



Citation and Notification of Penalty

Company Name: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

29 CFR 1910.23(c)(3): Regardless of height, open sided floors, walkways, or runways above or adjacent to dangerous equipment, pickling or galvanizing tanks, degreasing units or similar hazards were not guarded with standard guardrails:

Clean and Coat Department: Standard guardrails were not provided around the tank pit opening, including the grated area between each tank. Employees were required to stand between Tank 3 (Hot Rinse) and Tank 4 (Apex 463 Sodium Hydroxide solution) to pressure rinse coils of stainless steel rod. Also, toeboards had not been provided at each end of the pit area where railings had been provided.

Abatement Certification is Not Required

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$ 7000.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

29 CFR 1910.37(a)(2): Exit routes were arranged so that employees had to travel toward a high hazard area and the path of travel was not effectively shielded from the high hazard area by suitable partitions or other physical barriers:

Wire Mill: Suitable exit routes were not provided to employees working in the Wet Drawing Room. Exit routes provided through the furnace area and dry drawing area contained high hazard contents. The furnace room contained flammable hydrogen gas and the dry drawing room contained combustible dry powder lubricant. The remaining travel routes did not comply with travel maximum travel distances allowed in Nation Fire Protection Association (NFPA) 101 Life Safety Code per 29 CFR 1910.35.

Date By Which Violation Must be Abated: 12/19/2011
Proposed Penalty: \$ 5500.00

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

29 CFR 1910.138(a): The employer did not select or require employees to use appropriate hand protection when employees hands are exposed to hazards such as skin absorption of harmful substances, severe cuts and lacerations, severe abrasions, punctures, chemical burns, thermal burns and harmful temperature extremes:

Lashing Building, Metered Rewind: Coated, tight-cuffed knit gloves were provided to the operator, who worked in close proximity to rotating machine parts and spools.

Date By Which Violation Must be Abated: 12/19/2011
Proposed Penalty: \$ 4400.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

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

Plant-wide: Machines and equipment were not locked and tagged out in accordance with established lockout procedures for the following operations:

- A. Plant-wide: Employees classified as Laborers were not allowed to apply locks to equipment during preventative maintenance and cleaning operations. Employees were required to removed guards and/or position themselves in hazardous areas of the machines or equipment.
- B. Rope Mill: Stranding machines were not locked out when employees accessed gear boxes to set-up the machines.
- C. Cable Tech Assembly, Zinc Cafe: The Operator reached into the resistance cutting area throughout the production run to clean the electrodes with a file without the machine locked out and would change electrodes on a weekly basis while the machine was locked out by the maintenance staff. She did not affix a lock of her own.
- D. Cable Tech: Employees changed dies in the Enerpac swaging presses without locking out the machines.

Specific Abatement Documentation is Required

Date By Which Violation Must be Abated: 12/19/2011
Proposed Penalty: \$ 7000.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

29 CFR 1910.147(c)(4)(ii)(B): The lockout/tagout procedures did not clearly and specifically outline the steps for shutting down, isolating, blocking and securing machines and equipment to control hazardous energy:

Company: The specific lockout procedure for Rope Mill stranders did not address the potential for lay gears to move during machine set-up if tension was not released on capstans.

Date By Which Violation Must be Abated:	12/19/2011
Proposed Penalty:	\$ 5500.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

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

29 CFR 1910.184(d): Sling(s) and fastenings were not inspected each day or during use and were not removed from service when damaged or defective:

Rope Mill: Chain alloy slings were not inspected daily. Slings provided at the following machines were found to have bent/deformed master links and had not been removed from service:

- A. 12 Bay 69, #2.
- B. 12 Bay 69, #1.

Abatement Note: 29 CFR 1910.184(e)(9) requires removal from service when slings have cracked or deformed master links, coupling links or other components.

Abatement Certification is Not Required

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$ 4400.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

29 CFR 1910.184(e)(3)(i): Thorough periodic inspections of alloy steel chain slings in use were not made on a regular basis:

Rope Mill: The company had not developed and implemented a program to perform documented inspection of chain alloy slings on a periodic basis.

