

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:
G.A. Denison & Sons, Inc.
and its successors
131 Cedar Grove Avenue
New London, CT 06320

Inspection Number: 314405861
Inspection Date(s): 06/08/2011-06/08/2011
Issuance Date: 12/05/2011
CSHO ID: F5659-
Reporting ID: 0112000

Inspection Site:
69 Lyme Street
Old Lyme, CT 06371

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 12/05/2011. 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: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

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

29 CFR 1926.21(b)(2): The employer did not instruct each employee in the recognition and avoidance of unsafe condition(s) and the regulation(s) applicable to his work environment to control or eliminate any hazard(s) or other exposure to illness or injury:

Old Lyme Fire Station Re-Roofing Project: The employer did not train or otherwise instruct the employees about the hazards associated with construction.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 4620.00

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

29 CFR 1926.454(a): The employer did not have each employee who performed work while on a scaffold trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. The training did not include (a)(1) to (a)(5) as applicable:

Old Lyme Fire Station Re-Roofing Project: The employer did not train or otherwise instruct the employees on the hazards associated with scaffolding including the nature of fall hazards and falling object hazards, proper use of scaffold and proper handling of materials on scaffold, and maximum intended load and load-carrying capacities of scaffolds being used.

Date By Which Violation Must be Abated: 12/09/2011

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: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

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

29 CFR 1926.503(a)(1): The employer did not provide a training program for each employee who might be exposed to fall hazards. The program shall enable each employee to recognize the hazards of falling and shall train each employee in the procedures to be followed in order to minimize these hazards:

Old Lyme Fire Station Re-Roofing Project: The employer did not train or otherwise instruct the employees on the hazards associated with falls.

Date By Which Violation Must be Abated: 12/09/2011

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

29 CFR 1926.1060(a): The employer did not provide a training program for each employee using ladders and stairways, as necessary. The program shall enable each employee to recognize hazards related to ladders and stairways, and shall train each employee in the procedures to be followed to minimize hazards:

Old Lyme Fire Station Re-Roofing Project: The employer did not train or otherwise instruct the employees on the hazards associated with ladders.

Date By Which Violation Must be Abated: 12/09/2011

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: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

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

29 CFR 1926.28(a) The employer was responsible and did not require the wearing of appropriate personal protective equipment in all operations where there is an exposure to hazardous conditions or where this part indicates the need for using such equipment to reduce the hazards to the employees:

Old Lyme Fire Station Re-Roofing Project: Employees were using pneumatic nail guns to install shingles and were not wearing eye protection.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 3300.00

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

29 CFR 1926.102(a)(1): Employees were not provided with eye and face protection equipment when machines or operations presented potential eye or face injury from physical, chemical, or radiation agents:

Old Lyme Fire Station Re-Roofing Project: The employer did not provide safety glasses for employees who were using pneumatic nail guns to install shingles.

Date By Which Violation Must be Abated: 12/09/2011

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: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

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

29 CFR 1926.300(b)(2): Belts, gears, shafts, pulleys, sprockets, spindles, drums, flywheels, chains, or other reciprocating, rotating or moving parts of equipment were not guarded when such parts were exposed to contact by employees:

Old Lyme Fire Station Re-Roofing Project: Employees were working near and next to an operating air compressor with an unguarded belt and pulley assembly.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 3300.00

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

29 CFR 1926.451(a)(1): Except as provided in paragraphs (a)(2) through (a)(5) and (g) of this section, scaffolds and scaffold components were not capable of supporting, without failure, their own weight and at least four times the maximum intended load applied or transmitted to it:

Old Lyme Fire Station Re-Roofing Project: Employees were exposed to fall hazards while working from two ladder jack scaffolding systems that were overloaded with tools, materials, and employees.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 4620.00

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: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

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

29 CFR 1926.451(b)(7): On scaffolds where platforms are overlapped to create a long platform, the overlap shall occur only over supports, and did not overlapped by more than 12 inches (30 cm) and the platforms were not nailed together or otherwise restrained to prevent movement:

Old Lyme Fire Station Re-Roofing Project: Employees were exposed to fall hazards while working on ladder jack scaffold systems with two aluminum planks bridged over the save ladder jack bracket with the #2016 aluminum plank extending approximately 6 inches over the ladder jack bracket support.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 3300.00

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

29 CFR 1926.451(h)(2): Where there is a danger of tools, materials or equipment falling from a scaffold and striking employees below, none of the provisions of 1926.451(h)(2)(i) to (h)(2)(v) were applied:

Old Lyme Fire Station Re-Roofing Project: Employees were exposed to struck-by hazards while working under a ladder jack scaffold system with pneumatic nail guns, shingles, roof brackets, and other roofing tools and materials that were unsecured and the hazard area below the scaffold systems were not barricaded to keep employees out of the hazardous area.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 4620.00

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: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

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

29 CFR 1926.501(c): The employer did not have each employee exposed to falling objects to wear a hard hat and did not implement one of the measures of 1926.501(c)(1) to (3):

Old Lyme Fire Station Re-Roofing Project: Employees were exposed to struck-by hazards while working on the ground and from the ladder jack scaffold systems with an employee on the upper throwing shingles and other roof debris down from the upper roof to the ground below.

