.134(k)(1): The employer did not provide respirator training that would ensure each employee could demonstrate knowledge of items in section (i)-(vii):

a.) 800 Development Avenue, Chambersburg, PA - Chemical Processing Facility - On or about July 11, 2024, the employer did not provide training to employees required to utilize full-face air purifying respirators as a means of respiratory protection.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photographic or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: February 05, 2025
Proposed Penalty: \$0.00



Citation and Notification of Penalty

Company Name: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

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

29 CFR 1910.1000(a)(1): Employee(s) were exposed to an airborne concentration of Nitrogen Dioxide, listed in Table Z-1, in excess of the ceiling concentration of 5 ppm:

a.) 800 Development Ave, Chambersburg PA - Chemical Processing Facility - On or about July 11, 2024, during a chemical spill/atmospheric release, employee exposure to airborne concentrations of Nitrogen Dioxide (NO2) exceeded the established ceiling concentration.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photographic or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	February 05, 2025
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: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

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 5 a Type of Violation: **Serious**

29 CFR 1910.1200(e)(1): The employer did not develop, implement, and/or maintain at the workplace a written hazard communication program which describes how the criteria specified in 29 CFR 1910.1200(f), (g), and (h) will be met, and had not developed or implemented a written hazard communication program included the requirements outlined in 29 CFR 1910.1200(e)(1)(i) and (e)(1)(ii):

- a.) 800 Development Ave, Chambersburg PA - Chemical Processing Facility - On or about July 11, 2024, the employer did not develop, implement, and/or maintain a written hazard communication program.
- b.) 800 Development Ave, Chambersburg PA - Chemical Processing Facility - On or about July 11, 2024, the employer did not develop, implement, and/or maintain a list of the hazardous chemicals known to be present in the workplace.

ABATEMENT NOTE: Amongst other means, methods to correct this hazard include, but are not limited to:

- 1.) Developing, implementing, and maintaining a written hazard communication program that includes work-site specific descriptions of how the criteria for labeling and other forms of warning, safety data sheets and employee information and training will be met (i.e. who is responsible, how it will be done, etc.)
- 2.) Developing and implementing a list of hazardous chemicals known to be present in the workplace.
- 3.) Identifying and implementing methods inform employees of hazards associated with non-routine tasks, and hazards associated with chemicals contained in unlabeled pipes in their work areas (if applicable).
- 4.) Identifying and implementing methods for informing contractors of workplace hazards.
- 5.) Ensuring that the written hazard communication program is made available, upon request, to employees, their designated representatives, the Assistant Secretary and the Director, in accordance with the requirements of 29 CFR 1910.1020(e).

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photographic or video evidence of abatement or other 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: 1761311
Inspection Date(s): 07/11/2024 - 12/13/2024
Issuance Date: 12/31/2024



Citation and Notification of Penalty

Company Name: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	February 05, 2025
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: 1761311
Inspection Date(s): 07/11/2024 - 12/13/2024
Issuance Date: 12/31/2024



Citation and Notification of Penalty

Company Name: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

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

29 CFR 1910.1200(h)(2): The employee training did not include the requirements of 29 CFR 1910.1200(h)(2)(i) through (h)(2)(iv):

a.) 800 Development Ave, Chambersburg PA - Chemical Processing Facility - On or about July 11, 2024, employees work with chemicals during the manufacturing of cleaning products, and did not have hazard communication training.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photographic or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: February 05, 2025
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: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

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

29 CFR 1910.1200(h)(3): The employee training did not include the requirements of 29 CFR 1910.1200(h)(3)(i) through (h)(3)(iv):

a.) 800 Development Ave, Chambersburg PA - On or about July 11, 2024, facility employees were not afforded all necessary measures to include but not limited to, appropriate work practices, emergency procedures, and personal protective equipment, essential in the event of the presence or a release of hazardous chemical(s).

Zep, Inc. was previously cited for a violation of this occupational safety and health standard or its equivalent standard 1910.1200(h)(3)(iii), which was contained in OSHA inspection number 1622449, citation number 1, item number 1b and was affirmed as a final order on April, 11, 2023, with respect to a workplace located at 350 Joe Frank Harris Parkway, Emerson, GA 30137.

ABATEMENT NOTE: Among other methods, feasible and acceptable means of abatement would be to generated and complete employee training that will address the following criteria:

- 1) What operations have hazardous chemicals present; how employees are to protect themselves from hazardous chemicals.
- 2) Location and availability of the written HCS program including the required list(s) of hazardous chemicals and SDSs
- 3) How the employer monitors (e.g., monitoring devices, visual, odor) for hazardous chemicals.
- 4) The physical and health hazards (including hazards not otherwise classified) of the chemicals in the work area.
- 5) Measures employees can take to protect themselves from the hazardous chemicals including any specific procedures (e.g., work practices, emergency procedures, PPE).

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photographic or video evidence of abatement or other 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: 1761311
Inspection Date(s): 07/11/2024 - 12/13/2024
Issuance Date: 12/31/2024



Citation and Notification of Penalty

Company Name: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	February 05, 2025
Proposed Penalty:	\$80,655.00

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: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201

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

29 CFR 1904.29(b)(1): The employer did not enter each recordable injury or illness on the OSHA 300 log, or equivalent form, in the detail as required by the regulation:

- a.) 800 Development Avenue, Chambersburg PA, Column F for Case No. 1 on the 2024 OSHA 300 log does not specifically describe injury or illness, part(s) of body affected, or the substance that directly injured / made the employee ill, for an incident that occurred on or about July 11, 2024.
- b.) 800 Development Avenue, Chambersburg PA, Column F for Case No. 2 on the 2024 OSHA 300 log does not specifically describe injury or illness, part(s) of body affected, or the substance that directly injured / made the employee ill, for an incident that occurred on or about July 11, 2024.

Abatement certification and documentation required within 10 days after abatement date. The certification shall include a statement that abatement is complete, the date and method of abatement, and state that employees and their representatives were informed of this abatement. Abatement documentation shall include documents demonstrating that abatement is complete, such as evidence of the purchase or repair of equipment, photographic or video evidence of abatement or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	February 05, 2025
Proposed Penalty:	\$0.00

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

U.S. Department of Labor
Occupational Safety and Health Administration
4050 Crums Mill Road
Suite 102
Harrisburg, PA 17112



INVOICE / DEBT COLLECTION NOTICE

Company Name: Zep, Inc., dba AFCO
Inspection Site: 800 Development Avenue, Chambersburg, PA 17201
Issuance Date: 12/31/2024

Summary of Penalties for Inspection Number: 1761311

Citation 1 Item 1, Serious	\$16,131.00
Citation 1 Item 2a, Serious	\$16,131.00
Citation 1 Item 2b, Serious	\$0.00
Citation 1 Item 3a, Serious	\$16,131.00
Citation 1 Item 3b, Serious	\$0.00
Citation 1 Item 3c, Serious	\$0.00
Citation 1 Item 4, Serious	\$16,131.00
Citation 1 Item 5a, Serious	\$16,131.00
Citation 1 Item 5b, Serious	\$0.00
Citation 2 Item 1, Repeat - Serious	\$80,655.00
Citation 3 Item 1, Other-than-Serious	\$0.00
Citation 3 Item 2, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES:	\$161,310.00

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.

December 31, 2024

Kevin T. Chambers

Area Director

Date