

U.S. Department of Labor
Occupational Safety and Health Administration
3300 Vickery Road
North Syracuse, NY 13212



Citation and Notification of Penalty

To:
Frazer & Jones Company, Inc., dba Frazer & Jones
Company, A Division of The Eastern Company
and its successors
Sadmir Brkanovic, General Manager
P.O. Box 4955
Syracuse, NY 13221

Inspection Number: 1401131
Inspection Date(s): 05/13/2019 - 10/22/2019
Issuance Date: 11/13/2019

Inspection Site:
3000 Milton Ave.
Solvay, NY 13209

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty **you either call to schedule an informal conference (see paragraph below) or you** mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling 315-

451-0808. 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 11/13/2019. The conference will be held by telephone or at the OSHA office located at 3300 Vickery Road, North Syracuse, NY 13212 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1401131

Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company
Inspection Site: 3000 Milton Ave., Solvay, NY 13209
Issuance Date: 11/13/2019

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 3300 Vickery Road, North Syracuse, NY 13212**

Citation Number 01 and Item Number 001 was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 003 was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 004a was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 004b was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 005 was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 009 was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 010 was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 011 was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 011 was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 012 was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 013 was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 016 was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 017 was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 019 was corrected on _____
By (Method of Abatement): _____

Citation Number 01 and Item Number 020 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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company
Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which was free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to struck-by hazards:

a) Foundry, on or about 5/15/19: Yale bridge crane used to lift ladles of iron weighting up to 3700 pounds had a broken safety latch on the load hook.

Among other methods, one feasible method of abatement is to install a new safety latch to the hook as per ASME B30.16-2012, section 16-1.2.9 Hooks.

b) Load capacity ratings had not been determined for the following below-the-hook lifting devices:

(1) Dip Tank Room, on or about 6/4/19: Two below-the-hook lifting devices. These below-the-hook lifting baskets are used when lifting parts weighing approximately 825 pounds.

(2) Pot Packing Area, on or about 6/10/19: Two below-the-hook lifting devices. These below-the-hook lifting devices are used to lift pots containing quartz that weigh approximately 500 pounds.

Among other methods, one feasible and acceptable abatement method to correct this hazardous condition would be to determine the load capacity rating and mark the lifting devices accordingly as per ASME B30.20-2013, Section 20-1.2.1.

Abatement certification must be submitted for this item.

Date By Which Violation Must be Abated:
Proposed Penalty:

12/03/2019
\$9472.00



Citation and Notification of Penalty

Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which was free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to struck-by hazards:

a) Foundry/E-Melt Area, on or about 7/17/19: The employer did not ensure that Bobcat Skid Steer Loader 3175 had a functional backup alarm and safety bar interlock system.

b) Maintenance Area, on or about 7/31/19: The employer did not ensure that Bobcat Skid Steer Loader 763 had a functional backup alarm.

Among other methods, one feasible and acceptable abatement method to correct this hazardous condition would be to:

- 1) Ensure that the safety bar interlock is operational per the manufacturers Operation & Maintenance Manual;**
- 2) Ensure that the backup alarms are operational per the Association of Equipment Manufacturers safety manual, page 11;**
- 3) Ensure that the employees are provided with training and access to the owner's manual per the Association of Equipment Manufacturers safety manual, page 7 and 10.**

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$9472.00

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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which was free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to fire, explosion, and deflagration hazards:

a) Seacoal storage and mixing area, on or about 5/15/19: Equipment such as, but not limited to the storage silo, piping, hoses, and vibratory conveyors were being utilized to transport Seacoal, a combustible dust. This equipment contained potentially explosive atmospheres during normal operation. The equipment and areas were not equipped and maintained with means of protection to prevent explosions, fires and deflagrations exposing employees to the hazard of severe burns.

b) Muller area, on or about 9/9/19: Seacoal, a combustible dust, was being hand dumped into the Muller via five gallon buckets. This process created airborne dust. The equipment and areas were not equipped and maintained with means of protection to prevent explosions, fires and deflagrations exposing employees to the hazard of severe burns.

