

**Este documento es muy importante. Si ud. No habla inglés,
busque un traductor o llame al (770) 493-6644.**

U.S. Department of Labor Occupational Safety and Health Administration
2296 Henderson Mill Road Suite 200
Atlanta, GA 30345
Phone: (770) 493-6644 Fax: (770) 493-7725



December 22, 2016

Dear Eric Sidewater,

On 07/19/2016, an OSHA compliance officer met with you or your representative as part of an inspection at 1425 Candler Rd. Gainesville, GA 30507. This letter includes the citations for the violations that were found (see summary below). Please choose one of the three options from the box to the right and complete the associated steps found on the following page **within 15 working days**. Please call us if you have any questions about the enclosed citation and/or penalties; we are here to help you choose the best option to resolve your citation as quickly as possible.

Sincerely,


William E. Fulcher, Area Director

Your Citation Summary

Nemo Plastics, Inc.

Inspection Number: 1163153

Total Amount Due: \$115983.00

**Payment Due Date: 15 working days
after receipt of
this letter**

You must correct each violation by the date listed in the Citation and Notification of Penalty. Please see the violations and the correction deadline for each violation starting on page 6.

Total Number of Violations : 28

**Your First Correction Deadline is:
01/20/2016**

Step 1 – Choose a Response Option and Act within 15 working days

Respond now before you lose the ability to discuss potential adjustments to penalty amounts and/or due dates. Please choose one option below and complete the steps on the next page.

Option #1 – Discuss with OSHA

I would like to discuss the citation with an OSHA representative. This may lead to changes in the penalty amount, due date or correction deadlines (if appropriate).

Option #2 – Correct and Pay

I agree with the citation, penalties, and correction deadlines, and do not contest.

Option #3 – Contest the Citation

I do not agree with the citation, penalties, and/or correction deadlines, and would like to contest.

Questions or Concerns?

If you have any questions or concerns regarding the citation, penalties, and/or correction deadlines, please call us at (770) 493-6644.

Step 2 – Complete One Option Checklist

Please post a copy of the citation at or near the place where each violation occurred, even if you plan to contest. You can use the checklist to the right to help plan your next steps. Please do not send in your checklist.

Option #1 – Discuss with OSHA

I will complete by:



1. Call: William C. Fulcher, Area Director, at (770) 493-6644 as soon as possible to schedule a meeting with an OSHA representative that must occur **within 15 working days** of receiving this citation. Bring supporting documentation of existing conditions and corrections done thus far. If necessary, you can still contest the citation after this meeting. ****This meeting does NOT extend your 15 working day deadline to contest the citation.****

 ___ / ___

2. Fill in and post the attached "Notice to Employees OSHA Informal Conference" after scheduling meeting.

 ___ / ___

Option #2 – Correct Violations and Pay Penalty

I will complete by:



1. Correct violations, then complete and mail the attached "Certification of Corrective Action Worksheet" along with the appropriate evidence of repair (e.g. photos, purchase orders, etc.) to the OSHA office listed on the first page, **postmarked within 10 calendar days after each violation's correction deadline and include any required evidence. If these documents are transmitted by means other than mailing, the date the Agency received the documents is the date of submission.**

 ___ / ___

2. Pay the **Total Penalty** by using one of the following methods:
****Include your Inspection Number (see first page) on the payment.****

 ___ / ___

Pay Online: Search "OSHA" on www.pay.gov and complete the "OSHA Penalty Payment Form." Pay by debit, credit or Automated Clearing House (ACH) **within 15 working days**. Penalties over \$25,000 must be paid by ACH and require a Transaction ID (Call 202-693-2170 to obtain one).

Pay by Check: Mail check or money order payable to "DOL-OSHA" for the Total Penalty to the OSHA office listed on the first page **within 15 working days**.

Option #3 – Contest the Citation

I will complete by:



Mail a letter of intent to legally contest to the OSHA office listed on the first page, postmarked within **15 working days**.