Date By Which Violation Must be Abated: 12/09/2011

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

29 CFR 1926.452(k)(5): Platforms on ladder jack scaffolds were bridged one to another:

Old Lyme Fire Station Re-Roofing Project: Employees were exposed to fall hazards while working on a ladder jack scaffold system with two aluminum planks bridged over the same ladder jack bracket.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 4620.00



Citation and Notification of Penalty

Company Name: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

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

29 CFR 1926.1053(b)(1): When portable ladders were used for access to an upper landing surface, the ladder sides did not extend at least 3 feet (0.9 m) above the upper landing surface to which the ladder was used to gain access; when such an extension is not possible because of the ladder's length, the ladder was not secured at its top to a rigid support that will not deflect and a grasping device, such as a grab rail, was not provided to assist the employees in mounting and dismounting the ladder:

Old Lyme Fire Station Re-Roofing Project: An employee was exposed to fall hazards of approximately 26 feet while using a ladder to access and descend to and from the upper 5:12 pitched asphalt shingled roof and the ladder extended past the roof deck approximately 16 inches. Another employee was exposed to 15 foot falls while using a ladder to access and descend to and from the ladder jack scaffolds using a ladder that did not extend at least 3 feet past the landing.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 4620.00

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

29 CFR 1926.1053(b)(9): The area around the top and bottom of ladders was not kept clear:

Old Lyme Fire Station Re-Roofing Project: The foreman and an employee were using a fiberglass extension ladder to carry shingles to the employees working from the scaffold platforms and the bottom of the extension ladder had two bundles of shingles blocking the bottom of the ladder.

Date By Which Violation Must be Abated: 12/09/2011
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: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

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

29 CFR 1926.100(a): The employer does not protect employees from falling or flying objects nor from impacts. An instance of this violation was observed most recently on June 08 at a worksite at 69 Lyme Street in Old Lyme, CT., where employees were exposed to potential falling shingles, roof brackets, and other roofing tools and materials while working under the ladder jack scaffold system and while working from the ladder jack scaffold system with roofing materials and debris falling from the upper roof. No hard hats were in use:

G.A. Denison & Sons, Inc. has been previously cited for this practice, as described below. To abate this violation, the employer must ensure that hard hats necessary to protect workers against head injuries from impact and falling or flying objects are provided and that the hard hats are used to protect the employees.

G.A. Denison & Sons, Inc. was previously cited SERIOUS for a violation of this occupational safety and health standard which was contained in OSHA Inspection Number 314398355, Citation Number 01, Item Number 001, issued on 05/25/2010, with respect to a workplace located at 67 Faire Harbour Place in New London, CT., which became final order on 06/01/2010.

Date by which violation must be abated: Immediately upon receipt of citation.

Pursuant to 29 CFR 1903.19(d), the employer must provide documentation that this violation has been abated within 10 calendar days of the date it receives this citation.

Date By Which Violation Must be Abated:	12/18/2011
Proposed Penalty:	\$ 12100.00



Citation and Notification of Penalty

Company Name: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

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

29 CFR 1926.451(e)(1): The employer does not protect employees accessing and descending to and from the ladder jack scaffolds from falling to a lower level. Two instances of this violation was observed most recently on June 08 at a worksite at 69 Lyme Street in Old Lyme, CT., where two employees were exposed to 15 foot fall hazards while climbing around the ladder jack brackets and reaching over and across the scaffold planks to access and descend to and from the scaffold platforms:

To abate this violation, the employer must ensure that employees use the access ladders set up properly for access to the scaffolds.

Date by which violation must be abated: Immediately upon receipt of citation.

Pursuant to 29 CFR 1903.19(d), the employer must provide documentation that this violation has been abated within 10 calendar days of the date it receives this citation.

Date By Which Violation Must be Abated:	12/18/2011
Proposed Penalty:	\$ 15400.00



Citation and Notification of Penalty

Company Name: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

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

29 CFR 1926.451(g)(1)(i): The employer does not protect employees working from ladder jack scaffold from falling to a lower level. An instance of this violation was observed most recently on June 08 at a worksite at 69 Lyme Street in Old Lyme, CT, where personal fall arrest systems were not provided or in use:

G.A. Denison & Sons, Inc. has been previously cited for this practice, as described below. To abate this violation, the employer must ensure that equipment necessary to protect workers against falls from roof levels are available at its worksites and that such equipment are used to protect all employees who work from ladder jack scaffolds more than 10 feet above a lower level from falling to that lower level.

