

U.S. Department of Labor
Occupational Safety and Health Administration
4802 E. Broadway
Madison, WI 53716
Phone: 608-441-5388 Fax: 608-441-5400



Citation and Notification of Penalty

To:
The Monroe Clinic, Inc.
and its successors
515 22nd Avenue
Monroe, WI 53566

Inspection Number: 1180170
Inspection Date(s): 09/27/2016 - 11/23/2016
Issuance Date: 12/21/2016

Inspection Site:
515 22nd Avenue
Monroe, WI 53566

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 12/21/2016. The conference will be held by telephone or at the OSHA office located at 4802 E. Broadway, Madison, WI 53716 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1180170

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Ave, Monroe, WI 53566
Issuance Date: 12/21/2016

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, 4802 E. Broadway, Madison, WI 53716**

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1926.1101(e)(1): All Class I, II, and III asbestos work was not conducted within regulated areas:

On or about September 27, 2016, and at times prior to and thereafter, the employer did not ensure that Class III asbestos work was conducted within regulated areas, including but not limited to the following occurrences:

- a) Beginning July 1, 2016 through July 27, 2016, induction coil unit maintenance which disturbed asbestos containing material located on the backside of false drop ceiling tiles.
- b) Beginning July 1, 2016 through August 29, 2016, fan coil unit maintenance which required crawling within the 1950 Building crawl space which contains asbestos containing material in the dirt and debris.
- c) Beginning July 4, 2016 through July 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- d) Beginning July 11, 2016 through July 13, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- e) On July 12, 2016, opening boiler #2 for inspection and disturbing asbestos containing material that insulates the boiler.
- f) On July 13, 2016, boiler #2 inspection and clean-up which required opening the boiler and disturbing asbestos containing material that insulates the boiler.
- g) Beginning July 18, 2016 through July 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- h) On July 21, 2016, boiler #1 inspection which required opening the boiler and disturbing asbestos containing material that insulates the boiler.

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

- i) Beginning July 25, 2016 through July 26, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- j) On July 26, 2016, the removal of relief valves for recertification on boiler #2 which required disturbing friable asbestos containing insulation on the piping and asbestos containing debris around the valves.
- k) Beginning August 1, 2016 through August 25, 2016, boiler 2 annual maintenance which required crawling on top of and disturbing the friable and damaged asbestos containing material that insulates the boiler.
- l) Beginning August 1 2016 through August 5, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- m) Beginning August 8, 2016 through August 12, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- n) On August 14, 2016, work on the reassembly of boiler #2 which disturbed asbestos containing material that insulates the boiler.
- o) On August 15, 2016, removal of lockout /tagout from boiler #2 and application of lockout/tagout to boiler #1 which disturbed asbestos containing material that insulates the boilers.
- p) Beginning August 15, 2016 through August 19, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- q) Beginning August 22, 2016 through August 25, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

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: The Monroe Clinic, Inc.
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- r) Beginning August 29, 2016 through August 30, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- s) Beginning September 5, 2016 through September 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- t) Beginning September 19, 2016 through September 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- u) Beginning September 12, 2016 through September 14, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:	01/13/2017
Proposed Penalty:	\$12471.00



Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1926.1101(f)(2)(i): The employer with a work operation covered by the asbestos standard did not ensure that a "competent person" conducted an exposure assessment immediately before or at the initiation of the operation to ascertain expected exposures during that operation or workplace:

On or about September 27, 2016, and at times prior to, a competent person did not conduct an exposure assessment immediately before or at the initiation of maintenance staff performing class III asbestos work, including but not limited to, the following occurrences:

- a) Beginning July 1, 2016 through July 27, 2016, induction coil unit maintenance which disturbed asbestos containing material located on the backside of false drop ceiling tiles.
- b) Beginning July 1, 2016 through August 29, 2016, fan coil unit maintenance which required crawling within the 1950 Building crawl space which contains asbestos containing material in the dirt and debris.
- c) Beginning July 4, 2016 through July 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- d) Beginning July 11, 2016 through July 13, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- e) On July 12, 2016, opening boiler #2 for inspection and disturbing asbestos containing material that insulates the boiler.
- f) On July 13, 2016, boiler #2 inspection and clean-up which required opening the boiler and disturbing asbestos containing material that insulates the boiler.
- g) Beginning July 18, 2016 through July 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