 ___ / ___

U.S. Department of Labor

Occupational Safety and Health Administration
2296 Henderson Mill Road
Suite 200
Atlanta, GA 30345
Phone: 770-493-6644 Fax: 770-493-7725



Citation and Notification of Penalty

To:
Nemo Plastics, Inc.
and its successors
1425 Candler Rd.
Gainesville, GA 30507

Inspection Number: 1163153
Inspection Date(s): 07/19/2016 - 07/22/2016
Issuance Date: 12/22/2016

Inspection Site:
1425 Candler Rd.
Gainesville, GA 30507

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. 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.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 12/22/2016. The conference will be held by telephone or at the OSHA office located at 2296 Henderson Mill Road, Suite 200, Atlanta, GA 30345 on _____ at

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1163153

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507
Issuance Date: 12/22/2016

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, 2296 Henderson Mill Road, Suite 200, Atlanta, GA 30345**

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: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

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

29 CFR 1910.22(a)(1): All places of employment, passageways, storerooms or service rooms were not kept clean and orderly or in a sanitary condition.

On or about July 19, 2016, employees were exposed to fire and explosion hazards from the accumulations of combustible dusts on elevated surfaces throughout the production area when the employer did not develop and implement effective housekeeping practices to maintain the cleanliness of the facility walls, equipment, and stored materials.

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 of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/20/2017
Proposed Penalty:	\$8730.00

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: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

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

29 CFR 1910.22(a)(2): Floor(s) of workroom(s) were not maintained in a clean and, so far as possible, a dry condition:

On or about July 19, 2016, employees were exposed to fire and explosion hazards from the accumulations of combustible dust when the employer did not develop and implement effective housekeeping practices to maintain the cleanliness of the facility floors.

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 of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 01/20/2017



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

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

29 CFR 1910.176(c): Storage areas were not kept free from accumulation of materials that constituted hazards from tripping, fire, explosion or pest harborage:

On or about July 19, 2016, employees in the warehouse were exposed to fire and explosion hazards when the employer did not develop and implement housekeeping practices to maintain the cleanliness of overhead beams and pipes from the accumulations of combustible dust.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

01/20/2017



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

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

29 CFR 1910.23(a)(8): Every floor hole into which persons can accidentally walk were not guarded:

On or about July 19, 2016, employees were exposed to trip hazards when holes/openings in the floor had not been repaired. Employees walk and work in the following areas where the holes/openings were located:

- a. shipping dock
- b. warehouse aisles
- c. production areas

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

01/20/2017
\$3741.00



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 3 Type of Violation: **Serious**

29 CFR 1910.23(c)(1): Open-sided floors and/or platforms four feet or more above adjacent floor or ground level were not guarded with standard railings (or equivalent) and toeboards:

On or about July 19, 2016, employees were exposed to fall hazards when employees worked or walked in the following areas without fall protection:

- a. on a ledge without guardrails inside silo #1 where an employee stands in order to use a leaf blower to clean the dust
- b. on the unguarded section of the densifier platform next to the densifier #2 tank where the operator stands
- c. on the unguarded section of the densifier platform next to the densifier #3 tank where the operator stands
- d. at the ends of the densifier platform where the fan seat was located, the platform did not have a top rail installed at 42". ~~W~~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 of abatement, or other written records.

Date By Which Violation Must be Abated: 01/20/2017
Proposed Penalty: \$6236.00



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 4 Type of Violation: **Serious**

29 CFR 1910.23(e)(2): Stair rails did not consist of a top rail, intermediate rail and/or posts, with the vertical height not more than 34 inches (86.36 cm) nor less than 30 inches (76.2 cm) from upper surface of top rail to surface of tread in line with the face of riser at forward edge of tread.

On or about July 19, 2016, employees were exposed to fall hazards on the steps to the densifier platform.

- a. There was no midrail on either side of the steps
- b. The handrail ended at the bottom of the platform. Employees had to move their hands from the handrail to the platform floor or to the platform guardrail for the top steps because the handrail did not extend all the way to the top step.
- c. The handrail was approximately 36 inches above the surface of the tread of the steps.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

01/20/2017
\$3741.00

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

Inspection Number: 1163153
Inspection Date(s): 07/19/2016 - 07/22/2016
Issuance Date: 12/22/2016



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 5 Type of Violation: **Serious**

29 CFR 1910.24(f): Rise height and tread width were not uniform throughout any flight of stairs including any foundation structure used as one or more treads of the stairs:

On or about July 19, 2016, employees were exposed to tripping and fall hazards on the densifier steps when the rise from the floor to the first step was approximately 10", the rise from the first step to the second step was approximately 12", and the rise from the second step to the third step was approximately 10". ~~¶~~In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