Abatement Certification is Not Required

Date By Which Violation Must be Abated: Corrected During Inspection

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

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

29 CFR 1910.184(e)(1): Alloy steel sling(s) did not have permanently affixed durable identification stating size, grade, rated capacity, and reach:

Rope Mill: At the following machines, double legged chain alloy slings were not provided with id tags:

- A. 12 Bay 69, #2.
- B. 6 Bay 69, #1.
- C. 12 Bay 69, #1.

Abatement Certification is Not Required

Date By Which Violation Must be Abated: Corrected During Inspection
Proposed Penalty: \$ 4400.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

29 CFR 1910.184(e)(4): Certificate(s) of proof test were not available for new, repaired or reconditioned alloy steel chain slings:

Rope Mill: Proof tests had not been performed on the chain alloy slings provided at the following machines:

- A. 12 Bay 69, #2.
- B. 6 Bay 69, #1.
- C. 12 Bay 69, #1.

Abatement Certification is Not Required

Date By Which Violation Must be Abated: **Corrected During Inspection**

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

Cable Tech: The following Enerpac hydraulic swaging presses were not provided with point of operation safeguarding:

1. 1A1.
2. 2A2.
3. 3B1.
4. 4B2.
5. 5C1.
6. 6C2.
7. 7C3.
8. 9D1.
9. 10E1.
10. 11E2.
11. 12E3.
12. 13M1.
13. 1450T.

Specific Abatement Documentation is Required

Date By Which Violation Must be Abated: 12/19/2011
Proposed Penalty: \$ 7000.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

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

29 CFR 1910.219(c)(3): Vertical or inclined shafting was not enclosed with stationary casing(s):

Extrusion Department, Extruder #2: Three portions of the vertical shaft on the #2 Farris were not provided with a guard.

Abatement Certification is Not Required

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$ 4400.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

29 CFR 1910.219(e)(3)(i): Vertical or inclined belt(s) were not enclosed by guard(s) conforming to the requirements specified at 29 CFR 1910.219(m) and (o):

In the following locations, belt drives were not enclosed with guards:

- A. Extrusion Department:
 - 1. Extruder #2: Two belt drives located on the right side of the take-up unit were exposed.
 - 2. Sears Roebuck Mixer: The belt drive located on the left side of the machine.
- B. Lashing Building, Fab Shop: The drive belts provided on the John Wood air compressor.
- C. Rope Mill:
 - 1. Twelve Bay 69, #2: The drive belt provided for the main motor drive was not provided with a guard on the inside face.
 - 2. Twelve Bay 69, #1: The drive belt provided for the main motor drive was not provided with a guard on the inside face.
 - 3. Twelve Bay 62: A guard was not provided to prevent access to the drive belt located on the right side of the take-up unit.

Date By Which Violation Must be Abated:

12/19/2011

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

Citation 2 Item 10 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 at 29 CFR 1910.219(m) and (o):

In the following locations, drive pulleys were not enclosed with guards:

- A. Extrusion Department: Sears Roebuck Mixer: The spoked drive pulley located on the left side of the machine.
- B. Lashing Wire: The fan-type pulley located on the John Wood air compressor.
- C. Rope Mill, Twelve Bay 62: The spoked drive pulley located on the right side of the take-up unit was not provided with a guard on the outside face.

Date By Which Violation Must be Abated: 12/19/2011
Proposed Penalty: \$ 4400.00



Citation and Notification of Penalty

Company Name: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

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

- A. Warehouse Shipping: Two relocatable power taps were used in series to energize the shipping computer work station.
- B. Re-Reeling: Two relocatable power tapes were used in series to energize the computer workstation located next to Machine #3.
- C. Rope Mill: The festoon wiring provided at the CM hoist located at 6 B69 #1 was energized through a knockout box designed for permanent wiring.
- D. Cable Tech, Packing Station 1: Two relocatable power taps were used in series to energize computer equipment on the workbench.
- E. Lashing Wire: The electrical disconnect, the control panel and three electrical boxes were not designated for use in a class II area.