Among other methods, consensus standards including National Fire Protection Association (NFPA) 652 - Standard on the Fundamentals of Combustible Dust. These methods include, but are not limited to:

- 1) Ensure that a Dust Hazard Analysis is performed as is required in chapter 7;**
- 2) Ensure that explosion/ deflagration forces generated inside any storage or conveyance device are vented to the exterior of the building and prevented from traveling to other portions of the system and building as is required in chapter 8;**

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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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- 3) Ensure that potential ignition sources are controlled, including ensuring bonding and grounding of equipment is utilized, bonding and grounding of all buckets during hand dumping, and bonding of all conveyance methods, ensure that no burning material is conveyed from the storage silo, and ensuring that no metal is introduced into the Muller, all per chapter 8;
 - 4) Ensure that an operable fire detection and extinguishing system is operable in the storage silo per chapter 8;
 - 5) Ensure that housekeeping methods are documented and utilized per chapter 8.

Abatement certification is required for this item.

Date By Which Violation Must be Abated:
Proposed Penalty:

01/02/2020
\$9472.00

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

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Issuance Date: 11/13/2019



Citation and Notification of Penalty

Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company
Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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 4 a Type of Violation: **Serious**

29 CFR 1910.23(d)(7): Grab bars did not extend 42 inches (1.1m) above the access level or landing platforms served by the ladder:

a) E-Melt Deck Area, on or about 5/13/19: Fixed ladder used to gain access to the E-Melt roof top for maintenance purposes, was not equipped with grab bars that extended 42 inches above the access level.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/03/2019
Proposed Penalty:	\$13260.00

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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

29 CFR 1910.28(b)(3)(iv): The employer did not ensure each employee was protected from falling into a ladderway floor hole or ladderway platform hole by a guardrail system and toe boards erected on all exposed sides, except at the entrance to the hole, where a self-closing gate or an offset must be used.

- a) **E-Melt Deck Area, on or about 5/13/19: Two ladderway platforms used to access the roof for crane maintenance purposes were not provided with self-closing gates and the ladderway floor hole at the top was not provided with a guardrail system. Employees exposed to falling 9-feet 6-inches and 15-feet 10-inch.**
- b) **Waste Sand Silo, on or about 5/20/19: Two ladderway platforms used to access the top of the waste sand silo were not provided with self-closing gates to prevent employees from falling 28-feet and 21-feet ascending.**
- c) **Sand Silos, on or about 9/5/19: Three ladderway platforms used to access the top of the core sand silo were not provided with self-closing gates. Employees exposed to falls of 10 feet, 31 feet and 15 feet.**
- d) **Bond House, on or about 8/26/19: Fixed ladder used to access the work platform below the Seacoal and Core sand silos was not equipped with a self-closing gate at the landing. Employees exposed to falling 10 feet.**
- e) **Foundry, on or about 10/16/19: Ladderway platform used to access the #1 tundish hydraulic pump was not equipped with a self-closing gate. Employees exposed to falling 4-feet 10-inches.**

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

12/18/2019

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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

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

- a) **E-Melt, on or about 5/13/19: Employees working on the E-melt deck were not protected from falling 7-feet 6-inches into the charge bucket pit.**
- b) **Foundry, near Incline Pit Stairs, on or about 5/15/19: The employer did not ensure that an open sided floor next to the Hi-Vac machine was equipped with a guardrail system to prevent employees from falling 8-feet 10-inches.**
- c) **E-Melt, on or about 5/15/19: The secondary deck was not equipped with a guardrail system to protect employees from falling 4-feet into the scrap yard.**
- d) **Foundry/E-Melt Furnace Slag Pit, on or about 5/15/19: The furnace slag pit was not equipped with an adequate guardrail system along the unprotected side and ends in that no mid-rail was provided to protect employees falling approximately 4-feet 9-inches into the pit; and on or about 9/17/19 an employee was exposed to the open pit when he walked between the existing guardrail system and the pit.**
- e) **Foundry Deck, on or about 5/15/19: The walkway between the test stand and pouring unit was not equipped with a guardrail system on each open side to protect the employees from falling 6 feet.**
- f) **E-Melt Roof, on or about 5/15/19: Employees accessing the roof for crane maintenance purposes are exposed to an unprotected roof edge. Employees exposed to falling approximately 18 feet to the secondary deck below.**

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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company
Inspection Site: 3000 Milton Ave., Solvay, NY 13209