01/20/2017
\$3741.00

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: 1163153
Inspection Date(s): 07/19/2016 - 07/22/2016
Issuance Date: 12/22/2016



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 6 Type of Violation: **Serious**

29 CFR 1910.37(a)(3): Exit route(s) were not kept free and unobstructed:

On or about July 19, 2016, employees were exposed to fire hazards when there was angle iron bolted to the floor and boxes in the exit route outside the exit door. The exit led from the conference room next to the office belonging to Mr. Jesus Medrano, Sr. to the warehouse area.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

01/20/2017
\$3741.00

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: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 7 Type of Violation: **Serious**

29 CFR 1910.37(b)(4): Signs were not posted along the exit access indicating the direction of travel to the nearest exit and exit discharge when the direction of travel to the exit or exit discharge was not immediately apparent:

On or about July 19, 2016, employees were exposed to fire and smoke hazards when the exits were not visible:

- a. leaving the plant manager's conference room and entering the warehouse.
- b. leaving the offices located on the first floor in the front office area.
- c. once on the dock, there are no signs indicating how to leave the dock.
- d. there are no signs directing employees to the wall openings that lead to the shipping/receiving dock that are designated as an exit route.
- e. in the warehouse at the exits along the side wall except when standing in the aisle to the exits because the line of sight to these exits is obstructed by the height of the stacked materials.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

01/20/2017
\$3741.00



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 8 Type of Violation: **Serious**

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

On or about July 19, 2016, employees were exposed to fire and explosion hazards when employees were not wearing protective clothing such as flame-resistant clothing in areas where employees were exposed to potential combustible dust fires such as, but not limited to the following:

- a. filling super sacks in the bagging areas
- b. cleaning combustible dust with a gasoline powered leaf blower from the floors, equipment, electrical equipment, beams, pipes, walls, and inside silos
- c. banging on the side of the silo with a hammer to loosen material
- d. turning augers in order to loosen material inside of silos

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 of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 01/20/2017
Proposed Penalty: \$8730.00



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 2 Item 9 a Type of Violation: **Serious**

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

On or about July 19, 2016, employees entered silo #2 (located on the aisle next to densifiers #2 and #3) in order to clean with a leaf blower. Employees also enter/break the plane of silo #1 when opening the hatch to blow air into the silo. The silos present fire and explosion hazards from combustible dust, struck by hazards from augers, fall hazards from unprotected platforms and work surfaces, and engulfment hazards from plastic pellets and dust. A thorough evaluation of the entry procedures was not conducted to ensure that these hazards were eliminated during cleaning operations.

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 of abatement, or other written records.

Date By Which Violation Must be Abated: 01/20/2017
Proposed Penalty: \$6236.00



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 9 b Type of Violation: **Serious**

29 CFR 1910.146(c)(2): The employer did not inform exposed employees, by posting danger signs or by any other equally effective means, of the existence and location of and the danger posed by the permit spaces:

On or about July 19, 2016, employees entered silo #2 (located on the aisle next to densifiers #2 and #3) in order to clean with a leaf blower. Employees also enter/break the plane of silo #1 when opening the hatch to blow air into the silo. The silos present fire and explosion hazards from combustible dust, struck by hazards from augers, fall hazards from unprotected platforms and work surfaces, and engulfment hazards from plastic pellets and dust. Employees were not informed of the danger through signs or training.

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 of abatement, or other written records.

Date By Which Violation Must be Abated:

01/20/2017



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 9 c 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 July 19, 2016, employees entered silo #2 (located on the aisle next to densifiers #2 and #3) in order to clean with a leaf blower. Employees also enter/break the plane of silo #1 when opening the hatch to blow air into the silo. The silos present fire and explosion hazards from combustible dust, struck by hazards from augers, fall hazards from unprotected platforms and work surfaces, and engulfment hazards from plastic pellets and dust. There was no permit required confined space program.

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 of abatement, or other written records.

Date By Which Violation Must be Abated:

01/20/2017



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 9 d Type of Violation: **Serious**

29 CFR 1910.146(g)(1): The employer did not provide training so that all employees whose work was regulated by 29 CFR 1910.146 (permit required confined spaces) acquired the understanding, knowledge, and skills necessary for the safe performance of the duties assigned under 29 CFR 1910.146:

On or about July 19, 2016, employees entered silo #2 (located on the aisle next to densifiers #2 and #3) in order to clean with a leaf blower. Employees also enter/break the plane of silo #1 when opening the hatch to blow air into the silo. The silos present fire and explosion hazards from combustible dust, struck by hazards from augers, fall hazards from unprotected platforms and work surfaces, and engulfment hazards from plastic pellets and dust. Confined space training was not provided.