Date By Which Violation Must be Abated: 12/19/2011
Proposed Penalty: \$ 4400.00



Citation and Notification of Penalty

Company Name: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

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

29 CFR 1910.303(g)(1)(i)(A): The depth of working space in the direction of access to live parts was less than indicated in Table S-1:

Rope Mill, Switchgear Area: A proof test floor anchored clamp was located in the working space of the Sylvania 208 volt distribution panel.

Abatement Certification is Not Required

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$ 5500.00

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

29 CFR 1910.303(g)(1)(i)(B): In all cases, the working space did not permit at least a 90-degree opening of equipment doors or hinged panels:

Extrusion, Extruder #1: A computer and monitor for the Laser Link Controls had been installed in between the GE 200 amp disconnect and the Challenger 100 amp subpanel. The doors provided on the electrical boxes could not be opened at least 90 degrees.

Abatement Certification is Not Required

Date By Which Violation Must be Abated:	Corrected During Inspection
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See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

29 CFR 1910.303(g)(1)(ii): Working space about electric equipment rated 600 volts, nominal, or less was used for storage:

Rope Mill: In the following locations, electrical equipment was blocked by items in storage:

- A. 40 Bay Machine Control Enclosure: Spare reels, cardboard and plywood was stored on the floor around the equipment.
- B. Sylvania Panelboard behind 40 Bay: Spare equipment such as a take-up frame, shop-vac and cardboard was blocking the access to and area in front of the panel.

Abatement Certification is Not Required

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$ 4400.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

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

29 CFR 1910.304(g)(5): The path to ground from circuits, equipment, and enclosures was not permanent and continuous:

Rope Mill: In the following locations, drop receptacles were found to have an open ground when tested:

- A. Six Bay 69, #1.
- B. 36 Bay.

Abatement Certification is Not Required

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$ 5500.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

29 CFR 1910.304(g)(6)(vi): Exposed noncurrent-carrying metal parts of cord and plug connected equipment which may become energized were not grounded:

Extrusion: At the following machines, ungrounded Chicago magnetic base work lights were used to illuminate the extruding head:

- A. #1 Extruder.
- B. #3 Extruder.

Abatement Certification is Not Required

Date By Which Violation Must be Abated: **Corrected During Inspection**



Citation and Notification of Penalty

Company Name: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

Citation 2 Item 15 Type of Violation: **Serious**

29 CFR 1910.305(g)(1)(iv)(A): Flexible cords and cables may not be used as a substitute for the fixed wiring of a structure:

In the following locations, flexible cord was used in lieu of permanent wiring:

- A. Warehouse Shipping: A black extension cord was used as a drop cord in the shipping area to energize a stapler and other tools needed to prepare shipments.
- B. Re-Reeling: A gray extension cord was run up the wall, over trussed and dropped down to the computer workstation located next to Machine #3.

Abatement Certification is Not Required

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$ 3300.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

29 CFR 1910.334(a)(2)(ii): When there was a defect or evidence of damage that could expose an employee to injury, the defective or damaged item was not removed from service until the repairs and tests necessary to render the electric equipment safe had been made:

- A. Wire Mill Maintenance Shop: The power cord provided on the vertical belt sander was damaged and wrapped with electrical tape.
- B. Furnace Area: The power cord provided on the Microweld welder was nicked, exposing an inner conductor.
- C. Stranding Area: The power cord provided on a Dayton pedestal fan was damaged, exposing an inner conductor.
- D. Cable Tech: An extension cord used to energize a rotary swaging machine had a large nick in the outer jacket, exposing the inner conductors.

Abatement Certification is Not Required

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$ 4400.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

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

Plant: Electricians and mechanics who worked on or near electrical equipment had not been trained regarding what work practices and protective equipment was required to protect them against electric shock, arc flash and arc blast hazards while performing live electrical work, live trouble-shooting and verifying whether or not electrical equipment was properly de-energized.

