

U.S. Department of Labor
Occupational Safety and Health Administration
1771 West Diehl Road, Suite 210
Naperville, IL 60563



Citation and Notification of Penalty

To:
HUDAPACK METAL TREATING OF ILLINOIS,
INC.
and its successors
550 MITCHELL ROAD
Glendale Heights, IL 60139

Inspection Number: 1367898
Inspection Date(s): 12/21/2018 - 06/18/2019
Issuance Date: 06/18/2019

Inspection Site:
550 MITCHELL ROAD
Glendale Heights, IL 60139

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 630-300-7100. 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 on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type “OSHA” and click Go. From the results, click on OSHA Penalty Payment Form. 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.

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 06/18/2019. The conference will be held by telephone or at the OSHA office located at 1771 West Diehl Road, Suite 210, Naperville, IL 60563 on _____ at

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1367898

Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139
Issuance Date: 06/18/2019

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, 1771 West Diehl Road, Suite 210, Naperville, IL 60563**

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review

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

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Citation and Notification of Penalty

Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

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

29 CFR 1910.23(b)(10): Any ladder with structural or other defects was not immediately tagged "Dangerous: Do Not Use" or with similar language in accordance with 1910.145 and removed from service until repaired in accordance with 1910.22(d), or replaced:

On or about December 20 and 21, 2018, employees using a six foot Werner stepladder with structural defects were exposed to fall and burn hazards. Employees were using the step ladder during the cleaning process of the line 2 quench tank to access/egress the top of the tank and to place a pump in the tank for the removal of molten salt, which had a temperature of approximately 600 degrees Fahrenheit. The stepladder had damaged parts including a broken right main rail, a heat damaged left main rail, a repaired left support rail, a repaired mid-cross brace between the support rails and a repaired top cap that connected both main rails and both support rails.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
Proposed Penalty:

06/19/2019
\$9282.00

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
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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 1910.28(b)(1)(i): The employer did not ensure that each employee on a walking-working surface with an unprotected side or edge that was 4 feet (1.2 m) or more above a lower level was protected from falling by one or more of the following: Guardrail systems, safety net systems, or personal fall arrest systems:

- a) On or about December 20 and 21, 2018, the employer did not provide fall protection on the perimeter of salt to salt quench tank on line 2 with a fall hazard of approximately 5.9 feet to the exterior of the tank.
- b) On or about December 27, 2018, an employee without fall protection was exposed to a fall hazard of 14 feet while tightening motor cover bolts above line 1.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
Proposed Penalty:

07/10/2019
\$9282.00

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Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

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

29 CFR 1910.28(b)(6)(i): (i) Each employee less than 4 feet (1.2 m) above dangerous equipment was not protected from falling into or onto the dangerous equipment by a guardrail system or a travel restraint system, and the equipment was not covered or guarded to eliminate the hazard:

a) On or about December 20 and 21, 2018, employees without fall protection were exposed to falls of less than 4 feet directly into the uncovered quench tank. Employees without fall protection occupied the upper surface of the tank wall while engaged in tank cleaning operations.

b) On or about December 21, 2018, an employee without fall protection was exposed to a fall of less than 4 feet directly into processes tanks while attempting to remove parts which had fallen into tanks on line 1. Employees were exposed to burns from falling into molten salt at 1600 degrees Fahrenheit.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:

07/10/2019

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Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

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

29 CFR 1910.30(a)(1): Before any employee was exposed to a fall hazard, the employer did not provide training for each employee who uses personal fall protection systems or who is required to be trained as specified elsewhere in this subpart. Employers must ensure employees are trained in the requirements of this paragraph on or before May 17, 2017:

On or about December 20, 2018, and days afterward, employees without fall protection training were exposed to fall hazards in the regular course of their duties.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
Proposed Penalty:

07/10/2019
\$9282.00

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

29 CFR 1910.37(b)(6): Each exit sign was not illuminated to a surface value of at least five foot-candles (54 lux) by a reliable light source and be distinctive in color. Self-luminous or electroluminescent signs that have a minimum luminance surface value of at least .06 footlamberts (0.21 cd/m²) are permitted:

On or about December 27, 2018, the employer did not ensure that the exit sign in the aisle at the northeast exit was illuminated. This exposed employees to smoke inhalation and burns in the case of a fire.

Abatement certification is required for this item in accordance with 29 CFR 1903.19(c).