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 of abatement, or other written records.

Date By Which Violation Must be Abated:

01/20/2017



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 10 Type of Violation: **Serious**

29 CFR 1910.147(c)(1): The employer did not establish a program consisting of an energy control procedure, employee training and periodic inspections to ensure that before any employee performed any servicing or maintenance on a machine or equipment where the unexpected energizing, startup or release of stored energy could occur and cause injury, the machine or equipment shall be isolated from the energy source and rendered inoperative:

Employees perform servicing and maintenance activities such as installing, setting up, adjusting, inspecting, maintaining, repairing, cleaning and servicing a variety of machines and equipment such as, but not limited to, densifiers, augers inside the silos, grinders, shredders, balers, and shears. Employees did not use lockout or tagout devices to isolate energy sources, inspections on lockout methods were not performed, nor was training provided to employees on the energy control measures.

- a. There were no written machine specific lockout/tagout procedures.
- b. When equipment had multiple energy sources, employees only locked out the electricity.
- c. An annual audit was not performed because there were no machine specific procedures.
- d. The equipment was not locked out when the silo was cleaned or material checked.
- e. The equipment was not locked out when turning the shafts on the augers when the material was clogged.
- f. The equipment was not locked out when changing the blades on the densifiers.
- g. Employees performing work such as, but not limited to, densifier blade change were not trained to perform lockout/tagout.
- h. Employees performing work such as, but not limited to, densifier blade change were not provided with locks.
- i. If multiple employees were performing work on a machine, each employee did not place his own lock on the machine. Work such as, but not limited to, removing metal from grinders or cleaning grinders, involved multiple employees.
- j. Work such as, but not limited to, correcting an interlock on the baler was not locked out until OSHA asked why the work was being performed without locking out the equipment.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the

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: 1163153
Inspection Date(s): 07/19/2016 - 07/22/2016
Issuance Date: 12/22/2016



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

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 of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/20/2017
Proposed Penalty:	\$8730.00

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: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 11 Type of Violation: **Serious**

29 CFR 1910.176(a): Where mechanical handling equipment was used, sufficient safe clearances were not allowed for aisles, at loading docks, through doorways or wherever turns or passage had to be made. Aisle(s) or passageway(s) were not kept in good repair with no obstruction across or in aisles that could create a hazard. Permanent aisles or passageways were not appropriately marked.

On or about July 19, 2016, employees were exposed to struck-by hazards when

- a. there was not enough space for two forklifts to pass by each other on the dock due to material placed on the dock and there was no clear view of the travel path due to the zig-zag manner that material was placed
- b. there were potholes in the dock causing loads to be unsteady when driven into
- c. there were no permanent aisles or passageways marked on the dock to insure that materials were properly stored
- d. there were no permanent aisles or passageways marked in the warehouse to insure that materials were properly stored
- e. there were potholes in the warehouse aisles causing unsteady loads

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:

01/20/2017

Proposed Penalty:

\$4988.00



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 12 Type of Violation: **Serious**

29 CFR 1910.176(b): Material stored in tiers was not stacked, blocked, interlocked or limited in height so that it was stable and secure against sliding and collapse:

On or about July 19, 2016, employees in the following locations were exposed to struck-by hazards when materials were not stacked in a secure manner due to damaged boxes, damaged pallets, and unsafe material storage practices:

- a. warehouse area
- b. dock area
- c. production area

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 01/20/2017
Proposed Penalty: \$8730.00

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: 1163153
Inspection Date(s): 07/19/2016 - 07/22/2016
Issuance Date: 12/22/2016



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 13 Type of Violation: **Serious**

29 CFR 1910.178(c)(2)(vii): Power-operated industrial trucks designated as DY, EE, or EX are not used in atmospheres in which combustible dust is not normally in suspension in the air by normal operation of equipment or apparatus but where deposits or accumulations of such dust could be ignited by arcs or sparks originating in the truck:

On or about July 19, 2016, employees were exposed to fire and explosion hazards when the employer provided LP forklifts not rated as DY, EE, or EX for employee use in Class II, Division II areas where accumulations of combustible dust may be ignited by arcs or sparks originating in the truck.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

01/20/2017
\$6236.00

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: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 14 Type of Violation: **Serious**

29 CFR 1910.178(p)(1): Powered industrial truck(s) found to be in need of repair, defective, or in any way unsafe had not been taken out of service until restored to safe operating condition(s):

On or about July 19, 2016, employees were exposed to struck-by hazards when the forklifts were not taken out of service when the following hazards were identified during the shift inspection:

- a. seat and propane tank latch deficiencies were found on forklift G61080 for three days.
- b. emergency brake deficiencies were found on forklift G1084 for three days.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

01/20/2017
\$4988.00



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 15 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:

On or about July 19, 2016, employees were exposed to caught-in hazards when equipment such as, but not limited to, the equipment listed below was not guarded or was not adequately guarded. Employees work and clean under and near the hazardous locations.

- a. Return idler rollers on the bottom side of the belt conveyor used to load the horizontal baler are not guarded. Employees were exposed to being caught in the in running nip points of the rollers.
- b. Return idler rollers on the bottom side of the belt conveyor used to load the shredder's baler are not guarded. Employees were exposed to being caught in the in running nip points of the rollers.
- c. Guillotine shear #1: back side and unused portion of blade are not guarded. Employees were exposed to being struck by the blade.
- d. Guillotine shear #2: back side and unused portion of blade are not guarded. Employees were exposed to being struck by the blade.
- e. Horizontal baler wire twist mechanism has a gap in the guard that permits access to the wire threaders on the back side of the machine. Employees were exposed being struck by the threader.
- f. Horizontal baler has a gap in the guard that permits access to the wire twist mechanisms on the front side of the machine. Employees were exposed being struck by the threader.
- g. The horizontal baler's emergency stop control box was not mounted on the side of the conveyor. It was hanging down loose. Employees were exposed to amputations hazards.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

01/20/2017
\$6236.00

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: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 16 Type of Violation: **Serious**

29 CFR 1910.212(a)(2): Guard(s) on machine(s) were not affixed to the machine or secured elsewhere when attachment to the machine was not possible:

On or about July 19, 2016, employees were exposed to caught-in hazards when equipment such as, but not limited to the equipment listed below did not have the guard secured.

- a. A bolt was missing on the expanded metal cage that guarded the wire insertion bar/blade on the horizontal baler.
- b. Bolts were missing on the guard covering the horizontal balers hinged cover.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

01/20/2017
\$6236.00



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 17 Type of Violation: **Serious**

29 CFR 1910.219(c)(4)(i): Unguarded projecting shaft end(s) did not present a smooth edge and end and projected more than one half the diameter of the shaft:

On or about July 19, 2016, employees were exposed to struck-by and caught-by hazards when the exposed shaft ends of the following silos' augers were approximately 6-8 inches long.

- a. Shaft at the bottom of silo #1
- b. Shaft at the bottom of silo #2
- c. Shaft at the top of the silo that is accessed by the rolling ladder
- d. Shaft at the bottom of the silo that is not yet in use

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

01/20/2017
\$6236.00



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 2 Item 18 a Type of Violation: **Serious**

29 CFR 1910.219(d)(1): Pulley(s) with part(s) seven feet or less from the floor or work platform were not guarded in accordance with the requirements specified in 29 CFR 1910.219(m) and (o):

On or about July 19, 2016, employees were exposed to struck-by and caught-in hazards when the pulleys under the densifier platform for densifiers #2 and #3 were not guarded or were not adequately guarded. Employees walk and work and clean in the areas near the pulleys.

- a. The expanded metal guard over the belts and pulley under densifier #2 had a hole in it.
- b. The cover for the hole in the belts and pulley enclosure was missing.
- c. There was no guard over the belts and pulley located in the blue enclosure under the densifier #2 tank
- d. The pulley under densifier #3 was accessible from the bottom side of the guard.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated: 01/20/2017
Proposed Penalty: \$6236.00



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 18 b Type of Violation: **Serious**

29 CFR 1910.219(e)(1)(i): Horizontal belts which had both runs seven feet or less from the floor level were not guarded with a guard that extended to at least fifteen inches above the belt. Horizontal belts which had both runs 42 inches or less from the floor level were not fully enclosed by guards conforming to requirements specified in 29 CFR 1910.219(m) and (o):

On or about July 19, 2016, employees were exposed to struck-by and caught-in hazards when the pulleys under the densifier platform for densifiers #2 and #3 were not guarded or were not adequately guarded. Employees walk and work and clean in the areas near the pulleys.