- h) On July 21, 2016, boiler #1 inspection which required opening the boiler and disturbing asbestos containing material that insulates the boiler.
- i) Beginning July 25, 2016 through July 26, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- j) On July 26, 2016, the removal of relief valves for recertification on boiler #2 which required disturbing friable asbestos containing insulation on the piping and asbestos containing debris around the valves.
- k) Beginning August 1, 2016 through August 25, 2016, boiler 2 annual maintenance which required crawling on top of and disturbing the friable and damaged asbestos containing material that insulates the boiler.
- l) Beginning August 1 2016 through August 5, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- m) Beginning August 8, 2016 through August 12, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- n) On August 14, 2016, work on the reassembly of boiler #2 which disturbed asbestos containing material that insulates the boiler.
- o) On August 15, 2016, removal of lockout /tagout from boiler #2 and application of lockout/tagout to boiler #1 which disturbed asbestos containing material that insulates the boilers.
- p) Beginning August 15, 2016 through August 19, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

- q) Beginning August 22, 2016 through August 25, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- r) Beginning August 29, 2016 through August 30, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- s) Beginning September 5, 2016 through September 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- t) Beginning September 19, 2016 through September 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas. for boilers #1 and #2.
- u) Beginning September 12, 2016 through September 14, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:	01/13/2017
Proposed Penalty:	\$12471.00

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: 1180170
Inspection Date(s): 09/27/2016 - 11/23/2016
Issuance Date: 12/21/2016



Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1926.1101(f)(6)(i): The employer failed to provide the affected employees or their designated representatives an opportunity to observe the exposure monitoring:

On or about August 24, 2016, the employer did not provide the maintenance employees the opportunity to observe exposure monitoring.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:	01/13/2017
Proposed Penalty:	\$12471.00

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1926.1101(g)(9): The employer did not follow the work practices and engineering controls for Class III asbestos work specified in 29 CFR 1926.1101(g)(9)(i) through (g)(9)(v), to minimize the exposure to employees:

On or about September 27, 2016, and at times prior to and thereafter, the employer did not use engineering controls when maintenance employees were performing Class III activities, including but not limited to, the following occurrences:

- a) Beginning July 1, 2016 through July 27, 2016, induction coil unit maintenance which disturbed asbestos containing material located on the backside of false drop ceiling tiles.
- b) Beginning July 1, 2016 through August 29, 2016, fan coil unit maintenance which required crawling within the 1950 Building crawl space which contains asbestos containing material in the dirt and debris.
- c) Beginning July 4, 2016 through July 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- d) Beginning July 11, 2016 through July 13, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- e) On July 12, 2016, opening boiler #2 for inspection and disturbing asbestos containing material that insulates the boiler.
- f) On July 13, 2016, boiler #2 inspection and clean-up which required opening the boiler and disturbing asbestos containing material that insulates the boiler.
- g) Beginning July 18, 2016 through July 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

- h) On July 21, 2016, boiler #1 inspection which required opening the boiler and disturbing asbestos containing material that insulates the boiler.
- i) Beginning July 25, 2016 through July 26, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- j) On July 26, 2016, the removal of relief valves for recertification on boiler #2 which required disturbing friable asbestos containing insulation on the piping and asbestos containing debris around the valves.
- k) Beginning August 1, 2016 through August 25, 2016, boiler 2 annual maintenance which required crawling on top of and disturbing the friable and damaged asbestos containing material that insulates the boiler.
- l) Beginning August 1 2016 through August 5, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- m) Beginning August 8, 2016 through August 12, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- n) On August 14, 2016, work on the reassembly of boiler #2 which disturbed asbestos containing material that insulates the boiler.
- o) On August 15, 2016, removal of lockout /tagout from boiler #2 and application of lockout/tagout to boiler #1 which disturbed asbestos containing material that insulates the boilers.
- p) Beginning August 15, 2016 through August 19, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