- g) Compressor Room, on or about 6/10/19: Work platform was not equipped with a guardrail system to prevent employees from falling 5-feet 2-inches.**
- h) DISA #1, on or about 7/31/19: The East end of the catwalk was not equipped with a guardrail system to protect employees from falling approximately 17 feet to the next lower level.**
- i) Prepared Sand Belt Catwalk, on or 7/31/19: A 4-foot section of the guardrail was missing the intermediate railing and exposed employees to falling approximately 17-feet.**
- j) E-Melt, on or about 8/2/19, 8/23/19, 10/15/19 and 10/22/19: E-melt deck is not equipped with a fall protection system to prevent employees from falling 8-feet 10-inches into the furnace slag pit.**
- k) E-Melt, on or about 8/2/19: Employees relining the furnaces are not protected from falling 6 feet into the furnace.**
- l) E-Melt, on or about 8/2/19: Employees working on the melt deck are exposed to falling 10-feet into the basement when the furnaces are tipped vertically.**

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/09/2019
Proposed Penalty:	\$13260.00

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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

29 CFR 1910.28(b)(11)(ii): Each flight of stairs having at least 3 treads and at least 4 risers was not equipped with stair rail systems and handrails in accordance with Table D-2, Stairway Handrail Requirements:

- a) Foundry, on or about 5/15/19: Incline Pit stairs, having 13 risers, was not equipped with a stair rail system along the open side.
- b) Foundry, on or about 5/15/19: Tundish stairs, having 8 risers, was not equipped with a stair rail system along the open side.
- c) Foundry, on or about 5/15/19: Stairs next to Auto Pour, having 7 risers, was not equipped with a stair rail system along the open side.
- d) Shake Out Area, on or about 5/15/19: Stairs next to the accumulation table, having 5 risers, was not equipped with a stair rail system along the open side and no mid-rail for the left side descending.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$7577.00

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

Inspection Number: 1401131
Inspection Date(s): 05/13/2019 - 10/22/2019
Issuance Date: 11/13/2019



Citation and Notification of Penalty

Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company
Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

29 CFR 1910.37(a)(3): Materials or equipment were placed, either permanently or temporarily, within the exit route:

a) Foundry Motor Control Center Area, on or about 5/15/19: Exit route from the Motor Control Center was blocked by a bin of sand and a rolling stair unit which prevented free and clear egress from the area.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$7577.00

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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company
Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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 8 a Type of Violation: **Serious**

29 CFR 1910.101(b): The in-plant handling, storage, and unitization of all compressed gases in cylinders, portable tanks, rail tank cars, or motor vehicle cargo tanks were not in accordance with Compressed Gas Association Pamphlet P-1-1965 paragraphs 3.3.8 and 3.3.10:

- a) **Welding Area, on or about 5/13/19: (1) One Nitrogen compressed gas cylinder was not secured to prevent it from falling over and did not have a valve protective cap installed.**

- b) **Foundry Deck, on or about 5/15/19: (1) One nitrogen compressed gas cylinder was not secured to prevent it from falling over and the valve protective cap on the cylinder was not secured.**

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$9472.00

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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

29 CFR 1910.253(b)(4): Oxygen cylinders in storage were not separated from fuel gas cylinders or combustible materials (especially oil or grease), a minimum distance of 20 feet (6.1 m) or by a noncombustible barrier at least 5 feet (1.5 m) high having a fire-resistance rating of at least one half hour:

a) Welding Area, on or about 5/13/19: Oxygen and acetylene compressed gas cylinders were stored together within 5 feet of each other and were not separated by a noncombustible barrier at least 5 feet high having a fire-resistance rating of at least one half hour.

Date By Which Violation Must be Abated:

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

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Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

Citation 1 Item 9 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.

a) Assembly, on or about 6/4/19: Energy control procedures were not utilized by an employee who was clearing jammed parts from the Denison #4 press.

Abatement certification must be submitted for this item.

Date By Which Violation Must be Abated:

11/25/2019

Proposed Penalty:

\$9472.00

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U.S. Department of Labor
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Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

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

a) At the establishment, on or about 8/12/19 and 9/16/19: The employer had not conducted a periodic or more frequent inspection of their energy control procedures to ensure that the procedures and the requirements of this standard were being followed. Equipment energy control procedures requiring inspection include but are not limited to: Lindberg Annealing Furnace, Greenard Presses, Core Machines, Cleveland Auto Tap Machine and Denison Presses.

Abatement certification must be submitted for this item.