Specific Abatement Documentation is Required

Date By Which Violation Must be Abated: 12/19/2011
Proposed Penalty: \$ 7000.00

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

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

29 CFR 1910.333(a)(2): Where exposed live parts were not deenergized, other safety related work practices were not used to protect employees who could be exposed to the electrical hazards involved:

Plant: The employer had not developed and implemented an Electrical Safety Related Work Practice program to address hazards caused by arc flash, arc blast and electric shock in the facility. Employees conducted live trouble-shooting in electrical equipment and verified that equipment was de-energized using test equipment.

Specific Abatement Documentation is Required

Date By Which Violation Must be Abated: 12/19/2011
Proposed Penalty: \$ 7000.00

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

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

Plant: Personal protective equipment such as, but not limited to, voltage rated gloves, FR clothing, face shields, balaclavas, hard hats and hearing protection were not worn by employees who performed live electrical work, including trouble-shooting, or who verified that electrical equipment was properly de-energized.

Specific Abatement Documentation is Required

Date By Which Violation Must be Abated: 12/19/2011



PAUL MANGIAFICO
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
FEDERAL BUILDING, ROOM 613
450 MAIN STREET
HARTFORD, CT 06103
Phone: (860)240-3152 FAX: (860) 240-3155



INVOICE/ DEBT COLLECTION NOTICE

Company Name: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258
Issuance Date: 11/02/2011

Summary of Penalties for Inspection Number 314404831

Citation 2, Serious = \$ **95500.00**
TOTAL PROPOSED PENALTIES = \$ **95500.00**

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.

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

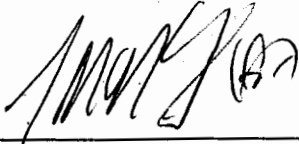
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 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 1% effective October 1, 2009. 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.



PAUL MANGIAFICO
Area Director

11-2-11

Date

U.S. Department of Labor
Occupational Safety and Health Administration
FEDERAL BUILDING, ROOM 613
450 MAIN STREET
HARTFORD, CT 06103
Phone: (860)240-3152 FAX: (860) 240-3155



Citation and Notification of Penalty

To:
Loos & Company, Inc.
and its successors
P.O. Box 98
Pomfret, CT 06258

Inspection Number: 314404831
Inspection Date(s): 05/10/2011-09/14/2011
Issuance Date: 11/02/2011
CSHO ID: V6849-929
Reporting ID: 0112000

Inspection Site:
1 Cable Road
Pomfret, CT 06258

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 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. **The penalty dollar amounts need not be posted and may be marked out or covered up prior to posting.**

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 page 4 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.

Accuracy of Information - 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 your inspection will be available 30 calendar days after the Citation Issuance Date. 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.

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.

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

Notification of Corrective Action - For each violation which you do not contest, you are required by 29 CFR 1903.19 to submit an Abatement Certification to the Area Director of the OSHA office issuing the citation and identified above. The certification must be sent by you within 10 calendar days of the abatement date indicated on the citation. For **Willful** and **Repeat** violations, documents (examples: photos, copies of receipts, training records, etc.) demonstrating that abatement is complete must accompany the certification. Where the citation is classified as **Serious** and the citation states that abatement documentation is required, documents such as those described above are required to be submitted along with the abatement certificate. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item.

All abatement verification documents must contain the following information: 1) Your name and address; 2) the inspection number (found on the front page); 3) the citation and citation item number(s) to which the submission relates; 4) a statement that the information is accurate; 5) the signature of the employer or employer's authorized

representative; 6) the date the hazard was corrected; 7) a brief statement of how the hazard was corrected; and 8) a statement that affected employees and their representatives have been informed of the abatement.

The law also requires a copy of all abatement verification documents, required by 29 CFR 1903.19 to be sent to OSHA, also be posted at the location where the violation appeared and the corrective action took place.

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 your inspection will be available 30 calendar days after the Citation Issuance Date. 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 11/02/2011. The conference will be held at the OSHA office located at FEDERAL BUILDING, ROOM 613, 450 MAIN STREET, HARTFORD, CT, 06103 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.