- q) Beginning August 22, 2016 through August 25, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- r) Beginning August 29, 2016 through August 30, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- s) Beginning September 5, 2016 through September 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- t) Beginning September 19, 2016 through September 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- u) Beginning September 12, 2016 through September 14, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:	01/13/2017
Proposed Penalty:	\$12471.00



Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1926.1101(h)(1)(iii): Respirators were not used during Class II and III asbestos jobs where wet methods were not used:

On or about September 27, 2016, and at times prior to and thereafter, the employer did not ensure that respirators were used during Class III asbestos jobs where wet methods were not used, including but not limited to, the following occurrences:

- a) Beginning July 1, 2016 through July 27, 2016, induction coil unit maintenance which disturbed asbestos containing material located on the backside of false drop ceiling tiles.
- b) Beginning July 1, 2016 through August 29, 2016, fan coil unit maintenance which required crawling within the 1950 Building crawl space which contains asbestos containing material in the dirt and debris.
- c) Beginning July 4, 2016 through July 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- d) Beginning July 11, 2016 through July 13, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- e) On July 12, 2016, opening boiler #2 for inspection and disturbing asbestos containing material that insulates the boiler.
- f) On July 13, 2016, boiler #2 inspection and clean-up which required opening the boiler and disturbing asbestos containing material that insulates the boiler.
- g) Beginning July 18, 2016 through July 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- h) On July 21, 2016, boiler #1 inspection which required opening the boiler and disturbing asbestos containing material that insulates the boiler.

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

- i) Beginning July 25, 2016 through July 26, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- j) On July 26, 2016, the removal of relief valves for recertification on boiler #2 which required disturbing friable asbestos containing insulation on the piping and asbestos containing debris around the valves.
- k) Beginning August 1, 2016 through August 25, 2016, boiler 2 annual maintenance which required crawling on top of and disturbing the friable and damaged asbestos containing material that insulates the boiler.
- l) Beginning August 1 2016 through August 5, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- m) Beginning August 8, 2016 through August 12, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- n) On August 14, 2016, work on the reassembly of boiler #2 which disturbed asbestos containing material that insulates the boiler.
- o) On August 15, 2016, removal of lockout /tagout from boiler #2 and application of lockout/tagout to boiler #1 which disturbed asbestos containing material that insulates the boilers.
- p) Beginning August 15, 2016 through August 19, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- q) Beginning August 22, 2016 through August 25, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

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- r) Beginning August 29, 2016 through August 30, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- s) Beginning September 5, 2016 through September 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- t) Beginning September 19, 2016 through September 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- u) Beginning September 12, 2016 through September 14, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:	01/13/2017
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Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1926.1101(h)(1)(iv): Respirators were not used during all Class II and III asbestos jobs where the employer had not produced a negative-exposure assessment:

On or about September 27, 2016, and at times prior to and thereafter, the employer did not ensure that respirators were used during Class III asbestos jobs where the employer had not produced a negative-exposure assessment, including but not limited to, the following occurrences:

- a) Beginning July 1, 2016 through July 27, 2016, induction coil unit maintenance which disturbed asbestos containing material located on the backside of false drop ceiling tiles.
- b) Beginning July 1, 2016 through August 29, 2016, fan coil unit maintenance which required crawling within the 1950 Building crawl space which contains asbestos containing material in the dirt and debris.
- c) Beginning July 4, 2016 through July 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- d) Beginning July 11, 2016 through July 13, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- e) On July 12, 2016, opening boiler #2 for inspection and disturbing asbestos containing material that insulates the boiler.
- f) On July 13, 2016, boiler #2 inspection and clean-up which required opening the boiler and disturbing asbestos containing material that insulates the boiler.
- g) Beginning July 18, 2016 through July 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- h) On July 21, 2016, boiler #1 inspection which required opening the boiler and disturbing asbestos containing material that insulates the boiler.