G.A. Denison & Sons, Inc. was previously cited SERIOUS for a violation of this occupational safety and health standard which was contained in OSHA Inspection Number 314398355, Citation Number 01, Item Number 003, issued on 05/25/2010, with respect to a workplace located at 67 Faire Harbour Place in New London, CT, which became final order on 06/01/2010.

Date by which violation must be abated: Immediately upon receipt of citation.

Pursuant to 29 CFR 1903.19(d), the employer must provide documentation that this violation has been abated within 10 calendar days of the date it receives this citation.

Date By Which Violation Must be Abated:	12/18/2011
Proposed Penalty:	\$ 15400.00

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: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

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

29 CFR 1926.501(b)(13): The employer does not protect employees working from residential roofs more than 6 feet above a lower level from falling to that lower level. An instance of this violation was observed most recently on June 08 at a worksite at 69 Lyme Street in Old Lyme, CT, where no fall protection system was provided or in use:

G.A. Denison & Sons, Inc. has been previously cited for this practice, as described below. To abate this violation, the employer must ensure that equipment necessary to protect workers against falls from roof levels is available at its worksites and that such equipment is used to protect all employees who work on residential roofs more than 6 feet above a lower level from falling to that lower level.

G.A. Denison & Sons, Inc. was previously cited SERIOUS for a violation of this occupational safety and health standard which was contained in OSHA Inspection Number 314398355, Citation Number 01, Item Number 004, issued on 05/25/2010, with respect to a workplace located at 67 Faire Harbour Place in New London, CT, which became final order on 06/01/2010.

Date by which violation must be abated: Immediately upon receipt of citation.

Pursuant to 29 CFR 1903.19(d), the employer must provide documentation that this violation has been abated within 10 calendar days of the date it receives this citation.

Date By Which Violation Must be Abated:	12/18/2011
Proposed Penalty:	\$ 15400.00



Citation and Notification of Penalty

Company Name: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

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 5a Type of Violation: **Willful**

29 CFR 1926.1053(b)(21): The employer does not require or enforce employees to grasp the ladder with one hand while climbing up and/or down the ladder. An instance of this violation was observed most recently on June 08 at a worksite at 69 Lyme Street in Old Lyme, CT where employees including the foreman were carrying bundles of shingles in one hand and using the other hand to leap from rung to rung as they climbed the ladders:

To abate this violation, the employer must ensure and enforce the use of two hands while climbing ladders.

Date by which violation must be abated: Immediately upon receipt of citation.

Pursuant to 29 CFR 1903.19(d), the employer must provide documentation that this violation has been abated within 10 calendar days of the date it receives this citation.

Date By Which Violation Must be Abated:	12/18/2011
Proposed Penalty:	\$ 15400.00



Citation and Notification of Penalty

Company Name: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371

Citation 2 Item 5b Type of Violation: **Willful**

29 CFR 1926.1053(b)(22): The employer does not enforce employees to not carry shingles while climbing a ladder. An instance of this violation was observed most recently on June 8 at a worksite at 69 Lyme Street in Old Lyme, CT where employees including the foreman were carrying bundles of shingles on one shoulder while climbing the ladder to the scaffold plank 15 feet above the ground:

To abate this violation, the employer must ensure that equipment necessary to hoist materials and equipment to the work area is available at its worksites and that such equipment is used to protect all employees from fall hazards associated with employees carrying materials and equipment up ladders.

Date by which violation must be abated: Immediately upon receipt of citation.

Pursuant to 29 CFR 1903.19(d), the employer must provide documentation that this violation has been abated within 10 calendar days of the date it receives this citation.

Date By Which Violation Must be Abated: 12/18/2011

A handwritten signature in black ink, appearing to read "Paul Mangiafico", 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: G.A. Denison & Sons, Inc.
Inspection Site: 69 Lyme Street, Old Lyme, CT 06371
Issuance Date: 12/05/2011

Summary of Penalties for Inspection Number 314405861

Citation 1, Serious	= \$	36300.00
Citation 2, Willful	= \$	73700.00
TOTAL PROPOSED PENALTIES	= \$	110000.00

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.

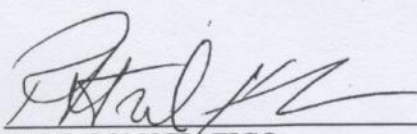
Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts 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
for Area Director

5 December 2011
Date