Date By Which Violation Must be Abated:
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06/19/2019
\$3978.00

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Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

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

29 CFR 1910.132(d)(1)(i): The employer did not assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If such hazards are present, or likely to be present, the employer shall: Select, and have each affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment:

- a) On or about December 20, 2018, employees were exposed to burn hazards while working around molten salt with temperatures of approximately 600 to 1600 degrees Fahrenheit. Employees wore plastic face masks and plastic safety glasses. Both of these items provide limited protection at high temperatures. Employees were not wearing appropriate personal protective equipment to protect from burns to the face and body. A hazard assessment was not performed to ensure appropriate personal protective equipment was provided to and worn by employees.
- b) On or about December 20, 2018 through March 15, 2019, employees were exposed to electrical and arc flash hazards while performing live electrical work. A hazard assessment for arc flash was not performed to ensure appropriate personal protective equipment was provided to and worn by employees.

Abatement documentation is required of this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
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07/10/2019
\$9282.00

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Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

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

29 CFR 1910.146(c)(1): The employer did not evaluate the workplace to determine if any spaces are permit-required confined spaces:

On or about December 20 and 21, 2018, the employer did not evaluate the workplace to identify permit-required confined space existence and location of those spaces including the salt to salt quench tank on line 2.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
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07/10/2019
\$9282.00

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

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Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

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

29 CFR 1910.146(c)(4): When the employer decided that its employees would enter permit spaces, the employer did not develop and implement a written permit space entry program that complied with 29 CFR 1910.146:

On or about December 20 and 21, 2018, employees entered a permit space when they performed maintenance activities on the salt to salt quench tank on line 2. The employer did not develop and implement a written permit space entry program. Employees were exposed to thermal burn, electrical, and struck by/caught-in hazards while in the space.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
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07/10/2019
\$9282.00

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Occupational Safety and Health Administration

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Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

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

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

On or about December 20 and 21, 2018, the employer did not develop, document and utilize procedures to control energy while employees performed maintenance activities on the salt to salt quench tank on line 2.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
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07/10/2019
\$9282.00

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Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

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

29 CFR 1910.147(c)(5)(i): Locks, tags, chains, wedges, key blocks, adapter pins, self-locking fasteners, or other hardware was not provided by the employer for isolating, securing or blocking of machines or equipment from energy sources:

On or about December 20 and 21, 2018, the employer did not provide hardware to employees for the control of hazardous energy. Employees were exposed to thermal burn hazards and struck-by/caught-in hazards while performing maintenance activities on the line 2 salt to salt quench tank.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
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Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

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

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

On or about December 20 and 21, 2018, employees were exposed to thermal burn hazards and struck-by/caught in hazards while performing maintenance activities on the line 2 salt to salt quench tank. The employer did not conduct a periodic inspection of the energy control procedures, at least annually, to ensure that the procedures and the requirements of the standard were being followed.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
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Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

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

29 CFR 1910.147(c)(7)(i): The employer did not provide training to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees:

On or about December 20 and 21, 2018, employees were required to clean out the line 2 quench tank. This task required employees to perform lockout/tagout to safely perform their duties. The employer did not provide training to the employees on the energy control program and the employees did not lockout the equipment.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
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07/10/2019
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See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

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Citation 1 Item 12 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):

On or about December 20 and 21, 2018, employees were exposed to machine hazards associated with rotating parts and thermal hazards when they performed salt cleaning activities on the quench tank. The employer did not ensure that employees implemented energy control steps prior to allowing them to begin work. The machine was shut down, but not locked out to prevent unexpected movement or energization of the equipment.

As a result, the remaining applicable energy control elements, involving machine isolation [1910.147(d)(3)], lockout/tagout device application [1910.147(d)(4)], dissipation of residual energy [1910.147(d)(5)(i)], and verification of isolation [1910.147(d)(6)] were not implemented to protect employees from machine servicing hazards.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

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Citation 1 Item 13 Type of Violation: **Serious**

29 CFR 1910.219(d)(1): Guarding. Pulleys, any parts of which are seven (7) feet or less from the floor or working platform, were not guarded in accordance with the standards of this section:

- a) On or about December 27, 2018, the employer did not provide guards of v-belt drives on the agitator drive shaft on line 2 adjacent to the east storage area. This condition presented a caught-in hazard that could result in an amputation to employees.
- b) On or about December 27, 2018, the employer did not provide guards of v-belt drives on the tumbler adjacent to the aisle leading to the northeast exit. This condition presented a caught-in hazard that could result in an amputation to employees.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

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Citation 1 Item 14 Type of Violation: **Serious**

29 CFR 1910.303(b)(2): Installation and use. Listed or labeled equipment shall be installed and used in accordance with any instructions included in the listing or labeling:

On or about December 20, 2018, employees were exposed to electric shock, arc flash and burn hazards while connecting, testing and utilizing a 480 volt pump connected to a flexible cord that was connected to a Cutler-Hammer enclosed switch/disconnect. The disconnect was used as an on/off switch for the 480 volt pump and was placed unsecured on top of a fiber drum/barrel outside the salt to salt quench tank on line 2. The disconnect is designed to be mounted to a wall or fixed structure.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
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\$6630.00