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Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
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- i) Beginning July 25, 2016 through July 26, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- j) On July 26, 2016, the removal of relief valves for recertification on boiler #2 which required disturbing friable asbestos containing insulation on the piping and asbestos containing debris around the valves.
- k) Beginning August 1, 2016 through August 25, 2016, boiler 2 annual maintenance which required crawling on top of and disturbing the friable and damaged asbestos containing material that insulates the boiler.
- l) Beginning August 1 2016 through August 5, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- m) Beginning August 8, 2016 through August 12, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- n) On August 14, 2016, work on the reassembly of boiler #2 which disturbed asbestos containing material that insulates the boiler.
- o) On August 15, 2016, removal of lockout /tagout from boiler #2 and application of lockout/tagout to boiler #1 which disturbed asbestos containing material that insulates the boilers.
- p) Beginning August 15, 2016 through August 19, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- q) Beginning August 22, 2016 through August 25, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

- r) Beginning August 29, 2016 through August 30, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- s) Beginning September 5, 2016 through September 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- t) Beginning September 19, 2016 through September 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas. for boilers #1 and #2.
- u) Beginning September 12, 2016 through September 14, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:	01/13/2017
Proposed Penalty:	\$12471.00



Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1926.1101(i)(1): The employer did not provide and require the use of protective clothing, such as coveralls or similar whole-body clothing, head coverings, gloves, and foot coverings for each employee exposed to airborne concentrations of asbestos that exceed the time weighted average and/or excursion limit in 29 CFR 1926.1101(c) or for which a required negative exposure assessment was not produced:

On or about September 27, 2016, and at times prior to and thereafter, the employer did not provide maintenance staff appropriate protective clothing when Class III work was performed for which a required negative exposure assessment was not provided, including but not limited to, the following occurrences:

- a) Beginning July 1, 2016 through July 27, 2016, induction coil unit maintenance which disturbed asbestos containing material located on the backside of false drop ceiling tiles.
- b) Beginning July 1, 2016 through August 29, 2016, fan coil unit maintenance which required crawling within the 1950 Building crawl space which contains asbestos containing material in the dirt and debris.
- c) Beginning July 4, 2016 through July 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- d) Beginning July 11, 2016 through July 13, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- e) On July 12, 2016, opening boiler #2 for inspection and disturbing asbestos containing material that insulates the boiler.
- f) On July 13, 2016, boiler #2 inspection and clean-up which required opening the boiler and disturbing asbestos containing material that insulates the boiler.

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

- g) Beginning July 18, 2016 through July 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- h) On July 21, 2016, boiler #1 inspection which required opening the boiler and disturbing asbestos containing material that insulates the boiler.
- i) Beginning July 25, 2016 through July 26, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- j) On July 26, 2016, the removal of relief valves for recertification on boiler #2 which required disturbing friable asbestos containing insulation on the piping and asbestos containing debris around the valves.
- k) Beginning August 1, 2016 through August 25, 2016, boiler 2 annual maintenance which required crawling on top of and disturbing the friable and damaged asbestos containing material that insulates the boiler.
- l) Beginning August 1 2016 through August 5, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- m) Beginning August 8, 2016 through August 12, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- n) On August 14, 2016, work on the reassembly of boiler #2 which disturbed asbestos containing material that insulates the boiler.
- o) On August 15, 2016, removal of lockout/tagout from boiler #2 and application of lockout/tagout to boiler #1 which disturbed asbestos containing material that insulates the boilers.
- p) Beginning August 15, 2016 through August 19, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

q) Beginning August 22, 2016 through August 25, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

r) Beginning August 29, 2016 through August 30, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

s) Beginning September 5, 2016 through September 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

t) Beginning September 19, 2016 through September 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

u) Beginning September 12, 2016 through September 14, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:	01/13/2017
Proposed Penalty:	\$12471.00



Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1926.1101(j)(2): The hygiene facilities and practices listed in sections (i) through (v) of this paragraph were not followed for employees performing Class I work involving less than 25 linear or 10 square feet of TSI or surfacing ACM and PACM, and for Class II and Class III asbestos work operations where exposures exceed a PEL or where there is no negative exposure assessment produced before the operation:

On or about September 27, 2016, and at times prior to and thereafter, hygiene facilities and practices were not followed for employees performing Class III asbestos work where there is no negative exposure assessment produced before the operation, including but not limited to, the following occurrences:

- a) Beginning July 1, 2016 through July 27, 2016, induction coil unit maintenance which disturbed asbestos containing material located on the backside of false drop ceiling tiles.
- b) Beginning July 1, 2016 through August 29, 2016, fan coil unit maintenance which required crawling within the 1950 Building crawl space which contains asbestos containing material in the dirt and debris.
- c) Beginning July 4, 2016 through July 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- d) Beginning July 11, 2016 through July 13, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- e) On July 12, 2016, opening boiler #2 for inspection and disturbing asbestos containing material that insulates the boiler.
- f) On July 13, 2016, boiler #2 inspection and clean-up which required opening the boiler and disturbing asbestos containing material that insulates the boiler.

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

- g) Beginning July 18, 2016 through July 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- h) On July 21, 2016, boiler #1 inspection which required opening the boiler and disturbing asbestos containing material that insulates the boiler.
- i) Beginning July 25, 2016 through July 26, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- j) On July 26, 2016, the removal of relief valves for recertification on boiler #2 which required disturbing friable asbestos containing insulation on the piping and asbestos containing debris around the valves.
- k) Beginning August 1, 2016 through August 25, 2016, boiler 2 annual maintenance which required crawling on top of and disturbing the friable and damaged asbestos containing material that insulates the boiler.
- l) Beginning August 1 2016 through August 5, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- m) Beginning August 8, 2016 through August 12, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- n) On August 14, 2016, work on the reassembly of boiler #2 which disturbed asbestos containing material that insulates the boiler.
- o) On August 15, 2016, removal of lockout /tagout from boiler #2 and application of lockout/tagout to boiler #1 which disturbed asbestos containing material that insulates the boilers.

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

- p) Beginning August 15, 2016 through August 19, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- q) Beginning August 22, 2016 through August 25, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- r) Beginning August 29, 2016 through August 30, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- s) Beginning September 5, 2016 through September 7, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.
- t) Beginning September 19, 2016 through September 22, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas. for boilers #1 and #2.
- u) Beginning September 12, 2016 through September 14, 2016, the insertion of a flue gas probe through damaged and friable asbestos containing material to conduct an analysis of the flue gas for boilers #1 and #2.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:	01/13/2017
Proposed Penalty:	\$12471.00

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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 9a Type of Violation: **Serious**

29 CFR 1926.1101(k)(6): At the entrance of the mechanical rooms/areas in which employees could reasonably be expected to enter and which contained ACM and/or PACM, the building owner did not post signs identifying the material present, its location, and appropriate work practice which, if followed will ensure that asbestos containing material and/or presumed asbestos containing material will not be disturbed:

On or about July 1, 2016, and at times thereafter, the employer did not post any signage on the boiler room/Power Plant identifying the asbestos containing material present, its location and appropriate work practices which, if followed, will ensure that power plant operators and maintenance staff will not disturb asbestos containing material and/or presumed asbestos containing material.

ABATEMENT CERTIFICATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:	01/13/2017
Proposed Penalty:	\$12471.00

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

Inspection Number: 1180170
Inspection Date(s): 09/27/2016 - 11/23/2016
Issuance Date: 12/21/2016



Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1926.1101(k)(8)(i): Where feasible, installed asbestos products did not contain a visible label:

On or about July 1, 2016, and at times thereafter, the employer did not ensure that where feasible, installed asbestos products contained a visible label, such as but not limited to, the pipe insulation in the boiler room, the insulation around the boilers and the access door to the crawlspace opening.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated: 01/13/2017

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: 1180170
Inspection Date(s): 09/27/2016 - 11/23/2016
Issuance Date: 12/21/2016



Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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 10a Type of Violation: **Serious**

29 CFR 1926.1101(k)(9)(i): The employer did not institute, at no cost to employees, a training program for each employee who was likely to be exposed in excess of the permissible exposure limit (PEL) and for each employee who performed Class I through IV asbestos operations:

On or about July 1, 2016, and at times prior to and thereafter, the employer did not provide required training to the maintenance employees that perform Class III and Class IV asbestos operations.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:	01/13/2017
Proposed Penalty:	\$12471.00