Citation and Notification of Penalty

Company Name: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

29 CFR 1910.212(a)(1): One or more methods of machine guarding were not provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ongoing nip points, rotating parts, flying chips and sparks:

- A. Wire Mill Maintenance Shop: A chuck guard was not provided on the TOS horizontal lathe.
- B. Outside Compactor: Safeguarding such as a positive pressure run control, interlocked door or loading hopper extension had not been provided to provide protection from the ram.
- C. Rope Mill:
 - 1. Adequate safeguarding had not been provided on the Nine Bay Watson cabling machine capstan. The existing guard allowed access to the nip points created at the capstan pull rolls.
 - 2. Adequate safeguarding had not been provided on the 12 Bay 69 #2 capstan. Nip guards were provided, however, the machine was not provided with an emergency stop device.
 - 3. Safeguarding had not been provided on the Hi-Tech Wrapper #2 capstan.
- D. Cable Tech Maintenance Shop:
 - 1. A guard had not been provided on the unused portion of the blade on the Wells horizontal band saw.
 - 2. Side guards had not been provided on the Baldor vertical belt sander to prevent access to the in-running nip points created by the belt running on the rollers.
- E. Swift Screw: The bottom in-running nip point was exposed on the Baldor vertical belt sander.
- F. Cable Tech: A gap was left between the hydraulic ram and the top of the unitized tool holder in the following Enerpac swaging presses:
 - 1. Cell B Press.
 - 2. Cell C Press.

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: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

Loos & Company was previously cited for a violation of this occupational safety and health standard which was contained in Inspection Number 311759120, Citation Number 1, Item Number 2 and was affirmed as a final order on October 7, 2008, with respect to a workplace located at Pomfret, Connecticut.

Specific Abatement Documentation is Required

Date By Which Violation Must be Abated: 12/19/2011
Proposed Penalty: \$ 27500.00

A handwritten signature in black ink, appearing to read "Paul Mangiafico", is written over a horizontal line.

PAUL MANGIAFICO
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
FEDERAL BUILDING, ROOM 613
450 MAIN STREET
HARTFORD, CT 06103
Phone: (860)240-3152 FAX: (860) 240-3155



INVOICE/ DEBT COLLECTION NOTICE

Company Name: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258
Issuance Date: 11/02/2011

Summary of Penalties for Inspection Number 314404831

Citation 3, Repeat = \$ 27500.00
TOTAL PROPOSED PENALTIES = \$ 27500.00

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.

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

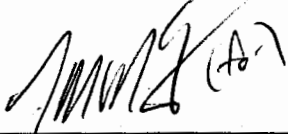
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 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 1% effective October 1, 2009. 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.



PAUL MANGIAFICO
Area Director

11-2-11

Date

U.S. Department of Labor
Occupational Safety and Health Administration
FEDERAL BUILDING, ROOM 613
450 MAIN STREET
HARTFORD, CT 06103
Phone: (860)240-3152 FAX: (860) 240-3155



Citation and Notification of Penalty

To:
Loos & Company, Inc.
and its successors
P.O. Box 98
Pomfret, CT 06258

Inspection Number: 314404831
Inspection Date(s): 05/10/2011-09/14/2011
Issuance Date: 11/02/2011
CSHO ID: V6849-929
Reporting ID: 0112000

Inspection Site:
1 Cable Road
Pomfret, CT 06258

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 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. **The penalty dollar amounts need not be posted and may be marked out or covered up prior to posting.**

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 page 4 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.

Accuracy of Information - 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 your inspection will be available 30 calendar days after the Citation Issuance Date. 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.

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.

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

Notification of Corrective Action - For each violation which you do not contest, you are required by 29 CFR 1903.19 to submit an Abatement Certification to the Area Director of the OSHA office issuing the citation and identified above. The certification must be sent by you within 10 calendar days of the abatement date indicated on the citation. For **Willful** and **Repeat** violations, documents (examples: photos, copies of receipts, training records, etc.) demonstrating that abatement is complete must accompany the certification. Where the citation is classified as **Serious** and the citation states that abatement documentation is required, documents such as those described above are required to be submitted along with the abatement certificate. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item.