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Citation 1 Item 15 Type of Violation: **Serious**

29 CFR 1910.303(b)(7)(iv): There shall be no 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) On or about December 20 and 21, 2018, employees were exposed to electrical and burn hazards while utilizing an electrical outlet that was arc burned and damaged. The outlet was located on the west wall outside of the salt-to-salt line 2. The outlet was being used to power a work light adjacent to the salt to salt quench tank on line 2.

b) On or about December 20, 2018 through December 27, 2018, employees were exposed to electrical and burn hazards while utilizing an electrical outlet that was arc burned and damaged. The outlet was located in the weighing area at the north end of the salt to salt line 2. The outlet was being used to power a scale and equipment in the weighing area.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

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Citation 1 Item 16 Type of Violation: **Serious**

29 CFR 1910.303(f)(2): Services, feeders, and branch circuits. Each service, feeder, and branch circuit, at its disconnecting means or overcurrent device, shall be legibly marked to indicate its purpose, unless located and arranged so the purpose is evident:

On or about December 27, 2018, the circuit breakers protecting the circuits for the salt to salt line 2 were not labeled. This condition exposed employees to electric shock and burn hazards from accidental actuation or inability to turn off the power.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

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07/10/2019
\$6630.00

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Occupational Safety and Health Administration

Inspection Number: 1367898
Inspection Date(s): 12/21/2018 - 06/18/2019
Issuance Date: 06/18/2019



Citation and Notification of Penalty

Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

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 17 a Type of Violation: **Serious**

29 CFR 1910.305(g)(1)(iv)(A): Flexible cords and/or cables were used as a substitute for the fixed wiring of a structure:

On or about December 20 and 21, 2018, an extension cord was used as a substitute for fixed wiring to provide electrical power to a Husky portable work lamp in the salt to salt quench tank area on line 2.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
Proposed Penalty:

07/10/2019
\$6630.00

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: 1367898
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Citation and Notification of Penalty

Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

Citation 1 Item 17 b Type of Violation: **Serious**

29 CFR 1910.305(g)(1)(iv)(B): Flexible cords and cables were run through holes in walls, ceilings, or floors:

On or about December 27, 2018, a flexible extension cord was run through a hole in the wall to provide electrical power for the tumbler adjacent to the aisle leading to the northeast exit.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:

07/10/2019

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

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Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

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 18 a 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:

Employees were required to perform live electrical work and/or voltage testing. The employee was not trained in and familiar with safety-related work practices such as the use of special precautionary techniques, personal protective equipment (PPE) and insulating and shielding materials:

- a. On or about December 20, 2018, the maintenance supervisor performed cable connections on energized components inside an electrical supply panel for a 480V pump.
- b. On or about March 15, 2019, the maintenance supervisor performed voltage testing on a 120V control for an agitator motor in the quench cabinet.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated: 07/10/2019
Proposed Penalty: \$6630.00

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: 1367898
Inspection Date(s): 12/21/2018 - 06/18/2019
Issuance Date: 06/18/2019



Citation and Notification of Penalty

Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

Citation 1 Item 18 b Type of Violation: **Serious**

29 CFR 1910.333(a): "General." Safety-related work practices were not employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts, when work is performed near or on equipment or circuits which are or may be energized. The specific safety-related work practices were not consistent with the nature and extent of the associated electrical hazards:

Employees were required to perform live electrical work and/or voltage testing. The employer did not ensure electrical safety-related work practices were employed such as the use of special precautionary techniques, personal protective equipment (PPE) and insulating and shielding materials:

- a. On or about December 20, 2018, the maintenance supervisor performed cable connections on energized components inside an electrical supply panel for a 480V pump.
- b. On or about March 15, 2019, the maintenance supervisor performed voltage testing on a 120V control for an agitator motor in the quench cabinet.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:

07/10/2019

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

Inspection Number: 1367898
Inspection Date(s): 12/21/2018 - 06/18/2019
Issuance Date: 06/18/2019



Citation and Notification of Penalty

Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

Citation 1 Item 18 c Type of Violation: **Serious**

29 CFR 1910.333(c)(2): "Work on energized equipment." Only qualified persons may work on electric circuit parts or equipment that have not been deenergized under the procedures of paragraph (b) of this section. Such persons were not capable of working safely on energized circuits and was not familiar with the proper use of special precautionary techniques, personal protective equipment, insulating and shielding materials, and insulated tools:

Employees were required to perform live electrical work and/or voltage testing. The employee was not qualified to safely work on energized circuits and was not familiar with safety-related work practices such as the use of special precautionary techniques, personal protective equipment (PPE) and insulating and shielding materials:

- a. On or about December 20, 2018, the maintenance supervisor performed cable connections on energized components inside an electrical supply panel for a 480V pump.
- b. On or about March 15, 2019, the maintenance supervisor performed voltage testing on a 120V control for an agitator motor in the quench cabinet.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:

07/10/2019

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Citation and Notification of Penalty

Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

Citation 1 Item 19 Type of Violation: **Serious**

29 CFR 1910.334(a)(2)(ii): There was a defect or evidence of damage that could have exposes an employee to injury and the defective or damaged item was not removed from service and an employee was using it before repairs and tests necessary to render the equipment safe were made:

- a) On or about December 20 and 21, 2018, employees were exposed to electric shock and burn hazards while using a damaged Husky portable work light that was being used to provide light while cleaning the salt to salt quench tank on line 2. The light's electrical cord was damaged and had bare conductors exposed. The light's on/off switch was also damaged and by-passed. An employee holding the light experienced an electric shock and was subsequently electrocuted and another employee experienced an electric shock when handling the light during a rescue attempt and was subsequently hospitalized.
- b) On or about December 20 and 21, 2018, employees were exposed to electric shock and burn hazards from a damaged flexible extension cord that was being used to power portable Husky work light. The cord had multiple areas that were burned, cut, and/or spliced and covered with tape. Employees were using the portable light to provide light while cleaning the salt to salt quench tank on line 2. An employee holding the light experienced an electric shock and was subsequently electrocuted and another employee experienced an electric shock when handling the light during a rescue attempt and was subsequently hospitalized.
- c) On or about December 20, 2018, employees were exposed to electric shock and burn hazards while using a 480 volt pump connected to a flexible cord that was damaged and spliced and partially covered with tape. The pump was being used to remove molten salt from the salt to salt quench tank on line 2.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
Proposed Penalty:

07/10/2019
\$13260.00

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: 1367898
Inspection Date(s): 12/21/2018 - 06/18/2019
Issuance Date: 06/18/2019



Citation and Notification of Penalty

Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

Citation 1 Item 20 Type of Violation: **Serious**

29 CFR 1910.334(a)(4): Conductive work locations. Portable electric equipment and flexible cords used in highly conductive work locations (such as those inundated with water or other conductive liquids), or in job locations where employees are likely to contact water or conductive liquids, were not approved for those locations:

On or about December 20 and 21, 2018, employees working in a wet environment were exposed to electric shock and burn hazards while using a damaged Husky portable work light that was being used to provide light while cleaning the salt to salt quench tank on line 2. The light's electrical cord and on/off switch was damaged. The light was not approved to be used in a wet location. An employee holding the light experienced an electric shock and was subsequently electrocuted and another employee experienced an electric shock when handling the light during a rescue attempt and was subsequently hospitalized.

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

Date By Which Violation Must be Abated:
Proposed Penalty:

07/10/2019
\$13260.00

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: 1367898
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Issuance Date: 06/18/2019



Citation and Notification of Penalty

Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

Citation 1 Item 21 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 electrical protective equipment that was appropriate for the specific parts of the body that needed to be protected and for the work being performed:

Employees were required to perform live electrical work and/or voltage testing:

- a. On or about December 20, 2018, the maintenance supervisor performed cable connections on energized components inside an electrical supply panel for a 480V pump.
- b. On or about March 15, 2019, the maintenance supervisor performed voltage testing on a 120V control for an agitator motor in the quench cabinet.

The employee did not use proper personal protective equipment consistent with safety-related work practices including the following, to protect against electrical shock and arc flash/blast injuries:

- 1) Rubber insulating gloves with leather protectors.
- 2) Arc-rated long-sleeve shirt and pants, or arc-rated coverall
- 3) Arc-rated flash suit hood, or arc-rated face shield and balaclava
- 4) Hearing protection (canal inserts)

Abatement documentation is required for this item in accordance with the requirements of 29 CFR 1903.19(d).

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Occupational Safety and Health Administration

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Citation and Notification of Penalty

Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139

Date By Which Violation Must be Abated:
Proposed Penalty:

07/10/2019
\$6630.00

A handwritten signature in black ink, appearing to read "Jacob Scott".

Jacob Scott
Area Director

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

U.S. Department of Labor
Occupational Safety and Health Administration
1771 West Diehl Road, Suite 210
Naperville, IL 60563



INVOICE / DEBT COLLECTION NOTICE

Company Name: HUDAPACK METAL TREATING OF ILLINOIS, INC.
Inspection Site: 550 MITCHELL ROAD, Glendale Heights, IL 60139
Issuance Date: 06/18/2019

Summary of Penalties for Inspection Number	1367898
Citation 1, Serious	\$181662.00
TOTAL PROPOSED PENALTIES	\$181662.00

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 on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. 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 2 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.



Jacob Scott
Area Director



Date