- a. The expanded metal guard over the belts and pulley under densifier #2 had a hole in it.
- b. The cover for the hole in the belts and pulley enclosure was missing.
- c. There was no guard over the belts and pulley located in the blue enclosure under the densifier #2 tank
- d. The pulley under densifier #3 was accessible from the bottom side of the guard.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:

01/20/2017



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

Citation 2 Item 19 Type of Violation: **Serious**

29 CFR 1910.307(c): Equipment, wiring methods, and installations of equipment in hazardous (classified) locations were not intrinsically safe, approved for the hazardous (classified) location, or safe for the hazardous (classified) location:

On or about July 19, 2016 employees in the production area were exposed to fire and explosion hazards where the employer did not prevent the accumulation of combustible dust on elevated horizontal surfaces, walls, equipment supports, equipment, and floors. The employer did not ensure that electrical equipment, wiring methods, and installations were safe for the hazardous location. Dust had accumulated on or near fans, fluorescent light fixtures, silo arguers, electrical disconnect boxes, blowers, grinders, balers, electrical control panels, motors, densifiers, electrical outlets, and clock that were not approved for use in Class II, Division 2 areas.

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 of abatement, or other written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	01/20/2017
Proposed Penalty:	\$8730.00

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: 1163153
Inspection Date(s): 07/19/2016 - 07/22/2016
Issuance Date: 12/22/2016



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

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

29 CFR 1910.145(c)(3): Safety instruction sign(s) were not used where there was a need for general instructions and suggestions relative to safety measure(s):

On or about July 19, 2016, employees were exposed to fire and explosion hazards when no combustible dust warning signs were posted to inform employees of the hazards such as, but not limited to, fire and explosion associated with combustible dust.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

01/20/2017
\$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

Inspection Number: 1163153
Inspection Date(s): 07/19/2016 - 07/22/2016
Issuance Date: 12/22/2016



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

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

29 CFR 1910.134(c)(2)(i): Respirator users were not provided with the information contained in Appendix D to 29 CFR 1910.134 when the employer determined that any voluntary respirator use was permissible:

On or about July 19, 2016, employees had not been given the information in Appendix D when voluntarily using dust masks.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:
Proposed Penalty:

01/20/2017
\$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

Inspection Number: 1163153
Inspection Date(s): 07/19/2016 - 07/22/2016
Issuance Date: 12/22/2016



Citation and Notification of Penalty

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507

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

29 CFR 1910.303(b)(7)(iv): There were damaged parts that could adversely affect safe operation or mechanical strength of the equipment, such as parts that were broken, bent, cut, or deteriorated by corrosion, chemical action, or overheating:

On or about July 19, 2016, employees were exposed to electrical hazards when the electrical junction box mounted on the end of the expanded metal guard on the back side of the horizontal baler had been damaged exposing the conductors inside the box.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET).

Date By Which Violation Must be Abated:

01/20/2017

Proposed Penalty:

\$0.00

A handwritten signature in black ink, appearing to read "William C. Fulcher". The signature is written in a cursive style and is positioned above a horizontal line.

William C. Fulcher
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
2296 Henderson Mill Road
Suite 200
Atlanta, GA 30345
Phone: 770-493-6644 Fax: 770-493-7725



INVOICE / DEBT COLLECTION NOTICE

Company Name: Nemo Plastics, Inc.
Inspection Site: 1425 Candler Rd., Gainesville, GA 30507
Issuance Date: 12/22/2016

Summary of Penalties for Inspection Number	1163153
Citation 2, Serious	\$115983.00
Citation 3, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES	\$115983.00

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

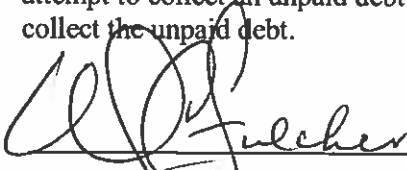
account, the bank will attempt to make the transfer up to 2 times.

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.



William C. Fulcher
Area Director

12/22/2016
Date