Date By Which Violation Must be Abated:

12/18/2019

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Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

29 CFR 1910.178(l)(1)(i): The employer did not ensure that each powered industrial truck operator was competent to operate a powered industrial truck safely, as demonstrated by the successful completion of the training and evaluation specified in this paragraph (l):

a) At the establishment, on or about 7/16/19: The employer did not ensure that each powered industrial truck operator received the required training and evaluation.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

12/18/2019

Proposed Penalty:

\$9472.00

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Citation and Notification of Penalty

Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

Citation 1 Item 12 Type of Violation: **Serious**

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

- a) **E-Melt Deck, on or about 5/13/19: Sanding machine was not equipped with a guard to protect the operator from the in-running nip points of the belt and roller.**
- b) **Pattern Shop, on or about 5/13/19: Walker Turner radial drill was not equipped with a guard to protect the operator from contact with the rotating chuck and cutting tool.**
- c) **Pattern Shop, on or about 5/13/19: Proto Trak DPM5 mill was not equipped with a guard to protect the operator from contact with the rotating chuck and cutting tool.**
- d) **Pattern Shop, on or about 5/13/19: Bridgeport Milling machine was not equipped with a guard to protect the operator from contact with the rotating chuck and cutting tool.**
- e) **Foundry, on or about 5/15/19: Post Mag Separator conveyor belt was not equipped with a guard to prevent contact with the in-running nip point of the belt and roller.**
- f) **Incline Pit Stairs, on or about 5/15/19: Incline pit conveyor belt was not equipped with a guard to prevent contact with the in-running nip point of the belt and roller.**
- g) **Raw Materials Area, on or about 6/4/19: Dumper was not equipped with a guard to prevent the operator from pinch point hazards created while dumping boxes.**
- h) **Pot Packing, on or about 6/10/19: The pot packing machine was not equipped with a guard to cover the rotating counterweights located at the operator's feet.**

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: 1401131
Inspection Date(s): 05/13/2019 - 10/22/2019
Issuance Date: 11/13/2019



Citation and Notification of Penalty

Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

i) **QC Department, Tensile Lab, on or about 6/10/19: (2) Two belt sanding machines were not equipped with guards to protect the operator from the in-running nip points of the belt and roller at the bottom.**

j) **Foundry Bag House, on or about 8/23/19: S1 waste sand belt tail pulley was not equipped with a guard.**

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/29/2019

Proposed Penalty:

\$13260.00

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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company
Inspection Site: 3000 Milton Ave., Solvay, NY 13209

Citation 1 Item 13 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):

- a) **Assembly Area, on or about 5/31/19: Greenerd Press #1 was not equipped with adequate guarding in that the operator could reach into the point-of-operation from the right side when hand feeding parts into the machine.**
- b) **Assembly Area, on or about 5/31/19: Greenerd Press #2 was not equipped with adequate guarding in that the operator could reach into the point-of-operation from the right side when hand feeding parts into the machine.**
- c) **Assembly Area, on or about 6/4/19: Denison #4 Multi-Press was not equipped with adequate point-of-operation guarding in that the operators could reach into the danger zone.**
- d) **Assembly Area, on or about 6/4/19: Denison #2 Multi-Press was not equipped with adequate point-of-operation guarding in that the operators could reach into the danger zone.**
- e) **Assembly Area, on or about 6/4/19: Denison #1 Multi-Press was not equipped with adequate point-of-operation guarding in that the operators could reach into the danger zone.**
- f) **Machine Shop, on or about 6/10/19: Auto Tap Machine #8 was not equipped with adequate point-of-operation guarding in that the operator could reach into the danger zone.**

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/03/2019
Proposed Penalty:	\$13260.00

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

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

Inspection Number: 1401131
Inspection Date(s): 05/13/2019 - 10/22/2019
Issuance Date: 11/13/2019



Citation and Notification of Penalty

Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company
Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

29 CFR 1910.212(a)(5): Fan blade guards, where the periphery of the blades was less than seven feet above the floor or working level, had openings larger than one half inch:

a) Sandblast Area, on or about 5/28/19: Super Vac fan blade guard, 40-inches above the floor, had an opening measuring 5-1/4-inches in diameter that exposed employees to contact with the rotating blade.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$7577.00

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: 1401131
Inspection Date(s): 05/13/2019 - 10/22/2019
Issuance Date: 11/13/2019



Citation and Notification of Penalty

Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

29 CFR 1910.303(g)(1): Sufficient access and working space was not provided and maintained about all electric equipment (operating at 600 volts, nominal, or less to ground) to permit ready and safe operation and maintenance of such equipment:

a) Core Room, on or about 6/10/19: Access to 480 volt circuit breaker panel PP18, was blocked by carts and bags.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$9472.00

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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company
Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