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

Inspection Number: 1180170
Inspection Date(s): 09/27/2016 - 11/23/2016
Issuance Date: 12/21/2016



Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1926.1101(o)(1): The employer did not designate a competent person on construction worksites, having the qualifications and authorities for ensuring worker safety and health required by 29 CFR 1926.1101(C), General Safety and Health Provisions for Construction 29 CFR 1926.20 through 29 CFR 1926.32:

On or about September 27, 2016, and at times prior to and thereafter, the employer did not designate a competent person with the qualifications for ensuring worker safety and health for maintenance employees performing Class III and Class IV work, in that the competent person was not trained in a manner consistent with EPA requirements for training as set forth at 40 CFR 763.92(a)(2).

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated: 01/13/2017

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: 1180170
Inspection Date(s): 09/27/2016 - 11/23/2016
Issuance Date: 12/21/2016



Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1926.1101(m)(1)(i)(A): The employer did not institute a medical surveillance program for all employees who for a combined total of 30 or more days per year are engaged in Class I, II and III work or are exposed at or above a permissible exposure limit:

On or about September 27, 2016, and at times prior to and thereafter, the employer did not provide a medical surveillance program for all employees that are engaged in Class III for a total of 30 or more days per year.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:
Proposed Penalty:

01/13/2017
\$12471.00

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: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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 1a Type of Violation: **Willful**

29 CFR 1926.1101(k)(1)(ii): The employer did not include asbestos in the program established to comply with the Hazard Communication Standard (HCS) and ensure each employee was trained in accordance with the provisions of the HCS and paragraphs (k)(9) and (10) of this section. The employer did not provide information on at least the following hazards: Cancer and lung effects.

On or about September 27, 2016, and at times prior to and thereafter, the employer did not include asbestos in the Hazard Communication Standard to ensure that each employee, including but not limited to, maintenance employees, was trained in the hazard of the asbestos in the facility and at least the cancer and lung effects of the hazard.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:	01/13/2017
Proposed Penalty:	\$124709.00

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

Inspection Number: 1180170
Inspection Date(s): 09/27/2016 - 11/23/2016
Issuance Date: 12/21/2016



Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1926.1101(k)(2)(ii)(B): The building owner and/or facility owner did not notify employees of the owner who will work in or adjacent to areas containing asbestos containing material or presumed asbestos containing material of the presence, location and quantity:

On or about July 1, 2016, and at times thereafter, the employer did not inform maintenance staff who work in and adjacent to the 1938, 1958, 1972 and 1993 buildings containing asbestos containing material or presumed asbestos containing material of the presence, location and quantity, as identified in the 2008 asbestos survey and the 2016 asbestos survey.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:

01/13/2017

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: 1180170
Inspection Date(s): 09/27/2016 - 11/23/2016
Issuance Date: 12/21/2016



Citation and Notification of Penalty

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566

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

29 CFR 1910.1200(h)(2)(ii): The employer did not provide information to the employees on operations in their work area where hazardous chemicals were present:

On or about September 27, 2016, and at times prior to and thereafter, the employer did not provide employees information on the asbestos throughout the facility.

ABATEMENT DOCUMENTATION REQUIRED PER 29 CFR 1903.19(d)

Date By Which Violation Must be Abated:

01/13/2017

A handwritten signature in black ink, appearing to read "Ann Grevenkamp".

For Ann Grevenkamp
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
4802 E. Broadway
Madison, WI 53716
Phone: 608-441-5388 Fax: 608-441-5400



INVOICE / DEBT COLLECTION NOTICE

Company Name: The Monroe Clinic, Inc.
Inspection Site: 515 22nd Avenue, Monroe, WI 53566
Issuance Date: 12/21/2016

Summary of Penalties for Inspection Number	1180170
Citation 1, Serious	\$137181.00
Citation 2, Willful	\$124709.00
TOTAL PROPOSED PENALTIES	\$261890.00

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.

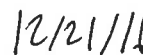
Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (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.



For Ann Grevenkamp
Area Director



Date