All abatement verification documents must contain the following information: 1) Your name and address; 2) the inspection number (found on the front page); 3) the citation and citation item number(s) to which the submission relates; 4) a statement that the information is accurate; 5) the signature of the employer or employer's authorized

representative; 6) the date the hazard was corrected; 7) a brief statement of how the hazard was corrected; and 8) a statement that affected employees and their representatives have been informed of the abatement.

The law also requires a copy of all abatement verification documents, required by 29 CFR 1903.19 to be sent to OSHA, also be posted at the location where the violation appeared and the corrective action took place.

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 your inspection will be available 30 calendar days after the Citation Issuance Date. 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 11/02/2011. The conference will be held at the OSHA office located at FEDERAL BUILDING, ROOM 613, 450 MAIN STREET, HARTFORD, CT, 06103 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.



Citation and Notification of Penalty

Company Name: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

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

29 CFR 1910.37(a)(3): Exit routes were not free and unobstructed. Materials and equipment were placed permanently or temporarily within the exit route:

- A. Clean and Coat: Reels of stainless steel rod were temporarily stored in the path to the exit door.
- B. Lashing Wire: A fan was stored in front of the exit door located on the front of the building.

Abatement Certification is Not Required

Date By Which Violation Must be Abated: Corrected During Inspection
Proposed Penalty: \$ 0.00

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

29 CFR 1910.37(b)(6): Each exit sign was not illuminated by a reliable light source to a surface value of at least foot candles (54 lux):

Clean and Coat: The Exit sign that was provided over the garage door walk through door was not illuminated.

Abatement Note: "Glow in the Dark" signs that comply with 29 CFR 1910.37(b)(6) are permitted.

Abatement Certification is Not Required

Date By Which Violation Must be Abated: Corrected During Inspection
Proposed Penalty: \$ 0.00

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



Citation and Notification of Penalty

Company Name: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

Citation 4 Item 3 Type of Violation: Other

29 CFR 1910.303(b)(7)(i): Unused openings in boxes, raceways, auxiliary gutters, cabinets, equipment cases, or housings shall be effectively closed to afford protection substantially equivalent to the wall of the equipment:

Shipping: A piece of cardboard was used to fill an opening on the front face of the Challenger circuit breaker box WMS-C.

Abatement Certification is Not Required

Date By Which Violation Must be Abated: Corrected During Inspection
Proposed Penalty: \$ 0.00

Citation 4 Item 4 Type of Violation: Other

29 CFR 1910.303(f)(2): Each service, feeder and branch circuit, at its disconnecting means or overcurrent device, was not legibly marked to indicate its purpose, nor located and arranged so the purpose was evident:

Rope Mill: In the following locations, electrical disconnecting devices were not marked to indicate their purpose:

- A. Behind 40 Bay: The middle circuit breaker on the right side of the Sylvania panelboard was not labeled.
- B. Aisle near 12 B 62: The Bulldog disconnect serving the buss located over the Hi-Tech area.

Abatement Certification is Not Required

Date By Which Violation Must be Abated: Corrected During Inspection
Proposed Penalty: \$ 0.00



Citation and Notification of Penalty

Company Name: Loos & Company, Inc.
Inspection Site: 1 Cable Road, Pomfret, CT 06258

Citation 4 Item 5 Type of Violation: Other

29 CFR 1910.335(a)(1)(ii): Protective equipment was not maintained in a safe, reliable condition and/or was not periodically inspected or tested:

Plant: The following pairs of voltage rated gloves had not been either inspected in accordance with 29 CFR 1910.137 or replaced every six months:

- A. A pair of Salisbury Class 1 gloves located on a tool cart that were estimated to be three years old.
- B. A pair of Salisbury Class 0 gloves located in the "flash gear bag" that were dated March 2010.

Date By Which Violation Must be Abated: 12/19/2011
Proposed Penalty: \$ 0.00

A handwritten signature in black ink, appearing to read "Paul Mangiafico".

PAUL MANGIAFICO
Area Director

SUMMARY OF PROPOSED PENALTIES

Summary of Penalties for Inspection Number 314404831

Citation 4, Other	= \$	0.00
TOTAL PROPOSED PENALTIES	= \$	0.00

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