29 CFR 1910.303(g)(2)(i): Live parts of electric equipment operating at 50 volts or more were not guarded against accidental contact by approved cabinets or other forms of approved enclosures, or other means listed under this provision:

- a) **Foundry MCC Room, on or about 5/15/19: Air compressor #2 electrical cabinet, 460-volts, had exposed live parts in that the cabinet doors were kept open to allow heat to escape.**
- b) **Foundry MCC Room, on or about 5/15/19: Sprue dust collector electrical cabinet, 460-volts, had exposed live parts in that the cabinet doors were kept open to allow heat to escape.**
- c) **E-Melt Basement, on or about 9/06/19: Capacitor bank, 480-volts, approximately 7-feet above the floor, was not equipped with an approved enclosure to guard against accidental contact with live parts.**
- d) **Foundry Office, on or about 9/6/19: Light fixture 7-feet 6-inches above the floor had live conductors that were not guarded against accidental contact.**

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/25/2019
Proposed Penalty:	\$13260.00

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

Inspection Number: 1401131
Inspection Date(s): 05/13/2019 - 10/22/2019
Issuance Date: 11/13/2019



Citation and Notification of Penalty

Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company
Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

29 CFR 1910.303(h)(2): Electrical installations, rated over 600 volts, nominal, having exposed live parts were accessible to unqualified persons:

a) E-Melt Basement, on or about 9/06/19: Unqualified employees are accessing the furnace room where they are exposed to live parts rated up to 1600-volts.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/25/2019
Proposed Penalty:	\$13260.00

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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

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

- a) **E-Melt Deck, on or about 5/13/19: Path to ground from an operating pedestal fan was not permanent, continuous and effective in that the ground pin was missing from the plug connector.**
- b) **Sprue Area, on or about 5/15/19: (2) Two pedestal fans did not have permanent, continuous and effective grounding paths in that the ground pins were missing from their plug connectors.**
- c) **Assembly, on or about 6/4/19: Path to ground from an operating pedestal fan was not permanent, continuous and effective in that the ground pin was missing from the plug connector.**
- d) **Shipping, on or about 6/10/19: Path to ground from a floor fan was not permanent, continuous and effective in that the ground pin was missing from the plug connector.**
- e) **Muller Deck, on or about 7/31/19: Path to ground from an operating wall fan was not permanent, continuous and effective in that the ground pin was missing from the plug connector.**

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$9472.00

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

Inspection Number: 1401131
Inspection Date(s): 05/13/2019 - 10/22/2019
Issuance Date: 11/13/2019



Citation and Notification of Penalty

Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company

Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

29 CFR 1910.332(b)(1): Employees had not been trained and made familiar with the safety related work practices required by 1910.331 through 1910.335 that pertain to their respective job assignments.

a) Throughout the Facility, on or about 9/09/19: No training was provided on electrical safety related work practices when work is performed near or on equipment or circuits that were or could be energized.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

12/18/2019

Proposed Penalty:

\$13260.00

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: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company
Inspection Site: 3000 Milton Ave., Solvay, NY 13209

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

29 CFR 1910.335(a)(1)(i): Employees were not wearing protective equipment that is appropriate for the specific parts of the body to be protected and for the work to be performed when working in an area where there was a potential electrical hazard.

a) Throughout the Facility, on or about 9/09/19: The employees were performing trouble shooting on energized circuits up to 480 Volts AC and were not wearing the appropriate personal protective equipment such as but not limited to, voltage rated gloves, arc-rated face protection and FR clothing.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 12/03/2019
Proposed Penalty: \$13260.00

A handwritten signature in blue ink, appearing to read "Jeff Prebish", is written over a horizontal line.

Jeff Prebish, CIH, CSP
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
3300 Vickery Road
North Syracuse, NY 13212



INVOICE / DEBT COLLECTION NOTICE

Company Name: Frazer & Jones Company, Inc., dba Frazer & Jones Company, A Division of The Eastern Company
Inspection Site: 3000 Milton Ave., Solvay, NY 13209
Issuance Date: 11/13/2019

Summary of Penalties for Inspection Number	1401131
Citation 1, Serious	\$214059.00
TOTAL PROPOSED PENALTIES	\$214059.00

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

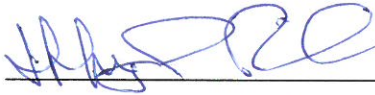
account, the bank will attempt to make the transfer up to 2 times.

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.



Jeff Prebish, CIH, CSP

Area Director

11-13-19

Date